

 Eine offizielle Website der Europäischen Union Woran ist das zu erkennen?



Rückmeldung von:

Austrian Compost & Biogas Association

Aktenzeichen der Rückmeldung

F502048

Eingereicht am

8 January 2020

Eingereicht von

Franz KIRCHMEYR

Nutzertyp

Environmental organisation

Organisation

Austrian Compost & Biogas Association

Organisationsgröße

Micro (1 to 9 employees)

Herkunftsland

Austria

Initiative

[Circular economy – new action plan to increase recycling and reuse of products in the EU](#)

we appreciate the initiative boosting circular economy especially because of its importance to further develop European society/economy and because Phosphorus is already seen as critical raw material but still mostly gets lost via landfilling and incineration of organic waste and sewage sludge. Avoiding a critical situation for European Union because of shortage on Phosphorus a strategy is needed how to avoid landfilling and incineration of valuable Phosphorus waste streams and to keep this valuable substance in the cycle. As mentionend in the roadmap one major obstacle for reuse or

recycling of materials is the possibility of pollution. So far in all legislation this shall be avoided with clear product requirements but sadly not via phase out of possible pollutants. Additionally, based on requirements of waste framework directive we have in each member state different status and ways on separate collection of waste streams. Due to existing migration within European Union and from abroad this causes huge confusion for citizen and leads to unwanted pollution of source separated waste streams. To further develop circular economy and to overcome coming shortage on Phosphorus we propose

- 1) further research on best techniques on separate collection and treatment techniques
- 2) amendment of waste framework directive
 - a) mandatory separate collection of all kinds of organic waste streams through preferably the same EU wide logical systems to avoid misthrows
 - b) ban of possible pollutants (fossil based plastic bag, fossil based packages, microplastics in care products etc.)
 - c) ban of incineration of organic waste and sewage sludge
 - d) amend article 3 15a in conjunction with Annex II R 3 so that also anaerobic digestion is seen as recycling technique
- 3) amend Animal by product regulation so that treated farm fertilizer like slurry does not require a sanitation step if it is treated via anerobic digestion

[Ein Problem bzgl. dieser Rückmeldung melden](#)

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