Joint call for nutrients in the EU Circular Economy Act *6th November 2025*

*The signatory organisations below call for **an EU Circular Economy Act, ambitious for nutrients**, to forward sustainability, EU job creation and competitivity, and food system resilience, including:*

- ➢ Fix objectives to **reduce resource consumption** alongside waste prevention and recycling objectives.
- ➢ Develop **coherent policies to achieve nutrient circularity and reduce nutrient losses** (Green Deal / UN Biodiversity Convention -50% target) including regulatory targets, market tools, fiscal and economic, public purchasing, border and trade …
- ➢ **Improve EU coordination and implementation of Circular Economy policies**: e.g. EU Circular Economy Board, information point, FAQ … Ensure coherence of all EU regulations relevant to nutrient circularity, including where possible of authorisations for different applications. Ensure coherence and clarify definitions between regulations and with waste codes.
- ➢ Address regulatory obstacles to nutrient recycling whilst maintaining where pertinent for safety and for user confidence, cradle-to-grave producer responsibility and traceability, in particular:
  - Simplify and accelerate **EU and National End-of-Waste** procedures, communication, implementation,
  - Where EU End-of-Waste criteria are not defined, enable default recognition by other Member States of National and "self-declaration" End-of-Waste status, for which standards, conformity assessment or certification procedures are in place,
  - Create facilitated legal status and procedures for '**secondary raw materials'** intended for recycling,
  - Address **permitting** obstacles to intake of secondary raw materials into production sites,
  - Facilitate administration of wastes **for R&D and testing** of recycling processes and routes.
- ➢ Develop **general 'End-Status' for processes recognised as safe** (End-of-Waste + ABP End-Point), based primarily on **safety and quality** of the recycled product (product testing, process quality assurance …), not on origin of input materials. However, traceability of the input material should be retained where pertinent.
- ➢ **Approved or certified European authorisations should confer EU End-of-Waste status** (Food, Feed authorisations, ABP End-Points), as does the EU Fertilising Products Regulation.
- ➢ **Develop policies to ensure market demand ('pull') for recycled nutrients** (see ESPP proposals here) and to support local circular economy businesses and their operating conditions.
- ➢ **Evaluate the feasibility of a recycled content target or quota and recycled content trading scheme** for recycled phosphorus in fertilising products (inorganic and organic).
- ➢ Modernise the **Animal By-Products and Animal Feed regulations** to improve coherence and user understanding, facilitate and remove unjustified obstacles to circularity, whilst maintaining guarantees of safety and food-chain confidence.
- ➢ **Support farmers** for nutrient recycling and for use of recycled fertilisers through the CAP (see discussion in SCOPE Newsletter n°154).
- ➢ **Nutrients as Strategic and Critical Raw Materials (CRM):**
- ➢ Implement the CRM Act art. 26 for phosphorus,
- ➢ Define 'Strategic' inputs for agriculture, critical for food security and food sovereignty, parallel to 'Strategic Materials' defined for industry in the CRM Act.
- ➢ Implement **separate collection of household organic wastes** (biowaste) with nutrient recycling.
- ➢ Ensure **comparable support for materials recycling as for renewable production** for materials or carbon valorisation from organics. Integrate where applicable nutrient recycling into waste-to-energy and renewable energy policies: e.g. include manure digestate processing in the Renewable Energy Directive (RED II).
- ➢ Establish EU guidance and coordination of waste / ABP / regulatory status of **waste-fed algae and biomass** and extracts therefrom.
- ➢ **Pollution at source**: rapidly phase out or strongly restrict industrial chemicals susceptible to be an obstacle to nutrient and organics recycling, including in imported products. In particular:
  - Rapidly phase out PFAS in consumer applications and for non-essential or dispersive industrial applications, with tolerances for recycling and reuse,
  - Ensure robust verification and enforcement for imports, including chemicals in imported 'articles'.
- ➢ **Integrate nutrient circularity**, **resource consumption reduction and phosphorus as a CRM across EU policies**, including: Organic Farming, Taxonomy, Corporate Sustainability Reporting, Public Purchasing, Fiscal policies, Battery Recycling Directive, EU chemicals regulation REACH, Industrial Emissions Directive …
- ➢ **Improve data** to support policies, in particular for organic-based fertilising products.

