Mr. Daniel Calleja Crespo
Director General
Directorate General for Enterprise and Industry
European Commission
B - 1049 Brussels

Brussels, 2 June 2014

CC: Mr. Karl Falkenberg, Director General, Directorate General for Environment
Mr. Jerzy Bogdan Plewa, Director General, Directorate General for Agriculture and Rural Development

Re: Revision of the EU fertiliser regulation and cadmium content of fertilisers

Dear Director General,

We are writing to you in relation to the revision of the EU fertiliser regulation to underline the importance of ensuring that limits on the cadmium content of fertilisers are kept as strict as possible.

Mineral phosphates are a non-renewable resource, and as 'purer' deposits are becoming depleted, the risk increases that rock contaminated with higher levels of cadmium will be exploited.

The harmful effects of cadmium on health and on the environment are however serious and uncontested. Once cadmium is taken out of mineral deposits and released in the biosphere it stays there, moving between soil, water and air, and bioaccumulating in living tissues. It is therefore crucial to prevent more cadmium entering the biosphere. Given that fertilisers are at present a major source of cadmium, it is imperative that their cadmium content be severely limited.

It is technically possible to decadmiate phosphates. Setting standards that will ensure this has several advantages. First of all it will help Europe develop a resource-efficient and a circular economy, by promoting the re-use of scarce mineral resources. Apart from taking out the cadmium from mineral phosphates, the recovery of phosphates already in circulation should become a bigger priority. This is in the long-term interests not only of the environment but also of the economy. Industry will benefit more from developing decadmiation and phosphate-recovery technologies as well as European-sourced organic fertilisers, than from being allowed to import, condition and distribute high-cadmium phosphate fertilisers extracted abroad.

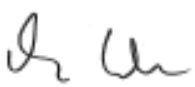
Some soils already have high cadmium levels, and it will take many years and careful nurturing of the soil for this contamination to come down to acceptable levels. It is therefore urgent that cadmium levels in fertilisers be limited. It is not more application of mineral fertilisers that will improve the quality of the soil, but the addition of organic matter in order to build soil life. Each application of contaminated phosphate fertiliser pushes further away the date when the soil will have lost its contamination.

The Regulation of 13th October 2003 included the following paragraph: *"Fertilisers can be contaminated by substances that can potentially pose a risk to human and animal health and the environment. Further to the opinion of the Scientific Committee on Toxicity, Ecotoxicity and the Environment (SCTEE), the Commission intends to address the issue of unintentional cadmium content in mineral fertilisers and will, where appropriate, draw up a proposal for a Regulation, which it intends to present to the European Parliament and the Council. Where appropriate, a similar review will be undertaken for other contaminants*."

We therefore urge you, after 10 years of inaction by the Commission, to now take decisive steps to address this well known problem and use the opportunity of a new fertiliser regulation to take Europe in the direction of a more resource efficient and resilient economy.

Jeremy Wates,

EEB Secretary General,



Also on behalf of IFOAM EU Group, the Institute for Agriculture and Trade Policy and ARC 2020