

Consultation questionnaire on the future detailed applicatory rules Initial response – 20 September 2007

Background and general comments

Following circulation by the Commission of the draft consultation questionnaire, the IFOAM EU Group has reviewed the document and makes general comments in this paper.

As a general comment, we agree with the sentiments expressed in the Advisory Group on Organic Farming that this questionnaire is too detailed for the average consumer, but not detailed enough for those directly, professionally or commercially involved in organic food and farming.

- For the former, we question if the intended straight transfer of the old annexes into the new implementing rules is an appropriate subject for consultation (in so far as nothing is intended to change). If anything, then a questionnaire for consumers should consist of more open questions about general direction and overall approach. We therefore do not support this questionnaire as being one for consumers.
- For the latter, many of the questions are too simplistic and cover more than one issue at a time or provide insufficient choices, so it is not possible to give appropriate answers. We were also given the impression that there were many points where there is lack of clarity and consequent variation in interpretation, but we do not see so many of these addressed in the questionnaire and wonder if there are more.

We strongly support the principle of open consultation and welcome the Commission's positive intentions in this regard. We also welcome the two-month time frame for the consultation, which is in line with ISEAL guidelines.

We appreciate that this questionnaire follows a standard formulation. However, from the answers given by the Commission at the Advisory Group on Organic Farming, it was unclear how the responses to the questionnaire will be evaluated. There needs to be a weighting given to each response that reflects its representivity. For example, one from a single consumer or farmer is very different to one from an association representing hundreds, or even thousands, of consumers or farmers. Similarly a national organisation is very different to an EU-level one.

The Commission's evaluation of the responses, together with the weighting used, and the use it then puts these results to, should be made public, alongside the actual responses themselves.

Our comments below are initial thoughts at how the questions should be expanded to make them more appropriate to those with a professional or commercial interest in the regulation. However, we have had very little time to consider the questionnaire in

depth, and therefore these should be considered as first impressions, rather than a definitive response. For instance, we have not looked at other possible questions.

Question 1

There are several references to “the same farm” but this can mean different things in different places. The old regulation refers variously to unit and holding, which have different meanings. These need clarifying in the question.

Similarly, there are references to “species/variety”, whereas these are very different and the question may be answered differently according to which is intended.

The grouping together in the seventh statement of “seeds, seedlings and vegetative propagating material” is also unclear as different answers may pertain to each of these.

Question 2

It is a mistake to group together poultry for meat production and for egg production in the first statement, as they are very different and may need different time scales for full organic production.

Similarly, the general reference to organic animals in the third statement does not differentiate sufficiently between herbivores and non-herbivores.

Similarly, in the sixth statement, grouping seed and seed potatoes is problematic.

Question 3

Again, grouping all species together does not recognise the different conditions and management responses that may be needed for them.

Question 5

There may be a case for allowing greater flexibility for rare breeds which this question does not allow to address.

Question 6

Whilst this question allows choosing more than one answer, it does not sufficiently differentiate between the two questions being asked: who decides, and how it is recorded.

In the choice “authorisation by member state authority needed”, there are really two possible choices: authorisation of the individual exception (that is on a case by case basis), or authorisation of the locality and/or conditions under which the exception may take place.

Question 8

The issue is not so much the number of layers that may be allowed in a house, but rather how the floor area is calculated in such buildings. In other words, are these platforms part of the floor area, or is the floor area measured only on the ground?



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Question 10

The different mutilations are employed for very different purposes and resulting from very different causes. Therefore, they need to be addressed individually rather than lumped altogether.