



EEB and BEUC comments on Revision of EU Ecolabel for Soil Improvers and Growing Media

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Summary

The European Commission is revising the EU Ecolabel for Soil Improvers and Growing Media. In September 2013, the Joint Research Center presented the study carried out to support this process and criteria proposals. These documents will be discussed at the 1st AHWG meeting organised in Seville on 9 October 2013¹. This position paper provides EEB and BEUC comments to the draft proposal.

EEB and BEUC consider that the focus of the criteria should be on the cycling of materials (with a preference for organic materials derived from collection and/or processing of waste material), and the reduction of risks from hazardous substances.

EEB and BEUC do not support the inclusion of mineral Growing Media, in the scope. Mineral wool should not be allowed as a constituent given its environmental disadvantages (e.g. use of high amount of energy during production process, long transport distances from mining areas to the very few producers in Europe, reuse hardly feasible due to the need of cleaning and mitigating risks from spreading plant pathogens and also nutrients, residues from pesticides etc.).

EEB and BEUC strongly call for keeping the current exclusion of use of peat in growing media, as extraction of this material is frequently associated with environmental degradation and loss of important and increasingly rare ecological niches.

¹ <http://susproc.jrc.ec.europa.eu/soilimprovers/stakeholders.html>

No.	Comment from	Contact person	Reference: - document - section/task - page	Subject of the comment	Comment
1	EEB and BEUC	Blanca Morales	General comment	Scope / Inclusion of mineral GM and SI	EEB and BEUC consider that the decision to include mineral GM and SI in the last revision was a mistake. The scope should clearly state that the Ecolabel is to apply to organic growing media (or similar term) with a minimum Organic Matter content of 15% DM.
2	EEB and BEUC	Blanca Morales	2 Product group definition 10	Definition of SI	<p>Proposal: The product group 'soil improvers' shall comprise materials to be added to the soil in situ primarily to maintain or improve its physical properties, and which may improve its chemical and/or biological properties or activity functions.</p> <p>Reason: In principle, SI are used to improve the overall soil functions with a special vie on productivity, resilience against erosion and land slides and its water retention and infiltration capacity. This summarising term function better expresses the complex role of "biology" in soils.</p>
3	EEB and BEUC	Blanca Morales	2 Product group definition 10	Definition of SI	<p>Proposal: The product group 'mulches' shall comprise materials to be used as protective covering placed on the soil surface to prevent the loss of moisture, control weed growth, reduce soil erosion, and enhance biological activity in the top soil layer.</p> <p>Reason: This is an important effect and thus purpose of applying mulch material</p>
4	EEB and BEUC	Blanca Morales	2 Product group definition 10	Definition of Mulch	Comment: For mulches, is it intended to concentrate on organic mulches? This too should be specified. <u>Synthetic mulches shall not be included in this category</u>
5	EEB and BEUC	Blanca Morales	3.1.1 Criterion 1.1: Organic ingredients 14	Proposal for definition of Organic ingredients	<p>We plead for Proposal 1 with the following amendment: "A product shall only be considered for the award of the Eco-label if it does not contain peat and its organic matter content is derived from the processing and/or re-use of waste or agricultural by-products and manure".</p> <p>Reason: We do not approve the inclusion of peat in this Ecolabel. The extraction of peat is frequently associated with environmental degradation, particularly the loss of important and increasingly rare ecological niches. There is some progress towards a more sustainable use of peat, but the EEB AND</p>

