POSITION PAPER: Restoring normal REACH [Regulation (EC)1907/2006] requirements for EU Fertilising Products will balance safety and innovation

Executive Summary

Regulation (EU) 2019/1009 (the Fertilising Products Regulation (FPR) cross-references the REACH Regulation (EC) 1907/2006 but imposes stricter requirements for substances produced in amounts less than 10 tonnes per year if they are used in EU Fertilising Products. (For shorthand, we refer to these stricter requirements as "REACH+".) The REACH+ requirements were imposed without an a priori impact assessment, neither how they would improve safety relative to the previous situation, nor with regard to the burden they would place on companies. The REACH+ requirements are an example of where regulatory simplification (by reverting to normal REACH requirements) would enhance competitiveness without compromising health, safety, or environmental protection.

This position paper explains concerns regarding these "REACH+" requirements that have been confirmed during applications for Conformity Assessment and offers our suggestions on how to meet the objective of ensuring high safety and environmental protection while reinstating the proportionality of the original REACH regulation.

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Why the REACH+ requirements in the FPR are problematic

- Most of the substances used in Fertilising Products that are produced under 10t/yr are manufactured by upstream suppliers. Customers have been unable to confirm the level of REACH registration or to persuade suppliers to upgrade the REACH dossier as required. Conformity Assessment Bodies struggle to confirm at which level substances have been registered under REACH.
- Producers of fertilising products are thus forced to switch back to older, less performing additives or to place products on the market under national rules.
- Annex II of the Fertilising Products Regulation does not clarify the distinction between Component Materials and impurities/unintended substances, implying that even the latter are subject to FPR requirements, despite clarification to the contrary in the Commission's FAQ 8.17[1] document (which is not legally binding).

To ensure the safety of EU Fertilising Products proportionately, we suggest substituting the wording of the REACH cross-reference currently found in CMCs 1, 3, 4, 5, 6, 8, 11, 12, 13, 14, and 15 with the option below:

2. 1 All substances intentionally incorporated into the EU fertilising product, on their own or in a mixture, except polymers, shall have been registered pursuant to Regulation (EC) No 1907/2006, unless explicitly covered by one of the registration obligation exemptions provided for by Annex IV to Regulation (EC) No 1907/2006 or by points 6, 7, 8, 9 or 10 (only for magnesia) of Annex V to that Regulation

2.2. The registration dossier for the substances incorporated into the EU fertilising product shall contain:

[1] Document date: 04/12/2024 - Created by GROW.F.2 - Last update: 04/12/2024 | | FAQ 8.17 | A substance or mixture belonging to CMC 1 may contain detectable traces of unreacted ingredients or processing agents. Should these impurities be separately considered as components of the final composition of fertilising product?

(a) the information provided for by Annexes VI, VII and VIII to Regulation (EC) No 1907/2006;

(b) a chemical safety report pursuant to Article 14 of Regulation (EC) No 1907/2006 covering the use as a fertilising product.

2. 3. By derogation, except where required by Regulation (EC) No 1907/2006, point 2.2 does not apply if a substance is present in the Fertilising Product in quantities of 0.1% weight by weight (w/w) or less, and according to Regulation (EC) 1272/2008:

- **the substance is not classified as hazardous or**
- **the substance is <u>only</u> classified for the following hazards:**
  - Physical hazards (Hazard Class 2, except for 2.1 Explosives)
  - Skin corrosion/Irritation (Hazard Class 3.2)
  - Eye Damage/Eye Irritation (Hazard Class 3.3)
  - Aspiration hazard.

Furthermore, we suggest adding a new paragraph 2 to the introduction to Annex II of the FPR that says: "Substances and mixtures present in the final composition of an EU fertilising product may not be 100% pure. Thus, component materials may contain detectable traces of impurities and unintended substances (including non-isolated substances such as ionic species in solution). Such impurities or unintended substances are not considered as component materials."

Our justifications of suggested modifications are explained in more detail below.

