

25<sup>th</sup> February 2025

## ESPP input to EU public consultation on draft modifications to the list of authorised inputs to Certified Organic Farming (EU 2021/1165) to allow use as fertiliser in Organic Farming of “calcium phosphate” recovered from sewage sludge incineration ash

Consultation open to 4<sup>th</sup> March:

[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14024-Organic-production-amended-list-of-authorized-products-and-substances\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14024-Organic-production-amended-list-of-authorized-products-and-substances_en)

ESPP welcomes the proposed authorisation of calcium phosphates derived from sewage sludge ash as fertiliser in Organic Farming, based on the positive EGTOP Opinion of March 2024, and requests that this modification of the Organic Farming inputs regulation 2021/1165 be implemented rapidly, with the text as proposed.

This proposal contributes positively to sustainability and productivity of Organic Farming, to stewardship of the EU Critical Raw Material “Phosphate Rock” (Critical Raw Materials Act 2024/1252) and to EU Circular Economy objectives.

As indicated by IFOAM (17/6/2020) [https://www.phosphorusplatform.eu/images/download/Joint-letter-ESPP-IFOAM-EU-recovered-phosphates-17\\_6\\_20.pdf](https://www.phosphorusplatform.eu/images/download/Joint-letter-ESPP-IFOAM-EU-recovered-phosphates-17_6_20.pdf):

“The authorisation of phosphate fertilisers from secondary sources (under appropriate conditions) is coherent with the overall sustainability objectives of Organic Farming and corresponds to a need in Organic Farming for phosphorus inputs to maintain crop productivity and an insufficiency of renewable phosphorus sources”.

ESPP notes that following the authorisation (2023/121) of struvite and precipitated phosphates from sewage and other sources, for use as fertilisers in Certified Organic Farming, products have already been Organic Certified and placed on the market.

In order to ensure safety and farmer confidence, ESPP supports the proposal that the recovered calcium phosphate should respect the EU Fertilising Products Regulation quality criteria and contaminant limits.

ESPP notes that the wording “calcium phosphate” can mean any inorganic compound (derived from sewage sludge incineration ash) consisting of calcium, phosphate, hydrogen and oxygen, e.g. monocalcium phosphate, dicalcium phosphate, octacalcium phosphate, amorphous calcium phosphates, hydroxyapatite, single super phosphate, triple super phosphate.

In addition to calcium phosphate and precipitated phosphates from sewage sludge, there are today various other routes to recover high-quality, safe phosphates and other nutrients, from sewage and from secondary resource streams, such as food industry wastes, biorefinery streams, digestates, animal by-products ... ESPP requests that adoption of the proposed regulation (text as proposed) be followed by wider consideration for Organic Farming of recovered nutrients based on safety, quality and agronomic criteria.

ESPP particularly requests future consideration, for Organic Farming, of calcium phosphates recovered from ash from animal by-products (certain animal by-products cannot be spread directly on fields and must be incinerated, so recycling of nutrients from ash is the best option) and of “Calcined Phosphates” from sewage (EGTOP gave a positive [opinion](#) in 2016 recommending authorisation for use in Organic Farming).

ESPP suggests that EGTOP consider all ash-derived phosphates respecting the EU FPR (PFC1 mineral phosphate fertiliser criteria and CMC13 criteria, possibly subject to other specific Organic Farming criteria such as exclusion of manure from ‘factory farming’, solubility criteria ... ). This would avoid the current one-by-one assessments which are slow and time-consuming.