

### **EFBA – who we are:**

The European Fertilizer Blenders Association (EFBA) represents national associations whose members are engaged in the importation, production and distribution of fertilisers in Belgium, France, Germany, Ireland, Italy, the Netherlands, Switzerland and the UK. Our members purchase fertiliser raw materials from both EU and non-EU manufacturers.

### **EFBA supports calls for fertilisers to be suspended from CBAM:**

EFBA strongly supports requests submitted by fertiliser and farmer trade bodies to their relevant Member States for fertilisers to be temporarily suspended from CBAM under Article 122 of the Treaty on the Functioning of the European Union (TFEU). These submissions include:

- Association Française de Commercialisation et de Mélange d'Engrais (Afcome) to the French government
- Bundesverband der Düngemischer eV to the German government
- Irish Farmers Association (IFA) and Irish Co-operative Organisation Society (ICOS) to the Irish government

The rationale for fertilisers to be suspended from CBAM includes the following factors:

- The war in the Middle East is detrimentally affecting fertiliser supply and price
- Concurrently, global cereal prices remain at a low level, putting farm profitability across the EU under significant pressure
- Farmers may reduce fertiliser inputs to the 2026-27 crop cycle due to economic pressures
- Reduced fertiliser use will adversely impact on yields with consequences for the resilience of EU food production and security

The impacts of the situation in the Middle East are likely to affect global fertiliser markets beyond the cessation of current hostilities as it will take time for fertiliser production and supply chains to stabilise. Given fertiliser trading in Europe for the 'new season' (i.e. for application in spring 2027) typically starts in late May / early June, the war presents an ongoing threat to EU food production into the 2026-27 crop cycle.

The proposed suspension of Most Favoured Nations (MFN) duties is unlikely to have any beneficial impact given the limited volumes provided for under the tariff quotas and the fact that the main countries of origin affected no longer export.

### **EFBA advocates a parallel suspension on ETS for EU-produced fertilisers:**

As mentioned above, our members purchase fertiliser raw materials from both EU and non-EU manufacturers. The fertiliser supply chain challenges created by the conflict in the Middle East impact both EU and non-EU manufacturers. Therefore, in the interests of supporting fair trade and ensuring comparable production costs, EFBA advocates a parallel suspension from the Emissions Trading Scheme (ETS) for EU fertiliser production.