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Contents

Introduction

According to Annex II of the Fertilising Products Regulation (FPR) [Regulation (EU) 2019/1009], component materials falling into Component Material Categories (CMCs) 1, 6, 8, 11, 12, 13, 14, and 15, as well as some additives mentioned in CMCs 3, 4, and 5 are subject to stricter requirements for substances produced in amounts less than 10 tonnes per year if they are used in EU Fertilising Products than under the normal provisions of REACH Regulation (EC) 1907/2006. (For shorthand, we refer to these stricter requirements as “REACH+”.) The current “REACH+” wording is below:

> “All substances incorporated into the EU fertilising product, on their own or in a mixture, except polymers, shall have been registered pursuant to Regulation (EC) No 1907/2006, unless explicitly covered by one of the registration obligation exemptions provided for by Annex IV to Regulation (EC) No 1907/2006 or by points 6, 7, 8, 9, or 10 (only for magnesia) of Annex V to that Regulation, with a dossier containing:
>
> (a) the information provided for by Annexes VI, VII and VIII to Regulation (EC) No 1907/2006, and
>
> (b) a chemical safety report pursuant to Article 14 of Regulation (EC) No 1907/2006 covering the use as a fertilising product.”
>
> ”

The justification for the divergence between normal REACH requirements and REACH+ requirements given by the Commission is the need to ensure safety of the food chain; however, no exemptions are made for substances already authorised for use in feed and/or food, even though most of the technical additives used in fertilising products have also been approved for these other food chain uses.

Therefore, imposing REACH+ requirements for substances used in Fertilising Products serves only to increase the administrative burden, animal testing, and costs for manufacturers without any demonstrable increase in public safety as we will demonstrate in detail below. Given the EU's current focus on regulatory simplification to increase competitiveness, it is timely to revert to normal REACH requirements in the Fertilising Products Regulation, thus simplifying compliance and keeping costs proportionate while still ensuring high levels of health and safety protection.

Our concerns can be summarised as:

- **Lack of feasibility** – It is not possible for companies to meet these requirements despite the good will to do so.
- **Economics leading to the use of alternatives that perform less well** – In the case of substances produced in small quantities, registering exempted substances or upgrading REACH dossiers may increase the cost of the final product so much as to make them unaffordable for end users.

The Commission has not cited any case where the application of "normal" REACH requirements previously applied to fertilisers within the EU (whether placed on the market under Regulation (EC) 2003/2003 or national rules) has led to any deficiency in safety**. Indeed, there was no impact assessment of the REACH+ rules before they were put in place.**

The following points summarise the major differences between the REACH+ requirements in the FPR and "normal" REACH requirements:

1. Under normal REACH there is a distinction in the data requirements for substances produced or imported in different tonnage bands:
    a) < 1 ton/year ➔ no REACH registration;
    b) 1-10 tonnes/year ➔ Annex VII requirements;

c) 10-100 tonnes/year ➔ Annex VIII requirements;
d) > 100 tonnes/year ➔ Annex IX requirements.

In contrast, under REACH+ the data requested under Annex VIII must be provided for all substances.

2. A chemical safety report is normally only required by the REACH regulation for substances subject to registration and in quantities of 10 tonnes or more per year per registrant. Furthermore, the REACH regulation specifies cases where no chemical safety report is required even when this production threshold has been crossed, due to the low-risk nature of the substance. **The FPR does not recognize exemptions for low-risk substances.**
3. **The Fertilising Products Regulation does not recognise the registration exemptions in Points 1-4 of Annex V of the REACH regulation**. Point 4, in particular, is extremely relevant for our products since the text of the FPR does not currently specify that impurities are not component materials or that component materials must be intentionally added, creating the possibility for market surveillance authorities to claim that EU Fertilising Products are non-compliant because their manufacturer does not demonstrate REACH registration for impurities. While this has been clarified in the Commission's FAQ document, the FAQ has no legal value.

In Annex II of this position, we describe some specific issues that companies have encountered while undertaking conformity assessment to illustrate the claims above.

