

COMMENTS TO EUs ORGANIC FARMING LEGISLATION

EasyMining, dedicated to closing nutrient cycles, welcomes the opportunity to influence the organic farming legislation. We would like to underline that the **Regulation 2018/848 art.5(c) specifies as a “general principle” of Organic Farming “the recycling of wastes and by-products of plant and animal origin as input in plant and livestock production”**. We also note that studies show that **Organic farms often have negative balances for phosphorus and potassium**, especially in specialist arable Organic farms (without livestock).

Therefore, we suggest that the principle of recycling from wastes in Organic Farming opens more widely for secondary nutrients, especially phosphorus, since phosphorus deficits will increasingly handicap Organic Farming in Europe, and will prevent the realisation of the **Farm-to-Fork target of 25% Organic Farming**. Further recycled phosphate materials should therefore be assessed for addition to the Organic Farming Regulation list of input materials, coherent with Organic Farming principles; quality, safety and consumer confidence.

As a first step of positive inclusion of secondary nutrients as organic fertilisers, **the inclusion of recovered phosphorus from incinerated sewage sludge** (already accepted in the new EU Fertilising Products Regulation 2019/1009 via the STRUBIAS report). This source of phosphorus comes with several benefits:

- Pure and defined phosphorus from domestic secondary resources closing the loop within countries and EU
- Improved performance compared to virgin phosphorus sources
- Efficient decontamination; no organic contaminants, microplastics or pathogens
- Efficient phosphorus recovery from sewage sludge ash (like EasyMinings concept) is holistic and enables the recycling of more than 95% of the secondary resource (ash) in the form of a decontaminated and well defined fertiliser.

ABOUT US

EasyMining, part of Ragn-Sells group, is passionate about inventing new technologies that use intelligent chemical solutions to close nutrient cycles and to detoxify waste flows. Our objective is to improve existing or even to create new circular material flows efficiently and commercially viable. EasyMining has developed and patented several chemical processes and holds a great know-how in chemistry, resource efficiency, circular business models and industrial symbiosis.

Our technologies; Ash2Phos, Ash2Salt and Project Nitrogen produce clean commercial fertilisers in a circular economy;

- **Ash2Salt:** from incinerated flyash to potassium chloride
- **Project Nitrogen:** from waste water to ammonium sulphate
- **Ash2Phos:** from sewage sludge ash to precipitated calcium phosphate

