

International Code of Conduct for the Use and Management of Fertilizers

Contribution of the International Fertilizer Association (IFA)

The International Fertilizer Association would like to thank FAO for the opportunity to comment and contribute to this draft Code of Conduct. Please find below our specific inputs regarding the current zero draft. Comments are noted by page number and/or paragraph.

Comments

- **P.1:** Fertilizers are important and widely used inputs in modern agriculture contributing to global food security, farmer livelihoods and essential human nutrition, consider **adding:** “*and prevent deforestation and other land use changes*”.
- **P.2, 1st Paragraph:** On “native ecosystems”: Not all land worth protecting from agricultural use, or excessive agricultural use, is native ecosystems. A good example is Germany where there are close to no native ecosystem but many areas are worth protecting, or worth using agriculturally with reduced intensity. There must be a better term for land that provides ecosystem services other than agricultural production.
- **P.2:** There are not enough references made to the SDGs throughout the text, and to the contribution the sustainable use of fertilizers makes in achieving them. This Code of Conduct should expand further on how it would contribute to reaching the SDGs, if properly implemented.
- **P.2, Paragraph 7:** Replace “*fertilizer industry*” throughout the text with “*plant nutrition suppliers*”, so that it better represents and incorporate all plant nutrition providers. Indeed, “fertilizer industry” is usually understood as mineral fertilizer producers only.
- **P.3, 1st paragraph:** Replace “*framework under*” with “*voluntary set of practices with*”.
- **1.1:** Replace “*agreed-upon expectations for behavior*” by “*voluntary practices*”.
- **1.2:** Replace “*including*” by “*especially*”.
- **1.3:** Remove “*monitoring the production, trade, distribution, quality, management and use of fertilizers*”. Replace by “*promoting the responsible use of fertilizers*”. In our view, the code is aimed at and should remain focused on promoting the responsible use of fertilizers.
- **1.3.1:** Replace “*Ensure global food production and food security*” by: “**increase global food production and ensure food security**”, so as to make it consistent with FAO’s long-term projections.
- **1.3.5 & 1.3.6:** redundant with 1.3.2 and 1.3.3. Once excess nutrients are in ground and surface waters, the Code can do little to reduce the impact of this presence.

- **1.3.7:** After "...human health", add "*through optimal use of plant nutrients*".
- **1.4.1:** Replace "end-users" by "farmers" as end-users could be understood as food consumers.
- **1.4.4:** add "biosphere, atmosphere and hydrosphere".
- **1.4.8:** Regarding "including comparable statistics": clarify which statistics, on what, and to what they should be comparable.
- **2. Terms and definitions:** The Code should define the following additional terms, among others: Nutrient stewardship; Responsible use; Efficient use; Effective use; Balanced use; Balanced crop nutrition; Use efficacy; Evidence-based; Unacceptable risk; Off-site impact. These terms are used in the text and can be subject to interpretation, therefore the importance of defining them.
It is our understanding that the Open-Ended Working Group agreed to add a definition to "agro-industrial byproducts" in replacement of "animal wastes".
- **2. Advertising:** The terms "fair" and use are very vague. Replace "fair sale and wise use" by "responsible sale and use".
- **2. Contaminant:** Replace the whole definition with: "*non-nutritive elements in fertilizers that could potentially have an impact on health and the environment on the basis of conclusive scientific evidence*". Classification as "contaminant" requires a sound scientific risk assessment, and this risk can be reduced through proper risk management practices.
- **2. Disposal:** Replace "*fertilizer waste*" with "*byproducts*".
- **2. Fertilizer additives:** Remove "reductions in solubility". Solubility reduction may result in lower fertilizer use efficiency.
- **2. Fertilizer industry:** Where do producers of animal manure and other organic fertilizers fit in this definition? We recommend replacing "*fertilizer industry*" with "*plant nutrition suppliers*" and "*the entire value-chain*" by "*plant nutrition suppliers*".
- **2. Fertilizer misuse:** Replace "*the application of contaminants to the soil that might pose risk to human health or the environment*" with "*to enable a proper management of the risks from non-nutritive elements in fertilizers to levels that are acceptable to protect the environment and human health on the basis of conclusive scientific evidence*".
Another misuse of fertilizers is the use of fertilizers by insurgents to produce improvised explosive devices. Should this aspect be addressed in the code?
- **2. Inorganic fertilizer:** add "**a nutrient-rich fertilizer produced industrially...**" (parallel to "*carbon-rich fertilizer*" for organic fertilizer). This is the key feature of an inorganic fertilizer: it is stable and has a high nutrient content.
- **3.1:** Replace "*fertilizer management*" with "*fertilizer use*".
- **3.5.4:** Delete, it is repetitive with 3.6.7.
- **3.6.5:** The word "*prohibited*" in the current wording is too strong; remove it.
Why is this paragraph exclusively focusing on P and does not apply to excessive applications of any element that could ultimately lead to negative environmental effects? It should also address the under-use of fertilizers (which is at least as widespread geographically), and its implications on crop productivity, human health and farm income.
- **3.6.8:** The code should not give the feeling that if we just soil test all the problems can be addressed. There is a big difference between soil testing and nutrient management. The code

