PROPOSED draft v3

ESPP input to public consultations on evaluation of the EU Fertilising Products Regulation 2019/1009 (FPR)

TWO consultations:
- Call for Evidence = 4000 characters plus optional attached document
- Public questionnaire consultation
Both consultations deadline 19 September 2025 https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14365-Fertilising-Products-Regulation-evaluation_en = questionnaire

Context:

Art. 49 of the FPR states that by 16/7/2026 the Commission shall submit to Parliament and Council a report assessing implementation and impacts of the FPR, including impacts on SMEs, including
- functioning of the internal market, conformity assessment, market surveillance, optional harmonisation
- review of limit values for cadmium "in phosphate fertilisers"
- "assessment of the application of restrictions on levels of contaminants set out in Annex I", including assessment of uranium contamination.

ESPP draft input to the Call for Evidence:

Max = 4000 characters, currently 3970

ESPP welcomes the cited aim of the FPR to enable large-scale production of circular fertilisers. But today the FPR is not achieving this. Few recycled fertilisers are CE-Mark. Establishing why, and how to resolve, should be the Evaluation priority.

ESPP (European Sustainable Phosphorus Platform) brings together 50+ members in nutrient recycling (companies, R&D, public bodies), is active in the EU Fertilisers Expert Group and works closely with fertiliser, waste and water industries. There is regrettably no register of FPR CE-Mark products, but our contacts suggest that to date very few recycled products are Certified and companies are reluctant to promote the FPR CE-Mark because they consider it inaccessible for their products. Evaluation of impacts of the FPR today (as outlined in the Call) may thus not be productive.

The Evaluation should assess what proportion of National fertilising products, for each PFC, by MS, have taken up the CE-Mark, and why other products have not. What are the obstacles: FPR criteria and exclusions? Partial or only recent inclusion of ABPs and manure? Demands and costs of Certification? Lack of understanding by operators or concerns about complexity? Products sold to local market not needing CE-Mark? Reluctance to engage a second certification process for products already having National certification? Other?

ESPP suggests to evaluate (detail in attachment):

- **Inclusion of Animal By-Products**, in particular ABPs cited in art.46 of the FPR and ABPs today authorised in National fertilisers.
- **Complexity and costs of Conformity Assessment**: products using secondary raw materials are often variable, small quantities, from different recycling sites.
- **Establish a process for recognition of Member States' National fertilisers under the FPR.**
- **Widen CMC categories, especially for bio-based industries,** to enable flexibility reflecting realities of recycling: varying materials, many processing routes, local specificities, low quantities. Can input streams be defined more openly subject to final product quality and safety criteria? Not require testing of contaminants not expected to be present?

- **Bio-Economy: widen and clarify inclusion of secondary organic streams,** as inputs to composts/digestates and for use directly as CMCs: biorefinery and biofuel sidestreams, algae grown in wastes, biowastes, plant wastes and by-products …
- **Simplification and coherence of wording** and incomplete consolidation (CMC11): make the FPR more understandable and reduce interpretation questions for operators, national authorities and certifiers (NoBos). The Commission (COM) has developed a 68-page FAQ to facilitate understanding of the FPR. This witnesses the strong engagement of COM staff (greatly appreciated) but shows the problem. Incoherent wording with other EU regulations also poses obstacles.
- **What post processing is allowed** of a fertiliser product or of a CMC without it "turning into something else" (a new CMC).
- **REACH+**, esp. for additives: addressed by chemicals simplification omnibus proposal (if adopted).
- **Microbial biostimulants**: cf. omnibus proposal.
- **Organic Farming**: coherence of FPR and Organic certifications.
- **Include sewage inputs** (urban wastewater treatment sludge, separately collected urine/faeces) to composts, digestates, biochars, subject to appropriate criteria.
- **Include Cat1 ABP incineration ash in CMC13**. Incineration is legally required to ensure safety, resulting in c. 30 000 t/y of phosphorus in ash (EU) which is used as fertiliser in the UK, but excluded from FPR.
- **Enable and standardise FPR labelling of "recycled" and "bio-based" nutrients/fertilisers**, with new CEN standards (CEN/TR 16721 carbon dating is not applicable).
- **Organic carbon in PFCs**: clarify requirements for C-org content and "non-biological" carbon exclusion.
- **Explanation and communication** to operators and stakeholders.
- **Establish a public catalogue of all FPR CE-Mark products** for transparency and to promote the FPR.