					<p>BEUC cannot agree that this process is well enough advanced to allow use of 'sustainable' peat in an Ecolabel.</p> <p>The inclusion of peat, even if found to be environmentally defensible (which EEB AND BEUC doubts), would raise two serious problems.</p> <p>1) <i>TRACEABILITY</i>, which might cause some practical difficulties. Any percentage can be effectively controlled: it cannot be traced back that for each relevant consignment in fact only less than e.g. 20% DM of peat was used. Also it is very likely that big companies would produce both, GM under the Ecolabel criteria and conventional ones using different peat origins. This opens the door for misuse and will be nearly impossible to trace back those cases.</p> <p>2) <i>COMMUNICATION & IMAGE</i>, which might be even the more serious problem. It has required a lot of work over many years to educate people about the damage to the environment (biodiversity, climate change...) that may be caused by peat use. It is thanks to this long and patient work by environmental organisations that peat producers are beginning to become more environmentally aware and draw up guidelines for 'wise use of peat' etc. Approving an Ecolabel which allows peat use could be understood as a complete U-turn. As stated in the minutes of the first AHWG meeting, "the admission of peat in ecolabelled products would also be difficult to explain to the consumer. It would only be marketable when built on very convincing and firm new arguments. Possible criteria should be strict, solid and explainable..." We have not found "very convincing and firm new arguments".</p>
6	EEB and BEUC	Blanca Morales	3.1.1 Criterion 1.1: Organic ingredients – Rationale and Discussion 16	Definition of 'Biodegradable' from the End of Waste project	<p>Comment: The "<i>biodegradation level of at least 90% in less than 6 months under normal composting or digestion process conditions</i>" as criterion for being <i>biodegradable</i> is technically not correct. This definition has been taken from the European Standard EN 13432 "Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging". Here it is logic that a 90% decomposition into CO2 is required. A biodegradation level of 90% within 6 months is not realistic. Natural organic compounds such as ligno-cellulosic and humic substances are more recalcitrant.</p> <p>Proposal: 'biodegradable': Organic material capable of undergoing biologically-mediated decomposition</p>
7	EEB and BEUC	Blanca Morales	3.1.2 Criterion 1.2: Sludges	New Proposal	<p>Comment: We support the new proposal in principle. However, non composted digestate should be excluded or at least restricted as constituent for GROWING MEDIA.</p> <p>Reason: Digestate is by its nature a bio-reactive and therefore biologically unstable substance. Due to high concentration in ammonium uncontrolled emissions of NH3 and N2O take place during storage, mixing and transport. By means of composting the available C and N sources may be transformed in stable humus complexes under controlled conditions, also minimising the danger of GHG emissions.</p> <p>If Digestate shall be added as nutrient source (e.g. for providing a readily available P and N source) it should be restricted to the needs of the foreseen uses.</p>

8	EEB and BEUC	Blanca Morales	3.1.2 Criterion 1.1: Organic ingredients	New organic ingredient	Proposal: add <i>Biochar produced from raw materials allowed under the EoW Decision for compost & digestate (if it is produced from source separated material and comply with the quality requirements as indicated below)</i>
9	EEB and BEUC	Blanca Morales	3.1.3 Criterion 1.3: Mineral ingredients Mineral Wool p. 18	Mineral wool as GM	<p>Comment: We strictly disagree to include mineral wool as constituent for GM.</p> <p>Reason:</p> <p>1) The reasoning is already given in the <i>Rationale and Discussion</i> on page 19. The first draft Criteria Proposal contains by far more unsolved risks and uncertainties than robust arguments for (environmental) advantages.</p> <p>2) Raw material from primary sources is in any case unacceptable due to long transport distances from mining areas to the very few producers in Europe.</p> <p>3) As stated by stakeholders – and this is obvious – re-use of this GM is hardly feasible because of the need of cleaning and mitigating risks from spreading plant pathogens and also nutrients, residues from pesticides etc.. ... not to forget the water and energy consumption during the recycling process and the collection and transport efforts from widely spread horticultural enterprises to recycling plants and back to the centralised Mineral Wool factories.</p> <p>4) The production (extrusion) process consumes high amounts of energy.</p>
10	EEB and BEUC	Blanca Morales	3.1.3 Criterion 1.3: Sources of mineral Extraction p. 21	Quality criteria for mineral constituents	<p>Comment: We agree that no quantitative restriction should be settled for mineral constituents for <i>Growing Media</i> because there exist a wide range of applications from potting soil for various plant families and nutrient demands, to golf course substrates for greens and roof greening substrates were very little amounts of e.g. composts are required. Here sustainably recycled mineral constituents are needed. The principle should be that the origin of the mineral constituents should be from recycling processes or also by-products from gravel or rock mining (sands, sediments, rock dust soils etc.).</p> <p>Since sustainable recycling products should be key focus of the Ecolabel criteria, natural minerals from original mining should be limited to 10% by volume. All other mineral constituents should originate from recycling processes or be by-products.</p> <p>Organic soil improver should not include any mineral constituents since, by definition, they are added to natural soils used in agriculture, silviculture, landscaping, land restoration for enhancing the humus content as key criterion of soil fertility and productivity.</p> <p>However, qualitative criteria should be established in order to prevent the use of e.g. excavated soils from contaminated sites or locations. The mineral constituents should meet the same limit concentrations for heavy metals and organic pollutants as the ones required for the final product.</p> <p>It has to be considered specifically the testing and approval regime for the</p>

