



# Driving circular fertilisers adoption in Europe: FER-PLAY policy insights

**ESNI Conference**  
**19<sup>th</sup> September 2024, 14:55 to 15:55 CET**  
**Ateliers des Tanneurs, rue des Tanneurs 58-62, 1000 Brussels (Belgium)**



# FER-PLAY

Circular fertilisers for healthy soils

Introduction by Inès Verleden, Researcher Energy and Circular Economy at INAGRO



Funded by  
the European Union

This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement N° 101060426.



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# What is FER-PLAY?

FER-PLAY is working to

- protect ecosystems,
- decrease EU dependence on fertiliser imports, and
- improve **resource efficiency** through the promotion of **circular fertilisers**.

The project is

- mapping and assessing circular fertilisers made from **secondary raw materials** and
- highlighting their multiple benefits to foster their wide-scale production and application.



# The challenge

## Conventional fertilisers

- **Finite**, often **imported**, resources + energy-intensive

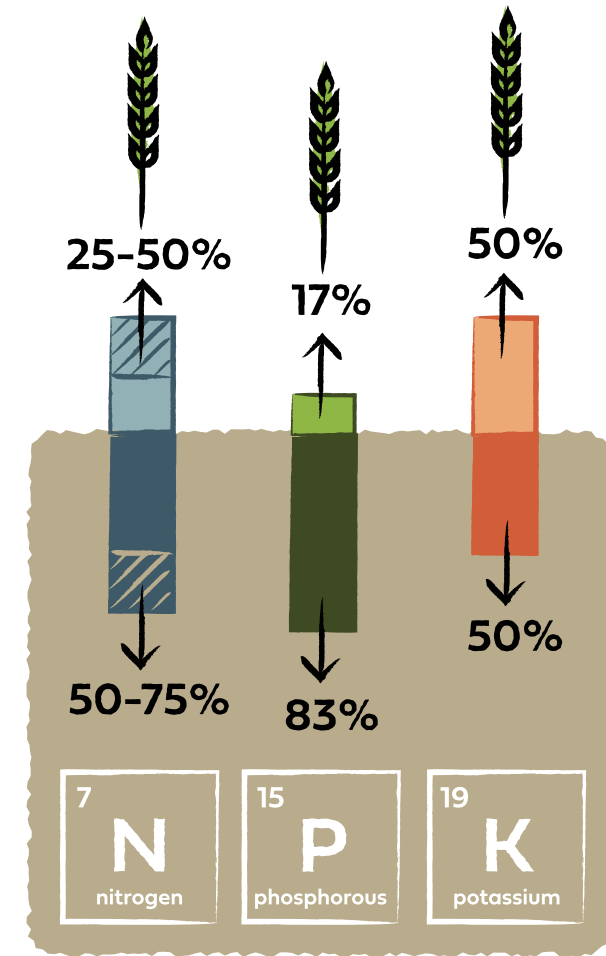
- Fast release of nutrients

## Crop nutrient uptake

- 25-50% of the available Nitrogen(N),
- 17% of phosphorous (P), and
- 50% of potassium (K)

## Excess nutrients

- Soil leaching
- **Degradation of ecosystems and water and soil quality**
- **Reduction of the soil's capacity to sequester CO<sub>2</sub>**

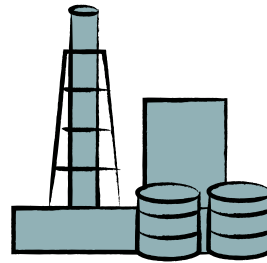


# The opportunity

**Circular fertilisers** as a promising solution to this environmental challenge

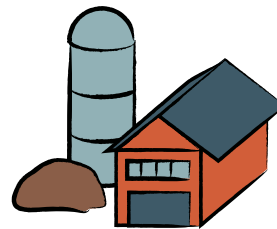
Opportunity to **reduce the environmental impact** of fertilisers

**Close the loop between domestically available resources and required nutrients** to be used in fertilising products

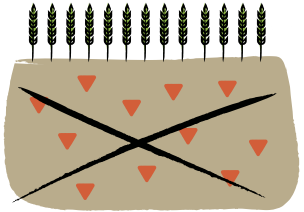


**Nutrients recovered from locally sourced secondary raw materials**

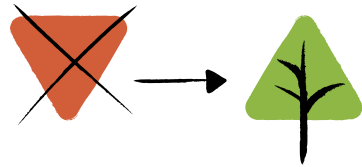
Yield benefits, **minimising the risks** associated with mineral fertilisers, **protecting the soil and water** from nutrient enrichment



