

Stakeholder participation and stakeholder protest: On the planned revision of the EU Organic Regulation

Christian Eichert, Alexander Zorn, Stephan Dabbert^{1,2}

Introduction

Shortly before Christmas of last year, the Commission of the European Union (EU) published the draft of a new EU Organic Regulation. This draft proposal, which is intended to replace Council Regulation (EEC) 2092/91 and supplementary regulations, has provoked substantial criticism from the German organic sector. Thus the German farmers' union (Deutscher Bauernverband, DBV) spoke of the "massive undermining of consumer protection" which could result from provisions in the draft. The German Federation of the Organic Food Industry (Bund Ökologische Lebensmittelwirtschaft, BÖLW) as the umbrella organization of organic producers, processors and traders rejects the present draft revision outright.

The broad rejection of the draft replacement regulation was confirmed at a workshop held in the framework of the EU ORGAP project, which brought together leading representatives of the German organic sector on March 30, 2006 in Berlin. The ORGAP (Evaluation of the European Action Plan for Organic Food and Farming) research project is of special interest in connection with the new EU Organic Regulation, since the draft regulation explicitly (and quite unusually) makes specific reference to this project: its results will be drawn upon at a later stage in order to draft the detailed implementation provisions for the regulation. The methodological approach of the ORGAP research project places a very strong emphasis on stakeholder integration.

The key objective of the workshop was to develop indicators for evaluating the European Action Plan for Organic Farming. In asking about conflicts and synergies between national and EU organic policies, the workshop gave room for a debate on the revision process of the organic regulation. The workshop followed a format provided by the project partners University of Wales, Aberystwyth (Nic Lampkin, Pip Nicholas) and University of Southern Denmark (Johannes Michelsen). The workshop took place in 9 European countries. We report on the German case alone. It was not the original intention of the workshop format to produce this paper on the revision of the organic regulation, but we were asked by the participants to do so. Thus this paper can be regarded as a by-product of the workshop process, though not originally intended.

We take up arguments from the workshop which, in our view, carry particular weight and place them within a conceptual framework. Concrete statements from participants in the national ORGAP Workshop are included to stimulate and enhance the debate; comments in italics indicate direct quotations. Our thanks go to the participants in the workshop; as authors of this article, however, we alone and not they are responsible for its contents. With this paper, we report key arguments from the debate and attempt to place them in a broader perspective. Reactions received on earlier versions of this article (Eichert et al. 2006) show that this puts the authors themselves into a debatable position, both in political and scientific terms. With respect to politics, disagreement to our statements developed below can be expected. More serious and fundamental, however, is the critique raised towards the scientific

¹ Institute for Farm Management (410a), University of Hohenheim, D-70593 Stuttgart, Germany.

² Manuscript for the poster presentation at the Joint Organic Congress "Organic Farming and European Rural Development", May 30-31 2006 in Odense, Denmark.

basis of our procedure. Critics stated that in our approach, we have become instruments to transport stakeholders' views, whereas stakeholders should argue their views themselves, and that the authors were losing their objectivity and jeopardizing their role as independent and respected scientists.

No doubt there exists in participatory research, like that on which this paper is based, a fine line beyond which the realm of political activism begins, and which can be easily crossed. On the other hand, participatory research with stakeholders implies, in our view, the necessity to take stakeholders concerns seriously with respect to their political implication and not only use them as data. Taking them seriously does not mean agreement but implies the necessity to evaluate such concerns in a more general manner, according to our own judgement; this is our aim here. It is up to the reader to decide whether we have crossed that line, and gone beyond simple research.

The proposed revised version of the EU Organic Regulation is a concrete step in the implementation of the European Action Plan for Organic Food and Farming, which was agreed in 2004. Numerous actions in that document make reference to this legislation which defines what is meant by "organic agriculture". For the European organic sector, with an estimated annual turnover of EUR 10,500 million to 11,000 million (figures for 2003), it is almost impossible to overestimate the significance of this regulation, since it sets out the crucial legal basis for production, processing and trade. From that point of view, few were surprised that the EU Commission would be putting forward a new regulation. Criticism from the sector is directed essentially at the procedure chosen by the Commission, and at key points of the regulation's contents.

The better to structure the critique of the new regulation, we frame it in the context of the principles of "good governance" which the EU Commission developed as a standard for its own conduct.

