



European Consortium
of the Organic-Based Fertilizer
Industry



European Biostimulants Industry Council

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POSITION PAPER

The regulation on statistics on agricultural input and output (SAIO) should include the term ‘fertilising product’ and cover all the product function categories under the Regulation (EU) 2019/1009

*This position is also supported by other organisations, listed at the end of this document.**

As business associations representing important fertilising product sectors in the European Union (EU), EBIC and ECOFI welcome the legislative proposal on statistics on agricultural input and output (SAIO) and the intention to gather information on agriculture that is as accurate as possible to enable the design and monitoring of policies that benefit the citizens of the EU.

However, our associations believe that in order to fulfil this objective, the SAIO regulation should be better aligned with Regulation (EU) 2019/1009 (the Fertilising Products Regulation—FPR). This means including the umbrella term ‘**fertilising product**’ as defined in the FPR to enable the collection of data on the full range of fertilising products covered by that regulation. The FPR covers seven product function categories (PFCs) that are used in a complementary way to achieve optimal plant nutrition and soil fertility management. Currently, the SAIO proposals only foresees the collection of data on inorganic and organic fertilisers, leaving out six PFCs.

Fertilising products are routinely used by European farmers, and they are key tools to achieve the goals of the Common Agricultural Policy and the EU Green Deal, so gathering statistics on their use is fundamental for informed policy-making at EU and national level.

The regulatory framework for fertilising products in the EU

Until now, the only European legislation concerning fertilising products was Regulation (EC) 2003/2003¹, which applied to inorganic fertilisers and liming materials. The rest of the products defined under the umbrella term ‘fertilising products’ by Regulation (EU) 2019/1009 (more information in the next section) were placed on the market under national legislation in the EU member states.

¹ Regulation (EC) No 2003/2003 of the European Parliament and of the Council of 13 October 2003 relating to fertilisers. Available at: <https://eur-lex.europa.eu/legal-content/GA/TXT/?uri=CELEX:32003R2003>

This all changed with the publication in 2019 of the **Fertilising Products Regulation (FPR)** [Regulation (EU) 2019/1009]², which will start to apply on July 16, 2022.

The FPR will regulate the placing on the market of ‘**fertilising products**’, which are defined in Article 2 of the FPR as “substance, mixture, micro-organism or any other material, applied or intended to be applied on plants or their rhizosphere or on mushrooms or their mycosphere, or intended to constitute the rhizosphere or mycosphere, either on its own or mixed with another material, for the purpose of providing the plants or mushrooms with nutrient or improving their nutrition efficiency”.

The FPR establishes seven **product function categories (PFCs)** of fertilising products in its Annex I, which are:

- fertilisers (PFC 1), subdivided into:
 - organic fertilisers (PFC 1.A)
 - organo-mineral fertilisers (PFC 1.B)
 - inorganic fertilisers (PFC 1.C)
- liming materials (PFC 2)
- soil improvers (PFC 3)
- growing media (PFC 4)
- inhibitors (PFC 5)
- plant biostimulants (PFC 6), subdivided into:
 - microbial plant biostimulants (PFC 6.A)
 - non-microbial plant biostimulants (PFC 6.B)
- fertilising product blends (PFC 7).

When the FPR starts to apply in July of this year, it will repeal Regulation (EC) 2003/2003, which only covered inorganic fertilisers (PFC 1.C in the FPR) and liming materials (PFC 2). The FPR covers a much broader range of fertilising products categorised under the seven PFCs listed above, and it will provide partial harmonisation to the EU fertilising products market, giving the opportunity for manufacturers to obtain a CE mark that will allow free circulation of their products in the EU.

The importance of the fertilising products sector in the EU

The wide range of fertilising products grouped under the seven PFCs in the FPR play different and complementary roles in helping farmers produce plentiful, high-quality crops while assisting the EU in the move towards more sustainable agriculture³. Fertilising products are

² Regulation (EU) 2019/1009 of the European Parliament and of the Council of 5 June 2019 laying down rules on the making available on the market of EU fertilising products and amending Regulations (EC) No 1069/2009 and (EC) No 1107/2009 and repealing Regulation (EC) No 2003/2003. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019R1009>

³ Plant nutrition & soil fertility: key to deliver Europe's Green Deal objectives. Available at: <https://biostimulants.eu/wp-content/uploads/2022/02/Plant-nutrition-trifold-web-version-FINAL.pdf>

routinely used by EU farmers to ensure food production under challenging conditions. Some have been used for centuries, while others have emerged in recent decades as a result of intensive innovation. Achieving the nutrient efficiency objectives outlined in the Farm to Fork Strategy depends on the judicious use of the right combination of fertilising products for site-specific conditions.

