

Call for Input: UK Fertiliser Regulatory Reform


Overview


The UK government, alongside the devolved administrations, is proposing a major overhaul of fertiliser regulation through a new framework: the **UK Fertilising Product Regulations (UK FPR)**.

The aim is to create a more modern, flexible system that supports innovation while maintaining high standards for environmental protection and human health. The opportunity to input on this overhaul is split into two parts. Those interested can:

- Contribute to a series of consultation questions which relate to the UK Government's preferred options for modernising UK fertiliser legislation by developing a flexible regulatory framework
- Contribute to a series of questions specifically calling for evidence on newer and novel fertilising products and materials, to inform their incorporation into future iterations of the framework

Though this is a UK focused opportunity, **we encourage all AMI members to get involved, as shaping policy in one jurisdiction will have positive ripple effects across the globe.**

 **Deadline:** 10 June 2026

 Full consultation can be found [here](#)

Background

Fertiliser is broadly defined in UK legislation as any material intended to supply nutrients to plants or improve nutrient efficiency. This includes not only traditional fertilisers, but also **inhibitors, plant bio-stimulants, and soil improvers**.

However, the current regulatory framework is:

- **Over 20 years old and fragmented**
- Focused largely on **inorganic fertilisers** and exhaustive **lists of fertilisers** that have not been updated to account for new developments (e.g., bio-stimulants or biochar)
- Lacking requirements around **contaminants and efficacy**

Since it was introduced:

- Scientific understanding of **environmental impacts** (GHGs, nutrient pollution, contaminants) has advanced significantly

- A wide range of **novel fertilising products** has emerged, including those based on **microbial and biological processes**
- There have been **fertiliser supply shocks**, highlighting the need for resilience

To address these issues, the UK proposes a **conformity assessment framework**, requiring products to meet defined standards before being marketed. This system is flexible, allowing new product types to be incorporated over time as the evidence base improves. This regulatory change will be **phased**, starting with well-understood products, with newer and novel products incorporated later as evidence improves.

Why this matters for microbiologists

Many of the most significant innovation areas are fundamentally **microbiological**.

However:

- Evidence on **efficacy, risks, and mechanisms** is still limited
- There is **no clear regulatory framework** for many emerging biologically-derived products
- Definitions (e.g. bio-stimulants) may not fully capture microbial functions

This consultation is therefore a key opportunity to ensure:

- Microbiology is properly reflected in **policy and definitions**
 - Regulation is based on **robust, current science**
 - Innovation is supported, not hindered
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Our Ask

The AMI Policy Team has pulled out some key questions from the consultation and ‘call for evidence’ that we think are of particular relevance to our members, as well as some questions we are interested in hearing your thoughts on. We strongly encourage members to contribute **evidence, examples, and expert insight** wherever appropriate.

The [full consultation](#) is extensive however, so please do have a look through the additional questions and feel free to provide your thoughts to us on any you see fit.

You can contribute by:

- Editing this document directly
- Emailing your input (bullet points welcome) to **policy@appliedmicrobiology.org**
- Submitting your own independent response to the consultation

If you decide to contribute to the joint AMI response, please indicate whether you are happy to be **named or remain anonymous**.

Call for Evidence (KEY SECTION)

While innovation in fertilisers offers strong potential, the government considers the current evidence base on novel products and materials' efficacy, safety, and scalability to be insufficient. As a result, these products are being de-prioritised in the initial regulatory framework, with further evidence sought to inform their potential inclusion in future iterations.

The government is therefore seeking this further evidence within the 'call for evidence' section of this consultation, to address the knowledge gaps around newer and novel fertilising products – particularly those involving biological systems.

1. Benefits and risks of plant bio-stimulants (Section 5.2.2 – read more on pages 127-128)

The UK defines plant bio-stimulant as “a product stimulating plant nutrition processes independently of the product's nutrient content with the sole aim of improving one or more of the following characteristics of the plant or the plant rhizosphere:

- nutrient use efficiency
- tolerance to abiotic stress
- quality traits
- availability of confined nutrients in soil or rhizosphere”

Call for Evidence question: Do you think that there are any issues with this definition?

The UK Government is particularly interested in any comments you may have with regards to other characteristics of the plant or the plant rhizosphere (not including tolerance to biotic stress) which are improved by plant bio-stimulant products which should be considered.

Call for Evidence question: Please name any plant bio-stimulants product(s) that you believe has a negative impact on human health (or mammalian health) and where available provide associated evidence.

Call for Evidence question: Please name any plant bio-stimulant product(s) that you believe has a negative impact on the environment including soil health, air quality or effects on water?

Call for Evidence question: There is less certainty about the risks and benefits of plant bio-stimulants, compared to inorganic fertilisers. Are there any examples of how plant bio-stimulants have been regulated in other countries which have worked well or would work well in the UK?

2. Alternative processing technologies and nutrient recovery (Section 5.4 – read more on pages 133-135)

At present there are no regulatory requirements in fertilisers legislation for novel fertilising products from alternative biological sources of nutrients and processing technologies, for example: anaerobic digestion, compost, phosphorous from struvite precipitation and ammonia stripping for recovery of nitrogen from digestate and wastewater; and thermochemical conversion of organic material via various procedures (for example incineration, pyrolysis) into ash-based products and biochar for fertiliser production.

The UK Government is seeking views and evidence on the market readiness and demand for alternative fertilising products.

