



EU fertilisers regulation. Key issues about CMC2 and CMC6

Afaïa welcomes the initiative for a harmonized European legislation for fertilizing products, that promotes the Circular Economy and has the potential to remove existing trade barriers currently impeding intra-EU trade flows in our sector.

1. CMC2

Annex II – part II – CMC 2 – point 1

In term of treatment methods, Afaïa proposes to merge both amendments adopted by EU parliament and Council version:

1. A CE marked fertilising product may contain plants, plant parts or plant extracts having undergone no other processing than cutting, grinding, centrifugation, sieving, **sifting**, milling, pressing, drying, freeze-drying, **granulating**, **chopping**, buffering, extrusion, radiation, frost-treatment, sanitation by using heat, extraction with water, **distillation**, or any other preparation/processing that does not render the final substance subject to registration under Regulation (EC) No 1907/2006.

Annex II – Part II – CMC2 – Point 2

Afaïa supports EU parliament amendment n° 229 about algae and blue-green algae:

AM 229

2. For the purpose of paragraph 1, plants are understood to include algae **except for** blue-green algae **that produce cyanotoxins classified as hazardous in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures.**

Note that another key issue for CMC2 is relative to conformity assessment procedures (ANNEX IV). As CMC2 material can be considered « safe », self-certification of the CMC2 materials via Module A - which complies with the common practice in the industry today - is absolutely sufficient. Then Afaïa strongly supports EP amendment n°316.

2. CMC6

Annex II – part II – CMC 6 – point 1 – c) (vinasse definition)

The definition of vinasse has still to be enlarged. Council version does not cover all the diversity of this material. Definition proposed by Afaïa, with the support of European distiller's industry, and European yeast industry:

c) vinasse: by product resulting from
- the distillation of fermented sweet musts (of fruit origin, wine, piquette of marcs, wine lees, cane, beets...) and after extraction of the ethyl alcohol produced.
- yeast production on molasse based substrate

Annex II – part II – CMC 6 – point 2 – subparagraph 2 a (about aflatoxin)

The EP Amendment n° 269 proposes to keep only material with aflatoxin content under the detection limit. Afaïa urges to delete that EP proposal: Aflatoxin is not a relevant marker for innocuity for using as fertiliser. In addition, most of raw material involved in that CMC 6 have already been controlled for aflatoxin, as they were relevant from other regulations (food or feed).

Afaïa, French federation, represent 72 companies, active in France on the industries of:

- *Organic fertilisers: organic soil improvers, organic fertilisers and organo-mineral fertilisers*
- *Growing media and mulches*
- *Plant biostimulants*

Afaïa is active for 30 years to represent its members, defend their interest and promote the products of the members.

Total sales of Afaïa members represent more than 300 million € with 1700 employees. More than 3 million of m³ of growing media and mulches, and 1.2 million of ton of organic fertilisers are sold annually.

Afaïa has a strong commitment in Circular Economy, with the organisation of the first convention about "Agriculture Circulaire", and the development of the "Fertilisant durable" (sustainable fertiliser).

