



Fertiliser Manufacturers Association

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Registered in England No 154651

Dear Sirs

Consultation of Stakeholders on the Draft Proposals on Cadmium in Fertilisers

The Fertiliser Manufacturers Association, on behalf of UK producers of chemical and blended fertilisers, welcomes the opportunity to comment on the Commission proposals to limit cadmium (Cd) levels in phosphatic fertilisers.

In general terms we fully support the submission of our European association, EFMA, (12th September) and in particular their proposal that a maximum limit of 60 mg Cd/kg P₂O₅ be set, but we would also wish to highlight a number of issues which are of particular concern to us:

- The quality of the evidence put forward to justify reductions below the 60 mg limit is flimsy to say the least. If industry, and here we include the agricultural users of fertilisers as well as manufacturers, are to have such measures imposed upon them the measures should be supported by a robust risk analysis. This is patently not the case.
- Should the measures be adopted as drafted, UK and most of the European industry will be at the mercy of a monopoly supplier and one which will have no commitment to supply the European market. The limited supply of low cadmium rock will inevitably go to the highest price market.
- The whole premise of the proposal to systematically reduce the permitted Cd level over time is based on an available and economic decadmiation process being developed and fully operational 10 years after the implementation of regulations. As clearly discussed in the EFMA submission the development of such a process is far from certain.
- In the event of there not being a decadmiation process available a large proportion of the phosphates supplied by the African producing countries would be excluded from the European market, thus depriving these countries of their main source of income.
- The net effect of the proposed measures will be to increase the cost of fertilisers and thus reduce European farmers' ability to compete with those countries which are not trammelled with such restrictions. And, contrary to what is postulated in the proposal, the ability of farmers to pass on the additional cost to the consumer is most unlikely.

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- Finally, should it ever be conclusively proven that cadmium poses a real threat to the environment and human health it is illogical, to say the least, to restrict measures to those phosphatic fertilisers which are produced by chemical reaction. All phosphatic materials; whether they be conventional fertiliser, fertilisers for organic farming (which currently have a limit of 90 mg Cd/kg P₂O₅), sludge and manure should be controlled on an equal basis.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D J Heather', with a horizontal line underneath.

D J HEATHER
Director General