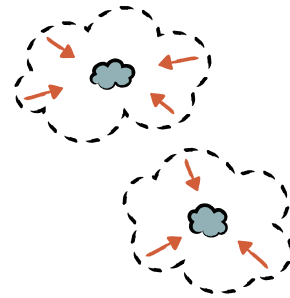
# Contributing to EU objectives



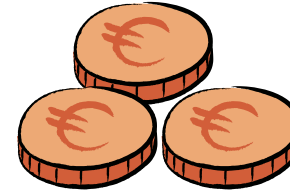
Preventing water and soil contamination



Replacing conventional fertilisers with circular ones



Mitigating GHG emissions from the agricultural sector



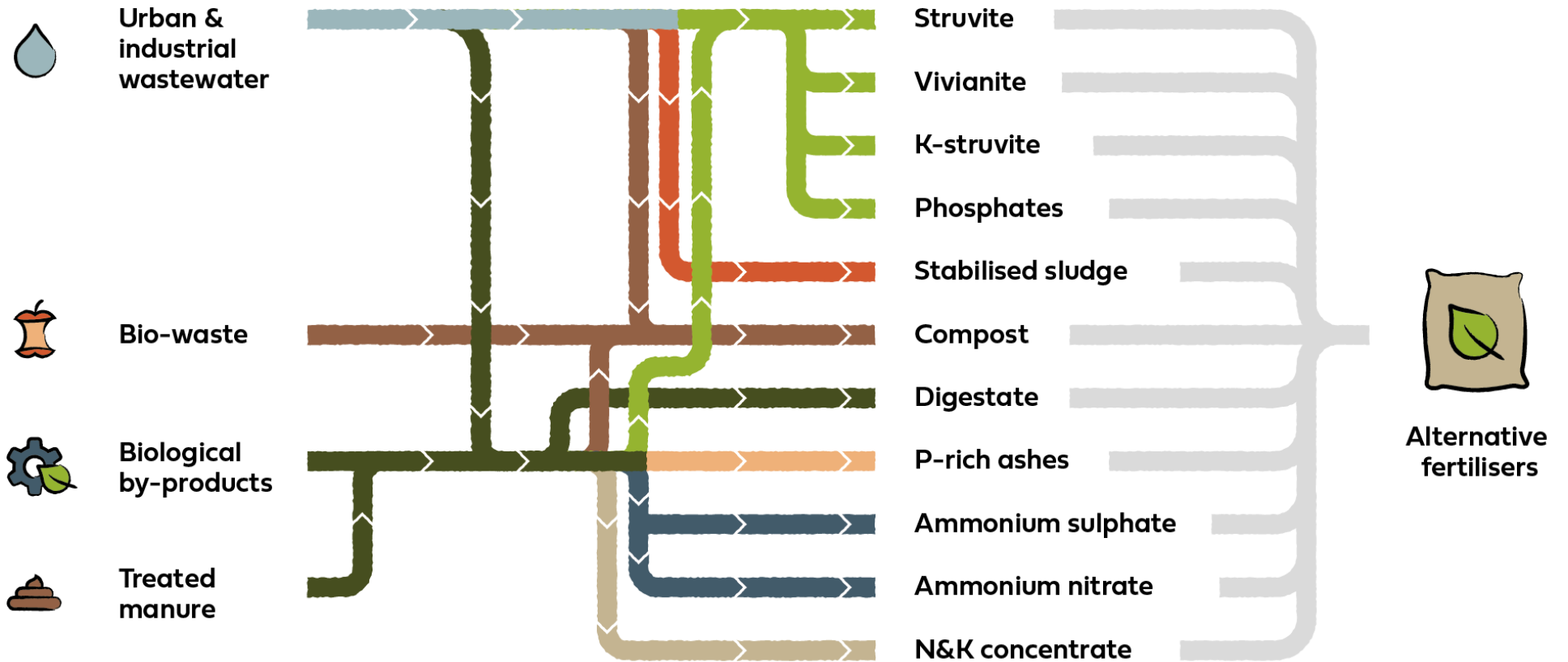
Improving resource independence



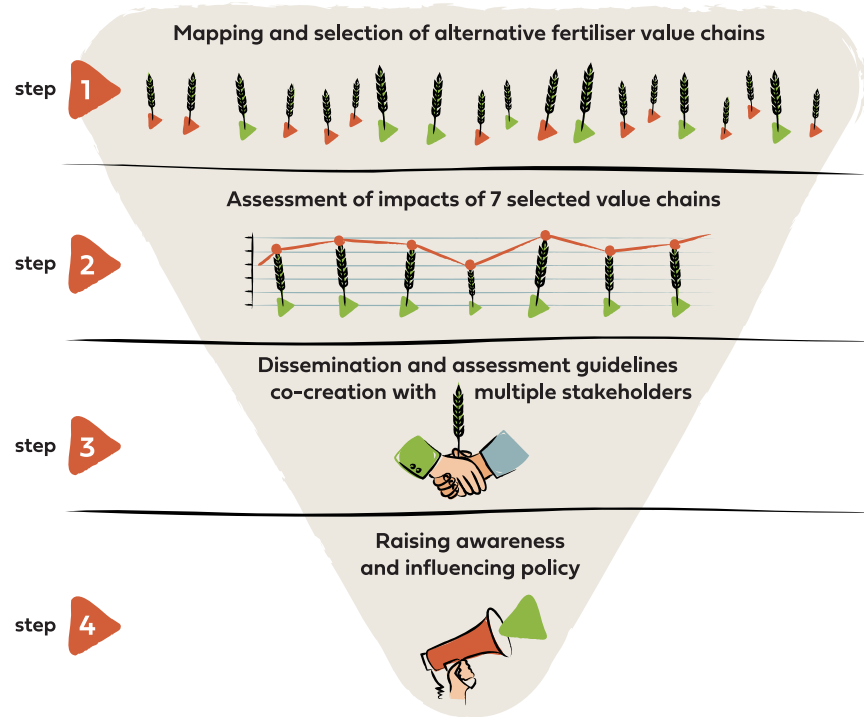
Promoting the circular bioeconomy at local and regional levels

# Nutrient recovery

Waste/by-product stream → Processes applied → Products



# FER-PLAY's step by step process



Urban waste water	Struvite
Industrial waste water	Struvite
Sewage sludge	Stabilised sludge
Biowaste	Composted biowaste
Biological by-products	Feather meal
Digestate	Solid fraction of digestate
Treated manure	Spent Mushroom Substrate

## Stakeholders targeted



Fertiliser producers



Farmers and farmers associations



Public administrations



Waste valorisation & agricultural researchers



# The consortium



**CETAQUA**  
WATER TECHNOLOGY CENTRE

**cetenma**  
Centro Tecnológico  
de la Energía y del  
Medio Ambiente



**NuReSys**<sup>®</sup>

**REVOLVE**



# Thank you for your attention



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## Stay up-to-date with FER-PLAY

Join us on **social media** and head over to our **website** to subscribe for our project **newsletter**, The Alternative, to learn the latest about the project, upcoming activities, networking opportunities, project outputs, and how to be part of the research!

 [@FER\\_PLAY\\_eu](https://twitter.com/FER_PLAY_eu)

 [FER-PLAY EU](https://www.linkedin.com/company/fer-play-eu)

 [www.fer-play.eu](http://www.fer-play.eu)

## Get in touch

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# Life Cycle Analysis results

**Dr Christina Papadaskalopoulou**

Head of Circular Economy and Climate Resilience,  
DRAXIS Research VENTures, DREVEN

*ESNI Conference, 19<sup>th</sup> September 2024*

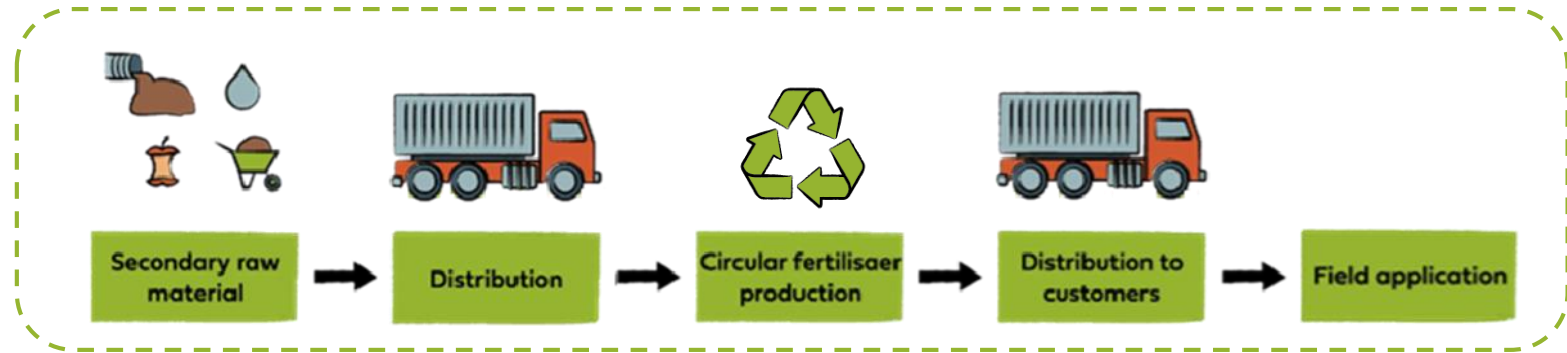
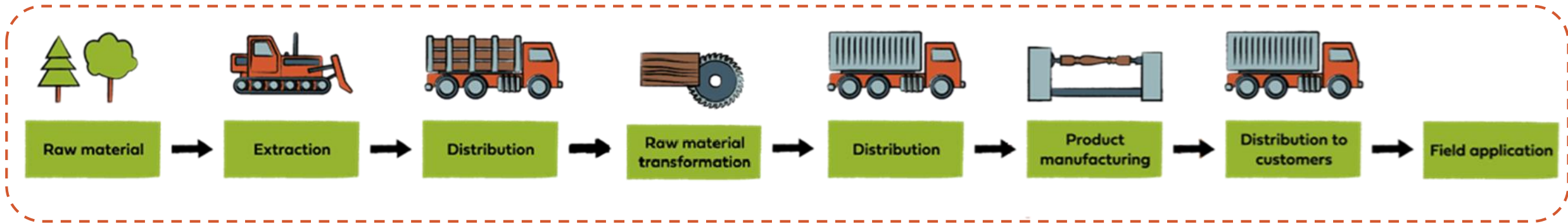


