

Fertilisers, soil conditioners and crop management tools

Admission Criteria for the “French Input List”

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Table of Contents

1. Introduction	3
2. Scope of products.....	3
3. Marketing authorization.....	4
3.1 Fertilizers, adjuvants for fertilizers and substrates	4
3.2 Products with negligible nutrient contents	4
4. Administrative requirements	4
4.1 Formal pre-conditions	5
4.2 Disclosure of composition.....	5
5. Technical Requirements	6
5.1 Fertilisers, soil conditioners and plant nutrients	6
5.2 Absence of GMOs.....	6
5.3 Materials of aquatic origin	6
5.4 Fertiliser additives.....	7
5.5 Specific Requirements for products and by-products of animal origin	7
5.6 Specific Requirements for products of plant origin.....	8
5.6.1 Fermentation products.....	9
5.6.2 Other single nutrients isolated from plant materials.....	9
5.7 Specific Requirements for micro-organisms.....	10
5.8 Specific Requirements for products of mineral origin	10
5.9 Inorganic micronutrients.....	11
5.10 Specific Requirements for potting soils.....	11
5.11 Specific Requirements for composts, digestates, compost and digestion additives	11
5.12 Requirements for other products.....	12
5.12.1 Fertiliser adjuvants	12
5.12.2 Specific Requirements for biodegradable mulching sheets	13
5.12.3 Synthetic nanoparticles / picoparticles.....	13
5.12.4 Silica.....	14
5.12.5 Phosphonate / phosphonic acid.....	14
5.13 Compliance with the objectives and principles of organic farming.....	14
6. Legal note.....	14

1. Introduction

In this document we refer to the “French Input List” as the FiBL-ITAB guide of products that can be used in organic production in France.

This document describes the criteria that products submitted to the “French Input List” must meet. This document can be found on the website france.inputs.eu. It will be updated whenever necessary. Please refer always to the most recent version, which is available on the website, and which is the only valid version.

2. Scope of products

Categories of eligible inputs

The following categories of products are included in the scope of the “French Input List”:

- Products within the scope of the EU fertiliser legislation (2019/1009) or the French fertiliser legislation, such as fertilisers, soil conditioners, fertilizer adjuvants, biostimulants and substrates
- Related products outside the scope of fertiliser legislation, such as biodynamic and homeopathic preparations, ‘plant strengtheners’ with negligible nutrient contents and mulching sheets
- Compost additives, biogas additives

Categories of non-eligible inputs

The fertilisers or related products below are at the moment excluded from the scope of the French Input List:

- Seed treatments
- Farm-specific mixes of potting soils (usually sold in bulk)
- Unprocessed manure, slurry, compost and digestate (materials of agricultural origin which are sold directly to farms in bulk)
- Mushroom growing media

The following product categories other than fertilisers are also currently excluded from the scope of the French Input List:

- Plant protection products and related products, such as basic substances, attractants, repellents, traps and beneficial organisms.
- Products for disinfection, cleaning & hygiene.
- Products for parasite control.
- Feed, feed additives and silage agents.
- Food additives

3. Marketing authorization

The “French Input List” requires products to comply with relevant general EU and national regulations. It is the responsibility of the applicant company to comply with the general legal requirements. The “French Input List” reserves the right to verify the information provided by the applicant in this regard as part of its internal quality assurance. If there is insufficient evidence of compliance with general legislation, it may postpone the listing until the applicant has demonstrated legal compliance.

No claims of a plant protection effect/claim may be made on any commercial material of the product (labels, technical data sheet, portfolio, webpage and technical sales documents).

3.1 Fertilizers, adjuvants for fertilizers and substrates

Requirements

The applicant should present:

- a valid marketing authorization or;
- documentation which demonstrates that the product is exempt from the requirement for a marketing authorization.

The following marketing authorization are recognised:

- Marketing authorization (“*autorisation de mise sur le marché*” - AMM) issued by ANSES in accordance to L.255-2 of “*Code Rural et de la Pêche Maritime*” (CRPM) or;
- CE fertilizers in accordance to Regulation (EU) 2019/1009 or;
- products that comply with a French standard (“*Norme Française*”) made mandatory by a decree published in the Official Journal or;
- products that comply with specifications described in the CRPM such as “*Substances Naturelles à Usage Biostimulant*” (SNUB);

3.2 Products with negligible nutrient contents

For products with negligible nutrient contents such as homeopathic and biodynamic preparations and mulching sheets, no marketing authorizations are required.

