

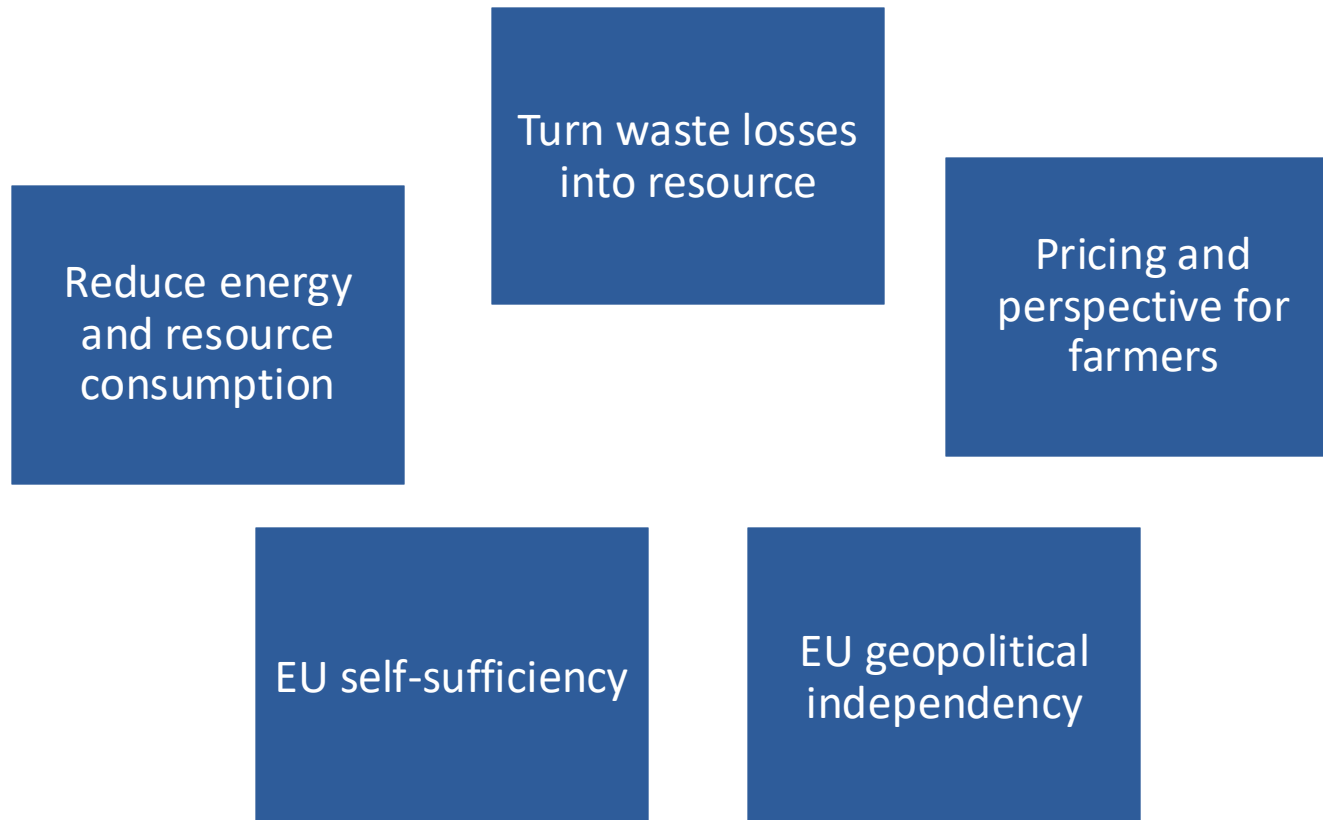
Circular Economy Act and Recycled fertilisers

Aligning policy, practice and innovation for sustainable agriculture
ReNu2Cycle session at ESNI-NERM , April 28 2026

Laura van Schöll, Senior Expert Circular fertilisers at NMI

Circular economy

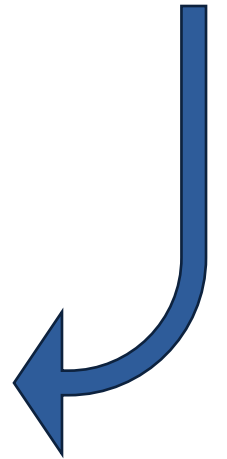
Recycling of nutrients and organic matter



EU Circular Economy Act (CEA)

Green deal → **Circulair economy action plan** → **Circular Economy Act**

- facilitate the free movement of 'circular' products, secondary materials and waste.
- increase the supply of high-quality recycled materials and stimulate demand
- address the slow transition to circularity in the EU



