

Striving for a harmonized EU Regulation on Growing Media – Opportunities and Hurdles



Gerald Schmilewski



Meeting of the Asoc. de Prepararados de Tierras y Sustratos
4 Oct. 2012 Valencia, Spain

Contents

1. Who is EPAGMA ?
2. Why do we want a GM Regulation ?
3. Revision of Fert. Reg. 2003/2003
4. Evolution of the revision
5. Who is doing the revision ?
6. Definitions
7. Labelling examples
8. CEN mandate and EN methods
9. Changes and consequences

EPAGMA Members



17 companies and
6 associations
operating in the 27
EU Member States

EPAGMA Members

Company members



AS Tootsi Turvas



Bord na Móna p.l.c.



BVB Substrates



Everris



Floragard Vertriebs GmbH



Griendtsveen AG



Jiffy Group



Klasmann-Deilmann GmbH



LaslandSp. z.o.o.



Neova



Peltracom



Pindstrup Mosebrug A/S



Sia Livanu Kudras Fabrika



Stender AG



Turveruukki Oy



UAB Klasmann-Deilmann Silute



Vapo Oy

Associate members



Ass. Italiana Produttori di Substrati di coltivazione e Ammendanti (A.I.P.S.A)



Belgische Potgrond Ferdeatie (BPF) (*as of 2013*)



Bundesvereinigung Torf - und Humuswirtschaft e.V. im IVG



Latvijas Kūdras ražotāju asociācija



Lietuviskos durpes (*as of 2013*)



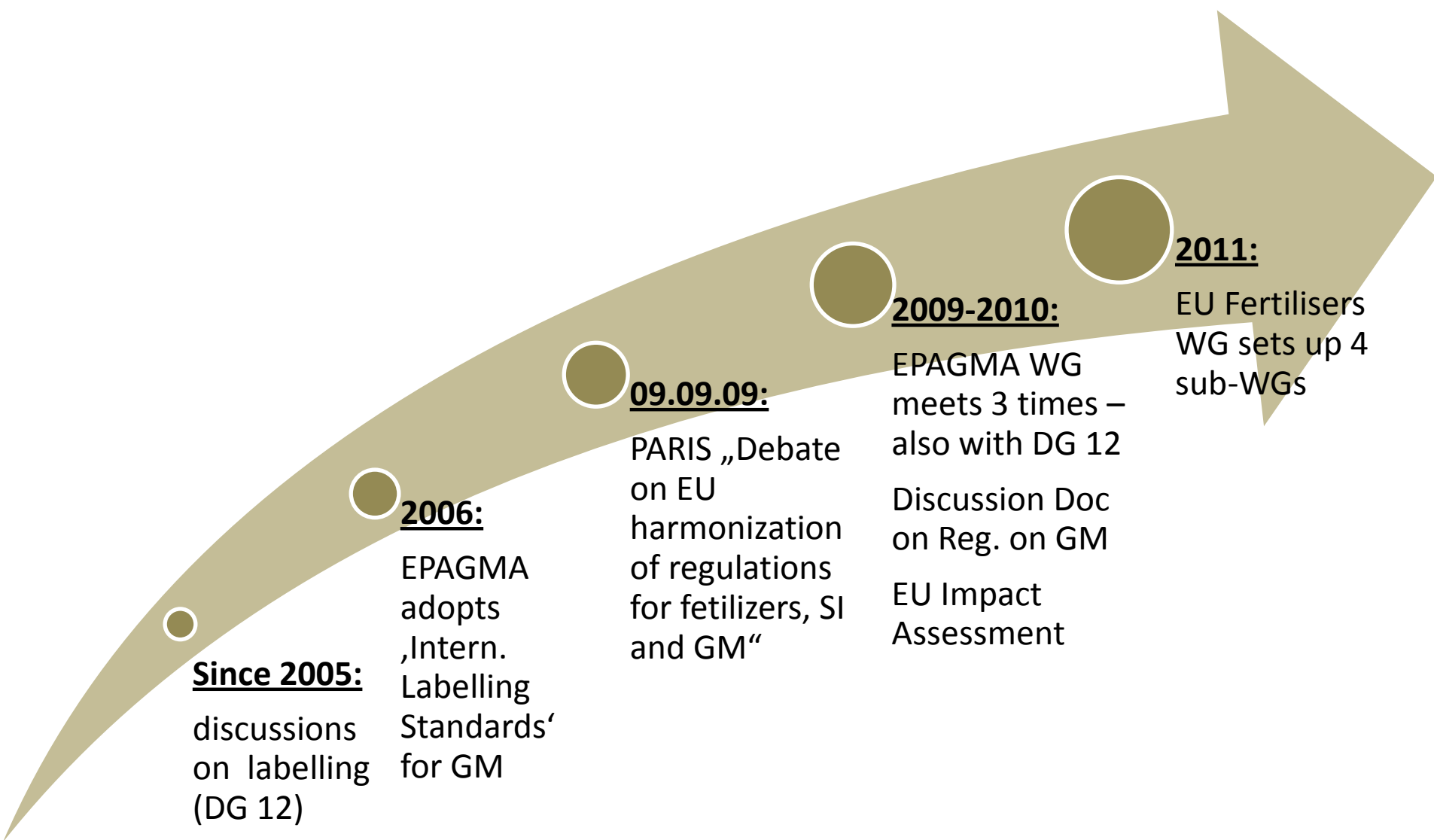
Vereniging van Potgrondfabrikanten Nederland (VPN)