Principles of good governance

In 2001 the EU Commission was prompted by its perception of a "disconnect" between the Union and its citizens to codify a set of governance principles in a white paper on "European Governance" (EC 2001). The objective of the governance reform is to "open up policy-making to make it more inclusive and accountable."³ The involvement of all actors and stakeholders⁴ in the policy-making process (participation) is an important principle; an additional aim is to speed up the policy-making process. Community law should be applied by more flexible means in order to do justice to specific regional circumstances. A further aim is more effective enforcement of Community law, in order to strengthen the functioning of the single market and the credibility of the Union. As a matter of principle, before the EU takes action, it should always clarify the issue of subsidiarity, i.e. whether any action is necessary at all and, if so, whether it should be taken at EU level.

There follows an overview of the five "Principles of Good Governance" of the EU, which also serve to reinforce the principles of subsidiarity and proportionality:⁵

³ EC (2001) p. 8.

⁴ The *Eurojargon* definition of "stakeholder" is "any person or organisation with an interest in or affected by EU legislation and policymaking. The European Commission makes a point of consulting as wide a range of stakeholders as possible before proposing new legislation or new policy initiatives." *Eurojargon* (2006).

⁵ EC (2001)

- Openness: institutions should work in a more open, transparent and accessible manner.
- Participation: improving participation, from policy development to the implementation of political programmes.
- Accountability: clear allocation of roles and responsibilities
- Effectiveness: clear objectives, evaluation and subsidiarity
- Coherence: consistency within strategic programmes and between the work of institutions (local, regional, national and supranational)

If we examine how far the product and process of redrafting the EU Organic Regulation have conformed to EU principles of governance, it is fair to say that some of the principles set out in the white paper have been applied. The plan is to implement the draft very quickly – within half a year – and in relation to organic food production, implementation of the regulation should be adapted flexibly to special regional and local circumstances. The Commission wishes to adopt a standard form of European labelling (either the EU logo or alternatively an “EU-ORGANIC” text mark) to safeguard the effectiveness of the internal organic market and to facilitate trade in organic products. We will go into this point in more detail below.

If we consider the policy-making process in terms of the principles of subsidiarity and participation, however, – i.e. involvement of stakeholders from the organic sector – regard for these criteria has not been adequate so far. While the detailed formulation of the European Action Plan took place on the basis of a relatively broad consultation process, stakeholders have had barely any involvement in the implementation of this Plan. The draft was largely developed without direct consultations with organic sector associations.⁶ This fact is reflected in the brevity of the process to date, and is certainly one of the reasons for the vehement criticism now confronting the EU Commission. Furthermore, the provisions of the new draft give the Commission additional sway in future concerning the implementation of the regulation. Here the sector’s complaint is that opportunities for participation in future will be inadequate, even though the development of implementation provisions is of crucial importance to everyday practice. (As yet no detailed information of any kind is available on the form these implementation provisions will take).

In the light of good governance, the principles of subsidiarity and stakeholder involvement in the revision of the regulation have not yet been adequately considered. Hence these principles will be discussed once again below in relation to the revision, and possible solutions will be put forward.

The subsidiarity principle and the EU Organic Regulation

Throughout the existence of the European Union and its precursors, the subsidiarity principle has been contained in its statutes, implicitly or explicitly.⁷ This states that decisions should be taken at the nearest possible level to the citizens. The fundamental question in advance of any political action at Community level is whether Community intervention is justified at all in the light of any scope for national, regional or local action. The subsidiarity principle thus

⁶ The one gesture towards sector participation was the list of questions on the revision of the EU Organic Regulation, which the Commission published with some haste in September 2005, giving the associations a three-week period in which to respond.

⁷ The principle of subsidiarity is anchored in the Treaty of Maastricht (Protocol to the Treaty establishing the European Community). Details of its application are set out in the “Protocol on the Application of the Principles of Subsidiarity and Proportionality”. EC (2004)

obliges the EU both to act and to exercise self-restraint, thereby imposing a double duty on decision-makers (Andersen and Woyke 2003).

The existing EU Organic Regulation applies universally and directly in all Member States, i.e. the statutory basis for organic farming as such is regulated at Community level. In other fields of organic agriculture policy, however, the Commission limits itself to setting out the framework and allows the Member States broad scope for their own activities. As a result, individual Member States and regions have become important actors in the field of organic agriculture policy, e.g. by setting out national or regional action plans to promote organic agriculture. On the strength of the success of some of these action plans (in Denmark, for instance, or the Federal “Organic Agriculture” Programme in Germany), enthusiasm was expressed for a European Action Plan which would supplement and integrate with the activities already taking place at national level.

Major parts of the European Action Plan concern the provisions of the EU Organic Regulation. This can be explained by the fact that the EU Organic Regulation falls within the Commission’s direct jurisdiction.

