

IFOAM EU Group

International Federation of Organic Agriculture Movements - EU Regional Group

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Response to the European Action Plan for Organic Food and Farming

Policy Paper • September 2004

General comments

The IFOAM EU Group would like to congratulate the Commission for responding so positively to the calls for an European organic action plan, and now for starting this important work. We also applaud the consultative process that it employed in achieving this, which clearly has contributed to this positive beginning.

We welcome in general terms the content of the action plan as outlined in the 21 actions. These would appear to represent a comprehensive range of measures and activities that address in some degree most of the necessary areas.

However we do have a number of significant concerns on certain specific issues. We detail these in this response paper, along with our many positive comments.

The IFOAM EU Group Board played a very active part in both calling for and developing the action plan over the last several years. Now that it is published we look forward to working with the Commission and other stakeholders in turning these proposed actions into concrete form and to start realising organic farming's enormous potential.

Organic farming is multifunctional and meets all the objectives of the common agricultural policy, like no other farming system. It therefore needs to be at the heart of the CAP, and of European food policy generally. We see this action plan as the start of that process. However it is only the first stage in what needs to be a progressive and dynamic development. Therefore it is the first organic action plan and should not, indeed must not, be the last.

Resources

A general and major concern is the lack of resources allocated by the Commission to the plan. We understand that the recently approved research project for monitoring and evaluating the action plan has a budget several times greater than that allocated to the plan itself. This is clearly a nonsense.

We appreciate that much can be done by redirecting existing resources and indeed a number of the actions are simply identifying what is already being done or is planned. However if organic farming is to fulfil its potential it will need considerably more than that and this must be addressed.

Another key issue is the need for capacity building in all sections of the organic sector.

Action 1: Information campaigns

We welcome this action. There is a great need for balanced and targeted information campaigns in all countries and this is a priority area for the additional resources mentioned above. To be effective, however, we suggest the campaign should be delivered by operators at a national level, though with EU funding, guidelines and other support.

However we are concerned at the continued emphasis on the EU logo. Widespread criticism of such an obligatory logo (including at the January hearing), certainly as currently designed, has pointed out that is unlikely to help inform and educate consumers or give them additional confidence in organic produce. Forced promotion of the EU logo will therefore not deliver the desperately needed boost in demand and hence would be a waste of the very limited resources currently attached to this action plan. Instead information campaigns must build on what consumers already trust, namely the various national and private logos. Use of the EU logo must in any case be voluntary and cannot be a condition to receiving support for general information campaigns.

We believe that an EU logo could be helpful for facilitating trade for certain products and in certain regions. The EU logo must, however, be redesigned in order to be identifiably different and to make its voluntary use more attractive to economic partners. National and private logos should be equally promoted alongside the EU logo.

The Commission must bear in mind the organic ideal of localised production and sales, which requires emphasis on local, regional & national identity. Furthermore, in some parts of Europe, the branding of organic food with 'EU' could undermine confidence and positive attitudes as a result of widespread Euroscepticism. A serious incident of fraud in another member state or at an EU level could bring down the reputation of organic food everywhere.

Action 2: Internet database on private and national standards

This action is acceptable, a database could be good for transparency; we note that the research project on the revision of Regulation 2092/91 is already laying its foundations. However, we do have some practical concerns: it would be a huge task to maintain and it could be difficult for the many different stakeholders to understand and effectively use a single database.

More importantly, we are concerned about the Commission's motives behind this action. We recognise the variety of different national and private standards and the difficulties this can cause. We also recognise that this diversity is an important driver in the further development of organic standards and therefore needs to be fostered. That the organic movement retain ownership and leadership of the organic standards is also fundamentally important for the same reasons. We note that it is often not so much the differences in

standards as the differences in interpretation of the EU Regulation that cause the problems. The IFOAM EU group therefore wishes to stress that it completely opposes the Commission using such a database for any move towards replacing private standards with only EU standards.

A possible simpler idea would be for a website that simply has live links to all the various private or national standards.