All EU Member States involved

DG Enterprise and Industry takes the lead



Evolution towards an EU harmonized regulation til 2012



Evolution towards an EU harmonized regulation from 2012...

Nov. 2012:

EU
concludes;
EPAGMA
concludes

End 2012:

SME Impact
Assessment

Spring 2013:

EU Comm.
Hopes to
publish draft
proposal of
Reg.

2013:

Many open
questions:

e.g.

Will TC 223 be
mandated for
drafting new
methods and
suggest
tolerances?

2015:

EU Comm.
Says
regulation
could be
finalized

EPAGMA WG members

BOON, Hein (RHP, NL)

CATTIVELLO, Costantino (AIPSA, I)

KAEMPE, Holger (Vapo, FIN)

KAHR, Bente (Pindstrup, DK)

Ni CHUALAIN, Dearbhail (Bor na Mona, IRE)

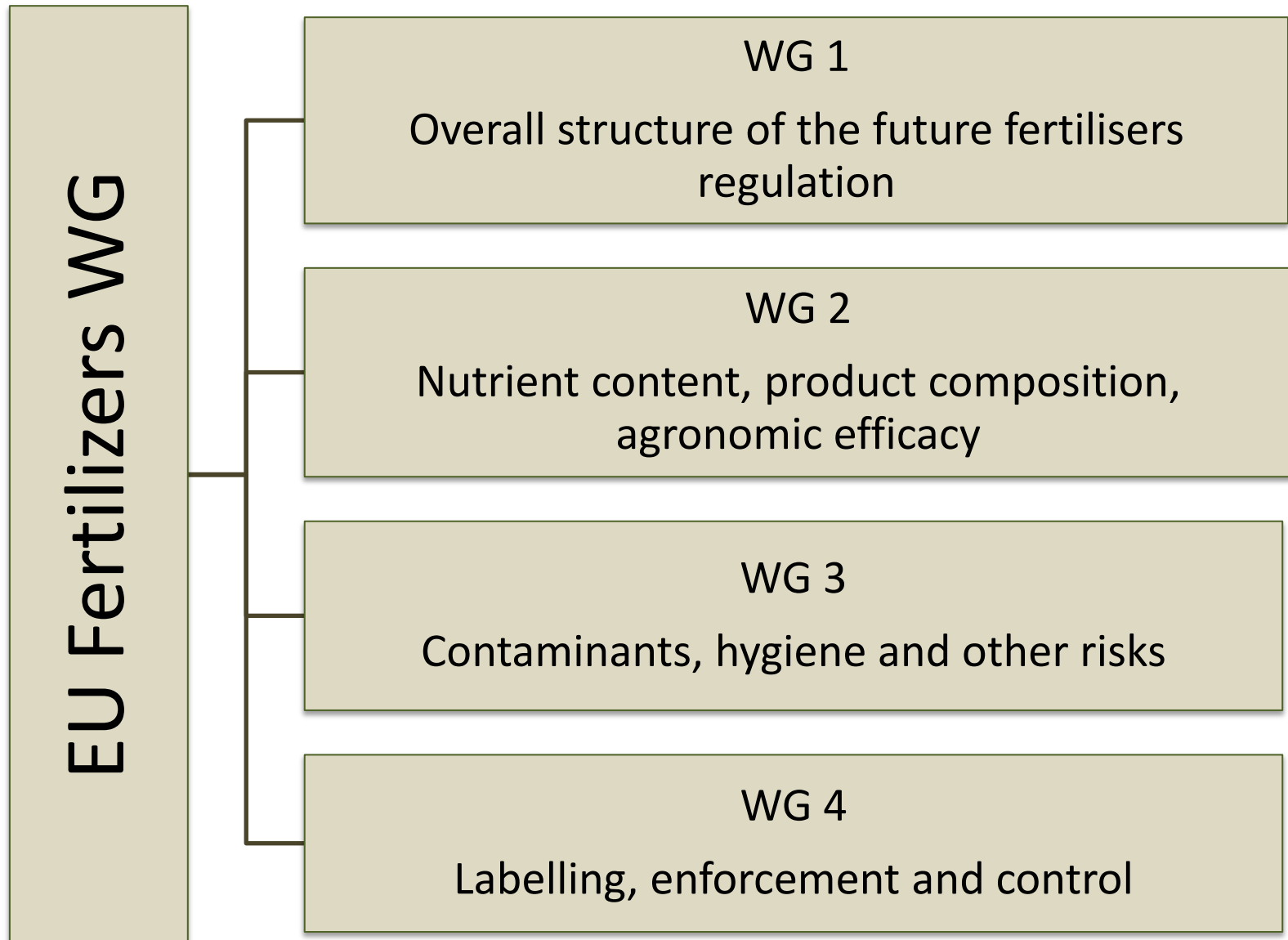
PENNINCK, Rik (Peltracom, B)

