



International Federation of
Organic Agriculture Movements –
EU Regional Group

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Working for organic farming in Europe

Mr. Jean-Francois Hulot
Head of Unit, Organic Farming
DG Agriculture F.5
Rue de la Loi 130
1049 Brussels
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Brussels 20.02.2008

Dear Jean-Francois,

Stakeholder comments on the draft Commission regulation on the implementing rules

Thank you for giving us the opportunity to comment on the working document of the draft Commission regulation on the implementing rules.

As you know, the timetable for commenting on what is a very substantial document has been extremely tight. Therefore, we have only managed to make brief comments on the key aspects. Please find these comments in the attached table.

From our comments, we would like to highlight a number of issues that are of particular importance to us. These regard the following articles:

- 2(e) Definition of "extensive husbandry" / Annex 1 'Fertilisers and soil conditioners referred to in Art. 3(1)'
- 10.3 Buildings for poultry
- 20 General rules on disease prevention
- 24.1 Substances allowed for processing of organic food
- 24.2 Non-organic ingredients
- 35 & 88 Tethering
- 39 Use of non-organic bees wax
- 40 Use of seed or seed potatoes not obtained by the organic production method
- 43 Exceptional rules
- 60 Control visits/ (risk based inspection)

The priorities are additionally marked throughout the comments in the table.

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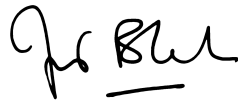
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Thank you for making the time to meet with us on the 4th March. We look forward to explaining these and other issues further and to a fruitful exchange on this draft regulation more generally.

With best wishes

Yours sincerely



Francis Blake, President

Encl.:

- **Table with IFOAM EU Comments February 2008**

IFOAM EU position papers:

- Imports (January 2008)
- Risk based inspections (October 2007)
- Labelling of seed mixtures (October 2007)
- Minimum conversion periods (October 2007)
- Exceptional Production Rules (September 2007)

IFOAM EU communications previously send to the Commission:

- Letter draft Implementing rules (January 2008)
- Letter on draft revision of AN VI.2 (April 2007)