

International Code of Conduct for the Use and Management of Fertilizers

General comments of Assofertilizzanti

Fertilizers contribute to feeding the plants and to avoiding the degradation and the erosion of the soil. They help the whole farmers in the world to obtain good harvests and to preserve the fertility of the soils: without them, we couldn't grow the food we need to live.

For this reason, Assofertilizzanti welcomes the new "*code of conduct for the use and management of fertilizers*", as a tool to assist countries in the establishment of rules for the use and management of plant nutrients. However, a number of specific comments should be made.

First of all we believe that this code should emphasize more the role of fertilizers, **with a stronger focus relating to nutrition concept**. In this context we consider plant nutrition product a substance, mixture, micro-organism or any other material, applied or intended to be applied, either on its own or mixed with another material, on fungi or their mycosphere or on plants at any growth stage, including seeds, and/or rhizosphere, for the purpose of providing plants or fungi with nutrients or of improving their physical or biological growth conditions or their general vigour, yields and quality, including by increasing the ability of the plant to take up nutrients. **This definition could be good to clarify the purpose of fertilizers** and to avoid any confusion with other agrochemical products (e.g. plant protection products), but this aspect must be very carefully worded to avoid misinterpretations once the code is published.

Secondly we would highlight that the deadline for the public consultation and the timeline provided to publish this document (the end of this year), **are not sufficient to create a thorough and reliable code of conduct**. A more consultation time gives benefits for the necessary improvements, in order to obtain a substantial and impactful code.

Following some considerations that justify our position:

- all categories of fertilizers are relevant and important in the good agricultural practices. It doesn't exist the best fertilizer because each of them play a different role (that depends from various factors). In view of the fact that the draft weights are different between fertilizers, **we would**

recommend complementarity in assessing the benefits and value for all;

- scientific evidence and scientific risk assessments are not fully taken into account, in particular in paragraphs referring to risks and contaminants. **The scientific approach is inescapable for the realization of a sustainable development** and this is the only way to guarantee the safety of human, animals and environmental health. 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;
- the code should focus its messages not only on the critical issues, that can derive from the overuse of fertilizers, but also on the **issues deriving from their underuse**. Indeed if in one hand the overuse of fertilizers pollutes, on the other hand the underuse bears to the degradation and erosion of the soil. **“Responsible use” should be defined and not limited to overuse;**
- there are two big gaps in the draft: the adaptation to climate change and the farmers’ livelihoods. **We suggest to explored more these aspects;**
- the human and environmental safety are an absolute priority for the fertilizers industries, but the sustainable use of fertilizers depending also from farmers. The code should give more emphasis to the role of farmers **as decision maker and more considerations should be given to how this role would be supported;**
- 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.

Assofertilizzanti hopes that all of this issues will be solved making the current draft more relevant for the adoption. In conclusion we would strongly recommend the development of a complete and balanced document, aimed to address the government, policymakers and all stakeholders in a common direction.