CAS position on the European regulation for fertilisers

CAS supports the project of harmonization for fertilisers and growing media. Beside mineral fertilisers, organo-mineral fertilisers, organic fertilisers, liming materials and growing media, the scope should clearly integrate plant biostimulants and additives. The addition of a specific category for mulches should again be considered. It would be a better way to include those products, than splitting them in 2 groups (organic soil improvers and other soil improvers).

1: Based on the latest document (Essential safety and quality requirements for fertilizing materials – prepared for June 2nd meeting), CAS comments are:

**Organic fertilisers**

**Threshold for Cu and Zn is a key issue:** The current proposal (200 and 600 mg/kg respectively) are too low. Large quantities of fertilisers, made from pure pig manure (at least 100 000 t in France) could be excluded from the market.

We support the principle of a labeling for products which exceed the limits for Cu and Zn.

In term of quality: we are against any overlapping of categories. We support the new proposal from the industry, with limit between organic fertilisers and organic soil improvers based on nutrients (data expressed in % of the total packaged weight):

- $N_{\text{total}}$: 2.5%
- $P_{2O_5}$ total: 2%
- $K_{20}$ water soluble: 2%

**Organo-mineral fertilisers:**

We support the new figures, based on Ecofi proposal, for both safety and quality criteria.

**Other soil improvers:**

That category should be précised. Right now, we have not enough elements to take any position.

**Organic soil improvers:**

The current limits for quality criteria are irrelevant, mostly for organic matter content. We basically support the industry proposal:

- Minimum dry matter: 40%
- Minimum organic C (based on total packaged weight): 10 %. Note that some vermicomposts would hardly reach 10 % of Corg. A limit at 9 % should be more relevant for that kind of product (even it is not a rounding value).
- Maximum nutrients ($N_{\text{total}}$: 2.5 %, $P_{2O_5}$ total: 2 %, $K_{20}$ water soluble: 2 %)
Growing media:

Safety criteria should be adapted for mineral growing media, especially mineral wools. Heavy metals included in those products are not released in soil, and not available for plants. CAT extraction (EN13651 method) is a good solution to take account of mineral growing media specific characteristics.

The introduction of a limit for As makes no sense for growing media.

2: Methods

We would like to draw the attention about methods: Generally speaking, for all fertiliser’s categories, any limit value should be proposed together the adequate method. Especially for organic soil improvers and growing media, reference methods (for sampling, extraction, analysis) have to come from CEN/TC223. That set of method is the lone being clearly validated for those specific matrixes. Some criteria are not yet covered by adequate validate method (e.g. viable weed seeds in growing media or soil improver): European commission should quickly mandate CEN/TC to achieve the methods.

3: About self-certification (see “New approach” document)

The scope of products concerned by self-certification has to be clarified. It has to be not limited on mineral, liming products and growing media.

Most of the fertilisers made of animal by-products are also very well known, and have a very long historic of use. The conformity of those products to the European regulation on animal by-products (currently CE 1069/2009 and 142/2011) is requested, and has to be considered as sufficient to permit the self-certification.

Same comment for by-products from agriculture or forestry (barks, straws, plant residues ...): They have to be clearly included in the scope of self-certification.

Laurent LARGANT, General Delegate

Angers, May 28th, 2014