ESPP accompanying document for the Call for Evidence:

Max = 4000 characters, currently ????

ESPP welcomes that the cited aim of the FPR is to enable large-scale production of circular fertilisers. But today the FPR is not achieving this. Few recycled fertilisers are CE-Mark. Establishing why, and how to resolve this, should be the priority of the Evaluation.

ESPP (European Sustainable Phosphorus Platform) brings together 50+ members in nutrient recycling in Europe (companies, R&D, public bodies), is an active participant of the EU Fertilisers Expert Group and works closely with fertiliser, waste and water industry federations. There is no central register of FPR CE-Mark products, but our contacts suggest that to date very few recycled products are Certified and companies are reluctant to promote the FPR CE-Mark because they consider it inaccessible for their products. Evaluation of impacts of the FPR (as outlined in the Call document) may thus not be productive.

The Evaluation should assess what proportion of National fertilising products, for each PFC and each Member State, have taken up the CE-mark, and why other National fertilising products have not. What are the obstacles: FPR criteria and exclusions? Current exclusion (or only recent inclusion) of ABPs and Processed Manure? Demands and costs of Certification? Lack of understanding of the FPR by operators or concerns about its

complexity? Products sold only to local market not needing CE-Mark? Reluctance to engage a second certification process for products already having a National certification? Other?

ESPP suggests to specifically evaluate:

- **Inclusion of Animal By-Products**, in particular all ABPs cited in art.46 of the FPR and ABPs today authorised in National fertilisers.
    - We hope that, in time for consideration in the Evaluation, a draft delegated regulation will have been published to **add to CMC10 all materials covered in the QLab report (except those with risks of chromium).**
    - **Feathers and down** should also be included.
    - To simplify understanding, we suggest that the same **storage conditions be specified for all CMC10 materials**, not defined separately for each material (with tighter conditions for specific materials where this is appropriate).
    - **Coherence of wording should be ensured between FPR and ABPRs** (e.g. "Organic fertiliser" means something different in ABPRs). This causes lack of confidence for operators, inhibiting FPR uptake.
    - **Produce a clear FAQ explaining how ABPs can be included into the FPR,** and differences compared to their authorisation and use in National fertilisers, validated by DG GROW and DG SANTE.
    - **All ABPs which have been 'sanitised' according to ABP Regulation specifications,** should be considered to be eligible for inclusion in CMCs (subject to the general CMC requirements) and to have reached an ABP End Point on inclusion into a CE-Mark FPR product. This is currently unclear. See discussion on wording of 2023/1605 below.
- **Complexity and costs of Conformity Assessment** for products using secondary raw materials: these are often are variable, small quantities from different recycling sites. This is contradictory to objectives of Circular Economy and of support to SMEs and to innovation.
    - **Avoid requirements to monitor things which are not expected to be there** (assumption of innocence)
    - Resolve the current text requiring (impossible) **"batch" visual monitoring** of continuous flow inputs and processes
    - **Avoid the requirement for a separate audit of every supplier for recycled materials coming from many sites.** This generates excessive costs, administrative complexity and supply rigidity for recycled materials which are often produced in small quantities, possibly seasonally, at many different sites.
    - **Review and simplify the Module D1 audit requirements:**
      - simplify documentation requirements, in particular as regards aspects not directly relating to the material and process (e.g. staff training),
      - enable 'self-certification' of upstream supply sites providing the same CMC material, wherever these sites are already subject to legal control (IED permit, Urban Waste Water Treatment Directive, ABP Regulations) with onsite audit only of the central site producing the final CMC
    - **Simplify certification requirements for any material which has low organics content** (<1% or <3% C-org) and is not expected to pose risks (e.g. not ABP or upstream sanitised, not previous contact with health or environment Classified chemicals …). Such materials, comparable to chemical fertilisers, should have a simpler and less expensive certification regime.

