

Industrial by-products and “Mineral”/“Low-Carbon” Fertilizers

5 September 2018 – ESPP Meeting on EU Fertilizers
Regulation and STRUBIAS in Brussels

Objective of Fertilizers Europe

- ✿ Ultimately, Fertilizers Europe calls for the high quality of mineral fertilizers to be maintained and recognized.
 - Agronomic efficacy of the final product (PFC) is key.



- ✿ This is crucial in order to:
 - Promote European fertilizer products in the long run,
 - Safeguard jobs and production sites in the EU.

Priorities for Fertilizers Europe

1

- Secure the use of **industry by-products** as a component of mineral fertilizers

2

- Secure a final deal on **cadmium limits** not below 60mg/kg P2O5

3

- New sub-category for **“Law-Carbon” Fertilizers**

Industry By-Products

Limited survey of
fertilizer companies
(6)

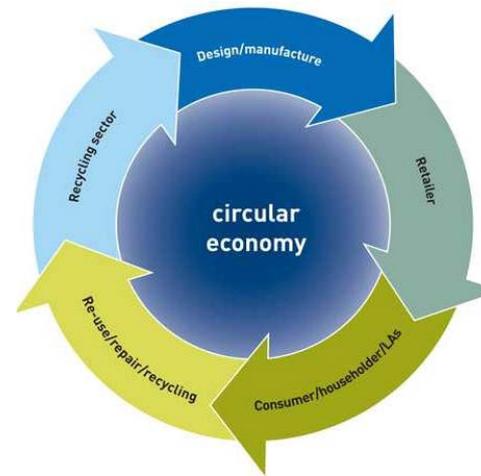
Around 500
products today
CE-marked

75% of them contain
by-products

Content of by-
products from 0.5% to
> 50%

All product types
concerned:
straight & compound

It is crucial to allow
the inclusion of
industry by-products
in the scope of the
new regulation in a
**non-bureaucratic and
simple way**
(via module A).



Science on Cadmium

Fertilizer content	Environment	Food	Economic aspects
<p>Cadmium content in fertilizer varies between countries, average is 32 mg Cd/kg P₂O₅, 8 % is over 60 mg Cd/kg P₂O₅ and 56 % is over 20 mg Cd/kg P₂O₅.</p>	<p>80 mg Cd/kg P₂O₅ means zero net accumulation, revised to 73 mg Cd/kg P₂O₅.</p>	<p>Approx. 55 % of dietary intake of Cd is related to cadmium in soil. The rest comes from imported food, seafood and more.</p>	<p>Imposing voluntary minimum standards for cadmium in inorganic fertilizer will increase costs at fertilizer industry as well as administrative level among the EU Member States without generating additional benefits.</p>
<p>Source: Prof. Dr. Eric Smolders, KU Leuven, in Scientific aspects underlying the regulatory framework in the area of fertilisers, European Parliament 2017.</p>	<p>Source: Prof. Dr. Eric Smolders, KU Leuven, in Revisiting and updating the effect of phosphorus fertilisers on Cd accumulation in European agricultural soils, IFS, 2013, reviewed by author 2016 and peer-reviewed by SCHER.</p>	<p>Source: Rietra et al, Wageningen, in Cadmium in soils, crops and resultant dietary exposure, 2017</p>	<p>Source: Prof. Wesseler in Economic Aspects of the Regulatory Framework in the Area of Fertilizers for the Policy Department of the European Parliament, April 2017.</p>

None of the above studies is included in the (very weak) Impact Assessment of the Commission: the proposal is not underpinned by proper scientific findings!

“Low-Carbon” Fertilizer

- 🌱 The issue -> Commission text of PFC1 defines as “inorganic fertiliser” all products which do not fit the definitions of “organic fertiliser” or “organo-mineral fertiliser”.
- 🌱 “Inorganic fertilizer” can thus contain 7.5% C-org that
 - > undermines quality
 - > misleads users
- 🌱 Possible solution -> introduction of a new sub-category in the New Fertilizers Regulation - **low carbon fertilisers** ($1\% < \text{C-org} < 7.5\%$).

Technical issues (1/2)

- **Secure an improved definition of PFC 1(C) and approve the change of the name of category into “mineral fertilizer”**
→ Meeting farmers’ expectations & reflecting language used in the market place
- **Setting high-enough minimum levels for nutrients in mineral fertilizers and clear solubility requirements for Phosphorus in annex I**
→ Ensuring agronomic efficacy of the products & guaranteeing efficient products to farmers
- **Correct the tolerances for mineral fertilisers**
→ Modifying the Commission proposals, which contains factual errors, also in order to reflect real production processes (lower levels of nutrients)

Technical issues (2/2)

- **Open the way for setting science-based biodegradability criteria for coatings of Controlled Release Fertilizers (CRF) at a later stage**
 - ➔ Recognizing the functionality of CRF, ensuring growers can continue to use this essential product
- **Align the fertiliser Regulation with the New Legislative Framework for responsibility of manufacturers**
 - ➔ Avoiding disproportionate requirements for operators in art. 4 paragraph 2

For more information

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