Draft standardisation request to support FPR

Fertilisers Working Group
10 May 2019

DG GROW/D2
Chemicals Unit
The overall workflow during the mandating process (from planning to notification to ESOs)

We are here

Need to have FPR published

Execution phase (Expected and actual deadlines for WPs, reports, deliverables, funding etc. are recorded)
Draft Standardisation request in informal consultation process (since November 2017)

Stakeholders and CEN
Fertilisers Working Group
AdCo Market Surveillance Group
Standards Market Relevance Roundtable (SMARRT)
Committee on Standards

Annual Union Work Programme for European Standardisation for 2018
EU fertilising products must:

- comply with requirements (safety, quality, labelling) defined for each product function category
- be composed of component material categories, themselves subject to specific requirements
- be certified as fulfilling requirements according to various NLF modules
New Legislative Approach Regulation

Harmonised standards may be used for verifying conformity of EU fertilising products with requirements (presumption of conformity).

*For conformity assessment*

*For market surveillance*

**Current situation:** European standards for inorganic fertilisers, liming material and agronomic additives developed under previous mandates (M/355, M/418 and M/454) for Reg 2003/2003
## Provisional titles of requested standards, reference information for drafting, timelines

<table>
<thead>
<tr>
<th>Reference information</th>
<th>Deadline for adoption by CEN</th>
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<tbody>
<tr>
<td><strong>1.</strong> Determination of the mercury content in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<td>To use as basis standards: EPA method 7343 with EN 13040 for the preparatory phase or ISO 16772</td>
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<td><strong>2.</strong> Determination of the cadmium, nickel and lead content in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<td>To use as basis standards</td>
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<td>Extraction: EN 13650</td>
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<td>Determination: ISO 11885 (as a basis for development of a specific method), EN 16319 (for Cd/Ni/Pb)</td>
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<td><strong>3.</strong> Determination of the chromium VI content in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<td>To use as basis standard: ISO 17075 part 2</td>
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<td><strong>4.</strong> Determination of the biuret content in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<td>To use as basis:</td>
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<td>ISO 18643</td>
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<td>ICP-MS method</td>
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<td><strong>5.</strong> Determination of the inorganic arsenic content in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<td>To use as basis standard: EN 16317</td>
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<td><strong>6.</strong> Determination of the copper and zinc content in organic fertilisers</td>
<td>36 months after notification of this Decision to CEN</td>
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<td>To be developed</td>
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<td><strong>7.</strong> Determination of <em>Salmonella</em> spp in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<td>To use as basis standard: EN ISO 6579</td>
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<tr>
<td><strong>8.</strong> Determination of <em>Escherichia coli</em> in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<td>To use as basis standards: FD/CEN TR 16193-B, NF EN ISO 16649-2</td>
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<tr>
<td><strong>9.</strong> Determination of <em>Enterococcaceae</em> in organic fertilisers</td>
<td>24 months after notification of this Decision to CEN</td>
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<tr>
<td>To use as basis standards: EN ISO 7899-1, EN 15788 and BEA method</td>
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</table>
Summary of comments to the draft request

Timelines proposed for the development of standards

Facts

• analytical methods need to be adapted / validated with ring tests → more time to develop standards
• date of application of FPR in 3 years (foreseen for June/July 2022)
• desirability of standards for EU fertilising products (presumption of conformity)

Proposed solution

two step development of any standard which needs more than 24 months

1st step: Development of Technical Specifications (CEN/TS*) within a deadline of 24 months
2nd step: Upgrade of the CEN/TS to a harmonised Standard within an extended deadline of up to extra 24 months

*CEN/TSs cannot be published in the OJEU nor be used to support presumption of conformity
Summary of comments to the draft request

**Standards for the determination of the quantity**

- Are standards for quantity needed?


Your views?
Summary of comments to the draft request

**Determination of the phosphonates content**

**Comment**
“phosphonates are not expected to be present in most EU fertilising materials

an extra burden in testing products”

**Fact**
legal provision: Annex I, Part II, point 6 (for all EU fertilising products)

unintentional presence of phosphonates shall not exceed 0,5 % by mass
Summary of comments to the draft request

Determination of nitrogen origin in the context of “Determination of nitrogen from ammonium nitrate in organo-mineral fertilisers”

Comment
• possible to analyse nitric or ammoniacal nitrogen present in an organo-mineral fertiliser
• impossible to determine if nitric or ammoniacal nitrogen originates from a) an ammonium nitrate fertiliser, b) another inorganic fertiliser or c) materials containing organic carbon and nutrients of solely biological origin

Fact
Legal provision: Annex I, Part II, PFC 1(B), point 2

“Where one or more of the inorganic fertilisers in the co-formulation is a straight or compound solid inorganic macronutrient ammonium nitrate fertiliser of high nitrogen content, as specified in PFC 1(C)(I)(a)(i-ii)(A), an organo-mineral fertiliser shall not contain 16 % or more by mass of nitrogen (N) as a result of ammonium nitrate (NH4NO3).”
Summary of comments to the draft request

Aqua regia extraction methods versus less vigorous extraction methods

Issue
Selection of the proper extraction method for mineral and organic soil improvers and growing media

Fact
Legal provisions set limit values for the content of heavy metals in all EU fertilising products

Solution
Vigorous extraction methods when determining heavy metals’ content in all products
Summary of comments to the draft request

**Determination of biodegradability of polymers (CMC 9)**

*Fact*
European Commission is empowered to adopt a delegated act and establish biodegradability criteria for polymers (coating agents & agents used to increase water retention).

*Result*
Biodegradation criteria for polymers are excluded from the current standardisation request addressed to CEN
Summary of comments to the draft request

**Determination of inhibitors in organic fertilisers**

*Comment*
“inhibitors cannot be part of organic fertilisers and thus any request of standard related to them should be withdrawn”

*Proposal*
inhibitors’ related standards in organic fertilisers will be deleted from the request.
Summary of comments to the draft request

Standards on detonation resistance and oil retention tests

Fact
all tests described in Annex IV of FPR

Proposal
standards on detonation and oil retention tests in ammonium nitrate fertilisers to be withdrawn
Revised version of draft request will be circulated to participants of FWG with a deadline of 10 working days for comments.

Right after the publication of FPR draft request will be published in the COM's dedicated notification system and sent for COM Interservice Consultation.

Vote in Committee for Standards (probably via written procedure).

Adoption of standardisation request by COM and notification to CEN.
Thank you for your attention!