- **Establish a process for recognition of Member States' National fertilisers under the FPR**
- **Widen CMC categories** to enable flexibility and reflect the reality of recycling: varying material flows, many different processing routes, local specificities, low quantities. Can input streams be defined more widely subject to quality and contaminant criteria? But not require testing of contaminants which are not expected to be there ?
    - **allow waste treatment processes for CMC15 materials** (for which demanding quality and contaminant criteria are already applicable).
    - **allow organic by-products in CMC11** (the current criteria limit to C_{-org} < 0.5%) where the organic content comes from plant materials.
    - **allow fermentation, pasteurisation, solid-liquid separation, drying, grinding, etc. as pre-treatments for all CMCs.** This is a significant problem for various biorefinery sidestreams. The basic raw material would be eligible for inclusion into a CMC (or as an input to CMCs 3 or 5, compost or digestate) but is not eligible because of such processes. See comments on pre- and post-processing below.
    - **add dairy and cheese sidestreams to CMC6** (rich in phosphorus, calcium, magnesium …), subject to appropriate safety criteria (e.g. sanitisation …) and possibly to measures to avoid mis-direction to animal feeds (e.g. dissuasive additives).
    - **Authorise recycled lime from bio-based industries**, in particular forestry.
- **Simplification and coherence of wording** and incomplete consolidation (CMC11).: make the FPR more understandable to operators, reduce interpretation questions for operators, national authorities and certification organisations (NoBos). The Commission (COM) has developed a 68-page FAQ (and growing) to facilitate understanding of the Regulation. This witnesses the strong engagement of COM staff (much appreciated) but shows the problem. Incoherent wording with other EU regulations also poses obstacles.

  Resolve current wording complexities and ambiguities, which are an obstacle to operator understanding and confidence, and so to uptake:
    - **Correct the current references to "urban" wastewater.** CMC12-1a and CMC13-1e refer to "wastewaters and sewage sludge from municipal wastewater treatment plants". As indicated in ESPP's note of 7th April 2025, the interpretation of 'municipal' is here unclear, and there seems to be no justification in the STRUBIAS report for using this word instead of 'urban'. The Urban Waste Water Treatment Directive 2024/3019 defines the terms 'urban wastewater', 'domestic wastewater' and 'sludge' but not 'municipal wastewater" nor "municipal wastewater treatment plant'. Also, the Sludge Directive 86/272 refers to 'urban waste waters' and does not use the term 'municipal'. The Waste Framework Directive 2008/98 does use the term 'municipal', but only for solid waste, not for wastewaters. This text would be legally clear if the word 'urban' were used (in place of 'municipal'), because then definitions can be taken to be those of the Urban Waste Water Treatment Directive 2024/3019. To our understanding, this was the intention of the STRUBIAS proposal, and does not pose any safety concerns, in that nobody really knows what 'municipal wastewater treatment plant' actually means, so impossible to say whether the current wording is narrower or wider or effectively the same … What is certain, is that the wording 'municipal' poses legal uncertainty for operators, NoBos and national regulators.
    - **Incorrect vocabulary for cyanobacteria**. As agreed in FPR FAQ 8.20 and FAQ 8.22, modify CMC2 as follows. Also, delete the term "blue-green bacteria" (cyanobacteria are NOT algae). "*For the purpose of this point, plants*

include mushrooms, algae and microalgae, but exclude ~~blue-green algae~~ (cyanobacteria). The CMC2 material may have waste or byproduct status."

- **Clarification concerning impurities.** As explained in the EBIC, ESPP and joint industry position (requesting modification of REACH+ FPR requirements 6_5_2025), it would be beneficial for legal clarity, for both industry and MS authorities, to specify in the header paragraphs of Annex II (CMCs) what is already consensus agreed in FAQ 8.17, that is: "*Substances and mixtures present in the final composition of an EU fertilising product may not be 100% pure. Thus, component materials may contain detectable traces of impurities and unintended substances (including non-isolated substances such as ionic species in solution). Such impurities or unintended substances are not considered as component materials*". This aligns the FPR with REACH, which similarly recognises the reality of unintended impurities in all substances. It would thus clarify interpretation and remove legal uncertainty and operator confusion.
- **Ensure coherence of definitions and wording with other EU regulations**, including:
  - Waste Framework Directive (definition of bio-waste)
  - Organic Farming
  - Nitrates Directive ("processed manure", "chemical fertilisers")
  - Sewage Sludge Directive and Urban Wastewater Treatment Directive ("municipal" versus "urban" wastewater)
  - REACH ("recovered substance", "substances and mixtures")
  - Taxonomy
  - CEN/ISO definitions of "bio-based" (vs. FPR wording "solely of biological origin")

  The same words should have the same meaning across EU laws. Alternative terms could be considered if necessary, but if so it should be considered whether this remains meaningful after translation into different languages. Exceptionally, the same words could have a different meaning, but this should be clarified and justified;
- **Include CMC11 criteria into the consolidated FPR**: for legal reasons, CMC11 (By-Products) 2022/973 is not consolidated and has to be read separately (missed by many operators).
- **Clarify the legal wording of 2023/1605**

  2023/1605 states (bold added by ESPP):

  > Art.1: "*This Regulation determines end points in the manufacturing chain for organic fertilisers and soil improvers … **provided that they are used as component materials** in EU fertilising products in accordance with Regulation EC 2019/1009*".
  >
  > Art. 3: "*The following derived products … **where they are manufactured in a fertiliser plant** approved in accordance with Article 24(1), point (f), of Regulation (EC) No 1069/2009, shall be considered as having reached the end point as organic fertilisers and soil improvers*".

