Position paper on Organic Greenhouse Production

International Federation of Organic Agriculture Movements – EU Regional Group

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Introduction

Growing in greenhouses is a longstanding horticultural practice. Greenhouses are used to lengthen the growing season and to protect vulnerable crops. Organic greenhouses exist in many Member states. Organic greenhouse production falls within the scope of Regulation (EC) No 834/2007. The general rules for plant production apply.

In Greenhouse production, due to its character, growing measures are applied that are not possible in arable farming or non covered cropping such as heating, lighting or cooling. Furthermore other growing measures that are common practice in arable farming are not possible in greenhouse production, such as a wide crop rotation.

Due to harmonization of organic rules and increase in demand for organic products, trade between Member states has increased. The producers that are confronted with different practices and interpretations in the Member states demand a level playing field. At the same time differences in climatic conditions and the demand for local produce should be respected. Finally, the energy input in greenhouses can be such a considerable part of that specific plant production system that it needs to be addressed in an organic regulation.

Regulating organic production in greenhouses touches upon many issues. It should be noted that some of the issues addressed are relevant for more types of production than only for greenhouses but we are proposing the measures only for greenhouses. Next to production of food crops this does include seedling production and production of ornamentals.

The IFOAM EU wishes to present a position on the topics of: conversion; use of CO_2, water, energy and peat; of steam sterilization, fertilization and growing in the soil. In this paper we have taken a position on conversion, CO_2 use, water use, steam sterilization and energy use (partly). The other topics are still under discussion and will addressed in the second paper that the IFOAM EU expects to finalize in the first half of 2012.

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Subject	IFOAM EU Group position	Rationale
Definition of greenhouse	A greenhouse is a structure in which plants are grown. For the purpose of this regulation, a greenhouse is a covered structure which stays for several years at the same place.	Specific provisions are required for protected cropping under permanent structures as this is considered as a system rather different from arable farming. As a consequence of this definition the proposed provisions do not apply to moveable structures like fleece covering, part season tunnel or netting.
Definition of waste heat	Waste heat is heat generated in a process, e.g. an industry, that can be utilised as a resource.	This is relevant for the position on the use of renewable energy
Definition of renewable energy	Renewable energy means renewable non-fossil energy sources: wind, solar, geothermal, wave, tidal, hydropower, landfill gas, sewage treatment plant gas, biogases and wood products	This is almost similar to the existing definition in art. 2.K of Reg.(EC) No 889/2008, with one addition, namely wood products. Biofuels are not included in the definition for the moment.
Definition of natural substrate	A mixture of soil and/or soil improvers that are mentioned in Annex I	If we accept that we can use pots for seedlings, herbs and ornamentals we need to have a description of what can go in the pots. Soil is not included in Annex I but is in practice used for some of the mixtures that go in the pots. This definition does justice to practice. We do not need to adapt Annex I. The article should be read as: “soil and/or [soil improvers that are mentioned in Annex I].

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Conversion of production in natural substrates	Substrates used in a conventional system cannot be converted to organic.	This line is to clarify that in accepted practices where you grow plants in pots (seedlings, herbs and ornamentals), you can only convert between batches. You cannot convert the plant in the pot to organic.
Use of peat	Use of other material is preferred to peat	Although we ackowledge that there is a diversity of systems all over Europe we thing that for those MS where peat is scarce other materials should be used first.
Steam sterilization of the soil	Steam sterilization of soil, of natural substrates and of compost made on the farm is only allowed in exceptional circumstances and only to combat or regulate soil borne diseases. No routine or systematic use is accepted and the need should be documented.	Steam sterilization should be considered an exceptional instrument.
Use of CO2	Carbon dioxide is accepted in protected cropping only if it has been produced as a by-product of another process. Fuel must not be burned solely to produce carbon dioxide.	As there seemed to be different understandings on the use of CO2 as a growth stimulator IFOAM EU feels it necessary to make a clear position on this.

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Water collection	If climatic conditions allow it, rainwater must be collected from greenhouses if the total size of structures on one operation site is 5000 m2 or more. New structures must be build so that rainwater is collected.	As water is a scarce resource it needs to be addressed.
Annual energy analysis	Holdings using non renewable energy/ fossil fuels above 130 kWh/m2 per year for heating must make an annual energy analysis. The annual energy analysis must record the energy use for lighting and climate control (climate control includes heating, dehumidification and ventilation). The energy analysis must be calculated on quantity harvested crop and per cropping area in m2. For potted plants, it is sufficient to calculate energy consumption per cropping area in m2. The energy analysis must record the source of energy.	In the future this topic should be further developed to become more complete and it should cover the whole farm. But as it is the first time energy is regulated in the EU organic regulation, we take a careful approach. We only want to target the heavy users and not create extra bureaucracy, so only the holdings that exceed the use limit of 130 kWh/m2/year will need to make an analysis. The number of 130 kWh/m2/year was chosen after exchange of information among experts that were consulted by the IFOAM EU.

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Plan to increase energy use efficiency	Based on the energy analysis an energy use efficiency plan must be elaborated. The plan must describe how: (1) to reduce total amount of energy; (2) to improve energy efficiency; (3) to reach the minimum requirement on the use of renewable energy sources as mentioned in article x Farms that already comply with the requirement on the use of renewable energy do not need to include in their plan how to switch to renewable energy. 4 years after the regulation enter into force the Commission must present an evaluation on the functioning of this paragraph and if needed formulate additonal rules.	The plan in itself will raise awareness among the farmers. We need to collect experiences and learn from experience before eventually introducing a more specific common regulation. In Sweden this system is in place on a voluntary basis since early 2010 and also inspected. The energy efficiency plan is part of the inspection and growers have to show what they have improved since the last control.