



Working for organic farming in Europe

24th November 2006

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Mr. Juha Korkeaoja
Minister of Agriculture and Forestry
President, European Agriculture Council
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Dear Minister

German/French proposals for a revision of Regulation 2092/91

On behalf of the IFOAM EU Group, I wish to express our concern at the pressure to reach a final decision on the proposal for a revision of Regulation 2092/91 in December. More time and more work is needed to bring it to a successful conclusion.

We are aware of a new German/French paper with proposed amendments to your Presidency's draft of 25th October. We strongly support serious consideration of its contents by the Council. It shows a marked improvement on preceding drafts in several key areas, though we have identified a number of issues that still need to be resolved.

We will be preparing more detailed comments when we have been able to consult with EU IFOAM members – we continue to assert that proper involvement of organic stakeholders is crucial to the success of this initiative.

With the weight of technical and political issues still to be settled, we would support your presidency in not trying to come to a decision on the whole council regulation this year.

Imports

Whilst writing, we would like to draw your attention to one important aspect of the related imports regulation, which your presidency will need to complete. This follows up the letter sent by my colleague Gerald Herrmann, president of IFOAM, on 13th November. There was one critical issue that should have also been included.

Article 27 allows imports into the EU of products certified by inspection bodies registered within the EU. Whilst these bodies are subject to the normal controls for their activities in the EU, the proposals make no such requirement for their activities in third countries. There is a lot of concern that this loophole will allow less than effective certification of these imports. Inspecting and certifying in a third country requires

special skills, knowledge and systems to enable effective operation remotely. The different growing conditions, language, culture, and socio-economic and legal contexts demand a differentiated and elaborated control system. There must be adequate supervision to ensure that these are in place, otherwise it could result in fraud not being detected and a loss of confidence in the organic market.

To correct this, we propose adding to the text of article 27.1 the following underlined text (as was also proposed by the French and German delegation) in order to have a basis for a better international supervision along the whole supply chain:

(b) the operators on all stages of production, preparation and distribution in the third country of the product concerned have been subject to control of inspection/certification authority or inspection/certification (control) body recognised in accordance with paragraph 2;

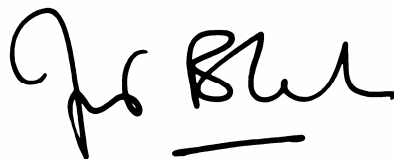
Furthermore we propose that Article 27.1 be amended with the addition of a new (d):

(d) the Commission, assisted by the member states ensures appropriate supervision of the recognised inspection/certification authorities and inspection/certification bodies, including the effectiveness of their inspection activities in third countries".

This amendment should guarantee that EU-based inspection bodies and authorities will undergo similar supervision for their foreign activities as bodies based in third countries.

I hope you will be able to introduce this amendment and thus safeguard the ongoing integrity of organic imports under the new measures.

Yours sincerely



Francis Blake
President

cc Mrs Mariann Fischer Boel, Commissioner for Agriculture
EU Ministers of Agriculture
European Parliament Agriculture and Environmental
Committees
Standing Committee on Organic Farming