  These two articles of 2023/1605, seem to indicate that the ABP End Point is defined only if the ABP processing as per 142/2011 specified in the relevant point of 2023/1605 generates directly a CMC used in an EU fertilising product. This would seem to mean that **2026/1605 does NOT concern the manufacturing of materials used as inputs to production of CE fertilising products, where these materials are not used directly as such in the fertilising product**, that is they are not used as such as a CMC but are used as an input to production of a CMC (e.g. input to composting or digestion, use

in production of a "derivate", precipitated phosphates from ABP-sterilised manure …).

For example, these wordings seem to exclude the following:

- Manure digested in a biogas plant conform to ABP requirements (2023/1605 art. 3 point (b) -> 142/2011 relevant chapters/points) which is then composted in an FPR conform composted (CMC3) or which is used as input for precipitated phosphates recovery (CMC12)
  → The digested manure is not an FPR fertilising product, and is not used as an FPR CMC – therefore it appears to be excluded by the wording of 2023/1605 Art.1 – so does not have a defined End Point under 2023/1605.
  → the biogas plant site is not a fertiliser plant (does not manufacture fertiliser, and indeed does not manufacture a CMC) so it appears to be excluded by the wording of Art.3.
- Ashes from waste-to-energy plants incinerating (e.g. chicken litter – 2023/1605 art. 3 point (a) -> 142/2011 Annex III), where the ashes are transported to a mineral fertiliser factory, and there processed together with mineral inputs, by chemical acidification, to produce a P-K mineral fertiliser (CMC13 "and derivates").
  → Similarly to the example above, the chicken litter combustion plant is not producing a fertiliser, and is not producing an FPR CMC.

For the second example, it is difficult to conceive how a chicken litter incinerator (from which the ash is not used as a fertiliser, but is chemically reprocessed in a fertiliser plant) can be considered to be a "*fertiliser plant*". And it is difficult to conceive how this ash, which is not used as a CMC (does not respect the wording of 2023/1605 art. 1) can somehow have an ABP End Point. For the ash-derivates to obtain an ABP End-Point under 2023/1605 it would seem necessary to interpret that the chicken litter combustion plant and the chemical fertiliser plant are in fact the same "*fertiliser plant*". For two plants on different sites, owned by different companies, this seems legally improbable.

Consequently, it is unclear to operators whether or not an ABP Cat2-3 used as input to an FPR compost or digester (CMC 3 or 5) must be pasteurised/sterilised (reach its ABP End-Point) BEFORE it goes into the composter/digester, or whether the End-Point (sterilisation/pasteurisation) can be ensured WITHIN the composting/digestion process (operation according to 142/2011 specified time-temperature-conditions).

We note that the current FPR FAQ document Q8.31 tries to addresses this but that operators do not seem to find it makes things clearer, and that operators have signalled to NoBos refusal to Certify a digestate where pre-pasteurised Cat3 ABP inputs are included, on the basis that the wording of 2023/1605, if taken as written, seems to not provide an ABP End-Point for input into a digester (the End-Point in 2023/1605 is for use "as component materials".

We suggest to modify 2023/1605 as follows:

> 2023/1605 Art.1: "*This Regulation determines end points in the manufacturing chain for organic fertilisers and soil improvers … provided that they are used ~~as component materials~~* ***in the production of*** *EU fertilising products in accordance with Regulation EC 2019/1009*".