1. The FPR should respect the tonnage bands and requirements for CSRs defined in REACH to ensure costs are proportionate to the likely exposure and to the size of the enterprise

The REACH+ data requirements imposed by the FPR are so high that no manufacturer or importer of substances that are produced in quantities of less than 1 tonne per year would be able to cover the costs of REACH registration under these conditions. Therefore, **companies are already experiencing cases where such producers/importers are refusing to supply proof of REACH registration to these levels. If these small suppliers are cut out of the market, it will reduce competition, distort the market, and discriminate against SMEs.** This is especially true for

importers, since low tonnages are exempted from such requirements in competing markets like the USA, so they have more attractive alternatives to meeting these additional administrative requirements.

This issue of disproportionate registration requirements is most relevant for technical additives, which are used in small quantities (as little as 10kg per 50t of final product). However, even some primary components (from a functional perspective) are produced and used in small amounts because the application rates for some products, such as plant biostimulants, are generally low (e.g. 500g to <5kg per hectare).

In the case of technical additives, substitution is difficult and may even be impossible because performance varies a lot from one additive to another. You need to find a technical additive compatible with the finished product formula at a specific pH, density, and viscosity.

Because the composition of technical additives is often a trade secret, it is unrealistic to think that manufacturers will be willing to disclose this data to their customers who would need it to upgrade the REACH registration themselves. Nor will such information necessarily be on the Safety Data Sheet (SDS) according to Article 31 of Regulation (EC) 1907/2006, if the additive is a mixture and contains substances that are not hazardous. Indeed**, in such a case, it is impossible for the purchasing company to know at what level the undisclosed substances were REACH-registered, if at all.**

The practice of allowing companies to omit non-hazardous substances from the SDS of mixtures is common in the EU and other markets like Canada, USA, Australia, and Turkey and allows for the protection of competitive know-how where patenting is not an option.

In Annex I of this position paper, we provide examples to illustrate the economic impacts of the REACH+ requirements. Because these impacts are so high, the knock-on effects on customers' costs range from increases of 26-540% in our examples.

Perversely, the REACH+ requirements could make economic considerations the primary criteria for selection and thus reduce the use of safer technical additives and those more in line with the European society’s desire for solutions that are perceived as more “natural”. If the cost per unit is so high that manufacturers cannot possibly hope to recuperate their return on investment, they will not use that substance.

Generating a Chemical Safety Report (CSR) is a costly and time-consuming process, particularly for SMEs, so this burden should only be imposed when absolutely necessary. Requiring CSRs for substances that are typically exempt from CSR obligations doesn't inherently enhance safety in the food chain. Indeed, the main goal of the CSR is not to safeguard the food chain but to ensure safe use for workers and to consider the impacts of unintended release to the environment; therefore under the CSR's PNEC, you calculate the safe use of the substance, but in the case of Fertilising Products, placement in the environment is on purpose and taken into account by the product R&D process and the FPR's essential requirements. If the EU Fertilising Product doesn't contain any hazardous substances, then the CSR will not generate any new data and will be an empty shell**. If the Fertilising Product contains one or more hazardous substances, then the manufacturer will have to produce a CSR for those substances in any case.**

Furthermore, the food safety of EU Fertilising Products is already ensured by compliance with the many existing Regulations that the FPR cross-references, such as Reg. 852/2004 on the hygiene of foodstuffs; Reg. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law; Reg. No 1881/2006 setting maximum levels for certain contaminants in foodstuffs; Reg. 2017/625 on official controls and other official activities performed to ensure the application of food and feed law; Reg. 396/2005 on maximum residue levels of pesticides, and others.

Suggested resolution:

Reinstate the original REACH tonnage bands. If the Commission feels that REACH cannot ensure health and safety, then the REACH+ requirements should only apply to substances that are carcinogenic, mutagenic or toxic for reproduction (CMR). This applies to Chemical Safety Reports (CSRs) as well as the data requirements for registration. Substances that are either of low concern or not hazardous should only be subject to normal REACH requirements.