4. Administrative requirements

Companies must comply with the provisions of the general business contract provided in the website of the “French Input List”. In case of breach of these conditions, companies shall be removed from the “French Input List”, together with all the products registered under their name.

4.1 Formal pre-conditions

The administrative and formal aspects of registration are described in a separate document called “Application guidance”. Please pay special attention to the following points:

- Companies must register for the “French Input List” prior to submitting products for evaluation.
- Only products which are on the market in France can be included.
- Requests must be complete. All questions in the application form must be addressed, and all required supporting documents (e.g. registration documents, product labels, material safety data sheets) must also be submitted. The application forms provide guidance regarding the documents required.

4.2 Disclosure of composition

Disclosure of the full composition (including all co-formulants / additives) and manufacturing process of the product is a pre-requisite for the evaluation in all cases. The following minimum requirements apply:

- The production process has to be described.
- All components/raw materials which are used during the production process have to be declared. Any treatment and/or processing of components/raw materials has to be declared.
- If the component/raw material is supplied by a third party, the supplier of the component must be identified.
- FiBL may also request the production process, origin and characteristics of components/raw materials supplied by third parties.
- All components/raw materials have to be described with English or French names. If possible, use standard chemical nomenclature. Where available, give also CAS numbers.
- For each component/raw material, the quantity must be given (in %, g/kg or other suitable units).
- Where known, indicate the technical function and the origin of each component/raw material.
- Analytical results may be necessary for the complete characterization of the product.

5. Technical Requirements

5.1 Fertilisers, soil conditioners and plant nutrients

Background

Fertilisers, soil conditioners and plant nutrients are explicitly mentioned and regulated in the EU organic legislation.

Requirements

- Only the fertilisers, soil conditioners and plant nutrients listed in Annex II to Reg. 2021/1165 are allowed.

5.2 Absence of GMOs

The EU organic legislation prohibits the use of food, feed, processing aids, plant protection products, fertilisers, soil conditioners, seeds, vegetative propagating material, micro-organisms or animals containing GMOS in organic production. Components of fertilisers or other products must not be genetically modified or obtained from a GMO product. Any unavoidable presence of GMOs must not exceed 0.9 %. As part of its quality assurance, FiBL may request companies to effect analyses and/or provide existing analysis reports to verify this point and/or provide samples for analysis.

Requirements

- The applicant must provide a declaration of the absence of GMOs, using the dedicated template on the website of the “French Input List” for the following materials:
 - all micro-organisms
 - materials derived from crops for which it is known that GMO varieties are cultivated, such as soy, oilseed rape, maize, etc.

5.3 Materials of aquatic origin

Background

For various materials of marine origin, the EU organic legislation restricts their origins to organic production or sustainable sources (see Reg. 2021/1165, Annex II).

Requirements

- Seaweed washed ashore and collected must be sorted to remove inert materials (plastic, glass, rope, cans, etc.) so that it can be used as fertilizer.
- For algae, algae products, mollusc waste and chitin (polysaccharide obtained from the shell of crustaceans) a declaration on origin is required. Please use the

dedicated form provided by the French Input List. For comparable products, the “French Input List” reserves the right to apply similar requirements.

- Seaweed products may be obtained by extraction with acids or alkaline aqueous solutions. Clarification: Acids/alkalines which increase the concentration of nutrients in the final product are restricted or prohibited. This means that nitric and phosphoric acids are not allowed, because they act as easily soluble mineral fertilisers. Extraction with potassium compounds (e.g. potassium hydroxide, KOH) is allowed, but the evaluation team may reject products which contain excessive amounts of potassium deriving from the extraction agents. In particular, such products may not be marketed as potassium fertilisers. Manufacturers may be asked to provide the necessary data for this point to be verified

5.4 Fertiliser additives

Background

At the moment, fertiliser additives are not mentioned in Annex II to Reg. 2021/1165. Additives can include, for example, emulsifiers, carriers, antifoaming agents, and preservatives. The “French Input List” restrict the use to certain substances.

