

Short report of meeting with Grodan (Rockwooll Group)

14 December 2018

Subject: Discussion of Grodan's concerns on the CPW interface and the fertiliser regulation

Participants

- [REDACTED] (Grodan), [REDACTED] (Fleishman Hillard)
- [REDACTED], [REDACTED] (GROW D2). [REDACTED] (GROW D1), [REDACTED] (DG ENV B.2.).

Discussion

[REDACTED] presented the growing media manufactured by Grodan. These are sponge-like fibrous supports made of rockwool which are used as a porous substrate to support growth of seeds / plants (eg in hydroponic culture). Grodan explained that they use certain by-products from the aluminium and steel industry (mostly certain types of slag) as input material to make the rockwool which they convert, following melting in a furnace and spinning of the fibres from molten glass, into the rockwool fibre mats which constitute the growing media supplied by Grodan.

The first concern explained by Grodan refers to the uncertainties about the by-product status of the input material (slags) and the difficulties they perceived were posed by the text of the current draft fertiliser regulation that requires input substances which are used in growing media to be REACH registered with information at least meeting annex VIII requirements and to have a CSR.

COM explained that the issue of uncertainties regarding waste / non-waste and byproduct status of materials was one of the challenges identified in the CPW interface communication and highlighted the importance of the study to be initiated by DG ENV on EoW practices in different Member States. On the requirements of the Fertiliser regulation COM explained that the CMC12 category of by-products was designed to cover by-products that will be used *per se* –and without any alteration– as fertilisers. COM highlighted that melting different input materials generates a new substance (glass) which could be considered as a CMC1 material, (glass is not subject to registration under REACH, subject to some conditions). COM indicated that Grodan could consider exploring this line of thought. COM also expressed some concern regarding the use of electrodes coming from the aluminium industry as input material, even if they were combusted during the process.

Also linked to the Circular Economy Grodan explained that most of their used growing media were collected as waste and recovered as a ground sandy material for use in making bricks (for construction). The problem is that most countries consider this material to be waste and it seems many operators are unwilling to take up this material to make bricks. In the UK recognition of this material as non-hazardous waste that could be used as input for brick producers had taken 2 years and Grodan asked for homogeneous, fast-track procedures for these waste related permits of for end-of-waste recognition.

COM explained that issues related to waste permitting were essentially in the hands of Member States, but that these considerations had to be discussed with the waste unit of DG ENV, who is the responsible service. The same advice applied to the request made by Grodan that a new entry in the

European “List of Waste” would be done in chapter 0201 to specifically cover as non-hazardous waste the used growing media.

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