De : Themistoklis Sfetsas <tsfetsas@q-lab.gr> **Envoyé :** jeudi 14 mars 2024 21:00 **Objet :** Questionnaire related to technical study for CMC10

Dear all,

Some of you, as you may already know,

The European Commission's Directorate-General for Internal Market, Industry, Entrepreneurship, and SMEs has entrusted Qlab P.C. (as a subcontractor) with conducting a technical study concerning the agronomic efficiency, environmental risks, and additional risks of various raw materials (please see below). This technical study is to facilitate the incorporation of raw materials into Component Material Category 10, as stipulated in Annex II of Regulation (EU) 2019/1009 (Fertilising Products Regulation).

We kindly solicit the participation of all relevant stakeholders in completing and submitting the provided questionnaire at their earliest convenience (e.g. within the next 2 weeks).

While participation is voluntary, it significantly aids in our collective goal of revising the legislative text to include specific raw materials under CMC10 within the Fertilising Products Regulation.

These derived materials are the following (plus processed manure that is covered under another study):

- (i) processed frass which fulfils the requirements set out in Section 2, points (a), (b), (d) and (e) of Chapter I, of Annex XI to Regulation (EU) No 142/2011;
- (ii) glycerine of Category 2 and 3 materials, and other Category 2 material resulting from biodiesel process and the production of renewable fuels which fulfil the requirements set out in Section 3, point 2(b), (c) and (f), of Chapter IV of Annex IV to Regulation (EU) No

142/2011;

- (iii) Category 3 materials other than glycerine, which fulfil the requirements set out in Section 3, point 2(b), (c) and (f), of Chapter IV of Annex IV to Regulation (EU) No 142/2011;
- (iv) processed animal protein of Category 3 materials which fulfils the specific requirements for processed animal protein set out in Section 1 point A, point B(1), (2) and (3)(a) and point C of Chapter II of Annex X to Regulation (EU) No 142/2011;
- (v) meat-and-bone meal of Category 2 materials processed with the standard processing method 1 set out in Chapter III, point A, of Annex IV and marked with glyceroltriheptanoate (GTH) as set out in Chapter V of Annex VIII to Regulation (EU) No 142/2011;
- (vi) blood products of Category 3 materials which fulfil the specific requirements for blood products set out in Section 2 of Chapter II of Annex X to Regulation (EU) No 142/2011;
- (vii) hydrolysed protein, including hydrolysed protein derived from residues coming from the leather or textile industry, which fulfils the specific requirements for hydrolysed protein set out in Section 5, point D, of Chapter II of Annex X to Regulation (EU) No 142/2011;
- (viii) dicalcium phosphate and tricalcium phosphate which fulfil the specific requirements set out in Section 6 or 7 of Chapter II of Annex X to Regulation (EU) No 142/2011, respectively;
- (ix) horns, horn products, hooves and hoof products which fulfil the specific requirements set out in Chapter XII of Annex XIII to Regulation (EU) No 142/2011;
- (x) hides and skins of ungulates which fulfil the specific requirements for the end point for those derived products set out in point C of Chapter V of Annex XIII to Regulation (EU) No 142/2011;
- (xi) feathers and down, which fulfil the specific requirements for the end point for those derived products set out in point C of Chapter VII of Annex XIII to Regulation (EU) No 142/2011;
- (xii) Wet blue leather, processed in accordance with method 1 in Chapter III of Annex IV to Regulation (EU) No 142/2011.

Thank you for being so kind and giving some of your time to provide additional information. Kind Regards, Themistoklis Sfetsas, Technical Manager, **Qlab** - **Research**, **Analytical & Quality Control Laboratory** - **Phone:** +30 2310 784 712 (internal: 259) - **Mobile:** +30 6932 41 63 77 - **Email:** <u>tsfetsas@q-lab.gr</u> - **Web:** <u>www.q-lab.gr</u> - **Address:** Konstantinou Karamanli 122, PC 57008, Ionia, Thessaloniki,GR





Survey to include new materials in CMC 10 to the Fertilising Products Regulation

Stakeholder Information	
Name of contact	
Job title /Position	
Email	
Organisation / Company	
Type of Organisation /	
Company (Producer, Distributor,	
Industry association,	
NGO, National authority,	
etc)	
Country	
What kind of fertilising	
products do you produce	
with that component	
material?	
(fertiliser, soil improver,	
etc)	
Potential of future	
development of products	
with that component material?	
Date:	
Information:	
-	g <u>questions</u> (Q) with the required information. In the <u>Comments</u> section, nformation that you find necessary to clarify any aspect related to the

Component Material:

provided data.





Q1. Does your national legislation lay down criteria for fertilising products containing the component mater maximum limit values of residues and impurities (heav	rial? Such criteria could refer to nutrients
If yes, kindly provide a link to these regulations.	
A1.	
Q2. Are there any crop-specific responses to the co	omponent material, and how can these be
Q2. Are there any crop-specific responses to the continuised? (e.g., bigher plants, bigger fruits etc.)	omponent material, and how can these be
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3. How do you decide the nutrient content of the component material to ensure consistent and liable fertilisation during its use?
3.
4. How does your material reach the end-point? Are any other pre-treatment or post-treatment
ocesses being followed to improve the agronomic efficiency and/or the safety of the fertilising
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Q5. Have you performed any analysis concerning the presence of heavy metals (e.g. Cd, Hg component material? Also, in your experience, have you observed the presence of radioisotopes (e.g. U) or antibiotics in the component material? If yes, please provide relative data.	
A5.	
Q6. Have you observed any significant presence of residues in the component material?	
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If yes, please provide relative data.	
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If yes, please provide relative data.	





Q7. Are these materials known to produce allergies, especially concerning direct contact during nandling and exposure to airborne particles? What processes are in place that limit such effects or ensure they will not appear, thus minimising the risk among workers and individuals in the vicinity? If yes, please provide relative information.
47.
Q8. What is the ecological impact of using the component material? Is there any environmental risk during large-scale production and application?
during large-scale production and application? f yes, please provide any risk assessment performed already.
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Other Comments:

