



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

President: Francis Blake

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To: Mr Horst Seehofer
Federal Minister of Food, Agriculture and Consumer Protection
Wilhelmstraße 54
10117 Berlin

Brussels, 30th April, 2007

Dear Minister,

Proposal for a new Council regulation on organic production and labelling

On behalf of the IFOAM EU Group, I am writing with our comments on the proposal for a new council regulation on organic production and labelling.

We are aware of the ongoing discussions between the Council, the Commission and the Parliament on this important proposed new legislation, and that negotiations have reached a delicate stage. We are also aware of the limited scope of these negotiations following the General Approach agreed by the Council last December. Representing the whole organic sector, we would like to offer our views in order to assist in finding solutions to some of the current issues under consideration.

Stakeholder involvement

The Parliament has approved a number of amendments formalising the need for proper stakeholder consultation. We feel this is vital to ensure both sound progress in the ongoing development of the regulation, and the continued support of the organic sector.

Scope

We support widening the scope of the regulation to include mass catering operations, textiles, cosmetics and (suitably managed) wild animals. However, we do appreciate that there are wider implications to this. In our view, the key issue is to ensure adequate protection of the term 'organic' in relation to these areas, as they are growing rapidly. We do not see the need to set detailed standards at EU level (at least for the foreseeable future).

GMOs

The discussions in both the Council and the Parliament over the issue of GMOs highlight the extent of the problems that remain. We appreciate that the Parliament's amendments attempt to maintain organic farming and food as free of GM contamination. Of course we support this principle, but we have long stressed that the organic regulation cannot achieve this alone, nor is a separate 'organic' threshold the answer.



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Rather, the primary means must be the general GM legislation. This has to establish adequate thresholds and liability to ensure the onus of responsibility lies with the perpetrators of the contamination, not the victims (whether they are organic or otherwise). It is intolerable to expect organic consumers to accept 0.9% contamination as if it was GM-free; but it is equally intolerable to expect organic operators to bear the costs of excluding such external contamination from their products.

Products and substances used in farming and criteria for their authorisation

We support Amendment 92 of the Parliament adding a new Article 11.2a, which clarifies a suitably public procedure for evaluating inputs.

Exceptional production rules

Amendment 112 of the Parliament introduces a useful qualification to Article 16 which makes sure that these exceptional rules do not become long term rules.

Stricter rules

We support the ability of member states (as well as private standards organisations) to set stricter rules in their territory, as per the Parliament's Amendment 152 amending Article 28.

There are, of course, many minor technical details that need further improvement, but we feel these are the key issues that need to be addressed. We ask that you will take these into account in your negotiations and we offer our expertise to assist in any way we can.

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