



European Consortium
of the Organic-Based Fertilizer
Industry

ECOFI perspective on the draft EU regulation on fertilising products

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About ECOFI

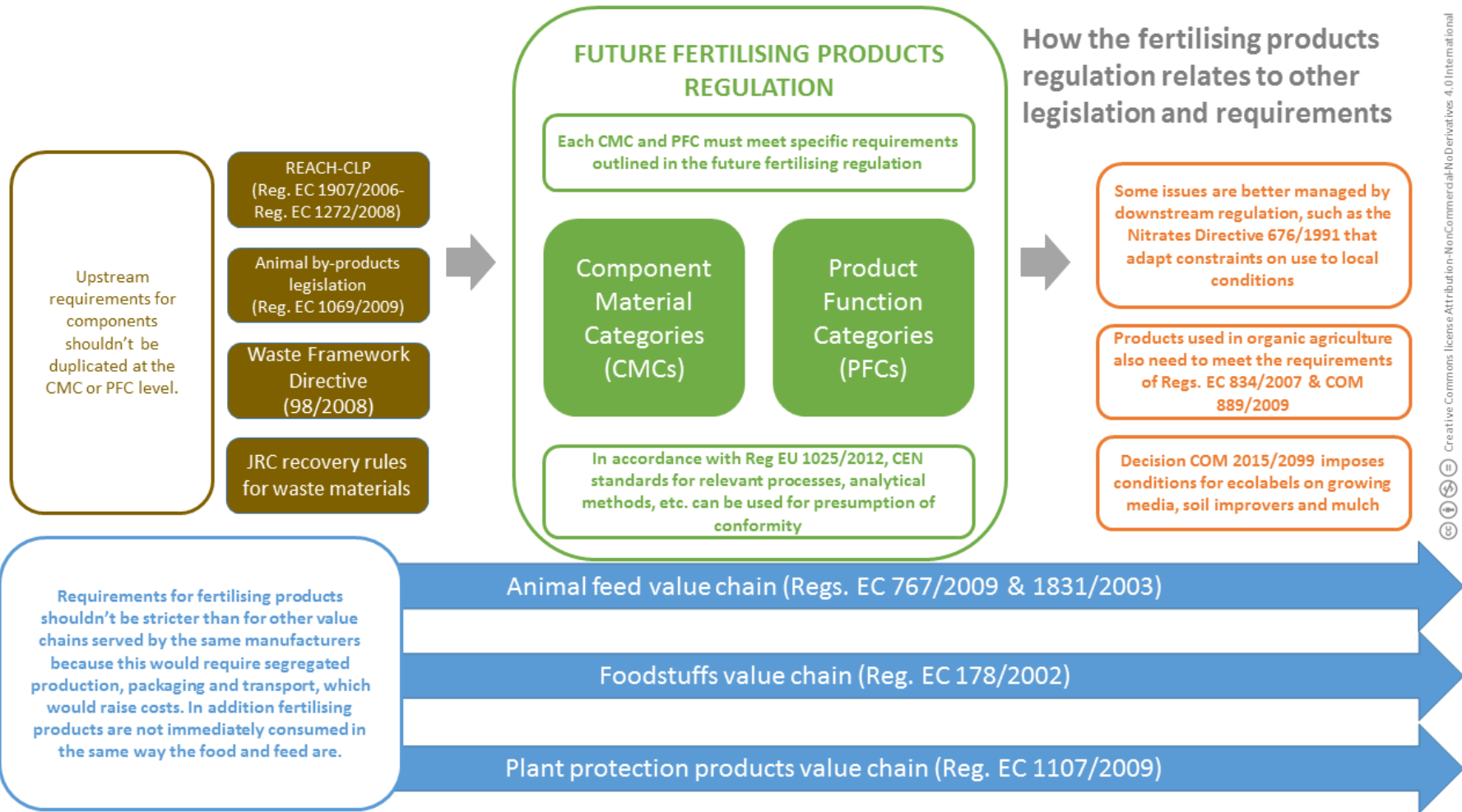
- Producers of organic fertilizers, organo-mineral fertilizers and organic soil improvers
- Members active in most European countries, the Mediterranean and the Middle East
- Accounts for roughly 60% of the European market in organic-based fertilizers, which is worth about €250 million euros
- The industry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

Concern 1: Many of the most common raw (secondary) materials for organic-based products are not included or inappropriately classified

Value chain	CMC 1	CMC 2	CMC 6	CMC 11 (not currently listed)	Not in draft
Directly sourced	Some seaweed & plant extracts	Seaweeds, plants & some seaweed extracts, vegetable cakes			Peat, natural polymers
Livestock				Manure	
Poultry flocks & wild bird colonies		Logically residual vegetable materials in bold, orange should be in CMC 2 or 6, but according to the current wording of the draft would be forced into CMC 1 or excluded		Poultry litter, seabird guano, eggshells	
Slaughterhouse				Feather meal, bone, blood, meat meal, horns, pig bristles, intestinal contents	
Fish & seafood processing				Fish meal, Fish bones, shells	
Food/feed processing	Some seaweed & plant extracts, Starch derivatives, Vegetable cakes	Seaweeds, plants & some extracts, Coconut fibre, Chaff, Vegetable tops, Husks		Mushroom composts	Starch, Fats & oils, yeasts
Sugar			Molasses, Vinasse		
Wine making	Marc, Vegetable cakes	Grape seeds, stalks	Vinasse		Yeasts
Vegetable oil processing	Vegetable cakes	Pulps, Pomaces			
Petroleum					Lignite, leonardite
Cosmetics, medicines & perfumes	Some seaweed & plant extracts	Vegetable cakes Some seaweed & plants extracts			
Textile industry		Flax shives, Fibres, Vegetable cakes, Vegetable stones			
Leather & fur production				Leather rejects, Wool, Fur, Skins, Feathers, Bristles	
Lumber & paper	Bark , Cellulose, Pulp, Paper, cardboard	Wood fibre, Sawdust, Wood chips, Twigs			
Packaging	Recycled plant materials				

Concern 2: The regulation does not yet minimise cumulative burden

- It shouldn't duplicate requirements from upstream regulations
- It shouldn't impose requirements that are better managed downstream
- It shouldn't impose stricter requirements than for the same materials in food, feed or plant protection



Concern 3: Requirements should be useful in the market

- 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)**
- Ensure that labelling requirements correspond to actual practice in the market
- 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 (as follows):

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

Thank you for your attention

- For more information, including ECOFI's detailed comments on the draft regulation:
<http://www.ecofi.info/2016/05/ecofi-responds-eu-commissions-proposal-regulation-fertilising-products/>
- **Contact the speaker**
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