

## IMA-Europe's position on Essential requirements for liming materials under the future Regulation on fertilizing materials

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### ESSENTIAL REQUIREMENTS FOR SAFETY

For liming materials, the essential requirements (ERs) for safety as presented at the EC Fertilizers WG meeting of 17 March 2014 consist of maximum limits (total content) for selected heavy metals:

- Cd 3 (mg/kg dry matter)
- Cr VI Standard in development
- Hg 2 (mg/kg dry matter)
- Ni 90 (mg/kg dry matter)
- Pb 200 (mg/kg dry matter)
- As 120 (mg/kg dry matter)

IMA-Europe supports these maximum limits. With regard to Cr VI, IMA-Europe proposes a limit of 2 mg/kg dry matter and the urgent development of an EN standard for the determination of Cr VI in liming materials.

### ESSENTIAL REQUIREMENTS FOR EFFICACY

Having considered the draft proposal of the EU Commission on efficacy criteria for liming materials, i.e. Minimum NV : 15 (equivalent CaO) or 9 (equivalent OH) determined on the commercialised product, IMA-Europe would like to raise the following comments:

- 1) The Neutralising Value (NV) is determined on the commercialised products, i.e. with moisture content. This is not the approach selected by the EU Commission for the determination of heavy metals (ERs for safety) which need to be expressed on dry matter. For consistency reasons, IMA-Europe recommends to also express the NV on the 'dry matter' content instead of 'commercial product' basis. In this scenario, it would thus be appropriate to slightly increase the NV value as follow:
  - Minimum Neutralizing Value (as EN 12945) : 25 (equivalent CaO) or 15 (equivalent OH) on dry matter

The minimum NV hereby proposed by IMA-Europe reflects the minimum NV of liming materials currently placed on the EU market. Thus, it would set an adequate minimum level for efficacy without excluding any existing liming products.

- 2) While the NV is essential with regards to efficacy, alone it is not sufficient to ensure real efficiency of liming products. It is noted that the 7<sup>th</sup> ATP of Regulation (EC) 2003/2003 introduces granulometry requirements. Such an approach is interesting but requires to differentiate different sub-classes of liming materials as the relevant granulometry



requirements differ for types of liming materials. A suitable, simple and homogenous alternative would be to set a minimum reactivity value for liming materials in addition to the NV. In this respect, we propose to set a minimum reactivity value of 10 as determined either with the citric acid method (EN 16357) or the hydrochloric acid method (EN 13971).

The **NV** combined with the **reactivity value** would provide appropriate ERs for efficacy of liming materials. These ERs are simple, meaningful in terms of agronomic benefits, and applicable to all liming materials. More so conformity assessment with these ERs would be facilitated by EN standards that exist for these two ERs.

Dr Roger Doome

IMA-Europe's Technical Director