To the Members and Substitute Members of the Environment, Public Health and Food Safety and Internal Market and Consumer Protection Committees of the European Parliament

Brussels, 6 December 2016

Re: Open letter supporting the EC proposal for a revised Fertilisers Regulation

Dear Member of the European Parliament,

We write to ask you to support the European Commission’s proposal to revise Regulation (EC) 2003/2003 related to fertilisers.

The proposal aims to create a level-playing field between waste-based and traditional fertilisers through the harmonisation of national standards and requirements for fertilising products. It will help reduce major sources of soil and water pollution, improve food safety, reduce dependency on imported critical raw materials and drive innovation in the sector.

The proposed limits on cadmium content of 20mg/kg for phosphate fertilisers will contribute to improving the health of the EU population and to lowering related socio-economic costs\(^1\). They reflect recommendations of food safety and health authorities\(^2\) which identify phosphate fertiliser spreading as the main cause of cadmium contamination of agricultural soils in the EU. Cadmium exposure can lead to kidney dysfunction, skeletal damage or cancer. Current dietary exposure to cadmium in the EU is higher than what the human body is able to tolerate (2,5 μg/kg of body weight per week).

Legislation setting stricter limits for contaminants, including cadmium, already exists at national level and corresponds to the lowest limit of the current Proposal.\(^3\) DG SANTE strongly recommends strict limitations on cadmium in soils to anticipate future requirements for a number of important contributors to dietary cadmium exposure, for example cereals, potatoes and other vegetables.

---

\(^1\) E.g. the socio-economic cost of fractures caused by cadmium in food amounts to approximately 400 million Euros per year in Sweden according to Swedish Chemical Agency Report 4/13 ISSN: 0284-1185

\(^2\) the European Commission Directorate General on Health and Food Safety (DG SANTE), the European Food Safety Authority, the World Health Organisation and the Food and Agriculture Organisation of the United Nations

\(^3\) Decree 577/2005 of the Ministry of Agriculture of Slovak Republic
The Commission’s proposal supports the recovery of nutrients from waste materials and their subsequent re-use in line with the EU Circular Economy strategy. The existing Regulation supports a linear economy model and leaves out of scope approximately 50% of the fertilisers currently on the market. Opening the EU market will thus help foster competition, boost innovation and create a market for fertilisers sourced from bio-waste and secondary raw materials. The Commission’s proposal will help move towards a circular economy.

We hope you will take our views into account and support the European Commission’s proposal.

Yours sincerely,

Laura Degallaix  
Director  
European Environmental Citizens Organisation for Standardisation

Jeremy Wates  
Secretary General  
European Environmental Bureau

Ágnes Zolyomi  
General Secretary  
CEEweb for Biodiversity