2. Clarifying that Annex II of the FPR does not apply to unintended substances or impurities

Point 8.17 of the 21 March 2024 FAQ on the FPR states that "an EU fertilising product cannot be 100% pure. Thus, irrespectively of the actual industrial process followed,

component materials belonging to CMC 1 in a fertilising product are expected to contain detectable traces of impurities." The FAQ then goes on to quote the Guidance for identification and naming of substances under REACH and CLP (p.15), which defines an impurity as 'an unintended constituent present in a substance as manufactured. It may originate from the starting materials or be the result of secondary or incomplete reactions during the manufacturing process. While it is present in the final substance it was not intentionally added'. Unfortunately, this FAQ document has no legal value.
The introductory words of Annex II of the FPR state: *"An EU fertilising product shall consist solely of component materials complying with the requirements for one or more of the CMCs listed in this Annex."* This could be seen as contradictory to the FAQ clarification on impurities, since the word "solely" in the current Annex II text might be interpreted to mean that impurities are also component materials and therefore subject to the REACH+ requirements, which is problematic since the FPR does not recognize the REACH exemptions for unintended substances Annex V point (1-4) of Regulation (EC) 1907/2006.

Under the current wording of the FPR, if a Notified Body, regulator, or market control authority detects an unintended substance present in an EU Fertilising Product, they could insist that the unintended substance must be registered under the REACH+ requirements, which is neither what was intended by the co-legislators, nor is it feasible.

One example of such impurities are ionic species in solution, which are not isolated from their solution and are therefore exempt from REACH registration.

- Any dissociated ionic species present in an aqueous solution (e.g., in liquid fertilisers) shall not be considered separate substances and classified as a distinct chemical entity requiring a REACH registration, indeed according to Article 3(I) of the REACH Regulation substances are only considered as "occurring" if they are intentionally manufactured or isolated from the solution.
- National regulatory authorities should evaluate fertilising products based on their placed-on-the-market composition, rather than hypothetical transformations that may occur in end-use applications (e.g., upon dilution or reaction with soil components). This clarification is essential to provide greater legal certainty for manufacturers and legal authorities.

Suggested resolution:

To address this issue, we propose adding the following sentence to the end of the first paragraph of Annex II of Regulation (EU) 2019/1009 *"Substances and mixtures present in the final composition of an EU fertilising product may not be 100% pure. Thus, component materials may contain detectable traces of impurities and unintended substances (including non-isolated substances such as ionic species in solution). Such impurities or unintended substances are not considered component materials."*

3. Ensuring safety and feasibility for substances present in extremely small quantities

As detailed above and in Annex I, imposing REACH+ requirements for substances that are present in the final product at extremely low levels, produced below the REACH bands of 1 or 10 tonnes, and representing a low risk to health and the environment is disproportionate and unfeasible.

To ensure that reinstatement of standard REACH requirements does not compromise safety or environmental protection, we propose, introducing a threshold for substances present in very small quantities below which normal REACH requirements apply to align with existing CMR (Carcinogenic, Mutagenic, or Reprotoxic) cut-off limits. A reasonable generic concentration cut-off limit could be derived from the REACH threshold specified in Article 56 of the REACH regulation concerning the authorisation of substances of very high concern which is listed as a concentration limit of 0.1 % weight by weight (w/w).

Suggested resolution:

Modify the REACH+ text in all concerned CMCs by setting a limit of 0.1% (w/w) or less

and where REACH+ requirements do not apply for substances that fulfil the criteria below:

- **the substance is not classified as hazardous or**
- **the substance is <u>only</u> classified for the following hazards:**
  - Physical hazards (Hazard Class 2, except for 2.1 Explosives)
  - Skin corrosion/Irritation (Hazard Class 3.2)

