



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Jean-Francois Hulot
Head of unit
DG Agriculture F.5
Rue de la Loi 130
1040 Brussels
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Dear Jean- Francois,

Postponing whole new organic regulation to 2010?

First of all, I would like to thank you very much for your cooperation and openness on the issue of the new organic regulation. However, I am writing to you to express the organic sectors' concern regarding the new draft of the implementing rules of the regulation 834/2007.

As you know we have closely followed up and commented on the issue about the new (now postponed) organic logo, the different draft(s) of the implementing rules, etc. We are experiencing now that the organic sector is partly alienated by changing timelines and procedures (e.g. logo) and certain aspects of the new draft implementing rules (fear that important details are left out/not well enough addressed).

Therefore we think that the Commission should consider postponing the whole organic regulation for one year so that the (new) logo and the implementing rules are introduced at the same time. We believe that the whole organic sector would benefit from a one-step introduction and a more fine-tuned new regulation, which would be in the end also in the interest and to the success of the European Commission:

- 1) While we appreciate your work on various well addressed issues in the new regulation, we still recognise that important areas need to be clarified and better addressed. Most of the areas that need to be better addressed do not seem to be questions of diverging intentions, but of missing fine-tuning due to a very tough timeline. (Example: percentage calculation of recipes, difficulties for beekeepers to produce organic honey)
- 2) It is for the sector much easier to implement the new organic regulation in a one-step introduction - instead of "piece by piece". We are aware that this is not possible for hundred percent of the regulation but it could be achieved for major parts of it. One example is the process of deciding about the new mandatory organic logo - the sector and organic operators are confused about the changes in timeline and procedures. Your intention is to postpone the part of the new regulation that relates to the use of the mandatory EU logo on organic products. On the other hand the new regulation includes different new labelling

requirements. This will cause serious problems and extra costs for operators who will have to change their packages twice.

- 3) You explained that you want “only” to transfer the current annexes into the new implementing rules. This is fine in most of the cases but it is a lost opportunity for improvement where the current regulation causes problems (Example: Measures in case of infringements and irregularities).

Therefore the IFOAM EU Group would welcome and express its support for the Commission (and member states) in postponing the whole organic regulation to 01 January 2010. Perhaps you find time tomorrow to discuss the issue with the member states.

Please let me underline that we are not in principle against the original date of 01. January 2009. For us it is important that we end up with a mature regulation which will work out for the sector. The only thing we want to avoid is to work towards a deadline, which is not necessarily needed by the sector, if we could do better with the deadline proposed for the mandatory new organic logo.

We will come back to you at a later stage providing more detailed comments on the new draft of the implementing rules. In the meantime we trust that you will be able to take our general reflections into account.

With best wishes

Yours sincerely,



Marco Schlüter
Director

Copy to:

Mr Mousnier; DG Agri deputy director Mrs Dormal – Marino; DG Agri unit F.5; standing committee on organic agriculture