

EBIC POSITION PAPER

Principles for blending biostimulants with other fertilising materials

- Rules for blending should not obscure the added value of the product present in a smaller quantity in the mixture (such as a biostimulant added to an NPK fertiliser or a micronutrient fertiliser added to a biostimulant).
- Rules for blending should prevent the inclusion of ingredients that have not met requirements for being placed on the market.
- EBIC supports labelling requirements that indicate which products are mixed, for example "Fertiliser mixed with biostimulant" or "Growing media mixed with biostimulant". This provides transparency for the end user and prevents the inclusion of not-properly-authorized ingredients. These labelling requirements should include references to the CE-marking (e.g. identification numbers of notified bodies that evaluated the products in the blend or any other such indication that allows end users to verify that the contents do indeed meet minimum safety requirements).
- Label information should provide verifiable indicators that all the cited components are present in meaningful amounts that confer added value and not just a negligible amount to justify a price premium without delivering any additional added value. In some cases, this may entail specifying the content of each secondary component relative to the main component (e.g. % w/w). In other cases, it will entail specifying verifiable claims and the analytical methods that can be used to verify those claims as well as the conditions that are necessary for the claims to be verifiable.
- Blending should not significantly alter any of the characteristics of the components. If mixing two products together alters any of the characteristics of the components in a significant way, then it is no longer a blend and needs to follow the appropriate conformity assessment or authorisation process for which it qualifies. E.g. Mixtures of fertilisers containing micro-organisms must be able to ensure the viability of the micro-organisms if their presence is to be claimed as a benefit. Similarly, if an agronomic additive is combined with a biostimulant, it should not eliminate the biostimulant effect.
- The resulting blend should be stable (and this stability should be verifiable by market surveillance authorities).
- Producers of standard blends (as opposed to one-off customised blends) should conduct sampling every six months and maintain samples so that market surveillance authorities can verify the consistency of the blend over time
- Any of the Product Functional Categories defined under the future EU regulation on fertilising products should be able to be blended with each other as long as the rules above are observed and followed (subject to other necessary safety rules such as restrictions on which materials can be combined safely with ammonium nitrate).
- Labelling requirements should include the blending technique (bulk blend, coating, etc.) and any new recommendations for use that result from the blend.