- Eye Damage/Eye Irritation (Hazard Class 3.3)
- Aspiration hazard

4. Conclusion

The EU Fertilising Product regulation is intended to modernise the placing of fertilising products on the market and to foster innovation within a Circular Economy mindset. However, as demonstrated above, the REACH+ requirements in the Fertilising Products Regulation impose onerous and costly burdens on the industry, particularly for substances being used in innovative ways and additives supplied by third parties. Furthermore, no impact assessment has demonstrated that any gains in public safety would result from imposing higher testing requirements on substances that are not classified as hazardous. Indeed, in the case of substances already approved for use in the food or feed chain, the REACH+ requirements would require additional costs to demonstrate a lower level of safety than has already been demonstrated under food and feed regulation! The REACH+ requirements are, therefore, counter to the Commission's own principles of Better Regulation and its current attention to simplification to ensure competitiveness. We therefore call for the reinstatement of normal REACH requirements under the Fertilising Products Regulation (EU) 2019/1009, both regarding data requirements and Chemical Safety Reports.
It is particularly puzzling that the FPR does not recognize the REACH exemptions for unintended substance, but the Commission reinstates them in the FAQ document, which does not have legal weight.

For more information about this topic, please contact Hélène Collignon at helene@prospero.ag

ANNEX I: Examples to illustrate the economic impacts of the REACH+ requirements

The following calculations were done in 2021 and do not take into account general inflation and price spikes of specific substances that have been witnessed since 2022.

- **Substance 1** (exempted from REACH registration according to the supplier because produced below 1t/year) is used by a company at about 150 Kg/year and incorporated below 0.5% in the end product. Substance 1 helps mineralisation for better plant growth. REACH registration for the 1-10t band plus a Chemical Safety Report would cost around 50K€ including ECHA's fee. If the additional cost is spread over 5 years, the raw material cost would increase by two and a half (2.5) times. Substance 1 already represents about 16% in the end product's final cost even though it is only around 0.5% of the volume/weight of the final product. If the cost of Substance 1 were to rise by 2.5 times, it would be 40% of the cost of the end product (again spread over five years), with important knock-on effects since the customer price would have to be increased by 26% to be offset only after five years. REACH registration in the 10-100t band would be even more expensive.
- **Substance 2** is a colorant that costs about 33 €/kg and is present in the final product at 0.01–0.05 % w/w. Substitution is difficult and may even be impossible because performance varies a lot from one additive to another. You need to find a technical additive compatible with the finished product formula at a specific pH, density, viscosity. Whatever works under the specific combination of pH, viscosity and density may not work if even one parameter is changed. Assuming REACH registration costs of 240K€ and production of 9999 kg/yr, REACH registration in the 10-100t band would raise the price of the component by 48€/kg if offset over five years, an increase of 146%.
- **Substance 3** is a synthetic amino acid used as an active component and present in the product at 0.04–3.5% w/w. Substitution would not be possible since any other amino acid produced in under 10 t/y would face the same situation. It is currently purchased for 2.63€/kg and REACH registered for the 1-10 t/y band. Upgrading the registration for requirements equivalent to the 10–100 t/y is

estimated to cost 155K€. Spread over 5 years, this would raise the cost per kg by 3€ or 117%, assuming 9999 kg are produced.

- **Substance 4 & Substance 5** are UVCB substances present in the final product (at 0.2-5% w/w) as additives. Substance 4 is not currently REACH registered because <1 t/y is produced and used while Substance 5 is currently REACH registered for the 1-10 t/y band.

  Registering the substance 4 for requirements equivalent to the 10 – 100 t/y is estimated to cost 270K€. Spread over 5 years, this would raise the cost about 54€/kg (assuming a production of 9999.99 kg). The current cost of the substance 4 is 10€/kg, which would increase 540% under these conditions.

  Upgrading the registration of the substance 5 for requirements equivalent to the 10 – 100 t/y is estimated to cost 200K€. Spread over 5 years, this would raise the cost between 4€/kg and 40€/kg (depending on how close production is to one or ten tonnes). The current cost of the substance 5 is 10€/kg, which would increase by 40-400% under these conditions.

ANNEX II: Examples of strategic substances used in small quantities and substances used in feed and food:

1. **Strategic substances (not used in food and feed) but used in small quantities in fertilising products.** Such substances may include innovative substances that are being test marketed before being scaled up (at which time their REACH dossiers would be upgraded) or substances supplied by a third party. Efforts to have suppliers register substances manufactured/imported in small quantities, have so far resulted in refusals by the supplier either due to costs or a desire to protect trade secrets.