Unfortunately, it is currently hard to obtain statistics on the use of the full range of fertilising products. Until now most member states only collect statistics on the use of inorganic fertilisers and may also amalgamate data on specific nutrients, regardless of the product containing them, through farmers' nutrient management plans. Therefore, accurate monitoring of the Farm to Fork Strategy objectives depends on including fertilising products in the SAIO proposal.

PCF 1: Fertilisers

Fertilisers are fertilising products “the function of which is to provide nutrients to plants or mushrooms”.

PFC 1.A: Organic fertilisers

The main function of organic fertilisers is to provide nutrients under organic forms from organic materials of plant and/or animal origin.

By definition, organic fertilisers deliver carbon organic matter to agricultural soils, which improves soil structure, increases its water-holding capacity and improves its ability to retain nutrients. The term organic fertilisers covers on-farm sources such as raw manures, but also processed organic fertilisers. The latter provide access to organic sources of nutrients to farmers in a form which can be transported economically and applied safely, with consistent formulations, reliable nutrient content, and traceable components. Organic fertilisers recycle nutrients which would otherwise be discarded. Ultimately, organic fertilisers enrich and revive soils to ensure they are healthy, fertile, and sustainable for agricultural production, while allowing plants to take-up nutrients as and when they are needed, thanks to their natural controlled-release properties.

The European organic fertilisers market already accounts for 2,3 billion euros and is expected to garner 3 billion euros by 2023, registering a compound annual growth rate (CAGR) of 4,2% from 2017 to 2023.⁴

PFC 1.B: Organo-mineral fertilisers

Organo-mineral fertilisers are complex fertilisers obtained by industrial co-formulation of one or more inorganic fertilisers with one or more organic fertilisers and/or organic soil improvers into liquids or solid forms (with the exception of dry mixes).

The combined use of mineral fertilisers and organic fertilisers has been proven to consistently produce considerably higher yields than the use of either product independently⁵. When used as complementary products, impacts of both types of fertiliser improve noticeably. Organo-mineral fertilisers integrate this complementarity into one product with controlled-release

⁴ Europe Organic Fertilizer Market by Source (Plant, Animal, and Mineral), by Crop Type (Cereal & Grain, Oilseed & Pulse, Fruit & Vegetable, and Others), by Form (Dry and Liquid) and by Country (Germany, France, Italy, Spain, UK, and Rest of Europe) - Opportunity Analysis and Industry Forecast, 2017-2023, Allied Market Research. Available at: https://www.einnews.com/pr_news/552408032/organic-fertilizers-market-in-europe-to-see-record-break-revenue-3-260-million-by-2023

⁵ International Fertilizer Association, '[Integrated Plant Nutrient Management](#)', 2018

properties thanks to mineral inputs' organic coating, reducing nutrient losses to the environment. Organo-mineral fertilisers combine the principles of integrated plant nutrition management into one single product. These products can be particularly interesting in agricultural contexts where low soil carbon constrains the uptake of mineral nutrients, such as in the Mediterranean.

As farmer demand for these products grows, the European organo-mineral fertilisers market is expected to grow with a CAGR of 4,7% in the forecast period of 2020 to 2027 to reach over 500 million euros by 2027⁶.

PFC 1.C: Inorganic fertilisers

Inorganic fertilisers contain or release nutrients in a mineral form.

PCF 2: Liming materials

Liming materials are fertilising products “the function of which is to collect soil acidity”.

PCF 3: Soil improvers

Soil improvers are fertilising products “the function of which is to maintain, improve or protect the physical or chemical properties, the structure of the biological activity of the soil to which it is added”.

PCF 4: Growing media

Growing media are fertilising products other than soil in situ, the function of which is for plants or mushrooms to grow in.

PCF 5: Inhibitors

Inhibitors are fertilising products the function of which is to improve the nutrient release patterns of a product providing plants with nutrients by delaying or stopping the activity of specific groups of micro-organisms or enzymes.

PCF 6: Plant biostimulants

Plant biostimulants are fertilising products “the function of which is to stimulate plant nutrition processes independently of the product's nutrient content with the sole aim of improving one or more of the following characteristics of the plant or the plant rhizosphere:

- (a) nutrient use efficiency,
- (b) tolerance to abiotic stress,
- (c) quality traits, or
- (d) availability of confined nutrients in the soil or rhizosphere”.

Plant biostimulants are increasingly demanded by EU farmers because they improve nutrient use efficiency and help improve crop quality; they improve tolerance to harsh growing conditions such as drought, excess heat and extreme weather events exacerbated by climate change; they provide additional beneficial micro-organisms to the soil to help convert nutrients into plant-available forms; and they stimulate root production of substances that enhance

⁶ [Europe Organo-Mineral Fertilizers Market – Industry Trends and Forecast to 2027](#), Data Bridge Market Research

nutrient absorption, among other effects. These products are different from fertilisers because they do not directly provide nutrients to plants, and they are different from plant protection products because they do not target pests or diseases.

