

Kemira GrowHow's comment on the Draft Proposal for a Regulation of the European Parliament and of the Council relating to cadmium in fertilizers (Draft N°22 of 31.07.2003).

Kemira GrowHow Oy's mission and vision focus on the food chain, food safety and quality. There are two main policy objectives of the proposal: "to ensure a high level of protection of the consumer, the environment and to complete the Internal Market for phosphate fertilizers". Consequently, the related objective of the proposal and Kemira GrowHow's course of action are matching. Kemira GrowHow as a company can live with the Commission proposal.

However, due to the limited availability of low cadmium containing phosphate rocks, fertilizer producers generally may face difficulties in fulfilling the requirements of the Commission proposal. Based on this, Efma, Kemira GrowHow being as a member, has prepared an industry position, which Kemira GrowHow also supports. Among other things this paper also includes the important subject to Finnish agriculture and Kemira GrowHow that local factors influencing soil cadmium accumulation are different and can lead to different local regulations.

Kemira GrowHow, Finnish authorities and institutes have over a long period performed studies and measurements of cadmium content and accumulation in soils, uptake by plants and, dietary intake of animals and human beings. Soil cadmium concentrations can be used as a good indicator of the purity of productive environments, agricultural inputs and agriculture produce. Cadmium is regarded harmful to the environment and human health. Crops take up cadmium from the soil and are considered the main source of human intake of this element.

Phosphate fertilizers have been identified as a major source of cadmium on arable land. All factors influencing soil accumulation such as original cadmium concentration related to parent rock, cadmium load from other sources, soil characteristics, soil pH status, erosion, climate conditions, as well as all past and future inputs, which could also lead to regional differentiation, should be taken into account. In Finland, the overall cadmium load and uptake is in balance and this is due to the low cadmium content in the rock used in the fertilizer production. If rock containing higher concentrations of cadmium would be used, this would over time result in a higher cadmium load.

As a summary Kemira GrowHow Oy wants to highlight that whatever conclusion Commission comes after all the consultations there must be room for regional differentiation in order to ensure equal high level of protection of the consumer and the environment.

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