



To the European Commission  
DG Internal Market, Industry, Entrepreneurships and SMEs  
DG GROW/B/2  
N105 4/66  
B-1049 Brussels

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### **German Sewage Sludge Ordinance**

EFAR (EUROPEAN FEDERATION FOR AGRICULTURAL RECYCLING) gathers and represents at a European level companies specialised in landspreading of organic wastes. EFAR's members are managing the day to day operation for the recycling on land of more than 3 million tonnes of sludge and 1 million tonnes of compost produced mainly by the co-processing of sludge and green waste. Therefore EFAR welcomes the opportunity to comment the German document "Ordinance reorganizing sewage sludge recovery" which is subject to the ongoing notification process No. 2016/0514/D by the EU Commission/DG Growth.

EFAR supports the implementation of specific rules for the protection of public health and the environment when sewage sludge is used in agriculture. Nevertheless, EFAR is totally against the ban of the agricultural use of sewage sludge for great size waste water treatment plants (> 50.000 inhabitant's equivalent) by the end of a 15 years transitional period. This provision would go against the principles defined by the EU Sewage Sludge Directive which regulates the use of sewage sludge in agriculture and sets quality criteria independently of the size of the waste water treatment plant.

Moreover this prohibition of sludge land application is not in line with the waste-hierarchy defined by the Directive 2008/98/EC.y.

Additionally it is not proven scientifically, that the small-sized waste water treatment plants produce better sewage sludge quality. Several studies undertaken by the European Commission in the frame of the FATE SEES program and of the sludge directive revision demonstrate that the risks of sludge landspreading are appropriately addressed by existing regulations .

EFAR believes that this new regulation will lead to the development of thermal treatment which has to be considered as a disposal route... Even if phosphorus can be recovered from the ash at a high cost process the other beneficial elements contained in sewage sludge such as organic matter and major and micro nutrient will be definitely lost which is against the circular economy principle supported by the EU through. the revision of the Fertiliser Regulation and the Circular Economy Package.



**For these reasons, EFAR calls for a revision of the German Sludge Ordinance and the definition and application of quality criteria independently of the waste water treatment plant size .**

Hubert BRUNET  
Chairman

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