Requirements

- only preservatives listed in Annex III and V of Reg. 2021/1165 are authorized.
- other additives should not be harmful to the user or the environment and should be easily biodegradable. They should not cause residues in crops. FiBL reserves the right to request additional information, particularly on environmental fate and on residues in soil and/or crops. If the applicant fails to prove the need to use an additive, or if he fails to demonstrate that the additive does not cause residues in crops and has no unacceptable effects on human health and the environment, the product will be rejected.

5.5 Specific Requirements for products and by-products of animal origin

Background

Annex II to Reg. 2021/1165 contain a list of permitted animal products and by-products. For certain compounds, the restriction 'factory farming origin forbidden' applies. However, there is no official definition of 'factory farming' and no agreement across Europe on how to implement this requirement. Currently, the “French Input List”

follows the implementation described in the Guide de lecture issued by INAO and regularly updated¹.

Requirements

- The animal products and by-products mentioned in Annex II to Reg. 2021/1165 are permitted.
- Materials may undergo physical processing. Other forms of processing will be evaluated case by case.
- Where the restriction 'factory farming origin forbidden' applies, materials may not derive from farming systems with slatted or grid flooring that exceed the thresholds defined in Annex I of Directive No. 2011/92/EU, or from cage farming that exceeds the thresholds defined in Annex I of Directive No. 2011/92/EU.
- Where applicable, products must meet the hygienic requirements of EU Reg. 1069/2009 and EU Reg. 142/2011.
- Unprocessed solid and liquid manure are out of the scope of the French Input List. However, products derived from liquid manure are required to comply with [French decree of 04/09/2018](#)
- Components declared as "guano" may be subject to further investigation as to their true nature, and the evaluation teams may require proof that a given guano product is free from human pathogens (analytical report and/or veterinary certificate as specified in EU Reg. 142/2011).

5.6 Specific Requirements for products of plant origin

Background

Annex II to Reg. 2021/1165 allows 'products and by-products of plant origin for fertilisers', and gives the following examples: 'oilseed cake meal, cocoa husks, malt culms'. The use of such materials for fertilization purposes is clearly desirable, since the raw materials have little other uses, and since they undergo only minor processing steps. The following requirements apply:

Requirements

- Yeast extracts (from non-GM yeast) are allowed as fertilisers.
- Aqueous and ethanolic extracts are generally allowed, while extracts with synthetic solvents are not allowed (exception for seaweed products: see section 'materials of aquatic origin' below). Extraction with ammonia is not permitted.

¹ <https://extranet.inao.gouv.fr/fichier/GDL.xlsx>

- By-products of plant materials derived by physical processing are allowed. The material may not be contaminated with non-authorized substances (e.g. chemical solvents) during the process. In such cases, the applicant must explain the production process including all substances used in sufficient detail, and he must demonstrate the absence of contaminants with chemical analyses. If the absence of contaminations cannot be established beyond doubt, the evaluation team may reject the product.
- Sludge from the food processing industry is not included in the category of 'organic by-products of plant origin for fertilizers' and cannot be used in organic agriculture

5.6.1 Fermentation products

Background

The French version of Annex II to Reg. 2021/1165 allows vinasse and vinasse extract with the restriction 'exclusion des vinasses ammoniacales'. Currently, the "French Input List" follows the French implementation policy for this requirement. Note: this policy might change in the future, because a recommendation by EGTOP and possibly a change in Annex II is expected.

Requirements

- Vinasse containing more than 1% ammonium nitrogen ($\text{N-NH}_4 > 1\%$ on dry matter base) is considered ammoniacal vinasse and therefore not allowed.

5.6.2 Other single nutrients isolated from plant materials

Background

Potassium sulphate is also produced in the manufacture of biofuels ('biodiesel'). This process involves an ester interchange with potassium hydroxide and a precipitation with sulphuric acid. The "French Input List" considers this as chemical processes.

Phosphates can be recovered from plant biomass with chemical processes that resemble the manufacture of superphosphate. The "French Input List" considers this as a chemical process.

Single nutrients (e.g. phosphorus, potassium) in pure form can be obtained from plant materials with ion exchange technology. In line with the Expert Group for Technical

Advice on Organic Production², the “French Input List” considers that such purifications are not in line with the objectives and principles of organic production.

Requirements

- Potassium sulphate from the manufacture of biofuels is not allowed.
- Phosphates recovered from plant biomass are not allowed.
- Single nutrients produced with ion exchange technology are not allowed.