2. **Substances used in feed and food.** Substances that are approved for use in food and feed are already subject to stricter requirements than what is specified in the Component Material Categories of the FPR. Therefore, imposing additional REACH requirements for these substances to be used in Fertilising Products serves only to increase the administrative burden, animal testing, and costs for manufacturers without any demonstrable increase in public safety. This violates one of the main principles of the EU's Better Regulation Initiative and is an example of the type of regulatory simplification that could improve the competitiveness of EU business without compromising health, safety, or environmental protection. Please find an example illustrating this issue just below in points a and b.

    a) **Food dye Brilliant Blue FCF, E-133** , CAS 3844-45-9 was assessed by the EFSA in 2010, considering a safe intake as a food ingredient of up to 6 mg/Kg body weight/day. For a 70 kg adult, we would consider a safe intake of 420 mg/day. With this dye present in a concentration below 0.5 g/Kg in an NPK, and considering an application rate of 300 kg/ha; assuming that the crop (e.g. wheat) absorbs 100% of the additive and that the consumer eats the whole plant (including stem and roots), consumer would have to eat an area of 28 m^2 of wheat to reach the daily dietary intake limit of Brilliant Blue.

    b) **Tartrazine, E-102, CAS 1934-21-0** was assessed by the EFSA in 2009, considering a safe intake as a food ingredient of up to 7.5 mg/kg body

weight/day. For a 70 kg adult, we would consider a safe intake of 525 mg/day. This dye is used in micronutrient fertilizers, in concentrations below 20 mg/kg. Considering an application rate of 4 kg/ha; assuming that the crop (e.g. wheat) absorbs 100% of the additive and that the consumer eats the whole plant (including stem and roots), to reach the daily dietary intake limit for tartrazine, consumer would have to eat more than 65,000 m^2 of crop.

The assumptions on consumer exposure in the above examples are extremely conservative. The amount of the substance in the final crop would be much lower than in our simulation.

There are many more examples of additives approved in the food industry, as on the table below, which should be REACH registered over 10 tons to be used in fertilizers:

Food additive that may also be used in in fertilising products	**Azorubine (Carmoisine)**	**Sunset Yellow (Orange Yellow)**	**Sodium propionate**
E-	E-122	E-110	E-281
CAS	3567-69-9	2783-94-0	137-40-6
EFSA assessment: safe intake as a food ingredient up to (mg/kg Bodyweight /day)	4	4	5.000
Year of ECHA assessment	2.015	2.014	2.016
Safe intake for an adult of 70Kg weight (mg/day)	280	280	350.000
Concentration in fertilising products	< 20 mg/Kg	< 20 mg/Kg	< 1 g/ Kg
Fertilising products type	Micronutrient fertiliser		
Fertilising products application rate (Kg / Ha)	4	4	10
m^2 eaten to overcome safe intake limit	35.000	35.000	350.000

ANNEX III : About the signatories

The European Biostimulants Industry Council (EBIC)'s mission is to promote plant biostimulants as essential to advanced food systems, providing education, advocacy, and support to members, policymakers, and farmers.

The Association des Producteurs Européens de Potasse (APEP) represents Europe's potash producers and plays a crucial role in ensuring the sustainable and responsible production of potash. Through collaboration and knowledge sharing, APEP fosters innovation and best practices in potash mining, supporting both the EU's food security by ensuring a stable supply of essential fertilisers and contributing to various industrial sectors

The **European Consortium of the Organic-Based Fertiliser (ECOFI)** represents manufacturers producing organic fertilisers, organo-mineral fertilisers, organic soil improvers, and/or fertilisers incorporating components derived from organic materials for the European market. ECOFI members work to support a more competitive, circular and sustainable future for farming.

