

EU Fertilizing Products Regulation 2019/1009

Digital Label

Statement of the IVA

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Introduction

In Regulation (EU) 2019/1009 (FPR), the information requirements for the labelling of fertilizers have significantly increased compared to Regulation (EC) 2003/2003. For this reason, it is more convenient and practical for users, producers, and distributors if the information is provided digitally in accordance with the regulation. The extensive physical provision of information would lead to increased complexity of the layout, reduced clarity of essential information, additional packaging material, and consequently more plastic and paper waste. At the same time, the packaging capacity of manufacturers would decrease, and the logistics complexity for all stakeholders would increase. The German and European agricultural industries strongly welcome the opening towards digital labelling for EU fertilizer products. As the Agricultural Industry Association (IVA), we support the Commission's proposal for the introduction of a digital label under the framework of 2019/1009 but recommend substantial changes.

Digital Label on fertilizers

Which type of digital labelling would be best suited for the fertilizer industry?

Currently, various easy-to-use technical solutions are available, such as marker codes, QR codes, barcodes, or simply printing a URL. Information provided through marker codes and QR codes can be easily accessed by users of the products using a smartphone or application. The same applies in principle to barcodes, although barcodes are more sensitive to physical damage compared to markers and QR codes.

By printing URLs, digital information becomes accessible to everyone. Internet availability is now widespread throughout Europe via broadband, mobile networks, and satellites. Farmers also handle administrative tasks through online applications, and information retrieval also takes place in the digital space.

Article 6 of the fertilizer products regulation should be supplemented with a provision stating that labelling can be done physically on the packaging or accompanying documents, digitally, or both. The detailed regulations regarding this are made in the new Articles 11a, 11b, and 11c. When packaged goods are provided to **economic operators** (traders), labelling can be done physically or digitally.

However, when packaged goods are provided to **end-users** (farmers or private users), the goods must be labelled either physically or digitally with an additional physical duplicate. In this context, **both farmers and private users are considered end-users**. However, since farmers make their purchasing decisions based on the requirements of the fertilizer regulation for their operations and good agricultural practices, they should be distinguished from private users without an economic intention in terms of usage and essential information. These groups of end-users have different amounts of education in plant nutrition therefore the necessary physical information level is different.

From our perspective, the exclusive distinction between economic operators and end-users is not practical or relevant, except in certain marginal areas of trade (due to the lack or unclear definition of terminologies).

Only in the case of complete B2B trade could a transition to a digital label actually be made. However, this would require traders to have their own physical label for distribution to end-users or the trader most likely will request labels from the manufacturer. Therefore, the regulation does not offer any improvement over the current situation and leads to increased complexity in the value chain and a significantly larger amount of packaging material. This information could be provided purely digitally without jeopardizing its understandability.

Information Required in Physical Form

The new FPR demands two to three times more information compared to the previous regulation. The current proposal still requires too much of the information to be provided also in physical form, which limits the effectiveness of the transition to a digital label. The key for the success of this initiative is the application of digital labelling only on packaging. Where digital labelling is required alongside physical labelling there is limited, to no, benefit in terms of cost savings, improved communication, and waste reduction.

Since most fertilizer manufacturers market and distribute their products in multiple markets (countries), and since distributors are free to sell EU fertilizers in any European market, this detailed information must be provided on each packaging in a variety of languages (10-15 on average). The resulting more complex layouts and larger label sizes are too extensive to be displayed clearly on standard packaging sizes of 25 kg bags. In this regard, the Packaging Directive states: "If the packaging is too small to contain all the information, the information that cannot be indicated on the label must be provided in a separate package leaflet" (Article 6 - Obligations of manufacturers; paragraph 7). It should be considered that in the EU requests for change in printed information occur on a regular basis. This means that a large number of brochures would need to be produced and distributed. With digital only labelling, these changes can be quickly implemented with no excess waste.