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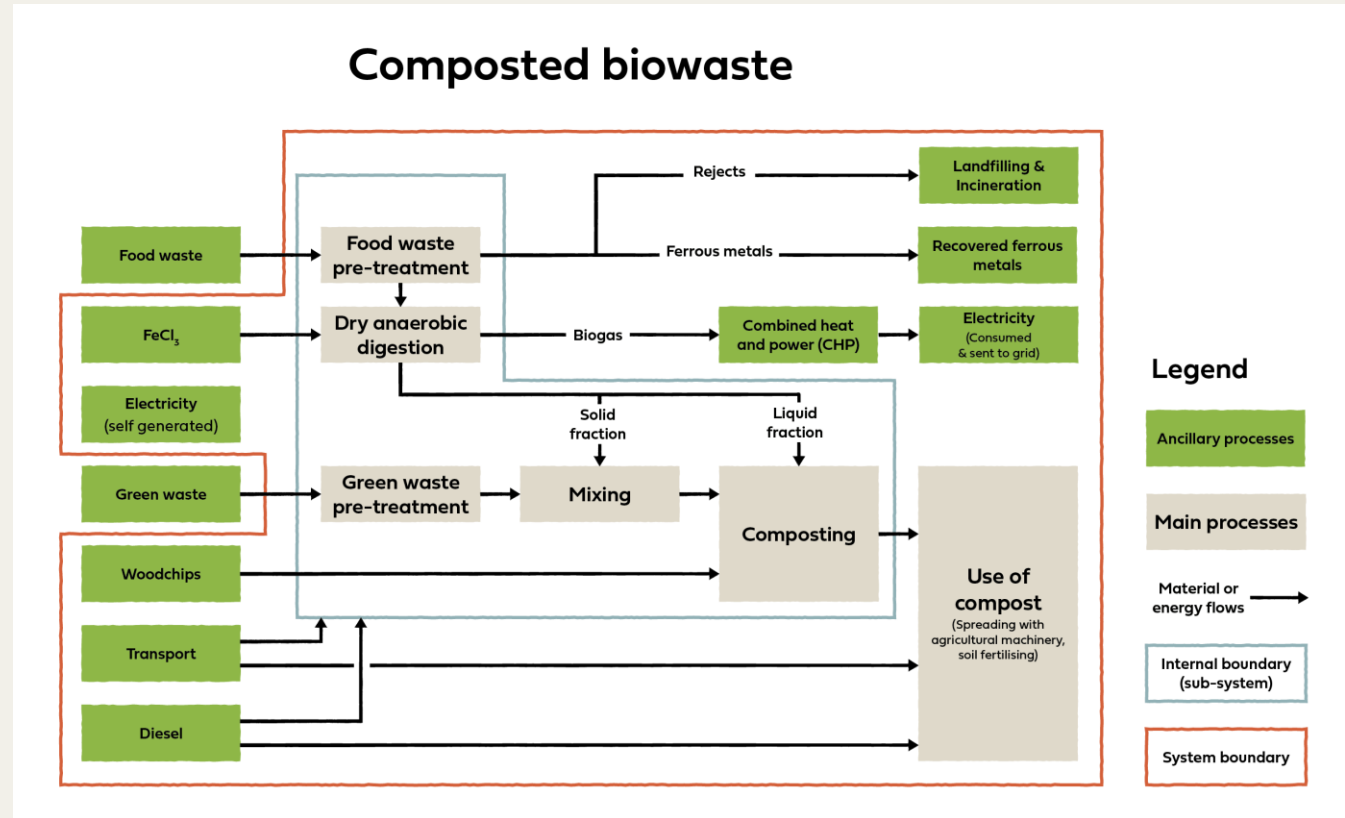
# Linear VS circular fertilizers



# Life Cycle Sustainability Assessment results



# Composted biowaste



**Social Dimension**

1. Rate of non-fatal accidents at workplace
2. Public sector corruption
3. International migrant stock
4. Frequency of forced labour
5. Living wage per month
6. Trade Union density

> +100%	+ 70-100%	+40-70%	+ 10-40%
Neutral			
-10-40%	- 40-70%	-70-100%	< -100%
Variation percentage of the circular fertiliser vs. its non-renewable counterpart. Greener values mean better prospects for circular fertilisers.			

**Environmental Dimension**

1. Climate change
2. Eutrophication, freshwater
3. Resource use, minerals and metals
4. Land use
5. Ecotoxicity, freshwater

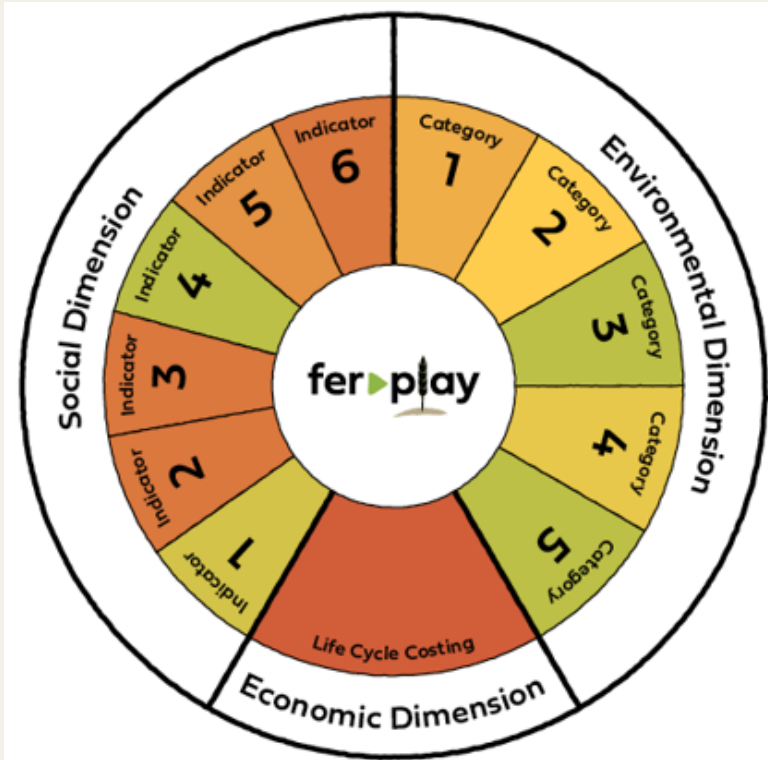
**Social impacts**

Higher impacts are mostly related to the Sewage and refuse disposal sector.

**Economic impacts**

**Higher impacts for composted biowaste**

**However:** The nature of the business makes it **attractive for public-private partnerships** and public tenders, as food waste treatment is a 'public good' which is hard to be supplied profitably only by the engagement of the private sector.



Northern EU region

**Environmental impacts**

**Lower or similar impacts for composted biowaste**

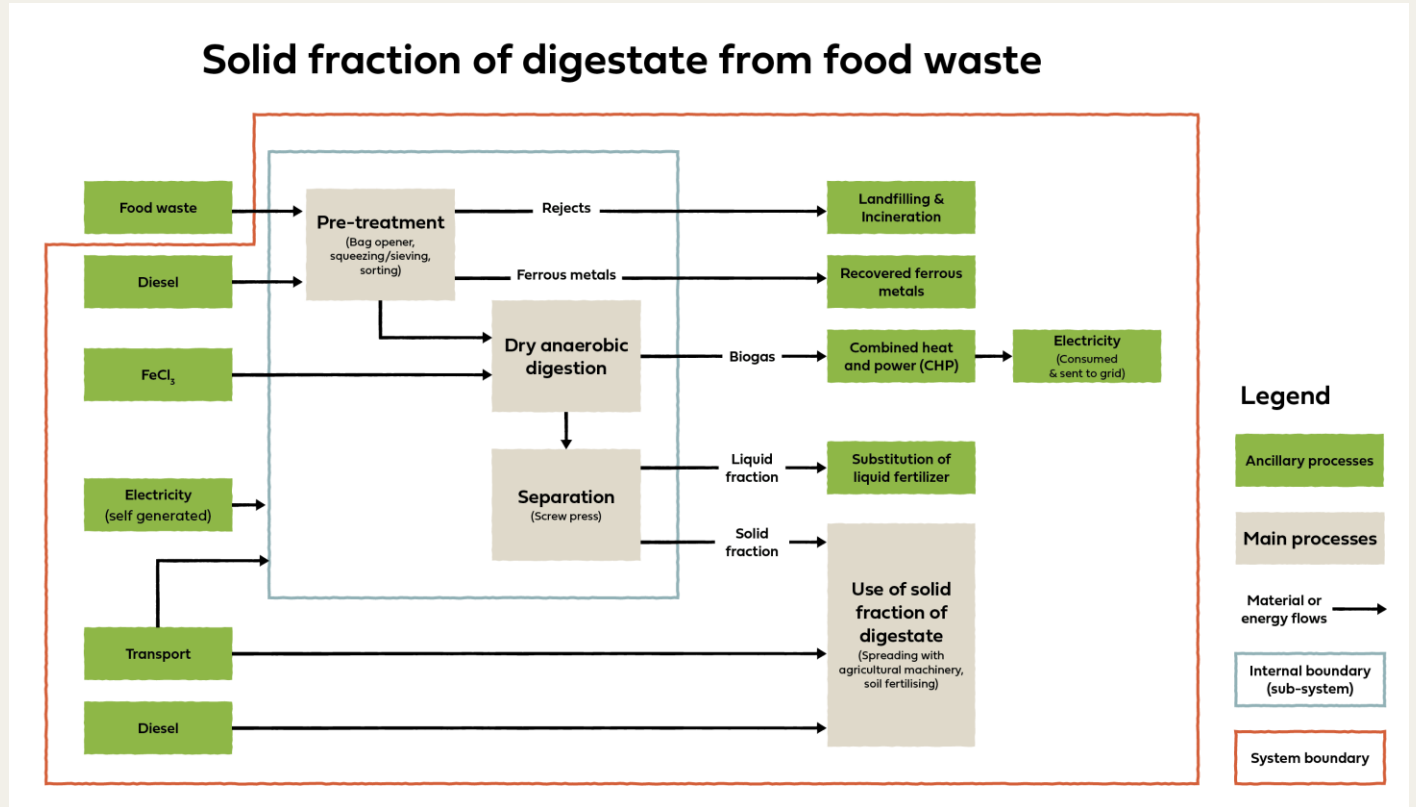
**How:** This is mainly attributed to the production and use of **renewable energy** from anaerobic digestion.

