



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

President: Francis Blake

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Commissioner Kyprianou
Commissioner Fischer Boel
Rue de la Loi 200
1049 Brussels
Belgium

RE: Working group DG Sanco/DG Agri: EU review (Commission Regulation 2229/2004) of existing pesticides used in organic agriculture

Dear Commissioner,

The ongoing 4th stage of EU review of existing pesticide active substances according to Commission Regulation 2229/2004 involves several active substances which are listed in Annex II B of Reg. 2092/91 and are essential in organic farming. The organic sector (i.e. farmers, producers associations, processors and wholesalers) has a strong interest that these substances remain available for use in organic agriculture.

The IFOAM EU Group, representing IFOAM and its members in the EU, welcomes the setting up of a working group which will address key problems concerning continuous use of Plant Protection Products in organic farming. Please find below a summary of key issues that should be addressed:

- For the substances lecithin, calcium hydroxide and petroleum oil no dossiers have been submitted. **The IFOAM EU Group asks those Member States where these substances are in use to declare 'essential use' in order to ensure continuous use.**
- Manufacturers envisage registration fees of up to 200'000 Euro, depending on Rapport Member States. **We ask the working group to discuss a substantial reduction of fees with the rapporteur Member States (RMS) concerned, pointing out the importance for organic agriculture Europe-wide.**
- There are concerns that some Rapport Member States may not apply appropriate registration procedures for plant extracts, semiochemicals and selected commodity substances. **We ask the working group to ensure appropriate registration procedures. This applies especially to 'low risk' substances and semiochemicals.**



The IFOAM EU Group does not argue against the need that all compounds should be proven safe, but we fear that the heterogeneity between RMS concerning fees and assessment criteria leads to a distorted registration market. We are concerned that even more substances might be withdrawn for financial reasons alone, even if they are safe for use.

The IFOAM EU Group is looking forward to pragmatic and constructive approaches that ensure the continuous development of the European organic food sector. The IFOAM EU Group is prepared to provide experts from this sector who may contribute to the joint working group in the future.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Francis Blake". The signature is written in a cursive style with a horizontal line underneath the name.

Francis Blake
President

Copy to:

Patricia Pitton, Wolfgang Reinert (DG Sanco), Hermann van Boxem (DG Agri), Standing committee on organic farming