SCHMILEWSKI, Gerald (Klasman-Deilmann, D)

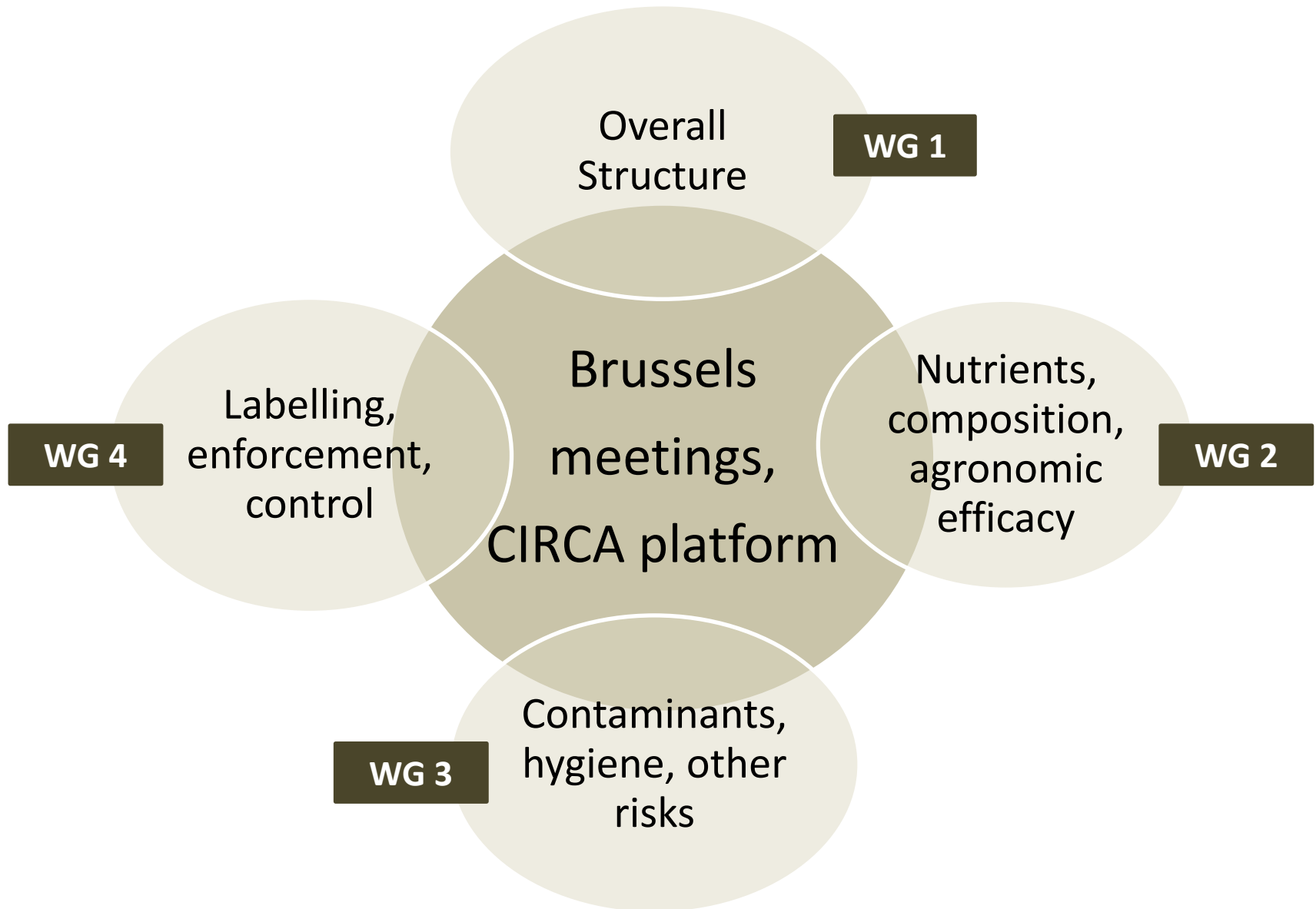
TEMMING, Winfried (Floragard, D)

