



Fédération Européenne des Activités du Déchet et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

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1 March 2006

Subject : Use of compost in organic farming

Dear Members of the Standing Committee on Organic Farming,

FEAD is the European Federation which represents the European waste management industry. Our members are national waste management associations, which have an approximate 60% share in the household waste market and handle more than 90% of industrial and commercial waste in Europe, with a collective annual turnover of € 50 billion.

We have 18 members from 17 EU Member States and Norway. FEAD represents companies with activities in all forms of waste management. These companies employ over 300 000 people who operate around 3 000 controlled landfills, 1,350 recycling and sorting centres, 1,000 composting sites and 350 incinerators and play an important role in the determination of the best environmental option for waste management solutions.

FEAD wishes to express deep concerns regarding the proposal to end the use of high quality composts in organic farming. According to Regulation 2092/91, the provisional period will expire on 31 March 2006. Compost will then no longer be eligible as a material for input into this sector. Not only will the ban on the use of compost in organic farming present a major loss of a market outlet for the European composting sector, this will also be of particular concern to organic farmers who have established long term relationships with Compost producers to supply essential organic matter for soil replenishment where there are few if any, acceptable alternatives.

Additionally, this measure would run contrary to current EU developments: in its proposal for a Communication on a Thematic Strategy on the Prevention and Recycling of Waste, the Commission is calling for the development of a European '**recycling society**'. The composting sector is one of the most important players in the recycling market and should be further supported. The Commission also intends to propose **EU quality criteria for compost** in the framework of the Revision of the Waste Framework Directive. Moreover, the Commission is preparing a Thematic Strategy and a Framework Directive on soil protection, emphasising the need for **organic matter in soils**.

Considering the above, FEAD calls for the **deletion of the time limit for the use of compost in organic farming**.

We hope that you can take this concern into consideration and remain at your disposal for further information.

Yours Sincerely,

(Original signed)

Nadine De Greef
FEAD Secretary General

Elise Bourmeau Stuart Reynolds
*Chair and Vice-Chair of FEAD Working Group
on Biological Treatment of Biowaste*

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