According to market analysts Dunham Trimmer, the value of the plant biostimulants sector was estimated to be about 3,6 billion dollars worldwide in 2021, and it is expected to grow around 12,6% (CAGR) between 2021 and 2027⁷. The EU is the biggest market for plant biostimulants, with an estimated value of 1 billion dollars in 2019⁸. However, due to the lack of official statistics on the use of plant biostimulants, the numbers differ between studies^{7,8}. Within the EU, the biggest markets for plant biostimulants are Spain (154 million dollars), Italy (124 million dollars) and France (78 million dollars)⁷, but these products are used in all of the member states. Equally important, the EU is the cradle of the biostimulants industry, which is a robust and dynamic source of exports.

- Non-microbial plant biostimulants represent around 63-90% of the plant biostimulants market^{7,8}. The main components of non-microbial plant biostimulants are seaweed extracts, humic substances and amino acids⁸. The sales of non-microbial plant biostimulants are expected to grow from 650 million dollars in 2020 to 2,1 billion dollars in 2030⁷. They are mainly used for fruit and vegetable production (59%), but their use in cereals and other row crops is increasing⁷.
- Microbial plant biostimulants represent around 10-37% of the plant biostimulants sector, depending on the study^{7,8}, but this subsector has been growing rapidly as scientists improve their understanding of the soil and plant microbiome, and growers realise the potential of micro-organisms to improve, for example, nutrient use efficiency, by using mycorrhizae-based or rhizobia-based plant biostimulants.

PCF 7: Fertilising product blends

Fertilising product blends are composed of two or more EU fertilising products of other PFCs.

Currently, no data captures the importance of this segment, but logic dictates that it is essential to help tailor products to site-specific needs. Additionally, we may think that the number of fertilising product blends will increase, allowing growers to reduce the number of product applications, and thus fostering sustainability in agriculture.

Fertilising products in the SAIO proposal

Despite the common use of fertilising products and the existence of the FPR since 2019, the original SAIO regulation proposal from the Commission (Article 5, point 1)⁹ only suggested to collect 'agricultural price statistics' and 'statistics on nutrients and plant protection products',

⁷ Global DunhamTrimmer Biostimulant Market report, 2020. Data cited with permission from <https://dunhamtrimmer.com/products/biostimulant-global-market-report/>

⁸ New opportunities for the biostimulant market: European Seaweed. A feasibility study and market study. North Sea Farmers, January 2021. Available at: https://www.northseafarmers.org/projects/Bio4Safe-O8-Feasibility-study-and-market-research_NSF.pdf

⁹ Proposal for a regulation of the European Parliament and of the Council on statistics on agricultural input and output and repealing Regulations (EC) No 1165/2008, (EC) No 543/2009, (EC) No 1185/2009 and Council Directive 96/16/EC. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021PC0037&qid=1633006457529>

which would cover ‘nutrients in agricultural fertilisers’, ‘nutrient balances’ and ‘plant protection products’. The Annex to the legislative proposal mentioned ‘fertilisers’ as one of the ‘absolute input prices’ that would be collected annually. Data on ‘nutrients in agricultural fertilisers’ would also be collected annually, differentiating between ‘inorganic fertilisers for agriculture’ and ‘organic fertilisers for agriculture’. Neither the SAIO proposal nor its annex made any reference to the legal definitions of fertiliser or plant protection product in the EU.

Our associations and some of our member companies submitted comments through the public consultations on this legislative proposal scheduled by the Commission during 2021¹⁰, in which we expressed our concern over the narrow scope of the SAIO proposal and the lack of clarity concerning fertilising products.

Therefore, our associations welcomed the amendments to the SAIO proposal suggested by the EU Parliament report¹¹, particularly amendments 29 and 30, which suggested to add the definitions of ‘fertiliser’ and ‘inorganic fertiliser’ in Article 2 of the SAIO regulation, and made a cross-reference to the FPR for the first time.

However, if statistics are only collected on fertilisers, even if distinguishing between organic and inorganic fertilisers, the SAIO regulation will provide limited data on the full range of fertilising products covered by the FPR. As specified in Annex I, Part II of the FPR, ‘fertilisers’ would only correspond to PFC 1, so the other six categories of fertilising products would be outside the scope of the SAIO regulation.

Therefore, our associations would like to build on amendments 29 and 30 suggested by the EU Parliament report, and instead of introducing the definitions of ‘fertiliser’ and ‘inorganic fertiliser’ suggested by the Parliament, we would propose to **introduce the definition of ‘fertilising products’, cross-referencing the definition under Article 2(1) in FPR.**

Therefore, we propose the amendment of Article 2 – paragraph 2 – point 3 (new) in the SAIO legislative proposal, so that it reads:

(3) ‘fertilising product’ means an EU fertilising product as defined in Regulation (EU) 2019/1009.

