The new framework will support the current innovative pathway that mineral fertilizer industry has undertaken.

It will require time and energy within the fertilizer industry to adapt to this new framework.

A paradigm shift

The aim of the first session of the EU Fertilizing Products conference was to provide all participants with a practical overview of the different changes, which manufacturers will have to implement in order to be ready for the application of the FPR in summer 2022.

Silvana Lyubenova, Director for Technical Harmonization and Consumer Policy at the Bulgarian Ministry of Economy, explained the defined roles of the different actors (i.e. manufacturer, importer or notified body) as well as the procedures to follow depending on what the product is made of and under which category it would be put on the market. This is why we can consider it a paradigm shift. The 2003/2003 Regulation was only regulating the characteristics of the final product in a very precise way, such as nutrient levels. The FPR will be regulating both the end characteristics (contaminants and nutrient levels) as well as the input materials contained in every fertilizing product (e.g. REACH registration).

A new tool available for manufacturers to get a CE mark

The new regulation basically establishes a common legal framework for fertilizing products in the form of a toolbox of measures, with different pathways depending on the product category and its content. This is to be understood as a ‘conformity assessment’, i.e. a process demonstrating whether specified requirements relating to a fertilizing product are fulfilled. It will definitely require time and energy within the fertilizer industry to adapt to this new framework – and so challenges remain.

The FPR will exist in parallel to national legislation, technical specifications and technical standards. The principle of circular economy is what we have to be aware of. It will be the first time that the EU will impose a circular economy based on recycling and this will hopefully be achieved before the FPR applies in June/July 2022.

A new player: notified bodies

An additional actor in the new FPR will be the ‘notified bodies’, which are considered to be conformity assessment bodies officially designated by the national authority to carry out the procedures for conformity assessment within the meaning of the FPR. The notified bodies are not obliged by any binding timeframe for giving their assessment to the requesting manufacturers. There is actually nothing specified in the FPR. But in practice, Cecile Monnier (Regulatory Affairs Manager at EUROFINS) clarified at the 28 May conference that the market will determine the acceptability of timelines and that the timelines will depend on the repeatability or the standard nature of the product concerned.

In practical terms, all the notified bodies will be listed in a public database on the internet (called NANDO). A manufacturer, here to be considered as a customer, asks forquotations before sending its application form to the notified body selected. The market and local competition are both determining the price range as much as the work performed. For instance, 200 notified bodies are listed across all sectors in Italy, whereas in France there are only 80.

The big challenges of standardization and labelling

Being acquainted with the new procedures and the role of notified bodies will not be enough to be able to apply the FPR. Fertilizer producers want to rely on a mutual understanding about the respective specifications and technical information required for the different product function categories – and this is why standards exist. This is what the convener of the working group seven on chemical analysis (part of the Technical Committee 260 on fertilizers and liming material within CEN, the European Center of Normalization), Ian Chys, explained during the Fertilizers Europe conference in Brussels.

To implement the FPR for all product categories concerned, about 230 standards need to be created or at least updated. And these standards are a key pillar to ensure a well-functioning EU market for fertilizing products, not least because they are providing a common method for compliance verification during the different conformity assessments. Still, ahead of summer 2022, substantial work within CEN will have to be done for establishing the frame of harmonized standards in place for the FPR – and this will hopefully be achieved before the FPR applies in June/July 2022.

A similar challenge remains as far as the labelling requirements for the different product function categories are concerned. The labelling information placed on the bag if the product is not bulk, will at least double in comparison to the current provisions under the 2003/2003 Regulation. It will have to include instructions for intended use, including application rates, timing and frequency. It will need to target plants or mushrooms, recommend...
Organic-based fertilizers are made-up of three core product categories – organic fertilizers, organo-mineral fertilizers and organic soil improvers. These are derived from organic materials such as discarded animal and vegetable materials, usually sourced according to the principles of the circular economy and industrial symbiosis. Organic-based fertilizers increase the organic matter in soil, feed soil micro-organisms, contribute to better plant health and can restore the land’s physical-chemical properties. They are also a rich source of primary nutrients: nitrogen, phosphorus and potassium.

The majority of producers of organic and organo-mineral fertilizers only act locally, selling in their own country or to sub-contractors, which makes it extremely challenging to compile data on the true value of the global market. Fewer than 10 industrial producing companies – mainly based in western Europe and organo-mineral fertilizers only act locally, selling in their own country or to sub-contractors, which makes it extremely challenging to compile data on the true value of the global market. Fewer than 10 industrial producing companies – mainly based in western Europe and organo-mineral fertilizers combined in one product such as organo-mineral fertilizers.

Mineral and organic forms of nutrients: Stronger together
ECOFI is keen to promote the complementarity between mineral and organic fertilizers combined in one product such as organo-mineral fertilizers.