5.7 Specific Requirements for micro-organisms

Micro-organisms have traditionally been used in organic farming, and there is no objection to their use. Micro-organisms are mentioned in the organic legislation.

Requirements

- The identity (species and strain) of the microorganism must be given.
- Strains which are known to have a pesticidal function are not allowed in fertilisers (see EU pesticides database).

5.8 Specific Requirements for products of mineral origin

Annex II of Reg. 2021/1165 contains a list of materials which may be used as sources of phosphorus, potassium, calcium, magnesium and sulphur.

Requirements

- Liming materials: magnesium and calcium carbonate of natural origin are allowed. This includes also mollusc and egg shells. These raw materials may not be processed with acids or other synthetic substances.
- Inorganic nitrogen: mineral nitrogen fertilisers are *not permitted* according to the principles of organic production³. This includes synthetic compounds such as ammonia, nitrate and urea, but also natural sources such as ‘Chilean nitrate’ (also known as ‘Chile salpeter’, ‘Peru salpeter’, ‘Caliche’).
- Stone meal, clay, clay minerals: for specific materials known to be on the market also in synthetic form (e.g. apatite), applicants have to confirm that the materials are of natural origin. In particular, they may undergo mining and milling. Processing/extraction with acids or other chemical substances is not allowed. Processes that change the chemical composition are excluded (e.g. conversion of calcium carbonate to calcium hydroxide).

² See EGTOP report on Food VI and Feed IV; EGTOP report on Food III; EGTOP Report on Food I.

³ see Article 4(b)(iii) and Art. 12(1)(e) of Reg. 834/2007, and Art. 5(g)(iii) of Reg. 2018/848

5.9 Inorganic micronutrients

Annex II of Reg. 2021/1165 allows all inorganic micronutrient fertilisers that comply with the limits for contaminants set by Reg. 2019/1009. This covers also chelating and complexing agents. In the French Input List, this is implemented as follows:

- All inorganic micronutrients listed in Reg. 2019/1009 are allowed.
- Consistent with the principles of organic production, mineral nitrogen salts (e.g. nitrate, ammonia) are not allowed as sources of micronutrients. Likewise, complexing agents containing mineral nitrogen are not allowed (e.g. ammonium salt of lignosulfonic acid).
- In the case of inorganic micronutrients obtained by recycling processes (e.g. from used batteries), the evaluation teams will request additional information on the recycling process, and/or may request analyses of contaminants.

Note on the use of micronutrients

Foliar fertilizers and microelements must not be used for fungicidal or bactericidal purposes. In the event of proven misuse, any additional copper from these foliar fertilizers will be accounted in the calculation of the annual application of copper (limited to 4 kg/ha/year).

5.10 Specific Requirements for potting soils

Potting soils may contain all materials listed in the relevant Annexes, in particular

- materials of plant origin such as compost, peat, wood fibre, coconut fibre, cocoa shells, bark,
- inert mineral components such as clay, sand, pumice, lava, perlite, vermiculite, expanded clay and soil, and
- fertilisers complying with the present admission criteria.

Requirements for coconut fibre and wooden products

Coconut fibre and wooden materials (incl. bark) are only allowed, if they have not been treated with synthetic substances such as nitrogen compounds (e.g. calcium nitrate).

5.11 Specific Requirements for composts, digestates, compost and digestion additives

Background

The relevant Annexes contain some specifications on raw materials and heavy metal content in the final product, but not on foreign matter (plastic, metal, glass, etc. particles). The EU fertiliser regulation (2019/1009/EC) sets limits for foreign matter. Additional French regulations may be applicable. It is primarily the responsibility of the applicant companies to ensure that their products comply with these regulations. However, the “French Input List” may request analyses to verify whether these requirements are fulfilled.

