



Working for organic food and farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

27/09/2011

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Dear Jean-François

In advance of the SCOF meeting on 27th September 2011, I am writing to update you on the feed issue. The changes to the proposed text of Art 19, compared to the previous text are significant. I am assuming that there must be a simple translation or transfer issue from the previous to the latest version.

The new wording in the proposal for discussion at SCOF is:

"Art 19

1 For sourcing organic livestock feed, the following conditions shall be met:

a) A minimum proportion of the feed shall be produced on the holding, where the livestock is kept. The minimum proportion shall be at least:

- 70% in case of herbivores

- 40% in case of pigs and poultry

b) Feed not produced on this holding shall be produced in the same region or in the neighbouring regions.

c) If the conditions in subparagraph b) cannot be met for climatic, geographical or structural constraints, livestock feed may be obtained from outside the region of the holding."

The version of subparagraph (a) above is so different from the original text that I think that a mistake in translation or transfer may have occurred. The original text was:

"1a. In case of non-herbivores animals at least 50% of the feed shall come from the farm unit itself or, if this is not feasible, be produced in cooperation with other organic farms primarily in the same region."

I think that it is important that the implications of this difference in wording be pointed out to SCOF, when the issue is discussed at their meeting on 27-28 September. With such a significant change in the wording, care is required since no impact assessment has been made for the position arising from the implementation of the proposed text. I hope that you will be able take this up with SCOF since I am aware that there is significant uncertainty amongst organic sector stakeholders with regard to this issue.



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It is important that organic sector stakeholders are able to respond to any proposals for significant amendments in a timely manner. The short timescale in this case has made our task at the IFOAM EU Group particularly difficult in this regard, not least because the IFOAM World Congress in S Korea is absorbing our attention.

Please do not hesitate to phone me if you would like to discuss; I am not in South Korea!

Best wishes

A handwritten signature in black ink on a light green background. The signature reads "Christopher Stopes" in a cursive, flowing script.

Christopher Stopes
IFOAM EU Group President