



## ***Working for organic farming in Europe***

May 14, 2007

International Federation of  
Organic Agriculture Movements –  
EU Regional Group

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Bundesministerium für Ernährung, Landwirtschaft und  
Verbraucherschutz  
Referat 612 - EU-Koordination  
Dietrich Guth  
Special Committee of Agriculture  
Berlin, Germany

### **RE: Discussion about Article 16.g from the Proposals for Council Regulations on organic production and labelling of organic products**

Dear Mr Dietrich Guth,

I am writing on behalf of the IFOAM EU Group, representing over 330 member organisations in the EU, in response to the discussions within the European institutions and the Special Committee on Agriculture concerning the possible deletion of Article 16.g from the Proposals for Council Regulations on organic production and labelling of organic products (17085/06).

We recognise that the issue of GMOs in relation to organic food and farming is both very contentious and very complex. This is partly because the cause of the problems, and also the solutions, are to be found outside the scope of the organic regulations. We therefore remain extremely concerned at the impact of GMOs on innocent, non-GM parties and the burden it places on them. This includes, not only GM contamination of products, but also availability of non-GM sources of ingredients.

We have consulted with IFOAM members in the EU on the possibility of deleting Article 16.g from the new proposals. The overwhelming view is to support deletion of Article 16.g.

We understand that there is a second proposal to amend Article 16.g by removing the references to food additives and 'produced from'. We recognise that this would be a positive, though incomplete, step in the direction of excluding GMOs and their products from organic food and farming.

I hope you will be able to take into account these views of the European organic sector when deciding on this issue.

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.

Yours sincerely  
Francis Blake, President

Copy to: Standing Committee on Organic Farming; permanent representation EU-27