					<p>constituents.</p> <p>Proposal: <i>Extracted minerals can be used provided that they comply with the quality criteria as set out in 3.2 Criterion 2: Limitation of hazardous substances.</i></p> <p>Important criteria would be:</p> <ul style="list-style-type: none"> ⊗ In case of original extraction or by-products: mineral constituents are stemming from natural sources ⊗ Processing of the mineral constituents include only mechanical treatments by means of sieving, crushing, washing with water with use of any synthetic extractants or any other agents ⊗ No chemical or modification including extrusion or other applications by means of high pressure or vacuum and/or temperature treatments (e.g. as used in mineral wool production)
11	EEB and BEUC	Blanca Morales	3.1.3 Criterion 1.3: Mineral GM after use p.23	Exclude mineral GM	<p>Comment: as indicated above we do not agree to integrate pure mineral GM and SI into the Ecolabel. In this case the criterion Mineral GM after use would not be needed.</p>
12	EEB and BEUC	Blanca Morales	3.2 Criterion 2: Limitation of hazardous substances 3.2.1 Limits for Potentially Toxic Elements (PTEs) pp. 25/26	Testing scheme for constituents and the product	<p>Comment: The proposal foresees monitoring of PTEs of products and constituents, both following the same sampling scheme. In principle we agree to the proposed concept, but practicability should be considered in order to verify compliance of constituents as well as final products.</p> <p>Also, e.g. in case of the use of certified EoW composts those already deliver a declaration sheet stating compliance with the EoW criteria. Further the applicant should require the test result on which the product declaration was based on in order to verify the compliance with the Ecolabel limit values.</p> <p>The testing scheme for certification should be given more time (6 instead of 3 months) in order to provide a more representative indication also for smaller production scales.</p> <p>We propose the following sampling scheme:</p> <p>Proposal:</p> <p><u>Product:</u></p> <p><u>For certification:</u> 4 samples from 4 different batches in 6 months prior to certification</p> <p><u>Post certification:</u> 1 sample is analysed for every 2,000 tonnes output on a dry matter basis up to maximum of 16 samples per year (one sample per month)</p> <p><u>Constituents:</u></p> <p><u>For certification:</u> Each of the individual constituents needs one approved test report certifying compliance with the PTE criteria for GM & SI</p> <p><u>Post certification:</u> 1 sample is analysed for every 2,000 tonnes of received constituent individually for each origin.</p>

13	EEB and BEUC	Blanca Morales	3.2 Criterion 2: Limitation of hazardous substances 3.2.1 Limits for Potentially Toxic Elements (PTEs) Methods for sampling and sample preparation p. 25	EN standard for sampling	Comment: the quotation of the sampling method is missing Proposal: Insert: <i>Method for sampling - EN 12079 “Soil Improver and growing media – Sampling”</i>
14	EEB and BEUC	Blanca Morales	3.3 Criterion 3: Health and safety p.29 & 30	EN Standard for the detection of <i>Salmonellae</i>	Proposal: Ad as method also: CEN/TR 15215-3:2006 Characterization of sludges - Detection and enumeration of Salmonella spp. in sludges, soils, soil improvers, growing media and biowastes - Part 3: presence/absence method by liquid enrichment in peptone-novobiocin medium followed by Rapport-Vassiliadis
15	EEB and BEUC	Blanca Morales	3.3 Criterion 3: Health and safety Sampling regime p. 30	Sampling frequency	Proposal: <u>Product:</u> <u>For certification:</u> 4 samples from 4 different batches in 6 months prior to certification <u>Post certification:</u> 1 sample is analysed for every 2,000 tonnes output on a dry matter basis up to maximum of 12 samples per year (one sample per month)
16	EEB and BEUC	Blanca Morales	3.6 Criterion 6: Product performance p. 33	Organic matter as Loss on Ignition (%DW)	Proposal: reduce the minimum Organic Matter content to 15 % organic matter by dry weight Reason: 1) be consistent with the End of Waste criteria for Compost. 2) Do not leave an undefined gap between organic soils and manufactured soils (< 15 % OM) and organic SI if a minimum content of 20% would be maintained. 3) Even in the production of hi quality and well humified and matured composts loamy/clay soils are traditionally added as additive in order to support the clay-humus complex formation. This may frequently lead to OM levels between 15% and 20% in the dry matter.
17	EEB and BEUC	Blanca Morales	3.10 Criterion 10: Provision of Information Item “o” p.37	Declaration for mineral growing media	Proposal: Delete “For mineral growing media the following declaration should be required:” and following within item “o” Reason: We propose to exclude mineral growing media from the scope