Certain signatory organisations have developed their own specific proposals, available via the websites indicated.

Detailed proposals prepared by ESPP, after wide stakeholder consultation (including workshops in 2024 and 2025), on policies for market-pull for recycled nutrients, on nutrient recycling in the Circular Economy Act and on implementing the EU Urban Waste Water Directive phosphorus 'reuse and recycling rates" are here: www.phosphorusplatform.eu/regulatory

Signatories:

ESPP (European Sustainable Phosphorus Platform) www.phosphorusplatform.eu	
CEWEP (CEWEP, Confederation of European Waste-to-Energy Plants) https://www.cewep.eu/	
AquaMinerals www.aquaminerals.com	
European Compost Network www.compostnetwork.info	
EurEau https://www.eureau.org/	
Netherlands Nutrient Platform https://www.nutrientplatform.org/	

Deutsche Phosphor Plattform https://www.deutsche-phosphor-plattform.de/	
European Biogas Association https://www.europeanbiogas.eu/	
Wien Energie www.wienenergie.at	
FEAD (European Waste Management Association) https://fead.be/	
SINFERT R&D project https://www.sfi.ie/challenges/future-food-systems/SINFERT/	
SUEZ Group, water and waste management, https://www.suez.com/en	
Twence, https://www.twence.nl/	
P2Green https://p2green.eu/	
UCT - Department of Power Engineering, University of Chemistry and Technology, Prague https://uen.vscht.cz/	
Institute of Soil Science and Plant Cultivation, State Research Institute, Puławy, Poland (IUNG-PIB) https://en.iung.pl/	

VaLoo, Circular Sanitation Network Switzerland, https://www.va-loo.ch	VaLoo Circular Sanitation Network Switzerland Réseau suisse pour un assainissement circulaire Netzwerk für kreislauffähige Sanitärsysteme Schweiz
Vuna Nexus www.vunanexus.com	vuna nexus
Sanitation360 https://sanitation360.se/	sanitation 360
Ragn-Sells https://www.ragnsells.com/ **EasyMining** https://www.easymining.com/	RAGN SELLS EasyMining
Politecnico di Milano https://www.polimi.it/	POLITECNICO MILANO 1863
Università di Bologna https://www.unibo.it/en/homepage	ALMA MATER STUDIORUM UNIVERSITÀ DI BOLOGNA
Eurofema www.eurofema.eu	EUROFEMA European Organic Fertilizer Manufacturers Association
ECOFI https://ecofi.info/	ecofi European Consortium of the Organic-Based Fertilizer Industry

RecoLab www.recolab.se	
Byosis www.byosis.com	
Leaf Wageningen www.leaf-wageningen.nl	
Proman Consulting www.proman.pro	
Inagro https://inagro.be/eng	
German Biochar e.V. https://german-biochar.org	
Greek Bioeconomy Council (GBC) https://greekbioeconomycouncil.gr/	
BETA Technological Center www.betatechcenter.com	
Kompost & Biogas Verband Österreich www.kompost-biogas.info	

Nutriënten Management Instituut www.nmi-agro.nl	
R2EM - Resource Recovery and Environmental Management (Univesitat Politècnica de Catalunya) https://www.upc.edu/ https://futur.upc.edu/R2EM	
Colsen https://www.colsen.nl/	
Tracegrow Oy https://www.tracegrow.com/	
Algen, algal technology center, Ljubljana https://algen.eu/	
International Platform of Insects for Food and Feed https://ipiff.org/	
The European Feed Manufacturers' Federation https://fefac.eu/	
European Former Foodstuff Processors Association https://effpa.eu/	

European Fat Processors and Renderers Assoication (EFPRA) https://efpra.eu/	