



Brussels, 13 November 2007

CELCAA comments on organic farming

CELCAA the European Liaison Committee for agricultural and agri-food trade would like to take the opportunity of the Commission consultation on implementing rules for organic farming to make the following general comments on certain aspects.

- **National derogations**

Agri-produce traders highlight the need for transparency and harmonisation of decisions on derogations for the admixture of conventional feedstuffs into tradable organic feedstuffs. Reporting of Member States between themselves and to the Commission needs to be improved. Decisions should not be based on availability of tradable organic feedstuffs on the national territory only. Clear criteria should be established for the enacting of derogations, including in particular criteria on the availability of raw materials across the EU. Preference should be given to a harmonisation of derogations at EU level in order to avoid distortion of competition and confusion of the public. Information on the availability of tradable organic feedstuffs on national and European level and derogations granted for the admixture with conventional tradable feedstuffs should be made publicly available (via a DG AGRI website).

- **New EU logo**

Agri-produce traders welcome the decision taken by the Commission services to attribute the highest priority to the establishment of the EU organic logo. The new EU logo should be ready much earlier than end 2008 as it has to be ascertained that it is recognisable by consumers when the new regulation on organic farming enters into force in January 2009. When drafting implementing rules for labelling, particular attention should be devoted to the need for continuity of the information provided to the public. It is important to avoid confusion in consumers' minds. Consequently, visibility of national and private organic logos should be maintained on the packaging besides the new European organic logo.

- **Control bodies**

Celcaa members are concerned about the high degree of data protection enabling control bodies not to inform operators about decertified companies. COM should reinforce communication amongst control bodies and between control bodies and the Commission. A regularly updated list of certified companies should be made available on a DG AGRI website.

- **Control system for imported products:**

Agri-produce traders would like to draw the attention to the fact that supervision and quality of control bodies in third countries are less uniform than in the EU Member States. On site inspection of 3rd country control bodies have not been repeated regularly; in some cases the last control was done 10 years ago. Agri-

produce traders request additional human resources to ensure strict and regular controls in third countries. Inspections by newly approved bodies should be improved through training.

- **GMOs**

Agri-produce traders note that media interpreted the provision of the 0.9% threshold for accidental contamination in regulation 834/2007 as possible acceptance of the presence of GMOs in organic farming. GMOs and products derived from GMOs are forbidden to be used in organic products as expressed in the same regulation; the threshold only intends to cope with possible unavoidable accidental contamination. The Commission should communicate towards consumers that operators take all necessary precautionary measures to avoid any accidental contamination in order to adjust the wrong image provided by the media and to maintain consumer confidence in organic produce.

- **Information flow from the Commission to stakeholders and follow-up**

We appreciate Commission consultation on the issue of organic farming in the context of the Advisory Group. However, stakeholders would welcome a more continuous and constant exchange of information enabling operators to provide timely and appropriate expertise on the implementing rules as well as a regular follow-up by the Commission on the proposals made by stakeholders.

CELCAA is the European liaison body for agri-produce trade. The membership comprises 13 European organisations representing the trade with the different agricultural and agri-food products of plant and animal origin. CELCAA aims to facilitate agri-produce trade in Europe and beyond by providing a platform for consultation and discussion and effectively voicing the views of the trade vis-à-vis the European institutions and international organisations. More information can be found at www.celcaa.eu