

COMMENTS ON THE DRAFT PROPOSAL ON CADMIUM IN FERTILIZERS

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The negative impact of Cd in fertilizers is not sure and needed to develop further studies in order to get a comprehensive risk assessment.

The annual world production of P₂O₅ from low cadmium igneous rock is equal to the current EU consumption and can not cover the needs of EU when expansions are taken into account. On the other hand, most of the low cadmium igneous rock is produced by FSU. It is therefore unrealistic and not economically viable to supply low cadmium phosphate from existing source and decadmiation of high cadmium phosphate sources, phosphate rock and phosphoric acid, is inevitable if this proposal is adopted.

There are several processes developed for decadmiation of phosphate rock and phosphoric acid. The process removing cadmium from concentrated phosphoric acid appears the most cost-effective and feasible at the pilot plant scale, but it has not yet been demonstrated on an industrial scale.

The cost mentioned in the proposal is only potential production cost of removal of Cd from the phosphoric acid based on pilot plant studies. When all cost items are included in an industrial scale plant and other processes are taken into account, the total production cost of Cd removal could be much higher than the one considered in the proposal. Furthermore, this additional cost of Cd removal could double until the fertilizer reaches the farmers.

Turkey has already completed the harmonization of technical legislation related to fertilizers on the extent of Customs Union Agreement with EU. This proposal would come into force in Turkey at the same time with EU most probably, although expansions of EU are not taken into account during preparation stage.

There are five companies producing phosphate fertilizers in Turkey. Three of them use imported phosphoric acid as raw material while others produce phosphoric acid from phosphate rock. After legislation comes into force,

- all of the companies would install units for decadmiation of phosphoric acid or
- three of the companies would import decadmiated phosphoric acid and two of the companies would import igneous or decadmiated phosphate rock or
- three companies including Toros would cease production since they can not find merchant grade phosphoric acid produced from Russian rock.

In all cases the companies could not compete with Russian producers as a result of cost increase and industry would disappear, because they keep living with small profit margins in current situation.

At the same time the regulation would have great impact on the Turkish farmers. They have small farms, their fixed costs are already high, and they are less supported when compared with EU or other developed countries farmer. Therefore regulation would have impact on social and economic life of the country.

We recommend that regulation should be less constraining like in USA and Oceania and take in account the expansions.