**What:** **land use** is the main impact from compost while **resource depletion** is the main impact from the non-renewable fertilizer.

*\* the avoided emissions resulting from reducing the amount of waste sent to landfilling could also be considered*



# Solid fraction of digestate from food waste, manure & sewage sludge





Digestate



Solid fraction of digestate

### Social Dimension

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2. Public sector corruption
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4. Frequency of forced labour
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Variation percentage of the circular fertiliser vs. its non-renewable counterpart. Greener values mean better prospects for circular fertilisers.			

### Environmental Dimension

1. Climate change
2. Eutrophication, freshwater
3. Resource use, minerals and metals
4. Land use
5. Resource use, fossils

## Social impacts

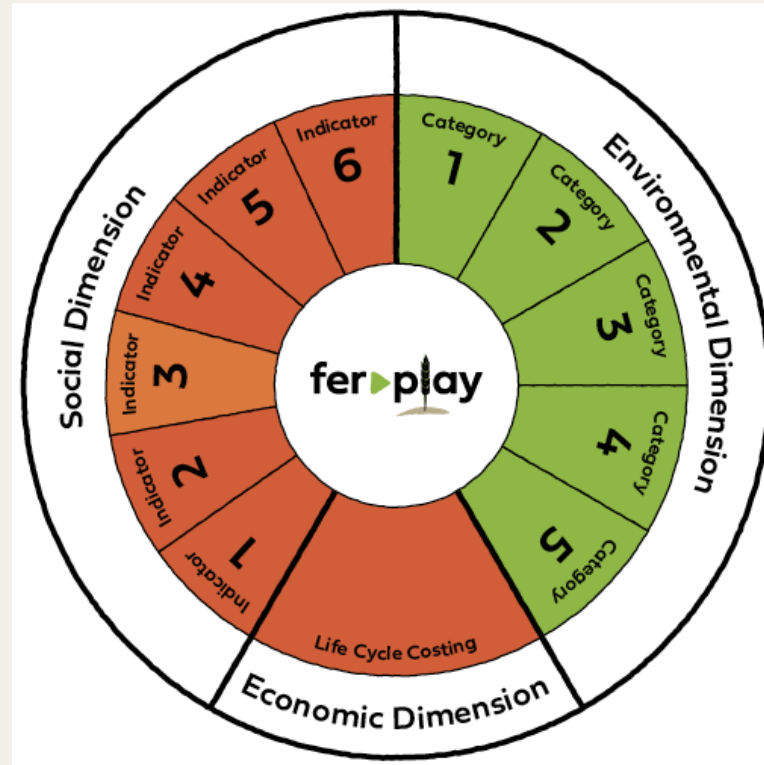
### Higher impacts for digestate

Social risks are mostly associated to the handling of manure

## Economic impacts

### Higher impacts for digestate

However: **SFD from sewage sludge has positive results**, due to economies of scale and the efficiencies achieved by operating coupled to WWTP.



Central EU region

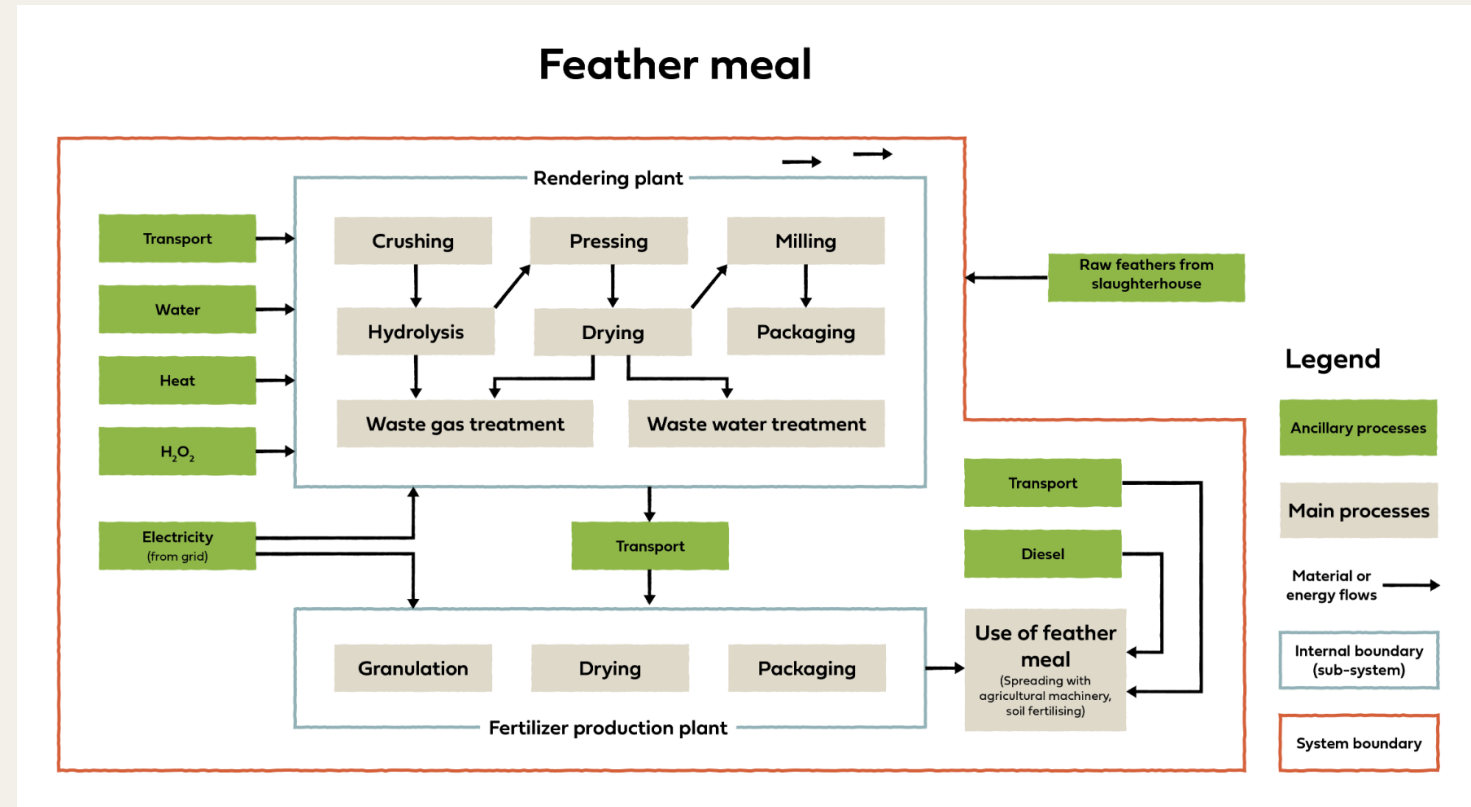
## Environmental impacts

### Avoided net impacts for digestate

**How:** Substitution of conventional electricity production, while assuming that the liquid fraction is also valorised as a fertiliser

The net result of producing and using SFD as a fertiliser **reduces the burden overall**.

# Feather meal





Social Dimension
1. Rate of non-fatal accidents at workplace
2. Public sector corruption
3. International migrant stock
4. Frequency of forced labour
5. Living wage per month
6. Trade Union density

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Neutral			
-10-40%	- 40-70%	-70-100%	< -100%
Variation percentage of the circular fertiliser vs. its non-renewable counterpart. Greener values mean better prospects for circular fertilisers.			

