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Traceability

Traceability of origin of organic materials is essential for confidence (farmers, food – retail sectors, consumers) → *pathogens, pharmaceuticals, ...*

- **Text requires traceability of type of input materials, production process**
→ *objective = market surveillance (verification of conformity to CMC definition)*
- **... does NOT enable traceability of origin of organics used**
→ *which farm, which sewage works*
- **Traceability can be ensured by IT data base from bar codes, is compatible with single market** → *example: meat products in supermarkets*
- **Not necessary for products not containing organic by-products** → *e.g. ash-based*

ESPP proposal:

COM to develop [within 3 years] traceability system for any susceptible to contain organics (= not if incinerated) from: sewage sludge, manures, household food wastes



Organic carbon limits in mineral and organo-mineral fertilisers

- Organics in “mineral” (or “inorganic”) fertilisers should **maximum** of e.g. 1 – 2 % C_{org}
→ a farmer purchasing a “mineral” fertiliser expects it to be “mineral”.
- But “organo-mineral fertilisers” should have **minimum** organic content of e.g. 7.5 – 10% C_{org} → lower organic carbon means that the product is not really “organo-mineral”, and will not bring the properties the farmer expects
- No reason to not be able to place on the market a product with say 3 -6 % C_{org}
- Contaminant limits etc. of PFC1(C) do not require adjustment

... but what vocabulary ?

ESPP proposal (not very good! any better ideas welcome):

PFC1(C) with $2\% < C_{org} < 7,5\%$ = “Mineral with some organics”



Art. 42.1 = criteria for addition of new CMCs

Current new CMCs can be added “(a) which are likely to be subject of significant trade on the internal market, and (b) for which there is scientific evidence that they do not present an unacceptable risk to human, animal or plant health, to safety or to the environment, and that they are sufficiently effective.”

- **Sewage sludge incineration ash: has risk (heavy metals) and is not an effective fertiliser but can be processed to produce conform fertilisers**
- **What does “sufficiently effective” mean ?**
- **Some materials might not be traded (as a CMC) but processed at source, to produce a fertiliser (which would be traded) → e.g. olive stones, manure ...**

ESPP proposed amendment

“(a) which are likely to be subject of significant trade on the internal market, **or are to be used to produce CE fertiliser products likely to be subject of significant trade on the internal market,** and (b) for which there is scientific evidence that, **subject to processing requirements specified (e.g. contaminant removal or nutrient solubilisation),** they do not present an unacceptable risk to human, animal or plant health, to safety or to the environment, **and that they offer product characteristics as specified by one or more PFCs** ~~are sufficiently effective.~~”



Wording changes

- Clarify text, avoid ambiguities, ensure operability
 - clarify definition of “mechanically processed”
 - ambiguity between processed plant parts / food industry by-products
 - specify that one CMC can be used as input to another CMC (not only blending)
- Avoid “double sanitisation” of manure
 - sanitisation is not necessary, before input, in composting or anaerobic digestion, where the process is designed and controlled to reach Animal By-Product end-points
 - “double sanitisation” would be economically prohibitive





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