Circular Economy Act

- Simplify the regulatory framework and remove barriers to the functioning of the Single Market
- Strengthen secondary raw material markets and improve access to feedstock

Challenges:

- the heterogeneous interpretations and implementation of EU rules by Member States
- fragmentation of the single market, making it costly for businesses to convert waste into valuable secondary raw materials and preventing economies of scale

Fertilising Product Regulation 2019/1009

FPR opens the internal EU market for organic and recovered fertilisers

- Agronomic efficiency
 - Safety and health
 - Conformity assessment
- } CE = GOLDEN STANDARD
CE = End-of Waste

But: uptake of recycled material fertilisers under the FPR very low: <5%

ReNu2Cycle Policy advocacy

Feedback and position papers

- Inclusion of processed manure under CMC 10
- Evaluation of FPR
- Greenlisting waste
- Nitrate directive evaluation
- RENURE policy recommendation
- Circular Economy Act



<https://renu2cycle.nweurope.eu/project-results>

FPR Challenges on recycled fertilisers

Common materials or process conditions not included

Difficult and time consuming to enter new materials

SME: conformity assessment costly and complexity

Dependency other regulations: Animal by-product, Waste shipment, Waste Framework, Nitrate Directive

Complexity: legal wording, different definitions under EU Law

Lack of information: no guidance or FAQ, no contact point

Circularity not prioritised

Do we need the FPR??

No free movement of materials

Recycled fertilisers are often waste or ABP, transport within EU difficult

No greenlisting for shipment of recycled fertilisers

National End-of Waste doesn't apply in other member states

Fertiliser plants become waste-recovery or ABP plants

'End point' process for animal by-products difficult and time-consuming

National regulation challenges

Inconsistent national rules to bring recycled fertilisers on the market:
End-of Waste, or not.... Can be used, or not... Biowaste, or not...

National fragmentation of regulations on fertilisers and waste

No overview of national legislations and no contact points

Unlevel playing field, hindering investments in innovations and technologies

Mutual recognition doesn't apply to waste or recycled product

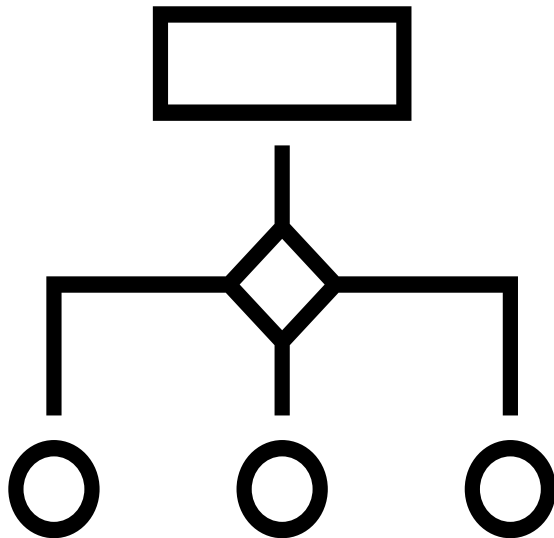
Threat: Replacement of national regulation with FPR

Amendment of legislation



- Harmonisation of National **End-of Waste** criteria
- **Mutual recognition** for recycled fertilisers
- Aligning of **FPR** and **Waste-shipment** regulation: **Greenlisting**
- Align and update of **Nitrate Directive** including full JRC ReNure
- **Facilitate** the uptake of recycled materials under FPR
- Strengthen the optionality principle: **national law remains important for materials not under the FPR**

Transparency and information



- Direct **contact point, Guideline and FAQ** for each EU law
- Complete and up-to-date **EU database: TRIS+**
 - Links and references to **relevant national law** on fertilisers and waste, with summary at websites of responsible authorities
- EU and national **Product Contact Point** for recycled fertilisers
- Bring recycled fertilisers under EU **business-friendly problemsolving procedure (SOLVIT)**

Harmonisation of terminology



- **Consistent definitions and wording** in different pieces of legislation
 - including **cross-referencing** to other pieces of legislation
 - EU's terminology management system **IATE** (Interactive Terminology for Europe)
 - in transposition to national law
- Updated **FAQ documents** or **guidance documents** for EU laws
- **Restructuring and rewriting** of the Animal by-product regulation
- Provide **unambiguous interpretation** of definitions and provisions

Examples:

- different definitions for "organic fertiliser" , "manure"
- inconsistent use of "reuse", "recover" "recycling"
- how to interpretate biowaste, urban or sewage sludges,
- human excreta not defined

Interreg



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Thank you