Environmental Dimension
1. Climate change
2. Acidification
3. Resource use, minerals and metals
4. Eutrophication, terrestrial
5. Eutrophication, marine

### Social impacts

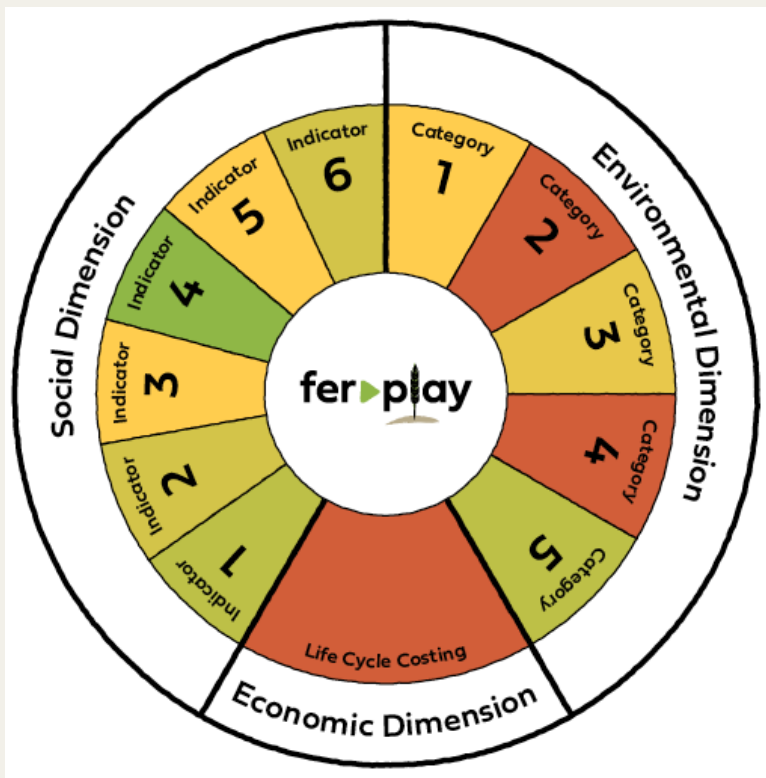
#### Lower impacts for feather meal

The main contributors are those related to energy provision e.g. electricity, gas, steam and hot water.

### Economic impacts

#### Higher impacts for feather meal

Why? Feather meal as fertiliser has a rather unconsolidated and fragmented market, with limited presence of suppliers across a restricted number of countries that results in an imbalance between supply and demand dynamics.



Northern EU region

### Environmental impacts

Use phase: This is the main source of most impacts (except climate change) for both fertilisers, mainly due to ammonia emissions from the application of fertilisers on land.

Why? Higher emission factor for FMF than for NRF; Almost double nitrogen content applied to land for FMF than for NRF

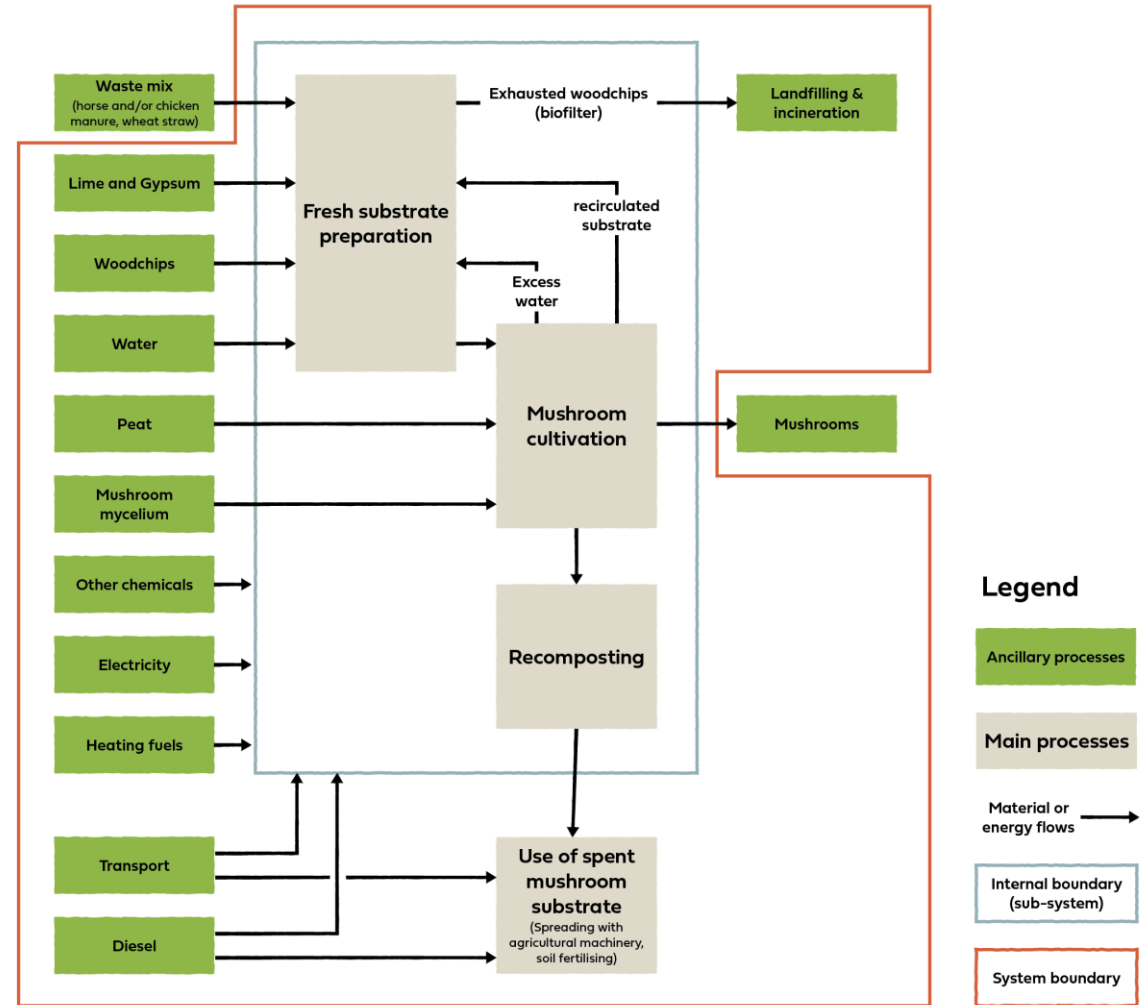
Production phase: Climate change is the main impact, followed by freshwater eutrophication and resource use.

Why? Energy consumption in the rendering process, as well as the transportation required along the supply chain.

# Spent mushroom substrate



## Spent mushroom substrate





Treated manure



Spent Mushroom Substrate

### Social Dimension

1. Rate of non-fatal accidents at workplace
2. Public sector corruption
3. International migrant stock
4. Frequency of forced labour
5. Living wage per month
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Variation percentage of the circular fertiliser vs. its non-renewable counterpart. Greener values mean better prospects for circular fertilisers.

