

EURO COOP'S POSITION PAPER ON THE REVIEW OF THE EUROPEAN REGULATION ON ORGANIC FARMING

Euro Coop welcomes the review of the Council Regulation 2092/91 undertaken by the European institutions and wishes to highlight the importance of agreeing on a clear and stable framework for the future expansion of organic production. Euro Coop would like to submit its comments on the proposal put forward by the Commission since Organic Farming is one of the key components of its members' approach to sustainable development. The text to be adopted must meet consumer expectations regarding quality, confidence and price.

A first point that must be stressed is the absolute need to involve stakeholders in the decision-making process leading to new rules both before and after 2009. In fact, the determination of consumers has been vital to develop Organic Farming in Europe and it is thus essential that these key-actors are duly represented in the fora where decisions are taken.

Therefore, Euro Coop believes that consumers, together with other civil society actors, must participate actively both in the drafting of the implementing rules and in the works of the Committee assisting the Commission. A mechanism should ensure that the opinion of consumers, farmers and other members of the sector are adequately taken into account.

Euro Coop welcomes the broadening of the scope of the Regulation aiming at the incorporation of organic wine and aquaculture products. In this regard, Euro Coop believes that the Regulation should include a mechanism for its adaptation to changes in agriculture, in particular to those that will follow any possible CAP reforms. The Regulation should be open and make possible the development of organic standards for non-food crops, e.g. cotton, in the next years if stakeholders think that it is pertinent.

Euro Coop does not support the deletion of the provision stating that a product can bear indication referring to organic production methods in the ingredients list where at least 70% of them are organic. Since this market is still in expansion, this could be a good way to attract both companies and consumers to Organic. As far as catering is concerned, Euro Coop supports its inclusion in the Regulation since some consumers already demand these products and it will contribute to further develop Organic Farming. In fact, in an increasingly competitive market, the claiming of the organic composition of meals can be a significant marketing tool for companies.

Euro Coop considers that marginal contamination by GMOs should not be accepted as inescapable and the adventitious contamination of organic and conventional crops should be avoided by every means. However, a minimum detectable threshold for contamination must be accepted. The European Union and National Authorities need react so that efficient coexistence measures are put into practice as soon as possible. In any case, if a solution to this problem is not quickly found, Organic farmers will bear the economic burden of irresponsible management of GMO crops. The possibilities of developing organic farming will also be perturbed if GMO crops contaminate surrounding areas. It would not be fair that consumers who are most concerned about GMOs finally get to pay a higher price for Organic due to the increase of financial costs caused by GMO producers.

In order to protect those consumers, Member States should commit to reserve a sufficient GMO-free land surface so that farmers can opt for organic production, ensuring real possibilities for its growth in the future.

To defend organic agriculture, the coexistence of both organic and conventional productions for the same category of products in the same holding necessitates special inspection procedures since the requirement of separation is difficult to be met even through physical means.

The introduction of Flexibility will foster the development of Organic Farming in those territories where geographical and climate conditions do not facilitate Organic production. Euro Coop supports flexibility as long as it is based on a common baseline, fully respects the principles provided for in the Regulation and is rigorous. However, the Regulation should not prohibit the development of stricter rules for Member States as long as it does not raise any obstacles to the operation of the internal market. So far, this has proved to be a very valuable instrument to develop organic production.

In relation to labelling, Euro Coop is of the opinion that the indication "EU-ORGANIC" on imported products could be misleading for consumers, who would tend to believe that these products have been produced in the European Union. Organic products consumers often prefer to purchase local products, and they have the right to clearly know about their origin. Labels must offer consumers as much information as possible and this information has to be clear and understandable.

Euro Coop welcomes the recognition of the right to introduce in the market imported goods produced in accordance with the Codex Alimentarius standards as a means to promote trade. The Commission must make sure that these standards are innovative and do not provide for a lower level of requirements than the European ones. The setting up of a control system based on risk and the increasing confidence in national inspection bodies will also contribute to the efficiency of the system and the promotion of trade.

Competition in the organic sector has to be fostered in a way that high quality organic products are at the disposal of consumers at reasonable prices. The European Union should make a big effort to ensure that all consumers know about organic products and can afford buying them. In order to achieve these results, the promotion of Organic Farming is fundamental. The implementation of coordinated campaigns at EU-level for the promotion of organic would contribute to the spreading of organic products and, as a consequence, would increase market opportunities. Promotion of organic products should focus on health and environmental benefits stemming from them. Only by learning about organic products' quantified benefits for health and the environment, will consumers be able to turn towards more informed buying choices.

Euro Coop would like to stress that education is a key area where serious efforts should be made in parallel to the implementation of legislative measures. Education about sustainable and healthy foodstuffs should start in the childhood. The European Commission should provide for the financial means to make sure that European consumers are educated about what organic means and implies.

Finally, Euro Coop believes that the debates and the discussion on the new Regulation have to take place with no time limits or time pressure if a long-lasting Regulation is to be adopted. For this very reason, Euro Coop invites the Commission, the European Parliament and the Council to deeply and calmly discuss the contents of the Regulation with European stakeholders.

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