



European Consortium
of the Organic-Based Fertilizer
Industry

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International Code of Conduct for the Use and Management of Fertilizers

Comments from the European Consortium of the Organic-Based Fertilizer Industry (ECOFI) on the zero draft (11/05/2018) prepared by the Food and Agriculture Organization (FAO) and the Intergovernmental Technical Panel on Soils (ITPS)

ECOFI welcomes the development of the International Code of Conduct for the Use and Management of Fertilizers and the inclusion of organic fertilizers in the zero draft. However, considering the importance of the Code's topic, and the fact that it merits additional reflection, discussion and consultation before being launched, ECOFI calls for the adoption of the Code of Conduct to be delayed until the Committee on Agriculture of the Food and Agriculture Organization (COAG) 2020, instead of 2018. This would thus leave the FAO, ITPS, and all relevant stakeholders adequate time for appropriate consideration of the draft.

Currently, the Code has clearly been written with mineral fertilizers in mind and with all other technologies cast as corrective measures around mineral fertilizers. For example, according to the proposed definition of contaminants, the carbon in an organic fertilizer would be considered a contaminant. It is crucial that the Code of Conduct is more ambitious in its vision for the future of the agricultural sector.

ECOFI would therefore like to see a rethink of the document as a Code of Conduct for Integrated Soil Fertility and Plant Nutrient Management in order to correct the over-emphasise on mineral fertilizers and simplify the long and repetitive document.

- This would promote a more holistic approach and balance the various tools involved, including incorporating organic fertilizers and soil improvers as well as organo-mineral fertilizers, which are not currently mentioned.
- This more holistic approach should begin with farmers' considerations of the starting conditions of their farm, constraints on their choices of fertilizers depending on the production system and objectives (e.g. specific labels, quality marks or certifications) and also consider all the possible choices of integrated soil fertility and plant nutrient management tools.
- The Code's section on nutrient recycling should give more attention to promoting the Circular Economy and economic development through organic-based fertilizers in industrial symbiosis. Other value chains' by-products provide the nutrients and organic material for organic-based fertilizers and soil improvers. The role of such raw materials and their accompanying processes in plant nutrition products should be explained and given adequate importance in the Code.
- In addition to providing nutrients, organic-based fertilizers can also contribute to other societal objectives such as mitigating climate change (carbon sequestration), adapting to climate change (improved water retention), soil health and industrial development. The contribution of organic-based fertilizers to achieving the UN's Sustainable Development Goals – particularly in terms of 12. Responsible Consumption and 13.

Climate Action¹ – should not be overlooked in this context, but encouraged and promoted by the Code.

ECOFI would also like to suggest some more specific changes to the text:

- In general, we feel that **many of the definitions should be reconsidered**. It might be worthwhile to consider definitions being used in various legal frameworks. For example, our comments include definitions being considered by the European Union in its review of its fertilizer law.
- The term “**Biofertilizer**” (see 2. Terms and Definitions, page 4) is used in some contexts (e.g. India) to refer to biostimulants, thus creating confusion with other inputs. ECOFI suggests that this term be avoided in the document.
- The definition of **fertilizer** (see 2. Terms and Definitions, page 4) must be modified to develop the role of fertilizers and add other sources of recycled nutrients (such as animal by-products, food industry by-products, products of other industry supply chains, etc.).
- The definition of **organic fertilizers** (page 11) does not provide a comprehensive list of sources of recycled nutrients. (Some missing sources are animal by-products, food industry by-products, products of other industry supply chains, etc.). Given the near impossibility of being exhaustive, it is probably better than the example not be included in the definition at all and only be mentioned in the section on recycled nutrients. This would also help reduce repetition. Instead, we suggest a criteria-based definition such as the one in the process of being adopted by the European Union: “An organic fertiliser shall contain organic carbon (C_{org}) and nutrients of solely biological origin, such as peat. Organic fertiliser may contain leonardite and lignite and substances obtained from them, but no other material which is fossilized or embedded in geological formations.”
- As noted above, the **list of sources of recycled nutrient in the definition (on page 11), is incomplete**. It should either be made explicit that the examples given are not exhaustive or the others should be added. (See list in the previous bullet point)
- A definition should be added for **organo-mineral fertilizers**. The pending European definition is: “An organo-mineral fertiliser shall be a co-formulation of one or more **mineral** fertilisers and one or more materials containing organic carbon (C_{org}) and nutrients of solely biological origin, such as peat. Organo-mineral fertiliser may contain leonardite and lignite and substances obtained from them, but no other material which is fossilized or embedded in geological formations.”
- Under point 3.4 “**Soil fertility and plant nutrition**” (page 13), the important **role of organo-mineral fertilizers** in improving nutrient use efficiency, reducing environmental losses, maintaining or improving soil fertility, etc. should be incorporated into the text.
- The **role of organic and organo-mineral fertilizers** should also be included and underlined under the section 4.2 “**Fertilizer use and management**” (page 18).

¹ <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>