Response to the Commission discussion paper on blending

2 June 2014  Fertilisers Working Group

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With regard to agenda point 6d: Rules for blending

• EBIC disagrees with the proposal to classify mixtures according to the main function of the product only. This would have several perverse effects:
  o It would obscure the added value of the secondary ingredients in the mixture (such as a biostimulant);
  o It would encourage the inclusion of ingredients that have not been properly authorized. Specifically, it would encourage companies to avoid registering biostimulants and additives that are mixed with fertilizers as the final product would just be labelled as a fertilizer;
  o It is also possible that mixing products of different categories could bring the final product below the minimum quality thresholds for the “main function” category, making a focus on the main function misleading.

• EBIC supports a position where labelling requirements indicate which products are mixed, for example “Fertilizer mixed with biostimulant” or “Growing media mixed with biostimulant”. While this would increase labelling requirements, it would provide transparency for the end user and prevent the inclusion of not-properly-authorized ingredients.

• In the examples above, the label information should include the biostimulants content with regard to the main component (e.g. kg/T or mL/L). This allows the user to determine that there is a meaningful amount of the second component to confer added value and not just a negligible amount to justify a price premium without delivering any additional added value.