

Conclusions of the Manuresource conference 2013, Bruges

These conclusions affirm the commitment to collaborate at improving the regulatory framework in order to foster a more efficient use and an increased recycling of nutrients from manure.

Introduction to the key problems

Plant nutrients are essential to secure worldwide food supply. Given the growing world population, the need for food and feed is increasing and requires to securing availability plant nutrient resources at affordable prices. This poses a problem in particular for the phosphorus resources, who are finite. Moreover, 90% of world phosphorus' reserves are to be found in only a limited number of countries nearly all of which are outside the European continent, which leads to high dependence for import. Nitrogen is not a scarce nutrient, but the production of N-fertilizers from atmospheric N has a high energy cost.

On the other hand, Europe has a large amount of nutrients available in animal manure and related products such as digestates, and wastes, wastewaters and by-products. In some regions, the overproduction of manure compared to the regional nutrient need has forced to ensure manure treatment to reduce its environmental impact. However, this represents a serious cost for farmers. By closing the nutrient cycle these two problems (excess supply of manure in certain regions and scarcity of nutrients in other ones) can be dealt with, and at the same time help reducing costs.

However, the current state of the European legislative framework hinders the full achievement of the goals to closing nutrient cycles to their full ecological optimum. Therefore, a sufficiently pragmatic legal framework, harmonized across Europe, clearly defined and coherent, and stable over time, is required that provides sufficient quality assurance without the presence of unnecessary administrative hurdles.

That is why it is necessary to align the points of view of the involved stakeholders to solve the identified issues within the European policies.

Objectives/recommended aspects of nutrient recycling

First, the European Union imposes rules relating to the placing of mineral fertilizers on the market, i.e. the conditions for designating "EC fertilizers" (may circulate freely on the European market), as well as the provisions regarding their labeling and packaging (**EC Regulation 2003/2003**). This Regulation is currently under revision. Extension of its scope to providing harmonized rules for extra categories such as organic and organo-mineral fertilizers would allow new commercial products from manure processing, containing plant-available nutrients in properly treated material, to be marketed. The enclosure of traded processed manure in this regulation, which is currently foreseen, should facilitate transport and trade of this important nutrients resource from regions with high livestock density to regions with cropland, demanding these nutrients.

Secondly, the Nitrates Directive (91/676/EEC) aims to protect waters against pollution caused by nitrates from agricultural sources. This Directive defines a chemical fertilizer as a fertilizer manufactured by an industrial process and livestock manure as waste products excreted by livestock, even in processed form (art. 2(g) Nitrates Directive). Consistency between the Nitrates Directive and the EC Regulation 2003/2003 would therefore be necessary to create a level playing field between chemical fertilizers and the manure based alternative.

Thirdly, when moving towards a circular economy, in particular concerning the upgrading of manure, compost and digestate related derivatives, criteria are required to assure the quality of such new products. This is also known as the European EoW Criteria and manure should be included in the scope of these criteria. EoW Criteria need to be consistent with other related legislations in order to provide a coherent cradle-to-cradle frame for European (agro-)industrial stakeholders.

Fourthly, when substances cease to be waste and become products, they may become subject to EU chemical legislation REACH Regulation 1907/2006. "Recovered substances" are exempted from REACH Registration (under certain conditions, but not from certain REACH information and documentation requirements) under Art. 2(7)d of REACH.

Also, REACH is intended to address the chemical properties of a substance itself, and is not an appropriate tool for addressing questions such as possible contaminants in manure based products.

It is necessary to clarify and to harmonize (between Member States responsible for REACH implementation, and between different manure processing routes) implementation of REACH as regards "recovered" products and manure based products, in the respect of the spirit of this legislation which aims to facilitate recovery and recycling and to assess chemical substances.

Finally, the processing, marketing and use of manure-based soil amendment and fertiliser products are impacted by other EU regulations and tools, for example (but not only): EU Water Framework Directive 2000/60, Waste Framework Directive, Common Agricultural Policy, Animal Byproducts Regulations, Organic farming Directive (134/2007), EU Ecolabels (eg. for soil amendments), Packaging and Labelling Regulations, sludge directive, IPCC, etc. These should also be coherent with the evolutions of regulations discussed above, and should be adjusted where appropriate to take into account new and ecological nutrient and soil improvement products produced by processing manure, that is to facilitate the production and commercialization of these products whilst ensuring environmental, health and food safety.

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This document has been elaborated in the framework of the Biorefine Interreg IVB project.