



European Federation  
of National Associations of  
Water Services

## EUREAU response to COM presentation FWG 17 March 2014

### A word about EUREAU

EUREAU is the European Federation of national associations of water and waste water services. Through 70.000 utilities, our Members collectively provide sustainable water and wastewater services to more than 400 million consumers in Europe. They reflect the full diversity of the European water services sector and represent public, private and mixed operators. As the focus of a European network, EUREAU represents a unique concentration of technical, scientific and managerial knowledge and practical experience in water and wastewater services.

EUREAU welcomes the possibility to comment on the presentation given by COM in the meeting of the FWG on 17 March 2014.

Our positions have earlier been communicated to the Commission on several occasions, e.g. in our Position paper on how the revision of the Fertiliser Regulation should promote sustainable use of sludge in agriculture dated 21 March 2012. At that time, the process for defining criteria for End of Waste for compost and digestate was ongoing, and it was unclear whether also treated, high-quality sludge and sludge-based products would be allowed to qualify for EoW-status. We now know that this did not happen, as sludge was put in a negative-list, making it impossible to qualify, not because of poor quality, but due to the origin of the nutrients and the organic material.

On 26 May the European Commission released the report “On the review of the list of critical raw materials for the EU and the implementation of the Raw Materials Initiative”

[http://europa.eu/rapid/press-release\\_IP-14-599\\_en.htm?locale=en](http://europa.eu/rapid/press-release_IP-14-599_en.htm?locale=en)

In the report, phosphate rock is defined as one of 20 critical raw materials for EU.

This increases the importance of improving the management of phosphorus, including recycling and recovery of phosphorus. New legislation must promote this.

EUREAU’s message, is therefore now even more valid as an input to the ongoing revision and extension of the Fertiliser Regulation; the need to create a common European market for high-quality sludge and sludge-based products. Legislation alone can not create this, but can be the foundation for industry to develop this.

EUREAU supports scientifically, risk-based limits for contaminants in a revised regulation. We note that the scientific basis to put strict limits on copper (200 mg / kg Dry Matter) and zinc (600 mg / kg DM), are questioned by many, also in the End of Waste process. Such strict limits for copper and zinc means that several nutrient rich residues and important organic wastes, e.g. sewage sludge, will fall out of the scope of the revised Fertiliser Regulation. This despite the fact that a large part of the copper and some of the zinc that we find in sludge comes from just drinking water and the food we eat. An alternative is to require extra labelling for products exceeding the proposed value.



European Federation  
of National Associations of  
Water Services

A parameter which is as important as the concentration of heavy metals is the admissible maximum dosage of heavy metals to the soil [g/ha\* y]. It is this parameter which limits the real load of heavy metals on agricultural land.

EUREAU is not in favour of a negative liste like mentioned in slide no. 3, and points to slide no. 13, where limit values for microorganisms are listed. Raw sewage sludge will never be able to meet these requirements, whereas several techniques for producing high-quality sludges exists, with the ability to comply.

Yours,

Arne Haarr  
Chair WG Sludge  
EUREAU