> 2023/1605 Art. 3: "*The following derived products … where they are ~~manufactured in a fertiliser plant~~* ***processed in plants*** *approved in accordance with Article 24 (~~1), point (f),~~ of Regulation (EC) No 1069/2009, shall be considered as having reached the end point as organic fertilisers and soil improvers,* ***when they are used as component materials in the production of EU fertilising products in accordance with Regulation EC 2019/1009***".
>
> This would ensure that derived products used as inputs to production of CMC materials, which are processed to ABP Regulation requirements (effectively "sanitised") are clearly covered, whilst ensuring that all plants processing the materials are subject to 142/2011 requirements (inspection, traceability …) as the ABP End Point would only be achieved when the material is finally incorporated into an EU fertilising product.
>
> It is also at present unclear whether it is authorised to use a sterilised ABP (treated according to standard processing specifications defined in 142/2011) can be used as input influent for CMC12 Precipitated Phosphates. Logically yes: the material has been treated to eliminate ABP risks, CMC12 point 6 admits Cat.2-3 ABPs which have reached an And-Point and art. 32 of the ABP Regulation 1069/2009 specifies that Cat.2-3 ABPs can be used in fertilisers if sterilised.

- **What pre- and post- processing is allowed** of a fertiliser product or of a CMC without it "turning into something else" (excluding it from a CMC, turning it into a new CMC).
    - **Include in the header of Annex II, a general list of authorised pre- and post-processing applicable to all CMCs** (fermentation, sanitisation, granulation, filtration, drying, solid-liquid separation …) unless specified by exception (where justified for certain CMCs or certain materials).
    - Ensure coherence between different lists of authorised post-processing for different CMCs.
    - Develop communications to improve operator and stakeholder understanding of the distinctions between mixing two CMCs together, reacting two ingredients (producing a new CMC material), blends, "co-formulations" (Organo-Mineral Fertilisers)
- **REACH+**, esp. for additives: addressed by chemicals simplification omnibus proposal (if adopted by Parliament & Council).
- **Microbial biostimulants**: cf. omnibus proposal.
- **Organic Farming**: coherence of FPR and Organic certifications:
    - There is a need to streamline the conformity assessment process between the FPR and Organic Farming. Where the Organic Farming Regulation 2021/1165 specifies that a material can be used as a fertiliser in Organic Farming subject to meeting the FPR requirements, then the FPR Certification, adapted to also verify Organic Farming Regulation conformity, should enable placing on the market across Europe for Organic Farming (automatic recognition by Organic Farming certification bodies, in all Member States, of such specifically completed FPR Certification).
- **Include sewage inputs** (including urban wastewaters, sewage sludge, separately collected human urine or faeces) to composts, digestates, biochars, subject to appropriate quality and safety criteria:
    - Coherence with contaminant limits in Annex I (for Organic Fertilisers and Organo-Mineral Fertilisers),

- Specific contaminant and pathogen limits for substances of potential risk or public concern in FPR products derived from these sources: pharmaceuticals, microplastics, PFAS, other industrial chemicals.
- Develop a specific CMC for materials derived from these sources (that is, direct use as CMC not input to compost / digestate / biochar) with again specific contaminant and pathogen limits.

- **Authorise use of Cat1 ABP incineration ash**, which is excluded from FPR.
  - Incineration of Cat.1 ABPs is legally required to ensure safety – so presumably the ash is safe. The ash is currently treated as non-hazardous,
  - Recycling potential of c. 30 000 t-P/y of phosphorus (EU),
  - 70 000 t-ash/y of Cat.1 ash has been and continues to be used as fertiliser in the UK for over a decade, with farmer satisfaction and with no safety concerns,
  - The recent EFSA Opinion (EFSA Journal 2025;23, e9435, DOI) concludes that safety is not today proven by scientific evidence on prions, but does not suggest that there is any evidence of risks.
- **Widen and clarify inclusion of secondary organic streams,** both as inputs to composts/digestates and for used directly as CMCs: biorefinery and biofuels wastes/by-products, sludges, algae grown in wastes, biowastes, plant wastes and by-products …
  - **Biowastes and similar secondary flows**. The EU Fertilisers Expert Group has repeatedly discussed and failed to agree concerning the proposed FAQ answer on the interpretation of the wordings in CMCs 3 and 5 "*bio-waste within the meaning of Directive 2008/98/EC resulting from separate biowaste collection at source*". It is our understanding that the disagreement is not about safety, but results from the contradiction between the current Annex II wording (above) and the fact that secondary materials from food, feed and similar industries are very widely used as input materials to compost/digestate, are considered as "comparable" to biowastes by many regulators, and are generally less contaminated and more reliable than separately collected household biowaste.

    Also, the current FPR Annex II wordings are incoherent between CMCs 3, 5, 12, 14 and 15.

    The discussion becomes further muddied when the word "sludge" is used, because this has many different meanings, both linguistically (a viscous mixture, a brown colour, sewage sludge, dredging sludge, battery cathode sludge … and others) and between different national and EU regulations.