Call for Evidence question: What are the main barriers that need to be overcome to drive the use and manufacture of fertilising products made from alternative biological sources of nutrients and processing technologies in the UK?

Call for Evidence question: What would be the benefits or drawbacks of expanding the scope of UK fertilisers legislation to fertilising products made from compost and digestate?

The UK Government explicitly invites examples from other countries or areas of regulation where available.

Call for Evidence question: Inorganic fertiliser products must comply with declared nutrient value limits as stated on each product's label. What evidence do you have that fertilising products containing organic nutrients can supply consistent levels of nutrients?

Call for Evidence question: What would be the impact of requiring a certain level of 'recycled' nutrient in fertilising products? (major positive impact, moderate positive impact, no impact, moderate negative impact, major negative impact, don't know).

The UK Government particularly invites any comments you have about the types of fertilising products which could contain a percentage of recycled nutrient, and the sectors where there are opportunities to recover nutrients for fertiliser manufacturer. Please also comment on any alternative regulatory changes or other proposals which could increase recycling of valuable nutrients into fertilising products. Please include examples from other countries or areas of regulation where available.

AMI Policy Team Question: What is the impact of not including novel products in the first iteration of the framework? Does de-prioritising and delaying their inclusion in the framework delay action towards achieving sustainable soils?

Consultation Questions

While the full consultation covers many points around the proposed regulatory design, we have highlighted a small number that may be of interest.

1. Nutrient Levels (Section 4.8.5 – read more on pages 88-89)

The UK Government proposes setting minimum levels of primary and secondary macronutrients in inorganic fertilisers, which will be agreed on at a later stage in the regulatory development process.

They also propose not setting an upper maximum limit for nutrients in inorganic fertilisers on the basis that actual soil loading will be determined by application and use of fertilisers which is not covered in these proposals.

Call for Evidence question: To what extent do you agree or disagree with the proposals for nutrient levels in inorganic fertiliser.

2. Contaminants (Section 4.8.6 – read more on pages 89-91)

Current fertilisers legislation does not set out contaminant limits in fertilisers. The UK is proposing to introduce limits in these new regulations on potentially toxic elements, including microorganisms.

The contaminants the UK proposes to establish limits on for inorganic fertiliser are:

- Cadmium (Cd)
- Hexavalent chromium (Cr VI)
- Mercury (Hg)
- Nickel (Ni)
- Lead (Pb)

- Inorganic arsenic (As)
- Biuret (C₂H₅N₃O₂)
- Copper (Cu)
- Zinc (Zn)
- Salmonella spp.
- Escherichia coli or Enterococcaceae

The contaminants the UK proposes to establish limits on for liming material are:

- Cadmium (Cd)
- Hexavalent chromium (Cr VI)
- Mercury (Hg)
- Nickel (Ni)
- Lead (Pb)
- Inorganic arsenic (As)
- Biuret (C₂H₅N₃O₂)
- Copper (Cu)

Call for Evidence question: Are there any other contaminants not listed above which the UK should consider in relation to straight, compound liquid and solid inorganic fertiliser and liming material consisting of CMC 1?

If yes, please state the name of the additional contaminant(s) together with relevant evidence that would help policymakers understand why this should be considered in relation to straight, compound liquid and solid inorganic fertiliser and liming material consisting of CMC 1.

3. Workshops (Section 4.11 – read more on pages 117-118)

The UK is proposing 10 technical workshops for setting detailed parameters at the first stage of implementation of the new regulatory framework, and to determine the procedures for sampling and analysing fertilisers for enforcement purposes. The outcome of this joint consultation and call for evidence may highlight further areas where policymakers need to get more technical input.

The following is a provisional list of workshops they are looking to hold:

- **Workshop 1 - General requirements for all fertilising products** – reviewing general requirements for all fertilising products placed on the market under UK FPR including labelling requirements.
- **Workshop 2 - Inhibitor efficacy requirements** - setting the effectiveness criteria for inhibitors and the testing methodologies that help demonstrate these criteria.

- **Workshop 3 - Contaminant limits** – reviewing evidence and setting contaminant levels for inorganic fertilisers and liming materials.
- **Workshop 4 - Liming material standards** – Review evidence and decide the technical requirements for PFC 2: Liming materials.
- **Workshop 5 - Ammonium Nitrate (AN)** – workshop to review proposals to consolidate existing requirements for AN of high nitrogen content into UK FPR. This will include discussion around the technical requirements for DRT testing specifically.
- **Workshop 6 - Nutrient content** – reviewing evidence to determine proposed minimum nutrient levels in inorganic fertilisers.
- **Workshop 7 – Testing and analysis standards** – review and evaluate the test methodologies and standards including latest CEN standards being developed for EU FPR, required for UK FPR (excluding thermal cycling, oil retention and DRT testing).
- **Workshop 8 – Additives (CMC 1)** – review the potential inclusion of polymer-based technical additives to CMC 1 under UK FPR.
- **Workshop 9 – Labelling requirements** – reviewing general labelling requirements for all fertilising products under UK FPR and product-specific labelling requirements for UKCA marked products.
- **Workshop 10 – Sampling and analysis of fertilisers** – review methods and procedures for sampling and analysing fertilisers for enforcement purposes.

Call for Evidence question: In addition to the suggested workshops, are there any other issues or topics that you think the technical workshops should cover in relation to the first stage of implementation of UK FPR?

Please note: scientists and interested stakeholders are also invited to note their interest in attending any of the workshops by sharing a summary of their experience, skills and reasons why you are interested in attending directly through the website.