

Clarifications on misconceptions in the article “The cadmium war” (Euractiv), Fertilisers Regulation Review – Trilogue negotiations

The article [“The ‘cadmium war’: EU in the midst of a geopolitical arm-wrestle”](#), published on 11 April 2016, contains numerous errors, as well as false and misleading statements which should be brought to light. In fact, the two core premises of the article are incorrect:

- First, the question of cadmium limits for phosphate-based fertilizers has not become a geopolitical conflict because of the threat of the EU becoming dependent on Russia for phosphate crop nutrients.
- Second, it is inaccurate to state that there is no scientific evidence that cadmium contained in fertilizers may pose a threat to the sustainability of agriculture and human health.

Below we summarize why these premises are incorrect, and suggest some questions that should be asked before claiming that cadmium limits are a geopolitical issue with no scientific backing.

1. Geopolitics: There is no need for creating a conflict where there is not one.

Safer Phosphates [members](#) have [repeatedly](#) provided [information](#) to EU bodies about their own production capacities and those of [other global producers](#) that are sufficient to supply EU demand for low-Cd phosphate rock-derived fertilisers. It is estimated that around half of all phosphates produced today meet the strictest limits proposed by the EU Commission.

In addition, the introduction of limits would be on a progressive basis taking between 12-16 years for full implementation. Therefore, the proposed timeframe for introduction of cadmium limits is such that if the corporations that currently manufacture and sell high-cadmium fertilizers to EU farmers were to adapt their supply chains or upgrade production technology, they would have sufficient time adjust to the new requirements.

Safer Phosphates™ believes that there is no need for creating a conflict where there is not one. This is not an issue of Morocco vs. Russia, or of EU dependence on Russia. Limiting potentially harmful elements in fertilizers and reducing the risk of environmental dissipation to the food chain is a matter of good governance.

Finally, it should be remembered that one of the goals of the legislation is to level the playing field between the production of mineral and recycled fertilizers. This in itself should enable the EU to become less reliant on imported phosphates.

2. The debate should be focused on sustainability and health

The premise of the legislation is to limit exposure to carcinogenic elements in the fertilizers that are used to grow the food we eat. The aim thereof is to promote better health and more sustainable agriculture. We believe that this is an issue where everyone gains over the long term, even the large corporations that will be required to make certain investments to improve or adapt the way that they produce fertilizers.

3. There is extensive scientific evidence supporting the EU Commission's position

It is undeniable that Cd accumulates in soil, leaches into waterways, is taken up by crops and grazing animals and enters the food chain. Today around half of the total inputs of Cd into EU soils comes from mineral P fertilizers. In recent months, opponents of the legislation have tried to create confusion over two prominent studies, Six & Smolders (2014) - Smolders (2017) and [Römkens et al. \(2017\)](#), modelling Cd accumulation across EU soils, raising questions about which limit is appropriate to prevent long-term damage.

The updated study by Smolders (2017) suggests a stand-still scenario at 73 mg Cd/kg P2O5. In contrast, the findings by [Römkens et al. \(2017\)](#) suggest a stand-still scenario at 20 (grassland and arable soils) or even 0 mg Cd (arable soils only). While these studies are similar in many ways, the key difference affecting results is down to their different leaching assumptions. This leads to significant variability in the predicting of long-term accumulation.

This, in itself, should not be overemphasized in the decision-making process as uncertainties are a normal part of scientific research. Those that advocate that as long as it is not 100% scientifically proven, should remember that Cd that is leached can pose yet another environmental and health issue: water quality. Safer Phosphates™ believes that aiming for a limit value above 20 mg Cd/kg P2O5 is unambitious and will fail to address environmental concerns arising from contamination in soil and food.

Conclusion

The issue of cadmium limits for phosphate-based fertilizers should be looked as an investment with an important future pay-off. In other words, it is an opportunity to shape the environment for the better, and to encourage stewardship of a precious resource: our soil. Ultimately, the regulation is designed to enhance the welfare of all EU citizens.

(Safer Phosphates™ is a network of fertilizer industry organisations from Canada, Egypt, Russia, and South Africa that strives to advance knowledge to promote a better understanding of the environmental footprint of phosphate-based fertilizers and bring rational arguments to the Cd limit value debate through public and private partnership)

Yours sincerely,

SAFER PHOSPHATES