    The current limitative list of materials allowed as inputs to digestates and composts (CMCs 3 and 5) excludes a wide range of plant-derived materials from biorefineries, biofuels, human, animal or pet food production. One approach could be to collate the lists authorised today in digestates in different Member States. However, ESPP suggests to not list each such material one-by-one, because materials are often specific to a local situation/process and new materials will appear as new bio-based industries and processes develop (e.g. production of bio-based plastics, fibres …). Also such lists always lead to ambiguities in interpretation (what is a "sludge"? is a site producing food grade and industrial alcohol "food production" ? Is the tobacco industry "food" and if not, why exclude it ?). Examples include lecithins and glycerin from biofuels, corn steep liquors, brewers grains, oils-sludges- and filter cakes from food, biofuels, fibre and other industries.

    ESPP therefore suggests to modify to the following wording for CMCs 3, 5, 12, 14 and 15:

- *bio-waste within the meaning of Directive 2008/98/EC resulting from separate biowaste collection at source*
- *any waste, by-product, sludge wastewater or material stream from plants processing or producing human foods, animal feed, pet foods:*
  - *unless processing steps involved contact with urban wastewaters (as defined in the UWWTD 2024/3019 art. 2), with a (non physico-chemical*) biocide or with a substance classified as hazardous, except if the substance is only classified for the following hazards [list as per REACH+ proposal above - * = added to avoid exclusion of e.g. lime]*
  - *which does not contain ABPs, or if the stream contains ABPs then an ABP End-Point is achieved […appropriate ABP legal wording].*

Alternatively, point (ii) could refer to the list of industries in the Urban Waste Water Treatment Directive 2024/3019 Annex IV, but we suggest that this list has different objectives and that including industries included in the UWWTD would cause confusion as regards the exclusion of urban wastewater in this point.

- ESPP also suggests that these secondary streams from biorefineries and bio-based industries should be authorised for use directly as CMCs (not only as inputs to compost and digestate), by establishing a new CMC "Biorefinery and bio-based industry streams".
  In this case, criteria could include (as above) exclusion of contact with chemicals Classified for chronic health or environmental effects, and also the contaminant and pathogen limits of CMC15 (PAH, dioxins, chromium, [thallium: not relevant?], salmonella, E. coli).
- **Authorise plants as inputs for "production processes" for recovery of CMC15 materials.** There is no justification for this exclusion, in that CMC15 materials are limited to <0.5% organic carbon.
- **Add "fermentation" to the list of processes for plant materials in CMC2.**

- **Enable and standardise labelling of "recycled" and "bio-based" nutrients / fertilisers**, including as part of the FPR CE-Mark Certification (FPR Annex IV) with accompanying new CEN standards:
  - Define criteria for labelling of "Recycled" and "Bio-Based" fertilisers and nutrients in FPR Annex II.
  - Mandate development of CEN standards to accompany these definitions (carbon dating as in CEN/TR 16721 is not applicable).
  - Ensure coherence and user clarification for the definition of carbon and nutrients of "solely biological origin" in PFCs 1(A), 1(B) and 3(A).
- **Organic carbon in PFCs**: clarify requirements for organic carbon content and non-biological origin / fossilised / geological origin carbon exclusion in PFCs. Clarify also for other minerals (e.g. calcium carbonate in shellfish shells).
- **Explanation and communication** to operators and stakeholders.
  - Detail the existing online list of Notified Bodies (NoBos) to specify which Annex IV modules / PFCs / CMCs they cover and link to this list on the GROW FPR web page.
  - Other useful information for operators could also be provided on the same website on regulatory documents (consolidated FPR Regulation, FAQ, Guidance documents …), list of Notified Bodies …

- **Establish a table summarising the conformity assessment requirements** of Annex IV for different PFCs and CMCs. This would make things much clearer for operators.

- **Establish a public catalogue of all FPR CE-Mark products** for transparency and to promote the FPR.
    - **Establish an obligatory central register,** with non-confidential information, publicly available online, of all certified CE-Mark fertilising products (that is, all products which are FPR certified by a NoBo). The register could possibly also include self-certified (Module A) CE-Mark FPR products. This would contribute to promote CE-Mark certification to fertiliser operators, and enable fertiliser users to search for CE-Mark products.
    - Reliable collection of the relevant information is feasible as it is in any case held by the NoBos.
    - Such a catalogue was established and is maintained by the European Commission for the EU Ecolabel here.