



INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS

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13 November, 2006

Ref: Proposal for Council Regulation amending Regulation (EC) No 2092/91 on organic production of agricultural products and indications referring thereto in agricultural products and foodstuffs

Dear Minister,

I am writing on behalf of the International Federation of Organic Agriculture Movements (IFOAM) as well as the IFOAM EU Group.

IFOAM recognizes the urgent need to amend Article 37 of EEC No 2092/91 dealing with the import of organic products into the European Union. Because a decision must be made soon, we would like to re-state our position on the proposed language of this amendment to the regulation.

***Regarding Approval of Foreign Control Bodies by the Commission:***

IFOAM agrees with the Presidency's position that third country operators who produce in direct compliance with Community rules should be allowed to choose to submit their activities to the inspection bodies designated by the Member States or to the control bodies and control authorities recognised by the Commission. We feel that this is a significant improvement in the flexibility of the regulation to support more choice of organic products for European consumers, and also to help improve the livelihoods of poor organic producers from developing countries. We support the authorization of the Commission to directly recognize control bodies in importing countries provided that there is sufficient evaluation of these bodies. In regard to making such a sufficient evaluation, we support that the Commission may entrust experts with the task of examining on-the-spot the rules of production and the control activities carried out in the third country by the control body or authority concerned. There is considerable expertise in the private sector that can be employed by the Commission to reduce the burden of site evaluation of control bodies in other countries.

*Regarding Equivalency*

IFOAM also continues to support mechanisms for the judgment of equivalency of other regulatory systems with the production standards and control arrangements of EEC no. 2092/91. As we have previously stated, we request that the language of the amended regulation include IFOAM Basic Standards and IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing as reference norms for judging equivalency. In this regard, we note that in its October, 2006 meeting the International Task Force on Harmonization and Equivalency in Organic Agriculture (ITF), which includes persons from the Commission and Member State organic authorities, re-stated its previous recognition of the IFOAM Basic Standards as international standards for the organic sector in addition to the CAC/GL 32, and recognition that the IFOAM Accreditation Criteria (IAC) are a legitimate and valuable reference for the oversight of certification bodies. ITF members from government authorities that regulate the organic sector have stated in ITF meetings that they referenced both the Codex Organic Guidelines and the IFOAM Norms (IBS and IAC) when developing their government's norms. The Council should recognize this reality and make reference in the regulation to these legitimate international norms. We request that the regulation is amended to cite the IFOAM norms in addition to CAC GL/32.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gerrmann', is written over a light blue horizontal line.

Gerald A. Herrmann  
IFOAM President

cc Mrs Mariann Fischer Boel, Commissioner for Agriculture  
EU Member States permanent representation  
European Parliament Agriculture and Environmental Committees  
Standing Committee on Organic Farming