Action 3: Statistical data

We support this action. The availability of statistical information about organic land, produce, processing and market is currently too limited and has many gaps. The organic sector requires more appropriate statistics to enable reliable estimation of the state and development of the organic food market. Uniformity is needed. There is also a need for general national statistics in food and agriculture to differentiate between organic and non-organic farming & products. A budget is needed for this action.

The data needs to be gathered at national level and compiled upwards, so that it can be analysed at regional, national and EU levels. This action should also not be implemented in a way that imposes new administrative burdens on organic farmers: the data should be collected by modifying the existing agricultural data collection systems, not through a new system.

Action 4: Top-up support for producer organisations in fruit & vegetable sector

We support this action as it will encourage the formation of producer groups, but we feel that the intention behind it needs to be applied much more widely. Not only producer organisations in the fruit and vegetable sector need such support, but also those in all production sectors. Further, if organic farming is to expand to its full potential then capacity building of all organic organisations, at local, regional, national and EU levels will be needed.

Action 5: Web-based menu listing EU measures

We support this action and urge that it be extended to include information on how these various measures are being applied nationally, in order to support co-operation and exchange of experiences.

Action 6: Use of Rural Development Programme instruments

This is clearly a very important action and we support it wholeheartedly. The link between strong support and strong growth of organic farming is evident and this lesson needs to be applied. We accept that the rural development regulation allows member states to respond to their own particular circumstances by devising their own support measures. We also recognise its important developmental role. However, support measures for organic farming are unique in also having an impact on the market. Therefore we urge that there does need

to be some form of coordination of, or consistency between, such measures to ensure that they do not cause market distortion.

The new Rural Development Regulation should mention organic farming. Also, as a way of implementing the recommendation that Member States should target organic farming as the preferred management option for environmentally sensitive areas, we suggest that for certain measures in this Regulation or in the national RDPs it should be stated that 'organic farming is the preferred management option'.

Action 7: Research

This is another priority action. We urge the Commission to include in the seventh framework programme a thematic area dedicated to organic farming, processing of organic foods and consumer issues related to organic foods with its own allocation of funds. Furthermore, these funds should be proportionately higher than the size of the organic sector because organic research will have benefits far beyond just the organic sector and also because commercial investors have less immediate interest in developing organic farming. The organic sector itself must be the key player in determining the research priorities and indeed we have just produced a policy paper on these.

Action 8: Defining the Principles of organic farming

We support this action, having consistently asked for implementation principles in Regulation 2092/91, rather than detailed rules. We note that this is a part of the research project on the revision of Regulation 2092/91 and point out that IFOAM is also currently reviewing the principles of organic agriculture. It is important for these two initiatives to work together, as clearly the organic movement, the founders and developers of organic farming, must make the final decisions when defining the principles of organic farming. It would also be useful to link organic farming in the Regulation to European environmental and food quality objectives.

Action 9: Maintaining the deadlines for ending derogations

We support the concept of derogations with transitional periods, as they are needed to address the different states of development in different countries or regions. We also recognise the importance of enforcing the deadlines. However, progress towards achieving deadlines must be more substantial and we believe this requires a different strategy. The deadlines must be set on the basis of good evaluation of the issues, building in a sufficient period of notice, and with the necessary research backup to overcome the obstacles involved. For many areas, adequate progress cannot be made without new resources being provided, e.g. for R&D, capital and information. The Commission must also ensure that member states each have plans for meeting the deadlines and it should monitor progress across the EU so that the necessary steps can be assured.

Action 10: Complete and harmonise the standards

We support filling the gaps in the Regulation 2092/91, in particular:

- additives and processing aids for processed animal products in Annex VI - absolutely necessary and urgent
- standards for the production of wine – also urgent
- standards for aquaculture

However we have concerns about extending the EU regulation to cover other major specific aspects of the environment (energy, biodiversity, landscape etc.). The organic sector certainly wishes for more progress to be made in these areas but we think other measures would be more suitable. These would be more in line with the three dimensions organic farming addresses equally in its holistic approach, namely the environmental, the social & the economic.

