IFOAM EU GROUP 10 YEARS
MAKING EUROPE MORE ORGANIC

International Federation
of Organic Agriculture Movements
EU Regional Group

Mr. Reinhard Büscher
Mr. Vincent Delvaux
Directorate General Enterprise and Industry
European Commission

Brussels, 27 June 2013

RE: Revision of the fertiliser legislation

Dear Mr. Büscher, Dear Mr. Delvaux,

The IFOAM EU Group represents the organic sector in Europe, including organic farmers and producers of organic inputs. As the legislation on fertilisers has a significant impact on these economic actors, we would like to highlight some concerns with regard to the revision of the fertiliser legislation.

Organic farmers consider fertilisation in the context of the **farm system**. The context in which nutrients are used is important, in addition to the composition of the nutrients themselves in an organic system where leguminous crops and crop rotation play an important role. There is still much to be learned about mineralisation of animal manure in soil and interaction of organic farm produced fertilisers with different soil types. Therefore in setting rules, organic fertilisation cannot be regarded in a similar way as mineral fertilisers.

In general we welcome the move to further **harmonise requirements** for the registration of fertilisers, in order to help overcome the current situation in which the registration of a fertiliser in one country may take much longer than in another. But we would like to stress that animal manure and farm produced compost are completely different products from formulated fertilizers (natural or synthetic origin) with regard to production, handling, marketing, consumer expectations and use. They therefore require different treatment.

<u>Considerations on animal manure and farm produced compost</u>
By nature, the amount of nutrients in animal manure and farm produced compost vary and very valuable organic matter is present in them. These inputs are generally used by farmers who value the qualities of these inputs and know how to treat and use them. The use of animal manure and farm produced compost is an important sustainable practice for the recycling of farm residues requiring little extra energy input. As well, this form of fertilisation contributes to the economic and ecological sustainability of farms. It is important especially for organic farming, which builds on the closed nutrient cycles at farms and on the enrichment of soils with organic material. These practices must not be hindered by disproportionate administrative burdens and quality control. An exemption from control duties for on-farm composting should be valid for the production of up to 2000m^3/year, if the compost is used on the farm or on cooperation farms.

To ensure effective use of animal manure and on-farm compost, **cooperation between farmers** is necessary in many cases - so for example some farms specialised on plant production import manure from livestock farms. This kind of cooperation should be stimulated instead of jeopardized by unrealistic administrative burden when transporting manure from one farm to another in the same region. To avoid any misunderstanding: we underline that all farmers have to use manure and compost in the spirit of good agronomic and environmental practice and in compliance with the EU environmental legislation (Nitrates Directive and Water Framework Directive).

Considerations on formulated fertilisers sold in packages

Protection of terms: Using terms like "eco/eko", "organic", "bio" and the others listed in the annex of regulation EC 834/2007 on the labels of fertilisers should not be permitted, as these lead to confusion: many buyers assume fertilisers bearing this term can be used in organic farming according to Commission Regulation EC 889/2008. There have been some cases of organic farmers and gardeners who were misled by labelling which suggested a fertiliser was suitable for organic farming and in which their certifiers had to withdraw certification for the parts of the harvest produced with this fertiliser.

Even when we are talking about fertilizers, other than animal manure and compost, permitted in organic farming, the full **labelling of the nutrient content** is not always possible due to the specific character and/or natural origin of the fertilizer. Although nutrients are not exactly quantifiable, these products are valid farm inputs and must remain available on the market. Indicative figures which give average values (and are labelled as such) for these types of fertilisers should be permitted.

The packaging of organic fertilisers should indicate the following:

- **Raw materials** used for production, e.g. cow manure, chicken manure, guano, feathers, household waste/compost and approximate percentage of ingredient (this information is especially important for organic farmers as some components are not permitted in organic farming or only permitted in certain conditions)
- In the case of fertilisers based on plant material and manure, an indication if the substance went through **thermal treatment** (including temperature and length of treatment) or **mechanical treatment** (e.g. grinding to destroy weed seeds). This is because farmers want to be aware of potential phytosanitary risks
- **Form:** pellets or powder. In the case of pellets it should be indicated if gluing agents were used
- **Recommendations** for storage (temperature, humidity), duration of use (e.g. 2-3 years from packaging), use on different crop species (doses in kg/ha for different growth stages)
- **Heavy metal** content. To avoid negative impact on human health the contents of heavy metals should be obligatory given on the fertilizer label (in mg/litre).

We trust the Commission will consider these issues when editing the legislative proposal and the impact assessment. If you have any further questions of clarification please contact me.

Sincerely yours

Marco Schlüter, Director of the IFOAM EU Group

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