### Environmental Dimension

1. Climate change
2. Eutrophication, freshwater
3. Resource use, minerals and metals
4. Land use
5. Resource use, fossils

## Social impacts

### Higher impacts for SMS

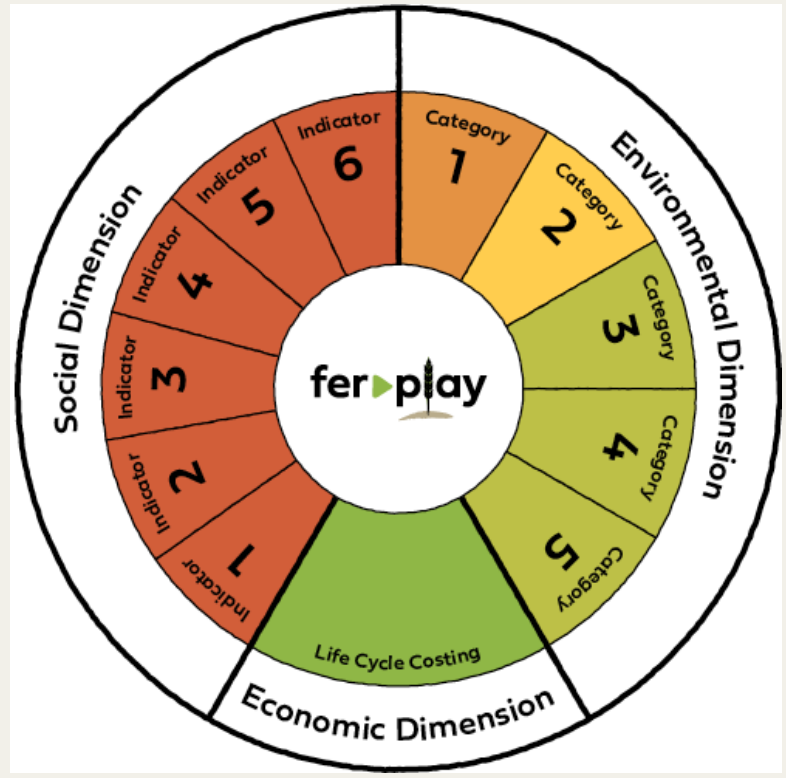
The impacts are mostly associated to the food sector

## Economic impacts

### Lower impacts for SMS

**How?** The biggest advantage is mushroom sales revenue. The 'recipe' of the substrate is also relevant, because the more wheat straw used, the higher the yield, and the lower the costs per unit.

**However:** the high number of actors involved, and the capital-intensive activity of mushroom growing is responsible for high overall costs.



Mediterranean EU region

## Environmental impacts

### Lower impacts for most categories

Higher extraction of minerals for the production of non-renewable fertilisers

**Exception:** Lower climate change impacts for the non-renewable fertilisers, due to high efficiency of industrialized processes of fertiliser production (lower consumption of raw materials)



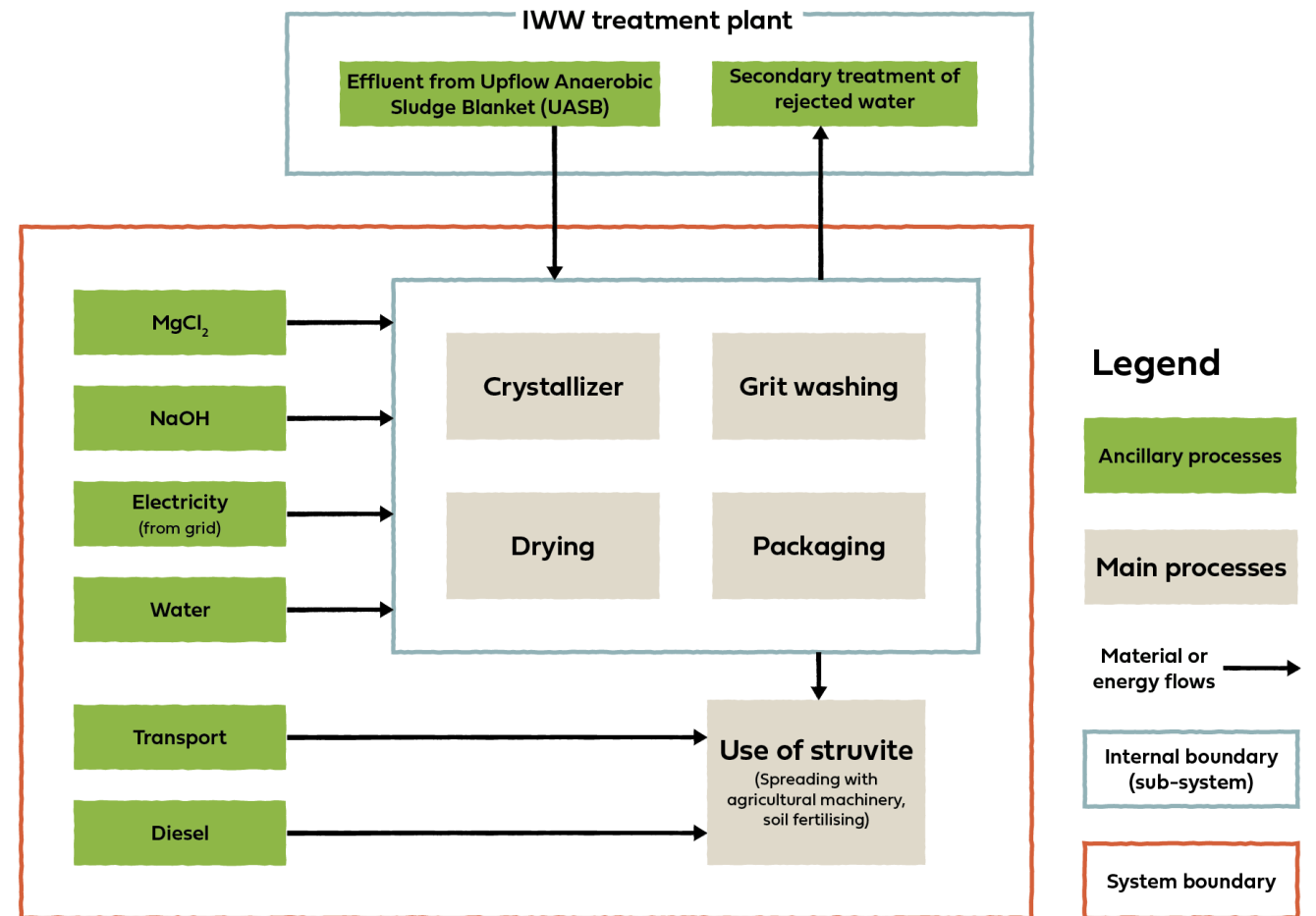
Funded by the European Union

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# Struvite from wastewater



## Struvite from IWW



**Social Dimension**

1. Rate of non-fatal accidents at workplace
2. Public sector corruption
3. International migrant stock
4. Frequency of forced labour
5. Living wage per month
6. Trade Union density

> +100%	+ 70-100%	+40-70%	+ 10-40%
Neutral			
-10-40%	- 40-70%	-70-100%	< -100%

Variation percentage of the circular fertiliser vs. its non-renewable counterpart. Greener values mean better prospects for circular fertilisers.

**Environmental Dimension**

1. Climate change
2. Eutrophication, freshwater
3. Resource use, minerals and metals
4. Acidification
5. Eutrophication, terrestrial

**Social impacts**

Lower impacts for struvite

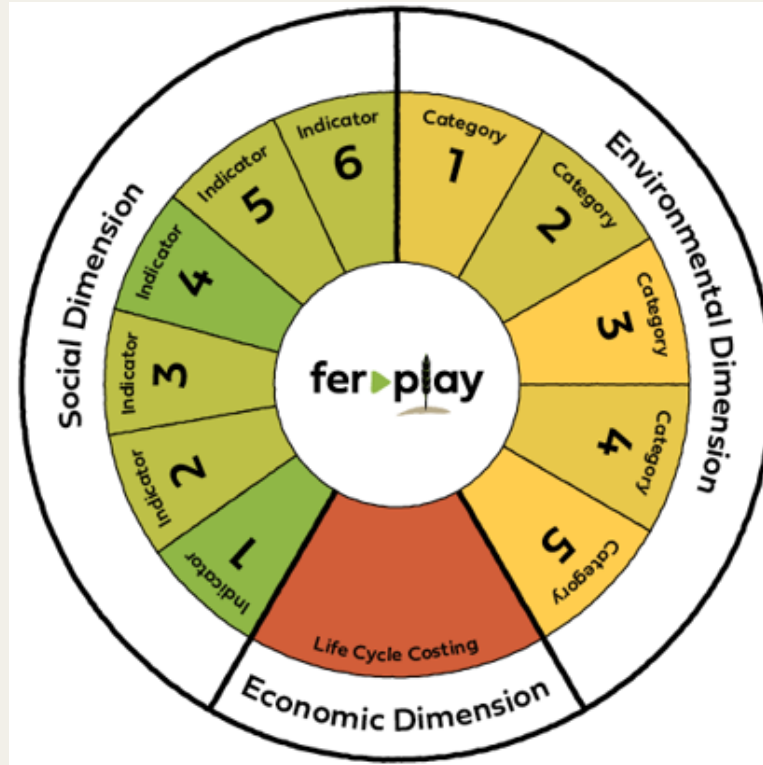
The chemical manufacturing sector is the main responsible for the social impacts

**Economic impacts**

Higher impacts for struvite

**However:** If struvite removal for improving operational efficiency was considered instead of struvite recovery for reuse, the costs would be lower.

