

## **Response by Eurogroup for Animals to the consultation on the new Council Regulation on organic products**

*Question 1: The current rules allow the following exceptions to help farmers to start or continue organic production when confronted with climatic, geographic or structural difficulties. For each of these exceptions, do you agree that they are kept, possibly under stricter conditions?*

Answer: All exceptions of tying and keeping animals in stables that were built before the current rules started applying should be ended. The same rules should apply to small farms.

*Question 2: The current rules allow the following exceptions to farmers that can not find organic feed, seeds, live animals or other farm input on the market. For each of these exceptions, do you agree that they are kept, possibly under stricter conditions?*

Answer: The use of non-organic poultry for future egg laying or meat production should be phased out, but due to practical circumstances, it is not feasible in the very near future.

The use of non-organic 18 week old poultry for future egg laying should also be phased out, but for the time being it is acceptable that the exception is maintained for some years. However the housing of the laying hens before the age of 18 weeks should apply to organic rules.

*Question 3: The current rules allow the following exception to farmers to solve a specific management problem. Do you agree that this is kept, possibly under stricter conditions?*

Answer: There should be a maximum period for keeping cattle, pigs and sheep for fattening indoors in the final phase.

*Question 4: The current rules allow the following exceptions to help farmers to continue organic production when confronted with catastrophes. For each of these exceptions that should only be used during or after catastrophic circumstances, do you agree that they are kept, possibly under stricter conditions?*

Answer: Exceptions in case of catastrophic circumstances can be maintained.

*Question 5: The current rules allow farmers that can not find organic breeding animals on the market, to bring non-organic breeding animals onto the farm under strict conditions. The animals should only be used for breeding purposes, be female and have not yet given birth (nulliparous). There is a yearly maximum of 10 % for horses, donkeys, cattle, buffaloes and bison, and of 20 % for pigs, sheep and goats. Do you agree to make the conditions stricter?*

Answer: The current percentages can be maintained

*Question 6: In case the exceptions analysed under section 1 are kept, we would like to know for each of these exceptions who should, in your view, take the decision, if it can be used. In addition we would like to know your opinion on the need for notification and special recording obligations. (you can choose more than one answer)*

Answer: In all cases authorisation by Member State authority is needed.

*Question 8: The current rules have led to confusion on whether poultry may be kept in stables with several layers of flooring area. If you think it is necessary to clarify these rules, how, in your view, should it be regulated?*

Answer: Yes, they may not contain more than 3 layers (including the floor surface)

*Question 9: The current rules have not fixed a minimum slaughter age for slow-growing poultry types. If you think it is necessary to clarify these rules, how, in your view, should it be regulated?*

Answer: Yes, the minimum slaughter age should be the same for all poultry types.

*Question 10: The current rules ban carrying out certain livestock management practices 'systematically' without being clear on what systematically means. If you think it is necessary to clarify these rules, how, in your view, should it be regulated?*

Answer: yes, keep the term 'systematically', but clarify that these operations may only be carried out on a limited number of individual animals and on condition that proper anaesthesia is applied.

*Question 11: The current rules allow reducing the period of 2 years for converting land to be used by organic pigs and poultry to 6 months, where the land has not been treated in the 'recent past' with plant protection products (for instance pesticides) or fertilizers not allowed in organic farming. The term 'recent past' is not defined. If you think it is necessary to clarify these rules, how, in your view, should it be regulated?*

Answer: Yes, the 'recent past' should be replaced by 'during the last 6 months'

*Question 12: The current rules use the term 'extensive husbandry' several times, determining for instance that only animals from extensive husbandry may graze organic land, or organic animals may only graze together with non-organic animals from extensive husbandry. The definition of the term 'extensive husbandry' was regulated by other rules, and the organic rules simply took this definition. But these rules have been repealed, so there is no longer a definition for this term in the organic rules. If you think it is necessary to clarify these rules, how, in your view, should it be regulated?*

Answer: 'Extensive husbandry' means a farming system that is not heavily reliant on veterinary and feed inputs not permitted in organic agriculture.

*Question 14: According to the new rules, the controls shall be based on a risk based control system. Do you think that the verification of compliance at least once a year should in all cases include an inspection visit on the spot?*

Answer: Yes.