According to the subsidiarity principle, the Member States (or, in Germany’s case, as a consequence of its federal structure, the federal states (*Länder*) that make up the country) are responsible for the interpretation and enforcement of particular responsibilities under the EU Organic Regulation, such as inspection. As a result of differing interpretations of the EU Organic Regulation, this division of responsibilities can lead to discrepancies in the conditions governing the organic sector.

The regulation currently in force makes it possible to use national certification which exceeds the European standard as a way of setting oneself apart from foreign competitors. In Great Britain, for example, the in some respects higher standards operated by the Soil Association, a private label organisation, is arguably the de facto market standard, which can make it difficult for organic producers from other countries to export to Great Britain if their production only meets the EU organic standard.

Thus it is obvious that subsidiarity in the examples mentioned can lead to results which might be seen as distortions of competition. The question in the current discussion seems to be whether reducing the significance of the subsidiarity principle is the right response to difficulties of market access. It could also be argued that higher standards have a role in some countries as this provides the potential for evolution of standards at the EU level.

Stakeholder involvement and the EU Organic Regulation

Various Member States (during their Council Presidencies) as well as the Commission have made efforts to involve the organic sector and the public at large during the five-year development of the European Action Plan for Organic Food and Farming. The fact that numerous suggestions from the conferences in Baden near Vienna (1999) and Copenhagen (2001) and from expert groups under the auspices of the European Commission were not taken up does not detract from this statement. Progress towards a pan-European Action Plan has fundamentally been characterised by the frequent exchange of knowledge and ideas with sector stakeholders.

The participatory outlook of this process is deeply significant, particularly in the policy area of organic agriculture because, historically, the sector emerged and was organised and

institutionalised on a non-governmental basis. This development was substantially carried along by a social movement which in many cases identified itself as a part of the environmental movement. Thus economic action was often motivated partly by environmental policy goals. Only in the mid-1980s did the policy sphere give organic agriculture a legal definition in a few countries. Since the introduction of the EU Organic Regulation in 1991, organic agriculture has gained a “European dimension”. This occasioned a shift in the power to define the meaning of organic agriculture into the hands of policymakers and administrators. In the course of this development, however, the sector still exerted a substantial influence over the frequent refinements of the regulation.

It is quite evident that since 1991, the continuing development of the existing EU Organic Regulation has involved an expedient combination of state action and non-governmental initiatives. Although there was some criticism of the detail, essentially the organic sector and the policy sphere had entered into a constructive process of cooperation which was accepted by both sides.

The discussion about the new regulation for organic agriculture does, however, raise the question of whether the Commission is living up to its own standard of “joint endeavour” between policymakers and sector interests, or whether a trend towards decoupling of the organic agriculture movement is in progress.

One potentially far-reaching change in the cooperation between the EU Commission and the sector is certainly the downgrading of the existing Annexes to the EU Organic Regulation into implementation provisions. These Annexes regulate the numerous details which quite practically define what actually makes organic agriculture organic. According to the draft of the new regulation, these detailed descriptions of organic agriculture should be placed in provisions on implementation which in the future can be determined by the Commission using the Management Committee procedure. Compared to the current Legislation Committee procedure, the position of the Commission will be strengthened. This reduces the sector’s potential influence on their specific contents. It is no mere administrative simplification, because it shifts the responsibility of determining what makes organic agriculture distinctively organic towards the EU Commission. Some actors in the sector have commented on these changes in drastic terms, feeling that the sector is being disenfranchised, “*having its child taken away*”. In other words, from the perspective of many stakeholders, by shutting out the private sector the ground is being prepared for subordination to state control.

For some actors in the sector, this impression arises from the fact that the EU Commission has not previously submitted provisions on implementation for public discussion. Moreover, there is a lack of clear public information on which areas will be revised and how, or any clear timetable which makes provision for adequate consultation of the private sector. This gives some stakeholders the impression that while they can comment formally, they are decoupled from the policy process. “*A sandbox is set up for the sector where it can engage with itself; in the background, while the EU, or the Commission, is pursuing different objectives.*”

Consequently, some parties to the discussion assume that in revising the EU Organic Regulation, the EU Commission is pursuing objectives which do not coincide with the proclaimed goals of the European Action Plan for Organic Food and Farming (“sustainable growth of the organic sector”): they see the “*market bias of the current draft*” as the outcome of successful lobbying from the conventional food trade. What many of these parties fear is the watering down of existing standards and the loss of the values they believe in. Furthermore the fear was expressed that detailed work on the draft was “*eclipsed*” by the “*dispute over competences*” between European authorities (Directorate-General Agriculture

and Directorate-General Health and Consumer Protection), weakening the organic sector as a consequence.