Requirements

- Biogas digestates must comply with [French decree 22/11/2020](#).
- Biogas digestates and composts containing animal by-products are required to comply with [French decree of 04/09/2018](#).
- Biogas digestates may be only obtained from materials materials listed in Annex II of Regulation (EU) No 2021/1165. Some materials are prohibited in biogas plants, including sludge from wastewater treatment plants and sludge from agri-food industries.
- Biogas digestates containing animal by-products co-digested with material of plant or animal origin falling in category 3 and digested tract content falling in category 2, originating from factory farming is prohibited and the process must comply with Regulation (EU) No 142/2011.
- Only the following processing aids or additives may be used in the digester for compost activation: materials listed in Annex II of Regulation (EU) No 2021/1165, microorganisms, enzymes and vegetable oils. Carbonaceous materials or any additive for moisture content adjustment are not allowed in the composting process.
- The use of additives in biogas digestion to stabilise the process or increase biogas yield is desirable from a resource efficiency point of view. Additives for biogas digestion must meet the following requirements established in [French decree 22/11/2020](#).

5.12 Requirements for other products

5.12.1 Fertiliser adjuvants

Background

In this document, the term ‘adjuvant’ summarizes products which may be used in combination with other authorised products, for example spreaders/stickers.

Requirements

For adjuvants which are used in combination with fertilisers or biostimulants, the same admission criteria as for fertilisers apply.

5.12.2 Specific Requirements for biodegradable mulching sheets

Background

Mulching sheets are regularly used in practice, especially in vegetable production. They serve a number of purposes such as weed suppression, water conservation, regulation of soil temperature and keeping the harvest clean. Depending on the crop and situation, it may be preferable to use non-biodegradable or biodegradable mulching sheets. Since biodegradable mulching sheets are not mentioned in the relevant Annexes, the “French Input List” has developed its own admission criteria based on the objectives and principles of organic production. Although these criteria were developed for mulching sheets, they may be applied also to other types of biodegradable products, e.g. biodegradable pots.

In the opinion of the “French Input List” team, such products should ideally be made entirely from bio-based materials. However, we recognize that to date this is not yet technically feasible.

Requirements for mulching sheets

- The raw materials may not be GMOs.
- Biodegradability and compliance with limit values for contaminants must be demonstrated with certificates based on a suitable test method (e.g. EN 17033; other certificates will be evaluated case by case). Results may be submitted either for the final product, or for all components. If no certificate is available, the evaluation team may carry out an evaluation of the product.

5.12.3 Synthetic nanoparticles / picoparticles

Background

The new organic legislation excludes food containing, or consisting of, engineered nanomaterials⁴, but makes no such requirement for inputs. Consistent with the policy of EGTOP⁵, the “French Input List” considers that nanoparticles are not implicitly authorized, but would require a separate listing in order to be authorized. For picoparticles, the same argument applies.

Requirements

⁴ Reg. 2018/848, Art. 7(e)

⁵ see EGTOP Report on Fertilisers (II), chapter 4.8.2.

- Synthetic nano- and picoparticles are not allowed at the moment.
- The size limit below which a particle is considered as a nanoparticle follows the definition of the European Commission⁶ (i.e. 50 % or more of the particles are in the range between 1 nm and 100 nm).
- Agglomerates of nanoparticles will be evaluated case by case.

5.12.4 Silica

Pyrogenic silica and other synthetic forms of silicium are not allowed.

The use of silicon from sodium silicate, potassium silicate or silicic acid as a fertiliser in organic farming is not allowed.

5.12.5 Phosphonate / phosphonic acid

Manufacturers must take great care to avoid the content of phosphonate / phosphonic acid (also in traces) in their products. The evaluation teams may request analyses to verify this point. In case that phosphonate is found in a product, the “French Input List” will take a case by case decision on the acceptability of the product, taking into account the manufacturing process, the levels of phosphonate and the dosage of the product. The “French Input List” reserves the right to de-list products, due to elevated levels of phosphonates.

5.13 Compliance with the objectives and principles of organic farming

The “French Input List” reserve the right to reject products/uses which they consider to be non-compliant with the objectives, criteria and principles of organic farming, as set out in Reg. 2018/848. Such decisions will be jointly taken by FiBL and ITAB, with involvement of the advisory board. Such decisions will usually be incorporated into the evaluation criteria.

6. Legal note

This document is based on the current interpretation of applicable laws in this field, on directives of the competent authorities and on decisions and requirements by the French national partners, finally reflecting the principles of organic farming and their application in the French context.

All of the statements, results etc. contained in this document have been compiled by the authors according to their best knowledge and have been scrupulously checked by the Research Institute of Organic Agriculture FiBL. However, the possibility of mistakes

⁶ https://ec.europa.eu/environment/chemicals/nanotech/faq/definition_en.htm

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