



## Working for organic farming in Europe

International Federation of  
Organic Agriculture Movements –  
EU Regional Group

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Mrs Mariann Fischer Boel  
Commissioner for Agriculture  
European Commission  
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Dear Commissioner

Thank you very much for our meeting last Monday and for being so open with us. We very much value your positive support for organic farming. It is reassuring to know that we share the same aims and I hope you found it useful exploring our perspective on how to achieve them. Of course, in the time available, we could not cover every aspect so I am writing this to note the main points again for our mutual reference.

We both wish for this new regulation to be the basis for a successful and expanding organic sector that is able to fulfil organic principles and deliver CAP and other EU objectives. But, as has been said before, “quality is more important than speed” and we are very concerned that rushing to complete political agreement before the end of the year will cause longer term problems of implementation that will damage this prospect. We are reassured that you will give due consideration to the Parliament’s opinion.

We appreciate your concern that discussion on this regulation should not go on endlessly. In our view, there are some major issues and a number of technical points that still need to be resolved and we are confident that, given an open and constructive atmosphere, this should be possible well within the term of the next presidency. We understand from our German board member, Thomas Dosch, who has good relations with the German Government, that they think so too. We are also aware of a new German-French paper. It appears to address many of the concerns we have identified and we therefore support its positive consideration.

We did not have time to cover the issue of involvement of stakeholders from the organic sector but I understand you did discuss this with our Danish colleagues beforehand. We appreciate that, within the constraints of current structures, you consulted on these proposals more than has ever been done before. However, suffice to say that, had there been better communication and stakeholder involvement in the preparatory process as well as from when the proposal was presented almost a year ago, we feel that many of the problems it has suffered, both in content and in presentation, would have been avoided.

A formal process for involving organic stakeholders in the future, continuing work on the new regulation, together with transparency, are important for legitimacy and acceptance. Please see also the IFOAM EU Group's recent position paper "Stakeholder Involvement and Transparency in the EU Regulation for Organic Food and Farming", which I enclose.

We were interested to hear (though not surprised) that there are still legal questions over Article 24. How can a private label organisation, whose mark is registered and legally protected, not have jurisdiction and control over its use? Anything less is contradictory and must therefore be unacceptable.

Regarding Article 20, we wonder why existing legislation is not sufficient? If it is sufficient, then why add complication and potential confusion by implying that specific measures are necessary through Article 20.2? This will inevitably be interpreted very differently in different member states, leading to differential implementation, additional bureaucracy and, ultimately, more cost for the organic sector.

Both the above point to a general implication that private label organisations are responsible for stifling a vibrant European organic market. We strongly contend the opposite. They are the ones delivering the Lisbon Strategy within the organic sector. They stimulate demand at the local and national level, and are the main driving force in developing an innovative, dynamic and competitive organic sector.

The practice of organic farming, and therefore its standards, still has to develop - we are a long way yet from the aspirational principles that lie at its heart. For that process, the initiatives of the private organisations are absolutely crucial. They act as pilot projects and, working together through IFOAM, help towards building a better organic agriculture. The authorities can never do this successfully. We urge you to signal acknowledgement of this important role, which also recognises that organic agriculture was initiated, and continues to be developed worldwide, by a grass roots movement with clear principles and objectives.

Whilst on principles, we draw your attention to the four overarching principles that IFOAM adopted at its General Assembly a year ago, after two years intensive work and consultation. Whilst we appreciate that the principles in the proposed regulation fulfil a different function, nevertheless, it would seem obvious to include, or at least reference, these four principles in the proposal.

Regarding Article 17, we appreciate that the new provisions for labelling of processed foods in the Finnish text reflects more closely the IFOAM basic standards. However, there seems to be confusion as to the exact interpretation and therefore how different it is from the IFOAM standards. This is an example of why there needs to be further technical discussions, before the possibility of concluding at a political level.

A similar situation applies to the exclusion of GMOs. We appreciate that there has been some progress in the definitions, but there is still a lot of concern about how Article 7.aa will apply in practice and the risks that this poses to the integrity of organic foods and inputs.

Articles 18 and 19 contain new and significant material which, whilst resolving one of our concerns, creates another. It appears that the community logo is now compulsory which, as you know, we do not support. We welcome the indication in Article 19 that it will be redesigned but it is very unclear if this is only to be the new wording, 'organic farming - controlled to EC standards'. Also, whilst we generally support an indication of origin, the implications of labelling, for example, 'EU/non-EU' seems hardly to result in clear information for the consumer. Again much further thought and technical discussion is needed on the issue.

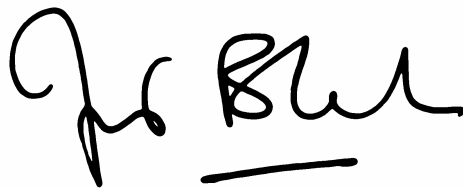
I will not repeat here the remaining technical points that still need to be resolved, as most of these have been identified in our various submissions previously. The Finnish text also includes a number of completely new provisions, such as the requirements for seaweed and yeast. We are generally supportive of these but, again, they need further technical consideration to make sure they are appropriate and sufficient.

All this leads to the conclusion that the regulation proposal does need more time to finalise it and ensure it becomes a successful and efficient regulation, and one which we will feel able to support. Please be assured that we do wish to support it and we look forward to being able to do so, hopefully in the not too distant future.

Thank you again for your time - I hope that you will be open to these concerns and suggestions.

With best wishes

Yours sincerely,

A handwritten signature in black ink, appearing to read "Francis Blake". The signature is written in a cursive style with a horizontal line underneath the name.

Francis Blake  
President

Encl.