WALLER, Paul (Growing Media Ass., UK)

ZACCEO, Patrizia (AIPSA, I)



How do the sub-WGs work ?



Mandate:

„To determine the overall structure (definitions, safety requirements, relevant mechanisms/structure for their verification) of the future legislative proposal taking into account each of the most promising policy options, while reviewing and integrating the outcome of the 3 other WGs“.



Mandate:

„To determine, if necessary, criteria for nutrient content, product composition and agronomic efficacy“.



WG 3: Contaminants, Hygiene and other Risks

Mandate:

„To draw up a list of chemical contaminants (heavy metals and organic substances), pathogens (bacteria), and other risk factors that need to be controlled in fertilisers and related products“.



WG 4: Labelling, enforcement and control

Mandate:

„To develop suggestions for compulsory and optional labelling requirements for each category of products that will be covered in the future EU Regulation“.



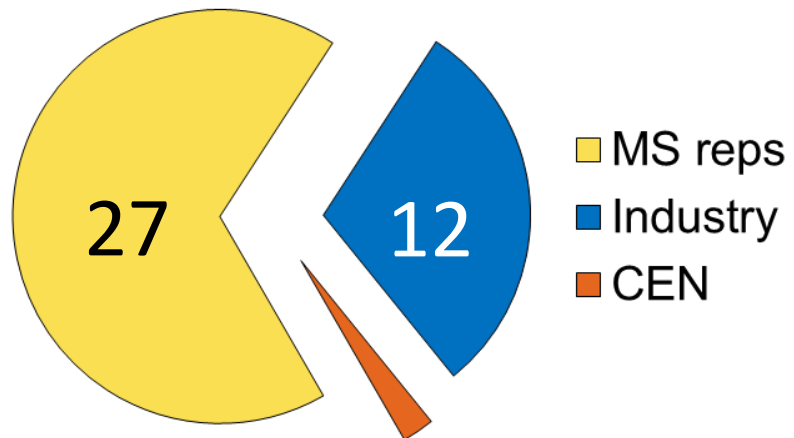
Meetings of the sub-WGs in 2012

Meetings	WG 1 (Overall Structure)	WG 2 (Nutrient content, Composition...)	WG 3 (Contaminants, Hygiene, Risks)	WG 4 (Labelling, Enforcement...)	
	GM reps: Gerald (EPAGMA) Paul (GMA UK)	GM reps. Gerald (EPAGMA)	GM reps. Dearbhail (EPAGMA) Paul (GMA UK)	GM reps. Dearbhail (EPAGMA)	
	1st round	16. Jan.	17. Jan.	18. Jan.	13. Feb.
	2nd round	13.-14.June	30. March	20. April	15. June
	3rd round	21. Sept.	17. Oct.	20. Sept.	16. Oct.
Conclusions	9. Nov.	-	-	-	