needs to put more emphasis on nutrient management, and less on soil testing, which is only one of the tools available to farmers to improve nutrient management.

- **3.8.1:** This is a task that can be daunting for farmers, especially for smallholders.
- **4.4:** in the first sentence, should the term “*nutrient*” be replaced by “*loss pathway*”?
- **4.5:** Misuse of fertilizers also includes their potential diversion to produce improvised explosive devices. Should this issue be addressed in the code?
- **4.5.4:** “*unacceptable risk*” is too vague, the code should either define or remove the term.
- **4.6:** Add “end users should **optimize the positive impacts of fertilizers**”.
- **4.7.6:** Replace “*Establish evidence-based application limits for nutrients from fertilizers*” with “*Consider the implementation of **nutrient budgets***”.
- **4.8.3:** Replace “*overuse and misuse*” by “***ineffective and inefficient use***”.
- **4.9.2:** Replace “*use*” by “***misuse***”.
- **4.9.3:** Replace “*risks*” by “***potential risks***”.
- **4.10.1:** Clarify “*use of different fertilizer delivery mechanisms*”.
- **4.10.3:** Remove this paragraph. This gives the impression that there is a proven risk of using and handling fertilizers, when no evidence supports this.
- **4.11.3:** Add “*applications (source, rate, time and place)*”.
- **5.1:** Replace “***of reused***” by “***from reused***”.
- **5.3.3:** If risk are unacceptable, some reused/recycled nutrient sources should be prohibited (analogy with 3.6.5).
- **5.4.4:** This paragraph is relevant but not in the context of this section, as it has not much to do with recycling and nutrient reuse.
- **5.4.5:** Why is the term ‘contaminants’ used in section 4.9.2 while ‘non-nutritive contents’ is used in 5.4.5?
- **5.5:** The burden and obligations on the organic fertilizer industry seem very light compared to those put on the inorganic fertilizer industry.
- **5.5.1:** National universities and institutes can also develop new technologies.
- **5.5.3:** This paragraph should go further, in that form it is calling for actions that have already been led.
- **Add several or one paragraph** addressing: fertilizer retailers, salespersons, farmers organizations, analytical laboratories & consultants.
- **6.3.2:** Replace “*harmful contents of*” by “***non-nutritive contents in***”.
- **6.4.1:** Replace “*deficiencies*” by “*requirements*”.

- **6.4.2:** Replace “*nutritive quantity*” by “*nutrient content*”.
- **7. Access, distribution and labelling:** This section should also address: (i) access to finance and (ii) fertilizer fraud and/or adulteration. They are big issues in some parts of the world such as sub-Saharan Africa.
- **7.1.2:** Global standards, where justified, should be soundly-based on scientific evidence.
- **7.2.4:** This paragraph focuses on responsibilities that regard local distributors rather than fertilizer producers.
- **7.3.1:** Define “*licensed dealer*”.
- **8.1.4:** Clarify what is meant by “*minimize off-site impacts of fertilizers*”.
- **9. Monitoring and Observance:** Add a paragraph that says:” all *relevant laws, regulations, customary rules at all levels have precedence over the code and should be applied independently of provisions taken towards the observance of the Code*”.
- **9.7:** Remove the reporting part. The industry monitors and communicates already quite extensively on its stewardship activities and performance.

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.



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