



CONSORZIO ITALIANO COMPOSTATORI

Rome, 21 September 2012

Prot. 671/R

CIC, Italian Composting Association

Position Statement on the 3th Technical Report for End-of-Waste Criteria on Biodegradable Waste Subject to Biological Treatment

The **Italian Composting Association (C.I.C.)** unites public and private companies, local authorities and others involved in the production of compost, as well as organizations which do not make compost but have an interest in the composting process (producers of machinery and equipment, producers of fertilisers, research bodies etc.). As in other European countries, since 2003 Italy has also undertaken a voluntary certification program for quality compost promoted by the CIC. The voluntary certification program for quality compost includes a first stage which certifies the product and following that, the creation of a Quality Assurance System, for both the product and the process.

Over the past twenty years CIC has been working to promote certified quality compost production in Italy. In 2003, CIC established a certification program based on Quality Assurance Scheme (QAS) on quality compost. Currently, CIC has a large database with over 1000 analysis performed on italian quality compost. CIC covers more than 80% of composting plants and anaerobic digestion that treat organic wastes.

We report briefly some focal points to express our position.

Ufficio Operativo Via Cavour 183/A -00184 ROMA Tel. 06 474.05.89 – Fax 06 487.55.13

E-mail: cic@compost.it URL: <http://www.compost.it/>

Ufficio Tecnico Località Cascina Sofia – 20040 Cavenago Brianza (MB) Tel. 02 950.194.71 fax 02 95337098



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MIXED MSW

We learned that Mixed MSW are again allowed as input material for End-of-waste compost and digestate. We are very surprised to see again, in the 3th draft of the EoW Document, the inclusion of such waste into positive list of feedstock materials. We therefore express our strong disapproval to such proposal since it would actually damage the biowaste recovery industry in Italy and in Europe.

We agree to exclude Mixed MSW from positive list as input material.

SEWAGE SLUDGE in composting and AD

We agree with the use of sewage sludge in composting and AD processes. But not for the use of all sewage sludge. Exist some sewage sludge with a good performances (low heavy metals, low POP's, etc.). The exclusion "tout court" from positive list could be an error. The large Italian experience of using sewage sludge as feedstock material for compost quality production, may suggest a good strategy. **We believe that the Sewage Sludge should be allowed in composting as input materials only under specific limitations and restrictions** (i.e. max 35% of feedstock materials, max POP's limits for sewage sludge, etc.).

DIGESTATE

The amount of analytical data are very few compared with the data of the compost. This concept is expressly mentioned several time on the 3th EoW draft. The EU compost production has a twenty year history.

In 3th draft there are not sufficient data on stability, maturity and analytical set of microbiological aspect.

No arguments were provided regarding the environmental and health effects of digestate management (storage, transportation, applications, etc).

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Currently, in many EU countries the digestate (not pre-composted) application on farmland are strictly regulated under local condition: i.e. restrictions on the application time, buffer zones from ground-waters and surface waters, obligation on direct deep ploughing, etc.. As consequence, this should be considered also in a context where the legal status of digestate is discussed. If any material gains the legal status of a "product", how such restrictions (and related controls) could be applied?

We suggest to strongly review the position of digestate as End of Waste and to collect additional analytical data of the digestate.

We suggest to consider in EoW criteria only the solid digestate (after liquid/solid separation) among feedstock materials for composting and compost production. In addition, we suggest to define the condition of post composting of digestate (retention time/temperature, etc).

HARMONIZATION WITH EU FERTILISERS REGULATION

We ask you to carefully analyze the consequences caused by the inclusion of organic fertilisers in the scope of the EU Fertiliser Regulation and the EU end-of-waste criteria which are currently still in the discussion stage. It's necessary an harmonization among EU Regulation WG's.

As requested by JRC, in attach there are some notes to comment on 3thdraft EOW.

Rome, 21 sept. 2012

Dr. Massimo Centemero
Technical Director of CIC