This would adapt the SAIO regulation to the current regulatory framework for fertilising products in the EU, it would future-proof the SAIO regulation against potential changes in the definition of fertilising products in the future, and it would ensure the gathering of data on the full range of fertilising products that are commonly used by EU farmers, which will be placed on the EU market under the FPR starting this year.

If the basic act of the SAIO regulation includes the definition of ‘fertilising product’ as proposed above, then the delegated acts could provide more details on the level of categorisation at which data should be collected, and which data are most relevant. Our associations believe that data on fertilising products should at least be collected at the level of the product function categories and subcategories, differentiating between organic fertilisers (PFC 1.A), organo-

¹⁰ Have your say platform. Farming statistics – agricultural inputs and outputs (updated rules). Available at: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12257-Farming-statistics-agricultural-inputs-and-outputs-updated-rules-en>

¹¹ Report on the proposal for a regulation of the European Parliament and of the Council on statistics on agricultural input and output and repealing Regulations (EC) No 1165/2008, (EC) No 543/2009, (EC) No 1185/2009 and Council Directive 96/16/EC (COM(2021)0037 – C9-0009/2021 – 2021/0020(COD)). Available at: https://www.europarl.europa.eu/doceo/document/A-9-2021-0285_EN.pdf

mineral fertilisers (PFC 1.B) and inorganic fertilisers (PFC 1.C); as well as between microbial plant biostimulants (PFC 6.A) and non-microbial plant biostimulants (PFC 6.B), apart from the seven PFCs. In our view, it is more important to track volumes of fertilising products used rather than prices, which would be a much more complicated exercise

It would also be helpful to have statistics on the fertilising products that are used in organic production, which would help reduce confusion between organic fertilisers, a category of fertilising products where the word “organic” refers to their carbon content, and fertilisers allowed for use in organic production as defined under Regulation (EU) 2018/848¹².

In addition, the statistical classification of economic activities in the European Community (NACE categories) would need to be updated to cover the full range of PFCs within fertilising products.

Conclusion

If the main objective of the European agricultural statistics compiled by Eurostat is to monitor and evaluate the Common Agricultural Policy (CAP) and other EU policies in order to support policy making, as stated in the current SAIO proposal, it is crucial to gather statistics on the full range of plant nutrition and soil fertility products that EU farmers routinely use, not just organic and inorganic fertilisers. It is said that *you cannot manage what you don't measure*, so gathering data on a narrow range of products is bound to provide an incomplete and thus inaccurate picture of the current understanding of plant nutrition and soil fertility management in the EU.

Amending the SAIO proposal to include a reference to ‘fertilising products’ instead of ‘fertilisers’, together with the EU-agreed definition, would be a minor change of wording that would allow EU policy-makers to better understand the evolving markets for and impacts of tools like plant biostimulants, organic fertilisers, organo-mineral fertilisers, soil improvers, growing media, etc., and to make informed decisions about how to best regulate these products and to incentivise their optimised use. Aligning the categorisation in the SAIO regulation with the categories of fertilising products in the FPR would make it easier to evaluate the impact of the FPR on market evolution and it would improve coherence within the EU legislative landscape. Finally, being able to track the use of fertilising products in the EU would allow policy-makers to quantify how the current and future tools available to EU growers could help reduce nutrient losses, minimise the use of plant protection products and promote organic production to make EU agriculture more sustainable.

For more information about this topic, please contact Sara García Figuera at sara.gfiguera@prospero.ag or Jessica Fitch at jessica@prospero.ag.

¹² Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007. Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32018R0848>

ABOUT EBIC



The European Biostimulants Industry Council (EBIC) promotes the contribution of plant biostimulants to make agriculture more sustainable and resilient and in doing so promotes the growth and development of the European Biostimulants Industry. Our mission is to ensure biostimulant technologies are valued as integral to sustainable agriculture, while securing an enabling regulatory framework for all of them.

ABOUT ECOFI



The European Consortium of the Organic-Based Fertiliser Industry (ecofi) represents European producers of organic fertilisers, organo-mineral fertilisers, and organic soil improvers. ECOFI membership is open to European producers in the sector whose production fully ensures the upstream traceability and the origin of raw material components.

**Other organisations supporting this position include:*

The Hellenic Fertilizer Association (SPEL)



The Hellenic Fertilizer' Association (S.P.E.L) is a non-profit organization, founded in 1995 and based in Athens, Greece. S.P.E.L. represents the manufacture and trade companies in the sector of fertilizers and plant nutrients. S.P.E.L has 51 members, covering 98% of the Greek market.