Representation in WGs

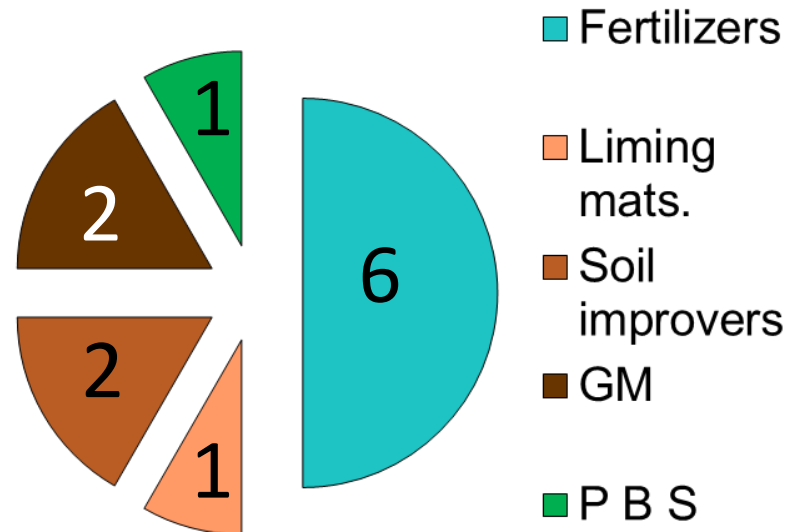
Total

Seats



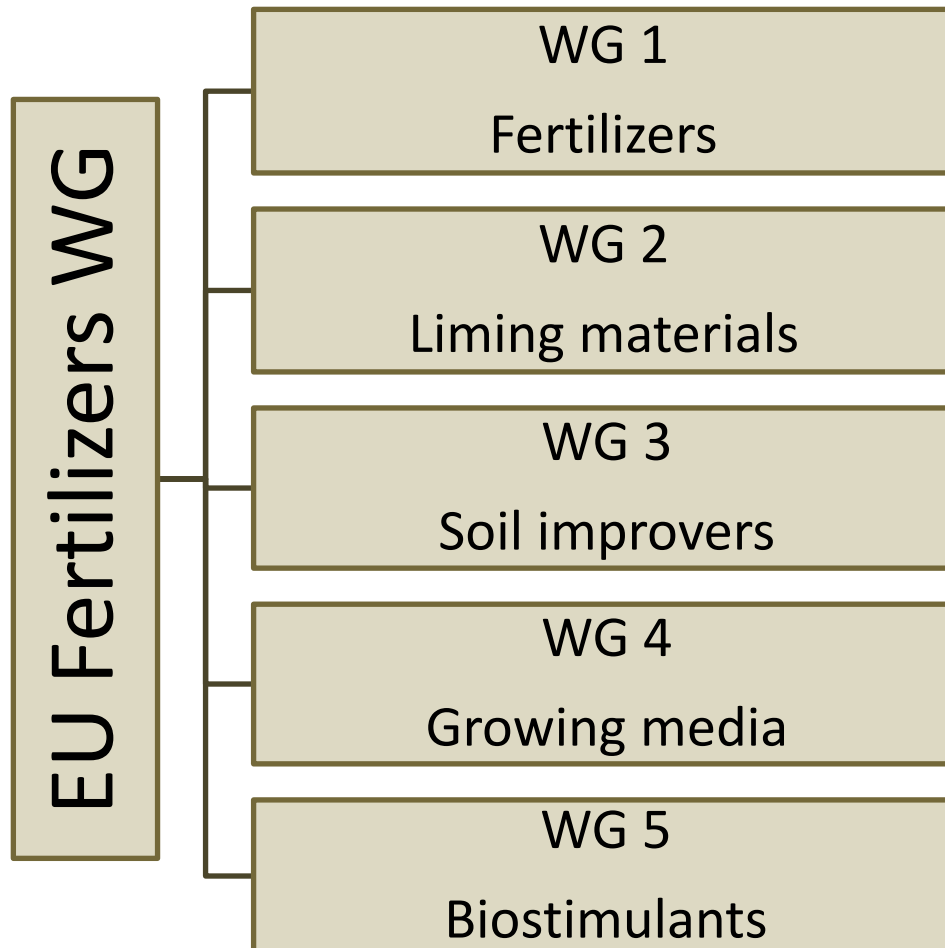
Industry

12 reps



EPAGMA position on the WGs

EPAGMA in strong support of harmonization but WGs acc. to product categories would be more efficient



Wishful
Thinking ?

