

Final answer from Baltic Sea Center to the EU Commission road map for the revision of the sewage sludge directive, 86/278/EEG

Web consultation, open until Aug 24th 2020

The Stockholm University Baltic Sea Center thinks that the present directive has little relevance for environmental protection and circular economy since it is too weak. A new directive must focus not only on preventing harmful effects on soil, vegetation, animals and man, but also on preventing harmful effects on drinking water, freshwater and the marine environment, by leakage of nutrient, pollutants, pharmaceuticals or microplastics from application of sludge.

A new directive should not consider the spread of sludge as the only solution, but should also be open to new techniques that can extract nitrogen and phosphorus while limit the spread of hazardous substances (e.g. heavy metals and persistent organic pollutants), pharmaceuticals and microplastics.

Phosphorus is a finite resource; efficient usage and recycling are essential. The EU Circular Economy Action Plan has generated interest in recycling phosphorus contained in human sewage in agriculture. This effort is an important step in closing the phosphorus cycle. However, there is greater potential to improve the efficiency of manure used as crop fertiliser. In the Baltic Sea catchment, the amount of phosphorus in manure is more than 3 times greater than in human sewage. By using manure more efficiently, mineral fertiliser imports could be reduced by 0,11 - 0,17 million tons, compared to about 0,036 million tons by using sewage sludge. This would reduce phosphorus surpluses and the risk of leakage to inland waters and the Baltic Sea.

Untreated sludge should never be allowed to be spread on agricultural land, not even if it is injected or incorporated into the soil.

We find it problematic that only handful of heavy metals have limit values in the present SSD, it is probably not enough to protect human health and the environment. The EU should further investigate which substances that should be included in the SSD, and which concentrations that should be the limit values for these, or whether the focus should be on effects or other "broad" parameters that can be used to assess the risks of sludge. The SSD should also be ready to respond to and act on newly discovered hazardous substances, instead of relying on a pre-determined list of substances.

Plant availability of P in sludge must be taken into consideration when calculating allowable maximal loads.

We support "it is important that what is used as a resource is not contaminated, otherwise recycling will result in increasing pollution of soil, water and/or air."