European Commission  
Rue de la Loi 200  
1049 Brussels  
(By email only)  

16 March 2016  

For the urgent attention of:  
First Vice-President Frans Timmermans  
High Representative Federica Mogherini  
Vice-President Jyrki Katainen  
Commissioner Elżbieta Bienkowska  
Commissioner Karmenu Vella  
Commissioner Phil Hogan  
Commissioner Cecilia Malmström  
Commissioner Vytenis Andriukaitis  
Commissioner Johannes Hahn  

Copies to:  
Secretary General  
Executive Secretary-General EEAS  
Director-Generals AGRI, ENV, SANTE, GROW, TRADE, NEAR, COMP  
Heads of Cabinets of the above Commissioners  
Director General, Fertilizers Europe  

Dear Commissioners,  

Proposed revision of the Fertiliser Regulation: Limits on Cadmium  

We understand that the Commission intends shortly to adopt a revised Fertiliser Regulation. We fully support the aims of the Regulation in promoting the circular economy. We also support in principle the inclusion of a limit on cadmium in phosphate fertilisers to protect health and the environment, and to promote the integration of the internal market.  

However, we are concerned that there has not been sufficient consultation, in line with the Commission’s Better Regulation Guidelines, on what limit should be set.  

It is vital to get this right: a limit set too low would not be justified by the most recent scientific analyses and would have severe consequences for the economies of producer countries in North and West Africa; for jobs and competition in the EU fertiliser and agricultural sectors; and for future supplies of phosphate, a Critical Raw Material essential to our food security.  

We respectfully request that additional time be allowed for consultations on the proposals. We stand ready to contribute constructively to enable an appropriate limit to be agreed without delay.  

Kind Regards,  

Signed by and sent on behalf of the signatories listed below:
Signatories:

Mr. Jorge Boucas, CEO and Chairman of the Executive Board, Groupe Roullier, FRANCE
Mr. Giovanni Giudice, President and CEO, Siriac srl, ITALY
Mr. Michael Pater, Managing Director, Origin Fertilisers, UK
Mr. Generoso Martín Blesa, Chief Executive Officer, Tervalis (Fertinagro), SPAIN
Origin Enterprises Plc, IRELAND
Mr. Tim O’Mahony, Managing Director, Goulding Chemicals Ltd., IRELAND
Mr. Gilles Poidevin, Délégué général, UNIFA (Union des industries de la fertilization), FRANCE
Fertilizantes del Noreste SL, SPAIN
Fertilizantes Compactados de Castilla Y Leon SL, SPAIN
Fertilizantes Catalanes SL, SPAIN
Nitrogen Iberian Company SL, SPAIN
Fertilizantes Compactados De Extremadura, SPAIN
Adubos Deiba Lda, PORTUGAL
Delso Fertilizantes Holding SL, SPAIN
Mr. Juan Antonio Ortiz de Urbina Vicente, President/CEO, Mirat Fertilizantes S.L.U., SPAIN
Leonesa Astur de Pienso – Lesa, S.A., SPAIN
Mr. Juan Antonio Ortiz de Urbina Vicente, President, Asturiana de Fertilizantes, S.L.U., SPAIN
Grupa Azoty, POLAND