ESPP, the European Sustainable Phosphorus Platform, promotes nutrient recycling and sustainable phosphorus management in Europe. ESPP is a not-for-profit association, funded by its 50+ members, who are a range of different industries (water and waste, fertilisers, chemicals, cement, recycling, services), knowledge institutes and public establishments. www.phosphorusplatform.eu

Fertilizers Europe represents the major fertilizer manufactures in the EU. Its members account for approximately 80% of the region's fertilizer production capacity and around 70% of phosphate fertilizer production.
The European fertilizer industry is vital for food security and the green transition. We strive to provide farmers with high quality and sustainable nutrients which are essential for ensuring the strategic autonomy and sustainability of food systems, while boosting the decarbonization of the European economy.
The association communicates with a wide variety of stakeholders on fertilizer technology and topics related to agricultural, climate,

environmental and economic challenges and is commonly recognised as the dedicated industry source of information on mineral fertilizers.

Growing Media Europe is the voice of the growing media and soil improvers industry. Our mission is to promote the interests of the growing media industry through obtaining optimum legislative conditions for the manufacturing and free trade of growing media. The association acts as an interface between the industry, the European Institutions and other stakeholders ensuring a sustainable future for the growing media sector.

AEFA: Spanish Agricultural Nutrients Manufacturers Association

The Spanish Association of Agronutrients Manufactures (AEFA) is a non-profit association created more than 25 years ago and actually formed by 60 agronutrients and biostimulants Spanish manufacturing companies. Our main aim is to enhance and develop the Spanish biostimulant market and to foster a sustainable and innovative agricultural sector that prioritizes both crop productivity and environmental stewardship. We focused our efforts on advanced agronomic solutions, supporting farmers with cutting-edge technology, and ensuring that our practices contribute positively to the high and sustainable ecosystem.

The Union of Fertilisation Industries (UNIFA) represents the sectors dedicated to plant nutrition and soil health. It brings together thirty-five manufacturers of mineral, organo-mineral, organic fertilizers, liming materials, and biostimulants.

As key players in upstream agriculture, these companies contribute to the vitality of French farming. They share a common vision: to achieve high agronomic performance while ensuring the safety and sustainability of fertilizing products. This vision is firmly aligned with current societal expectations and the broader ambition of securing France's food sovereignty.

UNIFA actively promotes an integrated and responsible approach to fertilization across its entire ecosystem

Artemis is the national association for producers and distributors of beneficial insects, pollinators, plant protection products of natural origin and biostimulants in the Netherlands. With 40 members, we have a shared mission: to promote the use and application of biological solutions and biostimulants, aimed at a transition to resilient cultivation systems.

***Federchimica* Assofertilizzanti - National Association of Fertilizer Manufacturers** - is one of the 17 Associations of Federchimica - National Federation of Chemical Industry - which protects and represents all the production companies in the fertilizer sector. To pursue this aim, **Assofertilizzanti** brings together the main operators in the fertilizer sector, with a total turnover of around one billion euros, equal to over 90% of the entire national market.
Assofertilizzanti develops the technical, legal and regulatory guidelines concerning the production and use of fertilizers and promotes them to public decision-makers, business organizations, to the world of communication and the scientific community.

Hellenic Fertilizers' Association (also known by the Greek acronym SPEL) is a professional, trade, non-profit organization, founded in 1995 and based in Athens, Greece. The Association represents manufacturing and trading companies that are active in the sector of fertilizers and plant nutrients in Greece. SPEL counts 73 members and, according to our members' profile, represents all activities related to the production, trade, transport, and distribution of all types of fertilizers and plant nutrition products.
The Hellenic Fertilizers' Association focuses on the science-based promotion of the efficient and responsible use of plant nutrients and fertilizers for plant growth and is committed to assisting the fertilizer industry through innovative research programs, while advocating sustainability, stewardship, safety, and security.

Afaïa represents companies in France that supply organic and innovative fertilizers for sustainable agriculture: growing media, mulches, organic amendments, organic and organo-mineral fertilizers, and biostimulants. The trade union represents its members before French and European institutions, provides information and training on regulatory and normative developments, and promotes the industry as a whole."