The development of the organic sector builds on the work of the associations. The authors perceive a danger that the importance of the associations as the guardians of organic values and ideas would be diminished if the current draft is put into practice, and hence that organic agriculture would lose a part of its identity.

It is becoming apparent that the Austrian government as Council President – probably under pressure from the protests – has backed down from the original plan of adopting the new proposal during its Council Presidency (by the end of June 2006). The plan is now to hold two further meetings of the Council Working Group by the end of June to discuss the revised draft (particularly principles and ground rules). This should bring about progress to the point where further work is possible in the second half of the year under the Finnish Presidency. Consequently, this latest development can be seen as an opportunity for sector stakeholders to engage in a constructive process to revise or redraft the widely criticised points of the EU Organic Regulation.

Organic sector involvement in official feed and food controls (Regulation EC 882/2004)

Organic certification according to the EU Organic Regulation is a stand-alone form of certification which only became separate from the organic producers' associations at the beginning of the 1990s. However, the producers' associations have continued to provide certification according to their own standards (which go beyond the requirements of the EU regulation). Thus, for the large proportion of the organic sector attached to associations (which applies to almost 70 % of Germany's organically farmed area) there are close organisational links between EU organic inspection and inspection according to private label standards. For inspections under the EU regulation, until now a public-private partnership (PPP) approach has been widely pursued: the public administration commissions certification firms (mainly operating in the private sector) to inspect enterprises engaged in organic production or processing.

The reason for the "double" certification carried out for the majority of farms under this system may be that additional certification to private label standards allows for further segmentation of the organic market via brands such as Demeter and Bioland. This can mean better marketing opportunities for those brands, since it enables them to position themselves as premium organic products. A further advantage is that when any kind of scandal affects particular parts of the organic market, it is possible to communicate more clearly with consumers through the unaffected segments. Moreover, another point of significance is that EU organic certification has never yet been part of the remit of government food control authorities.

Since the beginning of 2006, Regulation (EC) 882/2004 has governed the integration of organic agriculture into the general food and feed control regime. The structure of the existing Regulation (EC) 882/2004 poses considerable risks for the current division of responsibilities (PPP) in most EU countries. It is not yet completely clear how the organic sector is to be brought under this regulation in practice. One model makes provision for integrating organic certification into the state feed and food control system. This would mean that the past division of responsibilities between state control and private-sector implementation would no longer continue; there would be a paradigm shift (Gerber 2006). But perhaps it will be

possible for the division of responsibilities between private inspection bodies and state supervisory agencies to continue under Regulation 882/2004. Nevertheless, provision is made (Article 63 (2)) that, to take account of the specific character of the organic agriculture regulations, “specific measures to be adopted in accordance with the procedure referred to in Article 62 (3) may provide for the necessary derogations from and adjustments to the rules laid down in this regulation,” i.e. there is a possibility of establishing a special regime for organic agriculture.

From the perspective of the organic sector, the retention of the existing model is preferable, if this is possible legally (IFOAM EU 2006). There should also be a clear conceptual distinction between general food control, in which the principal focus is on product safety, and the specific inspection and certification of the organic process chain, as has been practised so far in conformity with the European standard EN 45011. From this point of view, the advantage of stronger substantive involvement from private certification firms outweighs the disadvantages of potentially less harmonisation in the definition of organic agriculture from one certification firm to another.

Labelling and information

The new draft regulation expressly suggests making “the use of a simple standardised text fragment EU-ORGANIC on labels compulsory”. The only deviation from this requirement will be if the product bears the EU organic (ear of corn) logo or is an organic product but does not originate from the European Community. This proposal is close to what Richter (2004) suggested by way of labelling and can also be traced back to points made at the Copenhagen conference in 2001. Unlike the German organic seal (the Biosiegel), this type of labelling would not be voluntary and would be restricted to products from within the EU. This is a more “dispassionate” form of labelling for consumers and would run less risk than the Biosiegel of developing into a brand in its own right.

This minimal labelling at European level has certainly not unleashed storms of protest per se. Such a labelling regime gives rise to blatant discrimination between products from the EU and imported organic products which are certified as equivalent. This point is seldom mentioned in the debate, however.

Such generic labelling is particularly serious for organic sector stakeholders in conjunction with the draft provisions relating to private logos and labels of conformity. The Commission explicitly formulates the objective of “further reduc[ing] the room for private logos and marks of conformity.” This objective is pursued by two kinds of measures in particular.

