EUROFEMA
European Organic Fertilizers Manufacturers Association
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Preliminary Opinion on organic-mineral fertilizers in the new regulation

Background

Organic-mineral fertilizers are well established in the marketplace. As Best-of-Both-Worl ds fertilizers they combine the nutritional and soil improving properties of organic raw materials and mineral fertilizers. In general the nutrients are derived from both sources, where most current member state regulations require a minimum level of nutrients derived from the organic sources. The growing use and application of these fertilizers can among others be explained by some specific properties:

- Just one application necessary to provide the soil with nutrients and organic matter
- Combined quick release and prolonged release of nutrients
- Far less leaching of water soluble nutrients
- Stimulating of soil structure and soil microbiological activity.

The group of organic-mineral fertilizers has a very wide variety with hundreds of combinations of organic and mineral raw materials available in the market. A large share of these fertilizers are complex fertilizers.

Opinion of EUROFEMA

1. The new regulation should **clearly recognize the existents of organic-mineral** and should not impose any barriers with respect to placing these products on the market ( other than those generic for all fertilising materials).

2. **A separate category for organic-mineral fertilizers is not deemed necessary** by EUROFEMA. Although specific essential requirements could be defined ( e.g. prolonged release )
   a. Measuring these properties will be time-consuming and costly
   b. The economic operators are well equipped to show to the market the specific properties of organic-mineral fertilizers
   c. Such a category would not create additional risk reduction

3. **The essential requirements defined for organic fertilizers can be applied to organic-mineral fertilizers.**

4. The yet unknown **blending and labelling provisions** of the new regulation should “include” compound-, complex and blended organic mineral fertilizers