



European Consortium
of the Organic-Based Fertilizer
Industry

ECOFI perspective on the draft EU regulation on fertilising products

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About ECOFI

- Producers of organic fertilizers, organo-mineral fertilizers and organic soil improvers
- Members active in most European countries, the Mediterranean and the Middle East
- Accounts for roughly 60% of the European market in organic-based fertilizers, which is worth about €250 million euros
- The industry is dominated by SMEs



Single market imperative

- There is currently no Single Market for organic fertiliser, organo-mineral fertilizers or organic soil improvers.
- The draft regulation is critical to reducing nutrient imbalances
- Co-existence of national and EU laws: getting the balance right is challenging
 - fostering competition
 - risk of lowering standards if EC Mark doesn't deliver quality



General comments

- Need to streamline and simplify across PFCs and CMCs:
 - Bring definitions into core text where possible and use the same definitions across categories (e.g. solid/liquid, including suspensions/pastes)
 - Use the same safety requirements across categories to facilitate combined products → **Same Cd limit for organic fertilizers, organo-mineral fertilizers and organic soil improvers (aligned with limit for inorganic fertilizers)**
- We need language that claims are the primary determinant of the PFC, but may be supported by mode of action, concentration of components and other relevant criteria
- Ensure that all necessary definitions are present (e.g. material)
- Revise definitions in PFCs 1 and 3, CMCs 2, 6 and 11.
- Ensure that safety requirements actually have a positive impact on human health and do not duplicate existing requirements (e.g. don't require a duplicate test for a product that was necessary for a component, like an animal by-product)
- Ensure that labelling requirements correspond to actual practice in the market

Ensure alignment with related regulations

- We support the way **REACH** conformity is used to streamline the regulatory burden.
- The **Animal By-Product Regulation** is a pillar of the draft, which ensures adequate safety requirements without duplication of testing
- Safety requirements for vegetal components should be aligned with those for **animal feed** derived from the same raw materials (otherwise industry will have to maintain segregated production and transport chains, driving up costs)

The Component Material Categories are the key to circularity

The Circular Economy will only be achieved if we can maximize the amount of organic and secondary raw materials that are used

- **CMC 2 (plant materials)** is currently too restrictive and excludes many non-chemical processing methods
- **CMC 11 (animal by-products)** is currently blank, despite there being a number of ABPs treated with EU-approved transformation processes that could be immediately inserted. Before the entry into force, as many national transformation processes as possible should be approved at EU level

Some specific remarks

- ✓ The definition of organic fertilizers, organo-mineral fertilizers and organic soil improvers exclude the use of “material which is fossilized or embedded in geological formations”. This would eliminate three of the most common sources of organic materials: leonardite, lignite, and peat.
- ✓ A requirement for C_{org}/N_{org} in organic fertilisers should be introduced to ensure minimum quality and improve environmental management.
- ✓ There should be minimum thresholds for the combination of N+P+K in multi-nutrient organic-based fertilizers:

	Solid	Liquid
Organic fertilizers & Organo-mineral fertilizers	6,5% by mass	5% by mass

Detailed comments on

<http://www.ecofi.info/2016/05/ecofi-responds-eu-commissions-proposal-regulation-fertilising-products/>

Thank you for your attention

- For more information, including ECOFI's detailed comments on the draft regulation:
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