









IMCO report: real improvement!

		
<p><u>Quality</u>: name, definition, nutrient levels, P solubility, N forms...</p> <p><u>Production</u>: inclusion of by-products, tolerances...</p>	<p>CRF – improvement but biodegradability of 48 month</p>	<p>More stringent cadmium limit</p>  <p>Single priority for plenary</p>

Council Working Party: no real progress

		
Blocking minority on Cadmium 		Copper and Zinc in the contaminants list

 We count on the Council to build up on IMCO report

Outstanding issues in the Fertiliser Regulation

Ashes from sludge incineration as input material for fertilisers

- ~ Currently not foreseen in Fertiliser Regulation;
- ~ STRUBIAS: not covered in draft report.

Sewage sludge as input material for compost / digestate

- ~ Currently excluded even if requirements for compost are met, traceability is ensured and additional requirements can be set;
- ~ Mainly discussion with Member States.

Requirements for aerobic composting / anaerobic digestion

- ~ Detailed requirements on processes (difficult to meet in Nordic climates);
- ~ Requirements to be set on end-product.

Market push

- ~ No market incentive to install P recovery;
- ~ Proposal: minimum recycled content in fertilisers.

ECN's recommendations on Fertilisers Proposal ahead of Plenary vote

- *With regard to the discussion in the European Parliament several elements are tabled as amendments for the vote in Plenary, which are incompatible with the **overall objective to increase the use of recycled nutrients from organic resources**.*
- *If adopted as such, the report would lead to the **exclusion of bio-waste materials including garden and park waste for CE marked fertilising products**, and thus would position the Parliament against overall Circular Economy goals.*

European Compost Network

ECN's recommends to reconsider:

- *The proposed **limit value for lead (Pb) of 20 mg Pb/kg** for organic fertiliser, organic soil improvers and growing media*
- *The **definition of CMC 2** 'Non-processed or mechanically processed plants, plants parts' as this is in **contradiction with the definition of waste**, and in particular bio-waste as defined in the Directive 2008/98/EC.*
- *The **absence of a defined list of input materials** for 'Compost – CMC 3' and for 'Digestate – CMC 5' - a specific input list is needed (Ref: JRC report 2014)*
- *The lack of recognition that **limit values for minimum nutrient and organic carbon content** should be expressed on **dry matter basis**.*
- *The inclusion of a **limit value for 'Escherichia coli / Enterococcaceae'** as **product criteria** for organic fertiliser, organic soil improvers and growing media;*

Digestate in the Fertilisers Regulation

What is EBA: represents anaerobic digestion in 26 European countries, with 94 direct members and indirectly 7.000 biogas actors

EBA assessment of ongoing revision (IMCO amendments):

- Revision of Regulation 1907/2006 on REACH – Added digestate exception to Point 12 in Annex V is very positive, now **Council support** is key;
- Nutrients in PFC 1(a) (I) & (II) – Added requirement for **total NPK sum** of 6,5% is negative and will exclude many organic fertilisers;
- Lead limits in PFC 1(a) – six fold decrease to 20 mg/kg in DM likely to exclude some organic fertilisers;
- Energy Crop Digestate CMC4 – Added “plant-based bio-waste” is positive, but **crop residues** status still unclear;
- CMC 11 on ABPs – **Need inclusive and clear list**, avoid divergence from existing ABP requirements.



European Consortium
of the Organic-Based Fertilizer
Industry

Outstanding issues in the draft EU regulation on fertilising products

Benoît PLANQUES – ECOFI representative to DG GROW's FWG
ITALPOLLINA S.p.A. – Global Regulatory Manager

Stakeholders meeting on EU Fertilisers Regulation and STRUBIAS
5 September 2017



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: Ensuring that the most common raw (secondary) materials for organic-based products are included

PFCs 1 (A), 1 (B) and 3(A)

- Peat, lignite and leonardite should be confirmed as acceptable sources of raw materials

CMC 2: Plant-based materials and extracts

- Good language from IMCO allowing all plant-based materials and extracts that do not trigger a REACH requirement
- Would like Council to adopt same language

CMC 6: Food industry by-products

- CWP discussions have broadened the list
- While this is a positive development, it's important not to exclude major categories → Important that COM have delegated powers to update the annex so omissions can be easily corrected

CMC 11: Animal by-products

- IMCO report includes important calls for COM to define end points quickly and suggests a list of ABPs that are commonly used in fertilizing products and could be defined as safe end points
- Need Council to validate these measures
- Most importantly, need COM working group on animal by-products to prepare implementation acts for the Animal By-Product Regulation
- To provide clarity and predictability for industry, we need to be closely associated with that process

Other industrial by-products

- To avoid pollution, the COM text would exclude all industrial by-products
- This inadvertently excludes many by-products currently used safely in fertilizing products
- We encourage Council to adopt the language from AGRI AM 222 that would allow by-products that meet CMC 1's REACH requirements.