WG 1 agreed that the future legislation should be **simple** and **understandable** for all stakeholders, as well as **easy to adapt to changes**.

The future legislation should **not create additional burden** for industry, administrations and users. It should address safety issues.

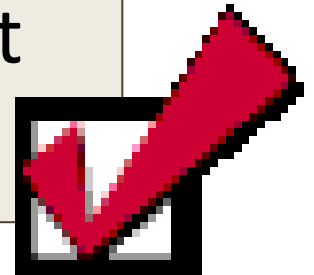
Tentative regulation title

EU Commission
suggested:

„Regulation on
Fertilisers and
related products“

EPAGMA suggested:

„Regulation on
Fertilisers, Liming
Materials, Soil
Improvers, Growing
Media and Plant
Biostimulants“



Definition ,fertilisers' (proposal)

„Fertiliser means a substance or mixture the main function of which is to provide nutrients to plants.“



Definition ,liming material' (proposal)

„Liming material means substances and mixtures containing one or both of the elements calcium and magnesium in the form of oxide, hydroxide, carbonate or silicate and whose main function is to correct soil acidity.“



Definition „plant biostimulants‘ (proposal)

„Plant biostimulant means a material which contains a substance or substances and/or microorganisms whose function when applied to plants or the rhizosphere is to stimulate natural processes to benefit nutrient uptake, nutrient efficiency, tolerance to abiotic stress, and/or crop quality, independent of its nutrient content.“



Definition ,soil improver' (proposal)

„Soil improver means a material added to soil in situ to maintain or improve its physical and/or chemical and/or biological properties with the exception of liming materials.“



Definition ‚growing medium‘ (proposal)

„Growing medium means a material other than soil in situ, in which plants are grown and which is used independently from soil in situ.“



More definitions.....

- Organic matter
- Inorganic fertiliser
- Organic fertiliser
- Compound fertiliser
- Complex fertiliser
- Blended fertiliser
- Orgno-mineral fertiliser
- Soil conditioner
- Compost
- Bio-digestate
- Additive
-

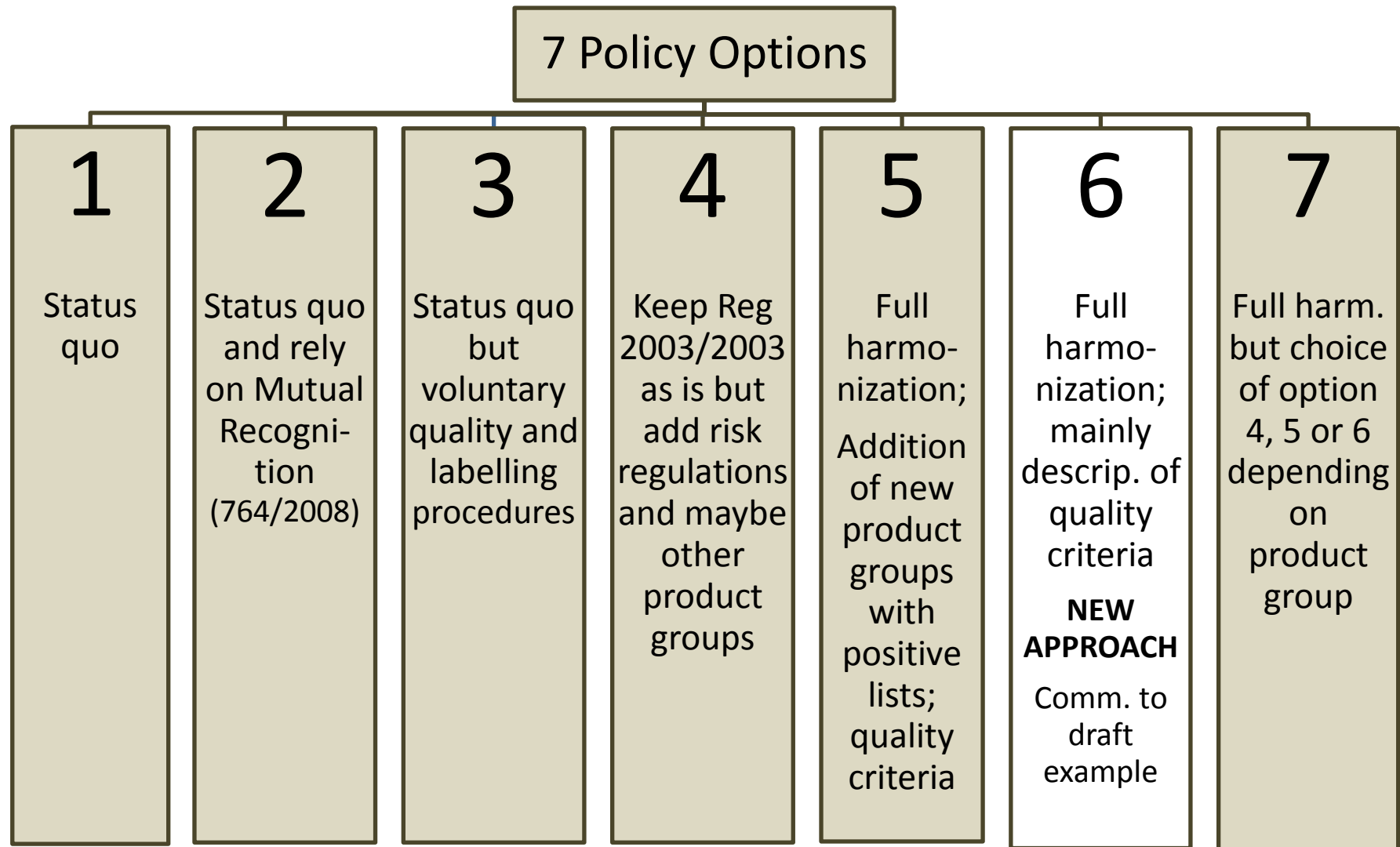
Also being discussed: Negative vs. Positive list

