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**Fertilizer Regulation – Triologue meeting on 20 November 2018**

Dear Mr Pettinelli,

I would like to highlight the key priorities for Fertilizers Europe ahead of this decisive triologue meeting on the new fertilizer regulation, which is scheduled on 20 November 2018.

Our producers expect the negotiations to deliver on three main aspects for this new fertilizer regulation to be a workable outcome:

- Setting a cadmium limit in phosphorus fertilizers not below 60 mg/kg  $P_2O_5$ , possibly higher. If the lower limit is chosen, a transition period should be granted in order to allow EU producers to adapt their sourcing practices and production processes.
- Ensuring the inclusion of industry by-products in the scope of the regulation without creating disproportionate bureaucracy for the conformity assessment. It is absolute key to ensure that both CMC 1 and the new CMC for industry by-products are subject to module A of the conformity assessment.
- Guaranteeing the high quality of mineral fertilizers (i.e. name of the PFC 1(C) category "mineral" fertilizer, high nutrient levels and clear phosphorus solubility criteria), as mineral fertilizers are a key input for European farmers.

Provided that the above conditions are met, Fertilizers Europe would welcome an agreement on this important file under the Circular Economy package.

Yours sincerely,