Concern 2: Minimum nutrient content should ensure sufficient quality

- Too low minimum nutrient content means products will not have a meaningful amount of nutrients, especially taking tolerances into account. **Best-in-class producers combine lower content raw materials with higher content raw materials to meet minimums, or they subject materials to further processing to raise minimum content.**
- Minimum content of N, P and K need to be **coherent within a PFC**
- **Labelling requirements should correspond to actual practice in the market**
 - Nutrients declared in **TOTAL not AVERAGE** (averages can't be verified during market surveillance)
 - TOTAL nutrient content needs to be **defined by organic**, not mineral, **forms for organic-based products**
- Tolerances for organic-based products need to be generous to account for the natural variation of organic materials and the natural reduction of organic matter content during storage and handling.

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** benoit.planques@italpollina.com
- **Contact ECOFI's secretariat**
c/o Arnaud Cayrafourcq, Arnaud@prospero.ag



ESPP, Brussels, 5.9.2017

European Fat Processors and Renderers Association

Dr. Martin Alm

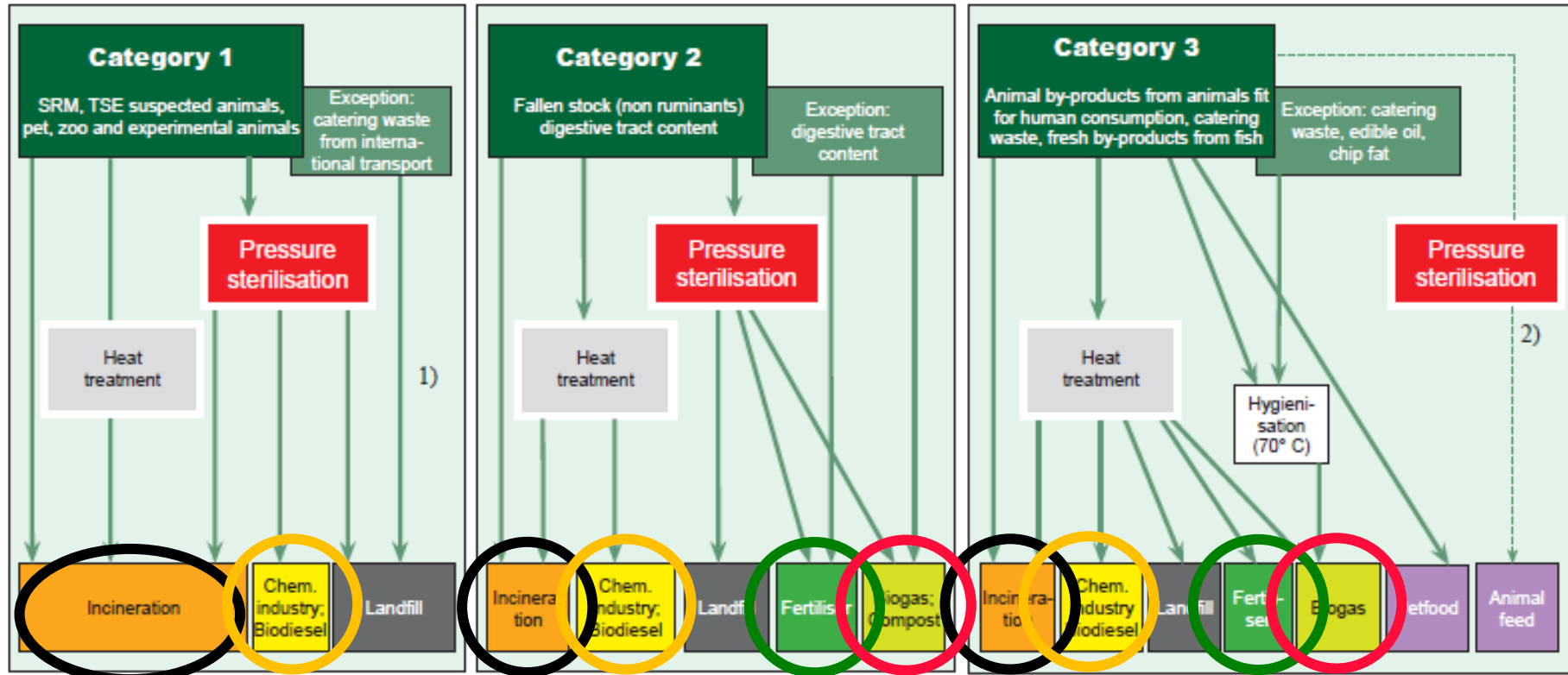


Overview of EFPRA

- EFPRA represents
 - 29 members in 25 European Countries, 5 associate members
 - The processing of over 17 Mio to raw material into 2,78 Mio to animal fat and nearly 4 Mio. to animal proteins
 - 440 different lines (from food to category 1, in 21 EU-MS)
 - 15.670 employees in 22 EU-MS



Where do we produce fertiliser?





Fertiliser Products

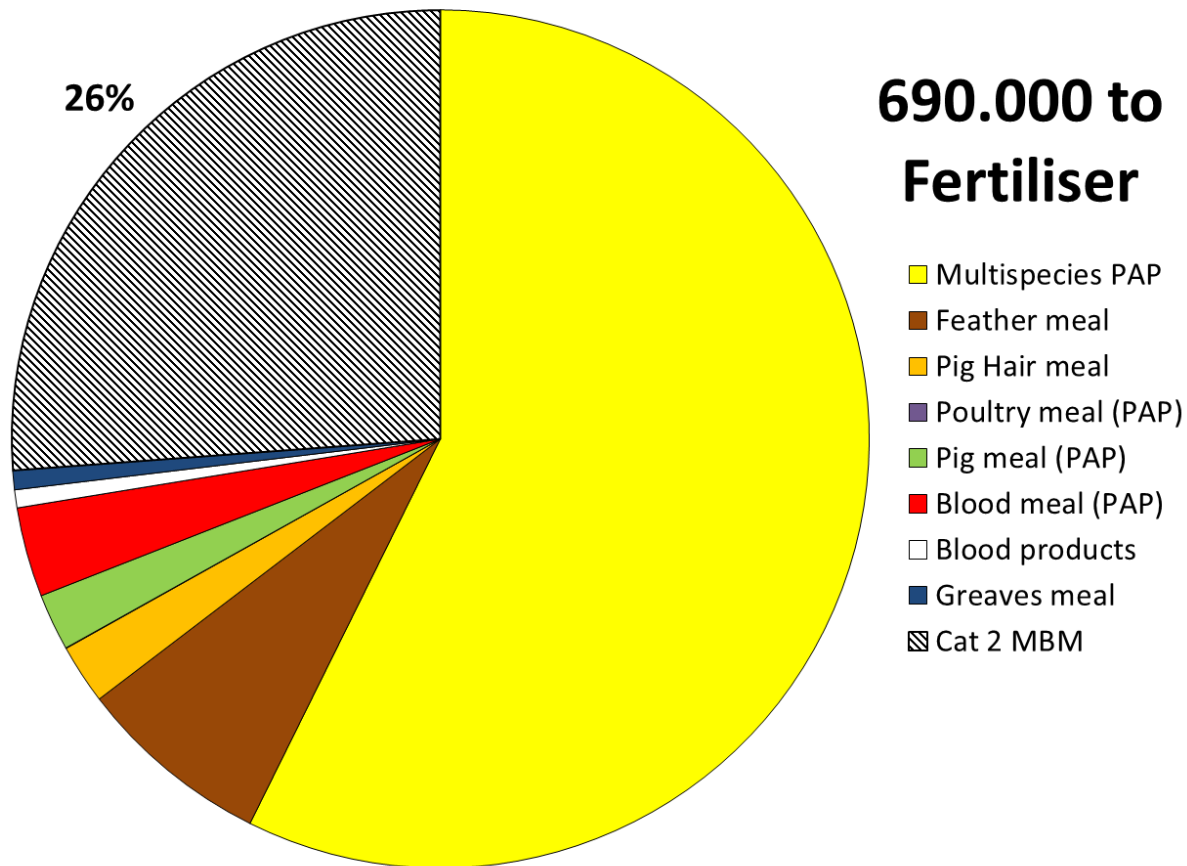
- PAP (Processed Animal Protein)
 - Feather meal, blood meal, (horn & hooves meal)
- Hydrolysed Proteins
- Blood products
- (milk & milk based products)
- (egg & egg products)
- Gelatine, collagen, DCP, TCP

- Cat 2 MBM

- Ashes
- Glycerine



Use of organic fertiliser in 2016





Thank you
very much
for your attention!