Negative list of ingredients might have a detrimental impact on innovation. It might not be flexible enough to take into account the development of new technologies that could allow making some excluded products compliant with the future Reg.

A positive list of authorised input materials is seen as a better option but there is concern about the possibility to modify the list in the future.

An open positive list would avoid constant modifications of the Annexes in a future Reg.

7 structure options following EU Impact Assessment



Labelling requirements for org. soil improvers (proposal)

Quality criteria (on the product as received)	Determination method
pH	EN 13037
Organic matter content	EN 13039
Total N (%)	EN 13654-2 (Dumas)
Total P (%)	EN 13650
Total K (%)	EN 13650
Dry matter content (%)	EN 13040
EC (optional)	EN 13038

Labelling requirements for growing media (proposal)

Quality criteria		Determination method	Tolerance (at time of manufacture)
pH		EN 13037	± 0.5 pH units
EC		EN 13038	± 50 %
Quantity by volume		EN 12580	- 5 % for individual units within a batch, and 0 % for the whole batch
NPK	(optional)	EN 13651 or 13652	?
Total pore space	(optional)	EN 13041	?
Water volume	(optional)	EN 13041	?
Air volume	(optional)	EN 13041	?
Shrinkage	(optional)	EN 13041	?

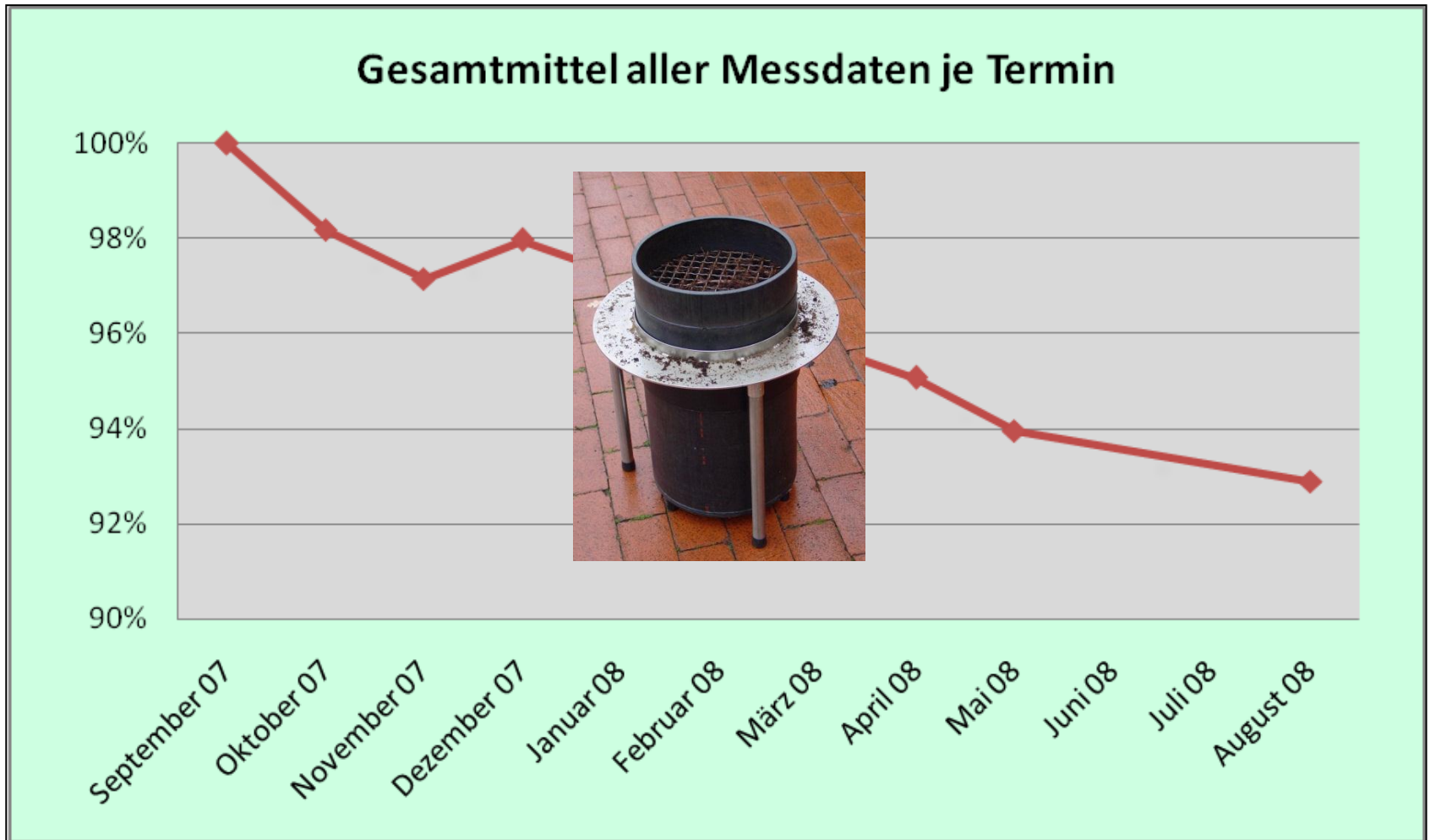
Big discussion point:

„At time of manufacture“

VS.

„At any time in the distribution chain“

EPAGMA Position Paper - Quantity



Average loss of volume of 5 different pre-packed GM (Horticon, 2008)

EPAGMA Position Paper – Microbial contaminants

