

Review of the Zero Draft Code of Conduct for the Management of Fertilizers

The Fertilizer Institute

July 13, 2018

The Fertilizer Institute (TFI) is pleased to provide comments to the Food and Agriculture Organization of the United Nations on the Zero Draft of the Code of Conduct for the Management of Fertilizers. The members of TFI are leading the way in development and implementation of new technologies and scientifically-based management for agricultural cropping systems to better meet social, environmental, and economic goals.

Statement of Interest

The Fertilizer Institute represents the United States fertilizer industry including producers, importers, retailers, wholesalers and companies that provide services to the fertilizer industry. TFI members provide nutrients that nourish the nation's crops, helping to ensure a stable and reliable food, fuel, and fiber supply. Whether from organic or commercial sources, fertilizer nutrients are a key component of sustainable crop production systems. Fertilizer is a key ingredient in feeding a growing global population, which is expected to surpass 9.7 billion people by 2050. Half of all food grown around the world today, for both people and animals, is made possible through the use of fertilizer. As demand continues to grow, farmers around the world will continue to rely on fertilizer to increase production efficiency, producing more food while optimizing inputs.

General Comments

While we applaud FAO for its ambition, we believe that the proposed timeline has not provided for sufficient consultation with sectors identified as key stakeholder entities within the document. The expediency of development will not result in a document which provides meaningful guidance and recommendations.

The 'Zero Draft of the International Code of Conduct for the Use and Management of Fertilizers' is a broad summary of tactics for sustainable use of fertilizers with the intention of allowing individual countries or stakeholders to be sure the code is appropriate for their situation. However, within the document there is a need to be more concise language and elimination of repetition of actions assigned to respective stakeholder groups. Additionally, the definition of the identified stakeholder groups changes throughout the document, making it a challenge for readers and users to interpret.

We are encouraged to see the fertilizer industry identified as an important stakeholder with roles and actions to support effective fertilizer use and management. And, we are equally pleased with the inclusion of the principles of 4R Nutrient Stewardship. In many geographic locations, the industry is a trusted advisor to farmers in the field, and the industry should be viewed as a resource for country efforts to optimize fertilizer use. Additionally, there is growing science and broad support for basing fertilizer use decision on 4R Nutrient Stewardship. Inclusion of the 4R principles can serve as an incubator for broader resource allocation and implementation efforts.

However, while we applaud these inclusions, we believe the document would benefit from greater consultation and time for engagement with the stakeholders identified as key to successful fertilizer

management. Throughout the document, there are specific tasks assigned to the fertilizer industry, not all of them may be feasible to implement and several could be improved with industry insight.

While not a complete collection of areas of concern within the fertilizer industry allocated sections, below are examples pointing to the need for great consultation and engagement.

4.11.3. Keep records of fertilizer sales and/or fertilizer applications along with other agronomic practices, data and farm records to support governments for the purpose of statistical information on fertilizer use.

While there is need to expand and improve record keeping, the challenges of data security will limit the amount of data and farm records that can and will be shared to governments for statistical information. Further consultation with the fertilizer and ag retail industry would be beneficial to clarify this tactic.

Further, 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. Concerns with what the fertilizer industry should do around these items occur in multiple sections of the document.

In Section 7. 'Access, Distribution and Labelling' there are multiple items that do not recognize the structure of departments and responsibilities within the fertilizer industry. For example:

7.2.1. Ensure that persons involved in the sale of fertilizers along the fertilizer value chain are trained adequately to be capable of providing relevant information to the related actors in the supply chain, such safety information, advice on risk reduction, and information on the responsible and efficient use of the fertilizer products.

7.2.2. Ensure that persons involved in the sale of fertilizers to users are trained adequately and are capable of providing sound advice on the use of the fertilizer products they are selling, and on the environmental and health risks associated with the misuse of fertilizers.

These items would be handled by multiple professionals within a company and should be addressed as such.

In summary, substantial improvements are still required to make the current draft relevant and ready for adoption. The current timeline has not allowed for proper research and consideration of existing systems and programs. Given the critical role of fertilizers, TFI would strongly recommend giving appropriate time and consultation 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.