

ASAFI - Association des adhérents français d'IFOAM

à: Monsieur Dominique Bussereau
Ministre de l'Agriculture, de l'Alimentation, de la Pêche et de la Ruralité
Paris, le 20 janvier 2006,

Subject : European Regulation for Organic Agriculture:
Revision proposed by the European Commission, N°(2005)671, 21st of December 2005.

Dear Sir,

On the 23rd and 24th of January you will be present at the European Council of Ministers of Agriculture. One of the points on the agenda is the EU Commission's proposal for a revised Regulation for Organic Agriculture, to replace the present Regulation CE 2092/91.

The board of AsAFI¹ (« IFOAM² France ») this morning firmly rejected the proposal of the European Commission, as both ill founded and ill formulated.

Organic Agriculture has for several decades been a voluntary initiative of citizens (farmers, scientists, traders, consumers...). The European Commission, by this revision proposed and by the timetable imposed, would deny the fundamental notion of the social contract and of participatory democracy. Moreover, the Commission would hereby give itself extra powers in the management of what is a voluntarily undertaken agricultural method. The procedure for revising this Regulation must be reconsidered.

This proposal is a framework document containing no precise technical criteria and is not a set of standards, but merely of generalities whose practical impact cannot be analysed. But, given its inadequacies, the subsequent definition of precise applicable standards cannot now be left to the Commission alone.

The considerations underlying the document are highly contentious. For example, we do not share the notion that the responsibility for the malfunctioning of the market can be laid on national or private standards.

The principles announced are not recognisable to the practitioners of organic agriculture in France and must be reconsidered. In particular, commercial considerations cannot become a criterion for the acceptance of synthetic chemicals (Article 4) into our mode of production founded on an ethical refusal of them.

Among the general rules announced, several vital themes are missing, that are part of Biological agriculture, such as its environmental qualities. There is nothing about waste management (for farm or business), packaging (quality & quantity), energy use, landscape & water management, or even biodiversity. For a project that is supposed to be an updating of the Organic Regulation, it conspicuously fails to include the latest advances in the field, as well as forgetting the historic motivations that were the origin of the organic agriculture movement. Concerning GMOs and synthetic agro-chemicals, this project would tolerate and perpetuate organised pollution.

The negative flexibility (Article 16) and the forbidding of information about positively stricter standards (Article 20), would result in a radical change that making the EU Regulation a ceiling below which anything goes, whereas it is today a minimum standard threshold ; we refuse this change.

The Commission's proposal would absolutely not achieve the shared objectives of improved legibility and clarity nor, above all, would it achieve harmonisation of practice and certification.

The board of ASAFI demands that this project be withdrawn and reconsidered in all serenity, without the imposition of an accelerated calendar, but with the consent of all the professional bodies and citizens specifically concerned.

[Veuillez agréer, Monsieur le Ministre, l'expression de nos sentiments respectueux.](#)

[Dominique Marion](#)
Président

¹ AsAFI is the association of the French organisations that are members of IFOAM (BioBourgogne - BioCoop - CGAB - CNRAB - EcoCert - FNAB - FormaBio - FNIVAB - FRABB - GRAB Avignon - Green Trade - Guayapi Tropical - ITAB - Inter Bio Bretagne - MAB Finistère - MCBioDyn - Nature et Progrès - ProNatura - SynaBio - Terre vivante). It handles their foreign relations.

² IFOAM is the International Federation of Organic Agriculture Movements, founded in France 1972. It federates 750 organisations specific to Organic Agriculture in 100 countries.