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Head of Unit of the Organic  
Sector  
Directorate General for  
Agriculture  
200, rue de la Loi  
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Brussels, 3 November 2005

Dear Madam,

The European Commission will present, by the end of the year, a draft Regulation amending Council Regulation (EEC) N° 2092/91. This proposal aims at implementing some of the actions contained in the European Action Plan for Organic Food and Farming.

In order to prepare this draft Regulation, the Commission prepared the staff working paper "Information and consultation on key-ideas to reform Council Regulation (EEC) No 2092/91".

The following are COPA/COGECA's contributions to the Commission working paper:

#### Scope of the regulation

For COPA/COGECA it is necessary to enlarge the scope of the current organic regulation. It should be extended to other food and non-food products processed from organic agricultural products. Large-scale kitchens and catering establishments should be allowed to make organic claims but be exempted from the inspection system laid down in the European regulation on organic farming, as they are already subject to similar inspections as other food outlets do.

All organic production within the EU should comply with the EU organic legislation, irrespective of whether the production is for sale within the EU or for export to markets outside the EU.

#### Simplification and definition of objectives and principles of organic production.

In its working document the Commission proposes a list of objectives. For COPA/COGECA this list should be enlarged to take into account the social aspects of organic production. Regarding animal welfare standards, they should cover transport and slaughtering.

Although the Council Regulation must be of a general nature it should allow some regional flexibility to reflect the climatic differences among the Member states.

For COPA/COGECA all public and private labels should comply with the EU regulation on organic farming and be covered by its inspection system. They can, however, have stricter production standards. The use of the term "organic" (and its equivalents in the different languages of the EU: "biologique", "ecológico", etc), and the use of the European logo, should be restricted to the compliance with the EU legislation on organic farming. The European logo could, however, be developed along with other national or regional logos in order to take account of regional specificities.

Action 11 of the European Action Plan on Organic Food and Farming proposes the establishment of an independent expert panel for technical advice. This expert panel would provide non-binding advice to the Commission. The organic farming advisory group, in which all the stakeholders of the organic farming sector are represented, provides advice to the Commission and is a forum in which all the problems and necessities of the organic farming sector are discussed. For COPA/COGECA it is not necessary to create a second expert panel. The existing panel should, however, be more systematically involved in the regulatory work.

#### Labeling and advertising

As all organic products should be produced according to the EU legislation, there are no "better, stricter or higher standard organic products". Moreover, and as the Commission stresses, these claims are often seen as confusing and reducing consumer confidence.

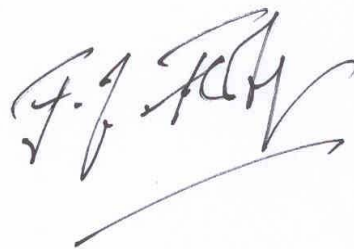
#### Functioning of the internal market and controls

The functioning of the control bodies should be improved by ensuring that the different Member States have a similar interpretation of the Community legislative framework, that the standards (public and private) applied in a Member State do not imply the non-recognition of other MS's organic products if the later fulfill the European Standards, and that the administrative procedures in the control bodies do not create barriers to trade within the EU.

#### International trade

Control systems in the EU and for third countries must be kept under public control. The Codex Alimentarius guidelines should be reinforced with a view to harmonising them towards the Community Standards on organic farming.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'F. J. Feiter', with a long horizontal stroke underneath.

Franz-Josef FEITER  
Secretary General