! Matter of burden allocation for multifunctional systems



Northern EU region

**Environmental impacts**

**Production phase:** Lower impacts in the production phase due to lower amounts of energy and/or chemicals consumed for struvite production.

**What:** Main impacts are associated to the use of magnesium chloride for struvite recovery

**However:** recovered magnesium chloride is also used in some cases, which could further decrease the impacts of the production phase

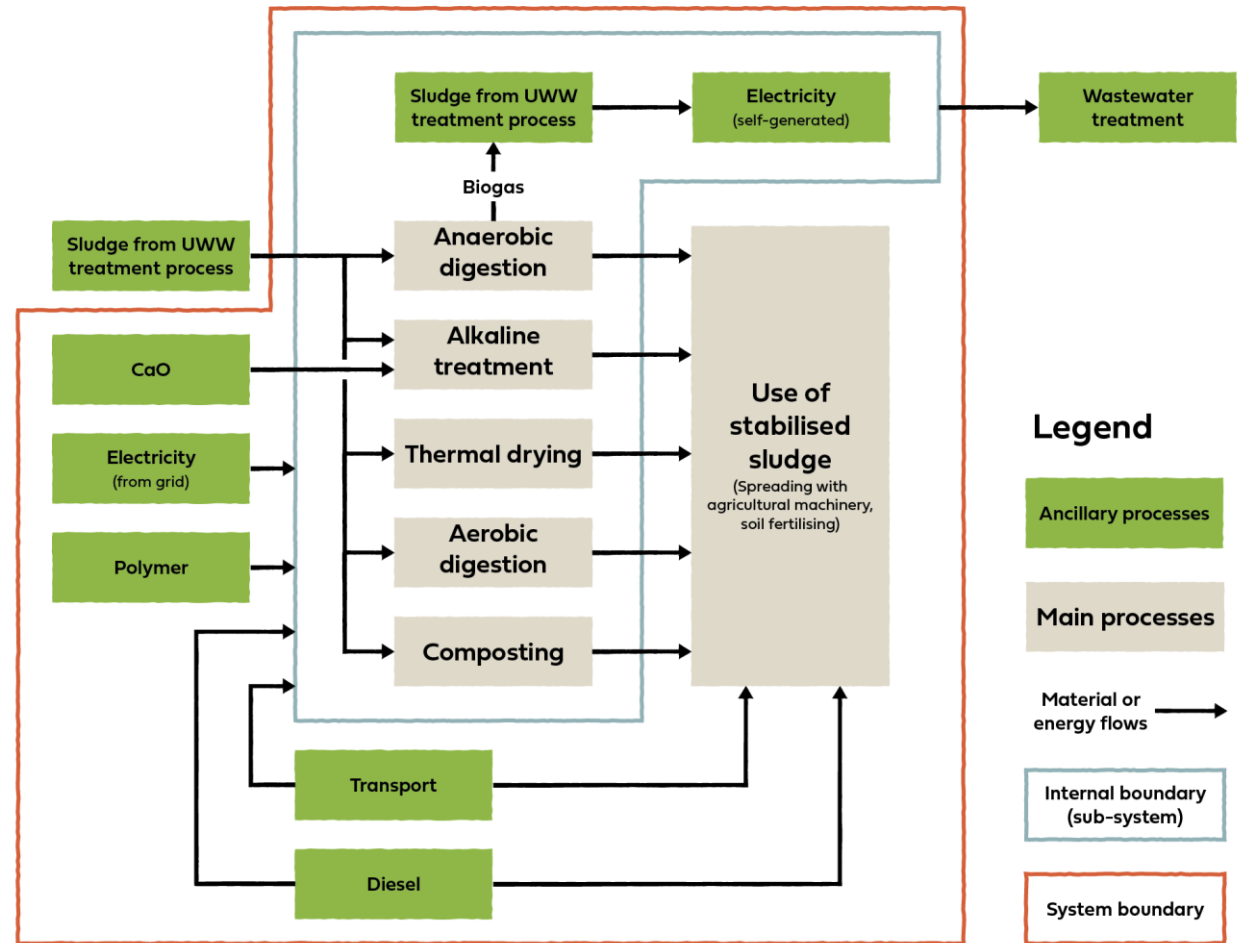
**Use phase:** Lower impacts during the application of struvite mainly due to its slow-release properties

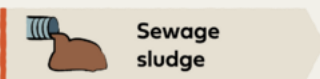


# Stabilised sludge from urban wastewater



## Stabilised sludge from UWW





Sewage sludge



Stabilised sludge

Social Dimension
1. Rate of non-fatal accidents at workplace
2. Public sector corruption
3. International migrant stock
4. Frequency of forced labour
5. Living wage per month
6. Trade Union density

> +100%	+ 70-100%	+40-70%	+ 10-40%
Neutral			
-10-40%	- 40-70%	-70-100%	< -100%

Variation percentage of the circular fertiliser vs. its non-renewable counterpart. Greener values mean better prospects for circular fertilisers.

Environmental Dimension
1. Climate change
2. Eutrophication, freshwater
3. Resource use, minerals and metals
4. Acidification
5. Eutrophication, terrestrial

### Social impacts

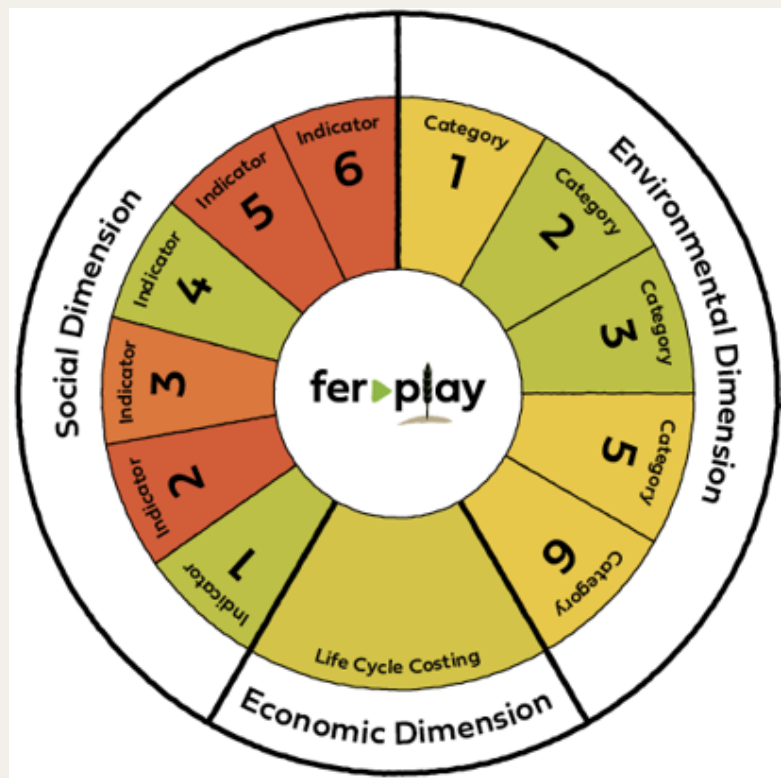
The main impacts are associated to the electrical energy, gas, steam and hot water supply sector

### Economic impacts

Lower impacts for stabilised sludge

Sludge treatment and reuse is increasingly being incorporated in UWWTP making the treatment of both water and sludge more economically viable.

\* As SS is still seen more as a waste, its selling price is low, but has potential to increase.



Northern EU region

### Environmental impacts

Lower or similar impacts for stabilised sludge

How: Its production leads to less environmental burdens and depletion of resources.

What: The use of renewable energy generated by the Anaerobic digestion is an added value that renders the process self-sufficient.