Organic farming is an holistic system that delivers many environmental and other benefits efficiently because it is multifunctional; its practices are generally multi-purpose (e.g. supporting biodiversity and pest control at the same time). The many benefits that organic farming delivers, and its efficiency in doing so, are a product of this multi-functional approach, rather than by addressing issues one by one which is the normal non-organic approach. It is therefore necessary that the continued evolution of organic farming be not hampered by a major new focus on individual environmental issues in the standards, particularly if new costs are introduced to the sector. Currently, these areas can best be progressed mainly through R&D to develop organic farming practices and knowledge, information dissemination and support for organic farmers.

Action 11: Expert panel for technical advice

We support the concept of an expert panel for technical advice. The composition of this panel must secure excellent representation of the organic sector itself and a broad stakeholder representation. There is a real need for formal representation from the organic movement to provide authenticity and technical advice to the European organic standard-setting process. This work is already going on informally and without support from the Commission, but current involvement of the organic movement via IFOAM must be formalised and built upon.

Scientific advice would also be useful, but it is very important that scientific experts do not dominate the standard-setting process. Final decisions must be taken by people who are experienced in and supportive of the organic holistic approach.

Action 12: GM contamination

We are extremely disappointed with the Commission's proposed action on GMOs. These are a major threat to the objectives and viability of organic farming in Europe, and this threat cannot be simply addressed by focussing only on labelling and thresholds for contamination.

We agree with the proposed clarification that GM labelled products cannot also be labelled as organic. However, the action does not even begin to deal adequately with GM contamination. The objectives of the organic movement, consumer expectations and the actual demands of the organic marketplace in this area all mean that zero GM contamination is the only acceptable objective for organic food and farming (in practice the reliable limit of detection, currently 0.1%). For this reason, organic certification therefore currently has zero tolerance for GM contamination and the IFOAM EU Group believes that it must maintain this approach. The IFOAM EU Group therefore urges that in any future papers or statements on the EU organic action plan or this subject the Commission supports the sector by stating that a limit of 0.1% is the only acceptable policy objective for GM contamination in organic farming.

However, and this is very important, the IFOAM EU Group also stresses that this objective cannot be delivered by a separate lower GM threshold in regulation 2092/91. This would be inappropriate and also unviable. Organic certification is a process-based approach. Testing of the end-products is used as confirmation that the process standards are being implemented and working as intended but testing is never the main approach. If testing reveals that contamination has occurred, corrective measures can be taken and sanctions imposed if the producers are not following standards (such as decertification of the product). A specific obligatory end-product threshold for GM contamination at an EU level would therefore be a significant deviation from this approach. Secondly, achieving a 0.1% GM contamination limit for all organic products can only in practice be delivered by the GM sector (or by governments). The organic sector, which has to abide by the requirements in 2092/91, only has limited control over GM contamination and so simply does not have the means to deliver this. In the current circumstances, therefore, separate thresholds in the regulation would result in a huge cost increase for organic farming, indicate guarantees to consumers which the organic sector cannot be certain of delivering, and could make organic farming impossible in some sectors.

Therefore, to achieve the 0.1% objective for GM contamination and continue our zero tolerance approach in a situation where commercial GM crops are introduced, the IFOAM EU group has two pre-requisites.

First, the existing legal restrictions on the 0.9% general labelling provision must be recognised and respected by the Member States, so that incidents of GM contamination are only allowed to be exceptional and not routine. As this condition is not currently being strictly interpreted, the Commission must provide a definition of "adventitious or technically unavoidable" to make it clear that routine contamination of non-GM products is not allowed as part of some general non-labelled tolerance.

Secondly, co-existence and economic liability regimes must be adopted which put the full responsibility for preventing and compensating for adventitious contamination on the GM users.

For this, the Commission must remove the current barrier that it put up to the adoption of adequate national co-existence regimes for organic farming: the reference to "the tolerance

thresholds set out in Community legislation" in its July 2003 co-existence recommendations (paragraph 2.1.4). Several member states currently recognise the need to provide adequate protection for their organic sectors and for best practice in agriculture from GM contamination. However, although these Commission recommendations are non-binding, some governments see this reference and the current absence of specific lower organic thresholds as a barrier. The Commission should therefore make a statement that 0.1% is the relevant objective for organic farming and, although it is not specified as a separate threshold, national co-existence regimes can and should be designed as far as possible to deliver a 0.1% limit for organic farming.

