



EFAR POSITION PAPER ON THE SLUDGE DIRECTIVE REVISION

The **protection of surface and groundwater** is one of the key topics of the European Union environmental policy. Systematization and improvement of urban wastewater treatment have led to a **steady increase in the production of sewage sludge**, which today reaches **10 million tonnes of dry matter per year**. This represents 70 million tonnes in wet weight and is equivalent to two thirds of the EU bio waste production.

High bound water content significantly limits the possibilities for sludge energy recovery apart through anaerobic digestion. However sewage sludge contains high levels of **organic matter and nutrients** which make it interesting for soil amendment and crop fertilisation. Since the adoption of the “sludge directive” in 1986 EU member states have regulated the use of sludge in agriculture in order to limit the dispersion of contaminants into the environment and to protect animal and public health. Extensive scientific knowledge as well as long-term field experiments have confirmed the **benefits and harmlessness of sludge land application** which is from far the preferred recovery option in the EU.

Recently the **European Commission** questioned the need to revise the sludge directive and published a **roadmap** accordingly prior to the organisation of a **public consultation** during the first quarter of 2021. In this context **EFAR is pleading for the sludge directive revision** with the aim to:

- **Encouraging the decrease of contaminants in sludge** to ensure a high level of protection of the environment and of human and animal health. Sludge contaminants concentrations have considerably decreased within the last twenty years. Therefore in application of the **precautionary principle** and in accordance with the **zero pollution action plan**, limit values could be revised downwards and new contaminants could, if justified, be regulated.

- **Setting up two sludge categories:**
 - **sludge complying with the quality criteria defined by the fertiliser regulations** and potentially with additional parameters that might be set following a **risk assessment analysis**. These sludge will have **limited restrictions of use**.
 - **sludge for which any contaminant concentration is above the ones of the fertiliser regulation (or of additional contaminants that might be set) but under the acceptable limit values**. For this category, the sludge producer would be required to review the conditions of industrial discharge to the sewer. These sludge will have higher restrictions of use such as comprehensive traceability, soil quality monitoring, limitation of contaminants flows per hectare and per year,

The objective is to progressively increase the part of the sludge production complying with the quality criteria set by the fertiliser regulation.

- Possibility for the sludge complying with the quality criteria defined by the fertiliser regulation and to additional parameters that might be set to **benefit from an end of waste status** and to be treated (composting, methanization) with other bio-waste.
- **Guarantee of free circulation within the EU** for sludge benefiting from an end of waste status.
- **Reinforcement of the quality control** of the sludge to be spread on agricultural land. Frequency and type of analyses to be carried out on sludge should be reassessed.
- **Improvement of traceability related to sludge production and recovery** with batch management to which an analysis result could be linked. Traceability scope and conditions would be adjusted depending on the sludge category.
- **Systematic establishment of nutrient management plan** to balance sludge nutrients input with crop needs.
- **Setting up a quality assurance scheme** covering the different points mentioned above.
- **Recognition through eco-schemes of the beneficial impacts of sludge land application** in regard to greenhouse gas emissions, due to savings in mineral fertilisers and carbon sequestration.
- **Setting up National Committees** gathering the various stakeholders impacted by sludge land application from farmers to consumers representatives The National Committee will review regularly the conditions of sludge production and recovery and will be informed of the evolution of scientific knowledge on the matter.

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