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# Thank you for your attention

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The FER-PLAY LCA team



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# Regulatory framework for struvite utilisation

ESNI Conference, 19<sup>th</sup> September 2024

*Wim Moerman, Dr. Ir. Process Engineer at NURESYS*

# Regulatory Framework for Struvite Utilisation

Wim Moerman & Aiman Anwar

NuReSys

Contact: [aa@nuresys.com](mailto:aa@nuresys.com)



This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement N° 101060426.



Aiman Anwar

moerman



# Regulatory framework analysis: key results for 7 circular fertilisers value chains

ESNI Conference, 19<sup>th</sup> September 2024

*Lucile Sever, EBA Policy Officer for circular economy*

# Objective



Assessing policies and legislations impacting on the **production, application, marketing or promotion/financing** of circular fertilisers.

1. Identify current **regulatory obstacles** hindering the adoption of circular fertilisers by end-users as well as **regulatory drivers** promoting their use.
2. Proposing **policy recommendations** to overcome those regulatory obstacles.
3. Proposing **new regulatory drivers** that can further stimulate the market of circular fertilisers.

# Scope

7 circular fertilisers value chains



3 levels of governance

International level

European level

National level (AT, BE, DK, FR, DE, GR, IT, NL, ES, SE)

Adopted legislation and legislation currently in the process of being adopted



# Methodology



Identification of policy experts → 46 policy experts



Interview process + online survey → 24 interviews + 20 answers to the survey

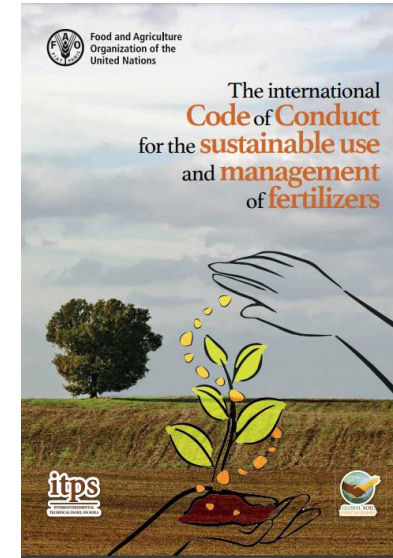


Analysis of interviews and survey responses, supplemented by co-creation tasks and literature review

# International level



FAO's



US-led Global Fertilizer Challenge



# European level

<p><b>Circular Economy and Zero Pollution Action Plans</b>  <i>Supporting waste prevention, circularity and nutrient recycling</i></p> <p><b>Farm-to-Fork, EU Biodiversity and EU Soil Strategies</b>  <i>Tackling nutrient losses and promoting the use of circular fertilisers</i></p>			
Production	Application	Marketing	Promotion / financing
<ul style="list-style-type: none"> <li><span style="color: red;">●</span> Waste Framework Directive</li> <li><span style="color: green;">●</span> Animal By-Products Regulation</li> </ul>	<ul style="list-style-type: none"> <li><span style="color: yellow;">●</span> Nitrates Directive</li> <li><span style="color: yellow;">●</span> Sewage Sludge Directive</li> </ul>	<ul style="list-style-type: none"> <li><span style="color: orange;">●</span> Fertilising Products Regulation</li> <li><span style="color: yellow;">●</span> Organic Farming Regulation</li> </ul>	<ul style="list-style-type: none"> <li><span style="color: yellow;">●</span> Common Agricultural Policy</li> <li><span style="color: green;">●</span> Carbon Removal and Carbon Farming Certification Framework</li> <li><span style="color: green;">●</span> Soil Monitoring Law</li> <li><span style="color: yellow;">●</span> Urban Wastewater Treatment Directive</li> <li><span style="color: yellow;">●</span> Taxonomy Regulation</li> </ul>

- Certain legislative provisions are significantly hindering the adoption of most FER-PLAY circular fertilisers.
- Certain legislative provisions could be refined to better encourage the adoption of most FER-PLAY circular fertilisers.
- The current legislation is either not obstructing or is actually encouraging the adoption of most FER-PLAY circular fertilisers.

# The Sewage Sludge Directive

Which FER-PLAY circular fertilisers are governed by the Sewage Sludge Directive?

UWW	IWW	SS	BW	FM	DIG	SMS
✓	✓	✓			✓	



Lack of regulation of problematic contaminants or low standard for sewage sludge.

*Excessive strictness at national level, inconsistencies between national laws. General distrust of farmers in struvite, stabilised sludge and digestate from sewage sludge.*



The Sewage Sludge Directive must be updated to potentially include stricter concentration limits for heavy metals and set limits for additional pollutants. This revision would increase farmers' trust in circular fertilisers, thereby promoting their use in agriculture.



Lack of political will for a revision

# The Fertilising Products Regulation

Which FER-PLAY circular fertilisers are included in the FPR?

UWW	IWW	SS	BW	FM	DIG	SMS
✓	✓		✓		✓	



Certain circular fertilisers not yet included in the FPR (e.g. **feather meal**, **spent mushroom substrate**). Overly stringent requirements for certain PFCs (e.g. **digestate**) and exclusion of input materials from certain CMCs (e.g. **stabilised sludge**).

Major discrepancy between the ABPR and the FPR limiting the processing of **compost** and **digestate** into EU fertilising products to only the standard transformation parameter.

Incomplete implementation of the FPR (e.g. lack of published EU-harmonised standards for testing methods by CEN, absence of notified bodies in some countries).

Overly complex legislation and difficult to operationalise.

*Unnecessary alignment of the national legislation with the EU Fertilising Products Regulation.*



The FPR's requirements must be reviewed to establish achievable standards for producers and to include new materials like sewage sludge and industrial sludge.

The inclusion of **feather meal** and **Spent Mushroom Substrate** in CMC 10 must be sped up.

Alternative transformation parameters authorised by national competent authorities under the ABPR must be permitted to treat animal by-products that will be used as input materials for **compost** and **digestate**.

The operationalisation of the FPR must be completed by establishing new notified bodies and publishing EU-harmonized standards for testing methods through CEN. In the longer term, simplifying procedures and making certification more accessible for smaller companies is desirable.

*Member States must maintain a separate national legislative framework, setting their own requirements for marketing products as soil improvers or fertilisers.*



Continually updated

# The Organic Farming Regulation

Which FER-PLAY circular fertilisers are included in the OFR?

UWW	IWW	SS	BW	FM	DIG	SMS
✓	✓		✓	✓	✓	✓



Overly strict requirement for **struvite** to meet FPR standards for use in organic farming, especially for small producers.

Lack of definition of the concept of "factory farming" at EU level.  
→ Results in varying interpretations among Member States and a lack of harmonisation.



The Regulation must be updated to allow the use of struvite certified under national legislation in organic farming.

The concept of "factory farming" needs to be clearly defined at the EU level, or further guidance should be provided for Member States to establish their own definition.



Uncertainty regarding a potential revision

# The Common Agricultural Policy

Which FER-PLAY circular fertilisers are included in the CAP?

UWW	IWW	SS	BW	FM	DIG	SMS
✓	✓	✓	✓	✓	✓	✓



Absence of mandatory measures, under SMRs or GAECs, requiring farmers to produce or use circular fertilisers in the CAP 2023-2027.

*Lack of ambition from Member States to introduce additional voluntary measures under eco-schemes and rural development programs to further support the uptake of circular fertilisers.*




The CAP must include mandatory measures, under SMRs or GAECs, requiring farmers to produce or use circular fertilisers.

In their CAP Strategic Plans, Member States must introduce additional voluntary measures under eco-schemes and rural development programs to further support the uptake of circular fertilisers.



Interim evaluation scheduled for 2026

# New regulatory drivers at European level

1. Revitalising the Integrated Nutrient Management Action Plan
  2. Establishing a European Nutrients Recycling Target
  3. Implementing fiscal tools for sustainable nutrient management
  4. Considering the integration of agriculture into the Emissions Trading System
  5. Enhancing Research and Innovation in sustainable nutrient management
- 



# Thank you for your attention



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## About FER-PLAY

FER-PLAY is working to protect ecosystems, decrease EU dependence on fertiliser imports, and improve resource efficiency through the promotion of circular fertilisers. The project will map and assess circular fertilisers made from secondary raw materials and highlight their multiple benefits to foster their wide-scale production and application.

## Get in touch

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## Social Medias

 @FER\_PLAY\_eu

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This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement N° 101060426.



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