In the current absence of these pre-requisites - (the prevention of routine contamination and the existence of co-existence and liability regimes that put full responsibility on the GM users) - the IFOAM EU Group must remain absolutely opposed to separate lower GM thresholds for organic farming. Meanwhile, to address this extremely serious threat, these two proposed communications need to be made as soon as possible by the Commission, as national governments are currently in the process of discussing and drafting the co-existence regimes on which the future viability of organic farming and best farming practice in Europe depends.

Finally, the IFOAM EU group is greatly concerned at the suggestion of a possible separate GM contamination tolerance for organic seed. Such an approach would be completely unmanageable for the organic sector as well as for conventional farmers who select their own seed varieties. Organic farming is currently largely dependent on non-organic seed, and even organic seed is directly derived from non-organic seed. As seed is the starting point of production, and as even a small level of genetic contamination of seed has the potential of multiplying throughout the production system and unnecessarily introducing GMOs across a large part of EU farmland (even where GM crops are only being grown in a limited area or not at all), it is essential that all non-GM seed be completely free of contamination. The threshold for adventitious contamination of all non-GM seed, conventional as well as organic, must therefore be the lowest reliable level of detection (0.1%).

For further information on our position on GMOs, please see the IFOAM EU Group's position on Co-existence, adopted in October 2003, and the IFOAM position on GMOs, adopted in May 2002.

Action 13: Risk-based approach and cross inspection

We fully support a risk-based approach. For implementing this approach equally in all member states we feel it will be necessary to define 'risk based', for which the Commission should initiate relevant development projects.

Also very important is a general simplification of inspection and certification systems for small and low risk producers.

Concerning cross-inspection we support this in principle but see potential difficulties in putting such a system into practice (e.g. when competing inspection bodies undertake cross-

inspection). Of equal or greater importance the need to improve the supervision systems of the competent authorities and the communication between inspection bodies.

Action 14: Develop sampling and analytical methods

Consistent sampling and analytical methods are important tools to back up the systems approach and ensure equal/similar performance by operators and inspection bodies. However we do not see that analysis per se can determine the organic status of a product.

Action 15: Use of parcel identification

We support this action.

Action 16: Better co-ordination of inspection activities

We fully support this action, especially with regard to irregularities/information about fraud.

Action 17: Specific accreditation system for organic inspection bodies

We support the idea of a specific accreditation system for organic inspection bodies as the organic 'process' approach is very different from other more product-based systems. We point out that such a tailored system of accreditation is already available through the IFOAM Accreditation Programme. In this context we appreciate the talks held between the Commission and the IOAS in spring this year. We note that the United States National Institute of Standards and Technology (NIST) has recently given its recognition of IOAS as an accreditor of Certification Bodies for Organic Production and Processing.

Action 18: Publishing information on breaches

We fully support this action. However, transparency only through publishing reports is not enough. The supervision systems in each member state need to be harmonised to ensure that inspection bodies work on the same level.

Action 19: Imports and equivalence

We support this action and again wish to point out the opportunities the IOAS can offer as an international accreditation system. Regarding imports, see next point.

Action 20: International standards and capacity building

We support this action. Harmonisation work on international standards should be undertaken together with IFOAM/IOAS. We also support the possibility of the EU encouraging the development of organic farming in third countries but only if such support

is in line with the basic organic ideal of localised food production and sale, which requires emphasis on local/national control. The Commission's strong focus on promoting international trade is inappropriate as a priority for an organic action plan. Where trade is encouraged it must not be to the detriment of internal markets, must adhere to fair terms of trade and must not lead to dumping practices. In short, exports (however equitable) should not be pushed for their own sake on the pretext of access to EU markets. Local production and control thereof must be the priority.

Action 21 International negotiation mandate

We support this action a priori, but would need to know more about its implications.