The European Commission is seeking proposals for limit values for *Salmonella*, *E. coli* and *Enterococcae*.

WG 3 is considering limits that should be set. Methods and limit values as per Animal By-Product Regulation 1774/2002 could be applied.

Proposal by the EU Commission

	Proposed max. limit values	Soil improvers and growing media
<i>Salmonella</i>	Absence in 25 g sample	ISO 6579
<i>E. Coli</i>	1,000 cfu/g	ISO 11866-2* or ISO 9308-3**
<i>Enterococcae</i>	1,000 cfu/g	ISO 7899-1***

* for dairy products

** for waste water

*** for surface and waste water

What will change ?

Today

- (1) Varying national legislation
- (2) Trade barriers
- (3) Difficult to understand and implement national legislation
- (4) National analytical methods
- (5) Little interest in CEN TC 223 „Soil improvers and growing media“
- (6) High packaging costs due to changes in nat. regulations
- (7) Poor product transparency and comparability

....Tomorrow

- (1) EU Regulation for all GM
- (2) Level playing field
- (3) Same requirements and criteria for GM in all MS
- (4) Analyses and labelling based on EN standards
- (5) Strong interest in CEN TC 223
- (6) Less packaging costs
- (7) Better product transparency

Consequences for the industry

Harmonized EU Regulation will replace all national regulations in the EU.

Quality assurance organizations., laboratories, in-house labs will need to adapt EN methods.

Industry will show more support for developing and revising EN standards.

Active on behalf of European growing media producers



epagma.eu

European Peat and Growing Media Association





**The end -
Muchas gracias !**

50 μ m