



INCOPA (Inorganic Coagulants Producers Association) welcomes progress towards integrating EU nutrient policies, with the development of INMAP (Integrated Nutrient Management Action Plan). INCOPA supports the Green Deal objective to reduce nutrient losses by 50% while ensuring that there is no deterioration in soil fertility.

INCOPA notes that the consultation web page refers phosphorus (P) as an essential element for life and an important natural resource. However, that human activities significantly alters natural phosphorous cycle, causing eutrophication, loss of biodiversity in lakes, rivers and seas throughout the EU.

INCOPA also notes that the consultation web page refers about two thirds of the excessive phosphorus levels in waters originate from fertilisers in agriculture while a third comes from industrial and domestic wastewaters.

Phosphorus is especially harmful to EU waters because it causes eutrophication, which is the excessive growth of algae and flora in lakes or other bodies of water. The consequences of eutrophication can be seen in, for example, the Baltic Sea, where toxic algal blooms during the summer of 2018 covered almost the entire Gulf of Finland at their peak.

In order to limit phosphorus losses through wastewater, discharged limit values of phosphorus in the current under revision Urban Waste Water Directive are not strict enough, as the European Environmental Agency report on the state of European waters illustrates. Much better results could be achieved with existing phosphorus removal technologies from waste water and without increasing the cost of treatment. Only political will is needed for setting a new standard for water cleanliness in Europe.

The more phosphorus that can be captured from the wastewaters, the more can be recycled. Together with more efficient wastewater treatment in general, this would contribute to the EU's circular economy goals. Phosphorus is listed as one of the 23 critical raw materials that are mostly imported into Europe; increasing recovery from wastewater would limit the need for these imports. In addition, the residual sludge from wastewater treatment can and should be used in the production of biogas.

INCOPA notes that the Commission document indicates the overall environmental costs of nitrogen pollution at 70 – 320 billion €/year, but that in fact this covers only nitrogen. An estimate of costs of phosphorus losses is needed.

INMAP should fix the overall objective to move away from EU import dependency for the CRM 'Phosphate Rock', and to define and implement regulatory, fiscal and other policy actions to achieve this.

More information on phosphorus recovery with coagulants can be found at in our [LCA analysis of different WWTP processes \(incopa.org\)](#).

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About INCOPA

INCOPA is the European Inorganic Coagulants Producers Association. It represents more than 30 producers, more than 80 production sites in Europe, which are accounting for 85% of the European coagulants production capacity.