Firstly, the draft regulation contains rules which make it considerably more difficult than it is in the current situation to achieve differentiated premium positioning for a particular organic segment. It will be explicitly forbidden to advertise that a particular set of standards, perhaps those of a producer association, are better, stricter or higher quality than the generic standard.

Secondly the draft regulation contains provisions which make it easier for products meeting equivalent standards to gain access to private logos and marks of conformity. Here the Commission quite obviously has its eye on cases like the Soil Association in Great Britain, which by its own account certifies 80% of the English market and which makes very specific stipulations in its standards which EU producers in other Member States often do not fulfil. In such cases, in future the onus would be on the Soil Association to prove that the products to

be imported were not produced to the equivalent of Soil Association standards. Since the Soil Association logo is privately owned, this is an unusual approach by the Commission.

If we take the three elements together,

- compulsory labelling with the text fragment EU-ORGANIC,
- making it more difficult to position “premium organic” products, and
- easier access to private logos,

we begin to understand at least part of the storm of protest from the private organic sector. All in all, this would diminish the value of existing marks and logos from organic associations, some of which have been built up over decades with considerable effort and investment.

It also remains unclear how the planned EU labelling policy would relate to labels such as the German Biosiegel. The way in which the German Biosiegel was introduced and its success has been viewed by the Commission as a prime example of a positive initiative to invigorate the organic market (EC 2004). In spite of this, the introduction of new compulsory labelling would actually render the German Biosiegel superfluous in substance. Nevertheless, the Biosiegel, which has meanwhile become very well established in one-third of the European organic market, cannot be expected to disappear. It is simply too well known by consumers for that to happen. There is no sign that this problem has been considered in advance of drafting the new regulation.

The draft regulation describes it as a prime concern “to reduce the trade-hampering impact on the internal market of multiple public and private certification.” It is true that in some countries such as England (or Sweden), it is only practical to sell organic products if they can be marketed under the label of the Soil Association (or the KRAV, the dominant inspection organisation in Sweden). In order to achieve this, additional certification is necessary for many foreign products. However, the Soil Association’s dominant market position can be attributed to skilled marketing of its logo as well as to consumer behaviour. This is not a case of a hindrance to trade, but the result of the actions taken by a very successful market player. It seems questionable to punish these market players by giving everyone who claims to comply with their standards access to the logo. The means chosen by the Commission of facilitating access – for instance, to the Soil Association logo – and shifting the burden of proof that its standards are not being fulfilled to the Soil Association itself, seems an inappropriate way to proceed. Whilst it is true that in the case of Great Britain (and this is similarly true of Denmark and Sweden), market entry is made very difficult by the de facto dominance of a widely known logo, this in itself is not sufficient reason for the EU Commission’s proposed steps, which have been dubbed “confiscatory” by KRAV (2006) for that very reason.

A standard labelling system with an EU-ORGANIC mark could, we believe, be justified (cf. also Dabbert et al. 2001). This would certainly make trade somewhat easier. What is not certain is whether the impacts in terms of broadening the total market would necessarily mirror the German experience, which has been very positive indeed. Ultimately, fragmentation of the organic market is not as far advanced in every EU country as it was in Germany in the year 2001. Based on the interim findings concerning the danger that the German Biosiegel is becoming “emotionally charged” as a brand, and that the state is thereby entering into direct competition with private label owners, attention should be given to ensuring that this text fragment is used as an objective, unemotional form of labelling. The freedom to develop private organic standards and organic marks which exceed the legal minimum standard should not be restricted.

Conclusion

To sum up, it is fair to say that the Commission's proposal has not brought about subordination to state control through exclusion of the organic sector. Instead, some positive approaches are currently in evidence – including some resulting directly from the protests – to work together in order to move organic agriculture forwards (stakeholder meeting on 27 March in Brussels, communication with the sector). In an internally circulated revised draft of the new Organic Regulation, the Commission has already taken account of some of the improvements suggested by the sector stakeholders. Moreover, there is evidence that the Commission and the Council will take more time over the more detailed drafting, and this will increase the stakeholders' opportunities for participation.

Particular importance should be attached to subsidiarity and public-private partnership as guiding principles as these developments continue. Ultimately the European model, where the state wields substantial influence over regulation of the organic sector, is just one among several conceivable options. Australia and Canada are examples of countries where the state is much more restrained and relies on private-sector solutions. The international trend concerning organic sector regulation is moving towards increasing subsidiarity. Europe should not shut its eyes to this trend; and further development of its regulatory model for the organic sector should be in keeping with this principle.

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