

International Code of Conduct for the Use and Management of Fertilizers

General Comments from the International Fertilizer Association (IFA) pertaining to the zero draft, which will be presented to FAO's Committee on Agriculture (COAG) at its session in October 2018

At IFA, we have always welcomed the idea to have a Code of Conduct for Fertilizers, and we have been very supportive of this project right from the beginning.

We consider this a quite unique opportunity to create a truly relevant and meaningful document not only for our industry but for all key stakeholders that are closely involved with our sector.

But the development of such an extensive and important document cannot be taken lightly: Creating a substantial and impactful document, that provides true guidance, takes time.

While we applaud FAO for its ambition, we believe that the proposed timeline (coming up with a zero draft in 6 weeks, getting it reviewed by the Intergovernmental Technical Panel on Soils (ITPS) and an Open-Ended Working Group within roughly 2 weeks, and coming up with a revised zero draft only a couple of days later for consideration at the Global Soil Partnership (GSP)'s Plenary Assembly in June) does not provide for sufficient consultation, and simply cannot result in a document which provides meaningful guidance and recommendations.

The FAO is renowned for its sound scientific, thorough and reliable work. If this document cannot benefit from more consultations and improvements, the outcome will not only affect the reputation of the FAO, but the code will ultimately not generate the adherence and support that a code is supposed to get from its target audiences.

What is immediately striking are the number of repetitions throughout the whole document, while there are entire areas and topics that would clearly benefit from clearer definitions and clarification.

For example:

- The differentiation of organic and mineral fertilizers would deserve more thoughts; it would be useful to assess and discuss where a stronger distinction within the document would make better sense and where both nutrient sources can be combined within the same paragraph. The draft weights also differently between organic and mineral fertilizers. We would recommend complementarity in assessing benefits and value of both.
- The context of scientific evidence and scientific risk assessments is not fully taken into account, in particular in paragraphs referring to risks and contaminants. In general, the language is very generic and non-specific in paragraphs relating to risks in usage, handling or storage. However, these are areas where a code of conduct has to be very carefully formulated as it is of absolute necessity to all users involved, to understand well these areas.

- As enshrined in WTO rules, a sound basis on scientific risk assessment should underpin any recommendations to governments. The notion of risk management also needs to be enshrined in the code, so as to demonstrate that potential risks can be adequately addressed. For the future relevance of the code, we cannot afford to “brush over” these chapters.
- Some good instruments within governance, initiatives, programs and regulations already exist in relation to fertilizer value chain (production, transport, QC, labelling, trading etc.) For lack of time, these have not been considered enough and deserve to be closer looked at.
- Economic considerations are also widely ignored, whereas this is of major interest and concern not only in regions that must overcome underuse of fertilizers.

The document is still quite unbalanced:

- While the preamble of the document clearly states that its goal is to “maximize benefits and reduce environmental impacts”, the current draft is unbalanced. Benefits and the need to address not only overuse but also underuse are side-lined in favour of an overwhelming strong focus on pollution. We should keep in mind that, worldwide, underuse cases are at least as widespread as overuse ones, and both are equally important from a sustainability standpoint, considering that nutrient underuse contributes to soil degradation and soil erosion.
- “Responsible use” should be defined and not be limited to overuse.

We noticed some gaps:

- We would recommend a stronger focus on crucial areas relating to nutrition, farmers’ livelihoods and adaptation to climate change. These aspects need to be explored more, also for the benefit of policymakers and advisors in developing countries and with a view to align the recommendations of the code with SDG targets and UNFCCC goals and objectives. The Code of Conduct should be anchored within a global framework of Agenda 2030.
- More emphasis could be placed on the farmer as a decision-maker. Farmers have a critical role to play in sustainable fertilizer use. More thoughts should be given to how the industry, governments, research and extension could support this role.

Language needs to be carefully reviewed, as some areas risk to create misunderstanding and confusion:

- Some sections are clearly “cut and pasted” from the Code of Conduct for Pesticides, which was used as starting point for developing the zero-draft (e.g. references to “remediation measures”, “allowable limits” do not apply to fertilizers). The same goes for references to shipping, where pesticides require a completely different handling and management.
- IFA would like to take this opportunity to emphasize that fertilizers and pesticides, besides both being important agricultural inputs, have nothing else in common. Fertilizers are aimed at feeding plants while pesticides are used to kill or control pests and diseases. As such, risks

associated with fertilizer use are much lower compared to pesticides. Using the code of conduct for pesticides as a starting point for this code of conduct is inappropriate in our view.

- Certain paragraphs seem to imply that there is a risk inherent to fertilizers itself – independently from the storage, handling and use. As mentioned above, this aspect must be very carefully worded to avoid misinterpretations once the code is published.

Definitions need further review:

- They are not always aligned with already existing FAO definitions that have been approved by member states. Here again, definitions have been drafted too quickly, without the necessary consultation.
- Terminologies relating to slow- and controlled-release fertilizers, for instance, are not accurate. The fertilizer industry can provide assistance with product definitions. The code would clearly benefit from this assistance.

In summary, substantial improvements are still required to make the current draft relevant and ready for adoption. We are of the opinion that the priority should be incorporating specific comments made during the GSP Plenary Assembly in June (by France, Germany, Jordan, Morocco, The Netherlands and IFA) and submit a new draft for consultation to the COAG. It would reflect a transparent, step-wise and constructive negotiation process.

We believe that the speed with which this document had to be pulled together is the main factor for its weaknesses, flaws and gaps. One must bear in mind that fertilizers have a major role to play for the world's future in terms of food security. 50 % of our food produced today is based on mineral fertilizers. At the same time, nobody denies that mineral and organic nutrients impact the environment and that improved management practices are of major importance.

Given the critical role of fertilizers, IFA would strongly recommend giving appropriate weight to the development of such a significant document: it is ultimately the extend of its content that will decide if this code is truly relevant for nutrient stewardship or if it will be dismissed as superficial and too general.

About the International Fertilizer Association

The International Fertilizer Association (IFA) is a trade association representing the global fertilizer industry, which provides the crop nutrients that allow farmers everywhere to meet the world's growing food, feed, fiber and bioenergy needs in a sustainable manner. IFA member companies represent all activities related to the production and distribution of every type of fertilizer, their raw materials and intermediates. IFA's membership also includes organizations involved in agronomic research and training. IFA has some 501 members in about 68 countries.