

## The new EU Organic Action Plan

### IFOAM EU assessment and position

19 Dec. 2014

#### Overview

The [first EU Organic Action Plan](#) has been launched by the Commission in 2004. As many of the actions are nowadays outdated, IFOAM EU has since some years called for a new organic action plan that would target current and future challenges; a comprehensive set of actions have been proposed since 2010<sup>1</sup> and have been discussed on the [7<sup>th</sup> European Organic Congress](#) in 2013 in the context of the regulation review.

The European Commission has responded by accompanying the proposal for a new EU organic regulation with a new action plan.

#### General assessment

IFOAM EU welcomes that a [new organic action plan](#) (COM [2014] 179) has been published. But whereas the launch of a strong action plan has been a long standing demand of the organic movements, the proposed plan lacks any clear commitments. While the analysis of the current developments and challenges in the organic sector is described well and concise in the action plan, we regret that the plan lacks more ambition for concrete action. Where actions are proposed, clear objectives, timeframes to reach the goals and a dedicated budget for specific action in organic farming and research is missing. Moreover, the document does not indicate if the Commission foresees any evaluation of the proposed actions after a certain period of time.

#### About the political process

Whereas the legislative proposal for a new organic regulation will undergo a co-decision procedure, the organic action plan as a planning and strategy instrument will be endorsed and commented by the Council and the Parliament, but does not have the status of a legally binding text with immediate consequences. However, it is an important indication of political will to support organic farming and to plan necessary action for the upcoming years. We call on Member States and European Parliament to suggest some further reaching action in their Council Conclusions and Parliament Resolution, and to support the action plan.

#### Assessment according to themes

#### Organic development must be strongly prioritised under the Common Agricultural Policy, recommendations and information are not enough to stimulate sector growth

- **What has been suggested:** Recommendation for Member States to use CAP EU Rural Development Programmes (RDP) and the Common Fisheries Policy, publication of an information document on EU organic legislation and opportunities under the CAP (Action 1) and the introduction of organic farming as specific scheme under the CAP communication and information funding stream (Action 2).
- **Who would be affected:** Farmers and member states

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<sup>1</sup> IFOAM EU (2010): [Shaping Agriculture and Food Systems to Future Challenges - The Strategic Role of Organic Food and Farming](#), Recommendations to the new European Commission and the European Parliament for a coherent framework of policies to support organic food and farming ([English](#) [French](#) [Hungarian](#) [Spanish](#))

- **IFOAM EU assessment:** The Commission has recognised the critical role organic farming plays in delivering on the objectives of key EU policies related to the protection and enhancement of our natural resources, the environment and confronting climate change - from the 2020 Biodiversity Strategy to the National Emission Ceiling Directive. This highlights the need for CAP funding to be better directed towards the sustainable expansion of the sector to 2020. Although the plan highlights a number of rural development measures relevant to organic farming as well as the 30% minimum spending requirement for the environment, it does not present clear targets or recommend a specific ring-fencing of funding that would increase the ability of organic farmers to reach these policy objectives through new the CAP and RDPs.
- **What further action is needed:** The Commission must ensure that RDPs make the best use of relevant measures under the CAP to support the sector's sustainable development. This includes organic farming support payments to incentivise organic production, but also investments in processing and marketing to support organic food and value chain development as well as the prioritisation of agro-ecological knowledge transfer, advice and innovation. The plan's acknowledgment of organic farming's relevance across different EU funds from the Agricultural Fund for Rural Development (EAFRD) to European Maritime and Fisheries Fund (EMFF) also highlights the importance of ensuring that spending priorities agreed under the Common Strategic Framework are used to support organic farming to 2020. The Commission must carefully monitor the implementation these support measures during the new programming period to ensure the funds are being effectively used to support the sector. A full evaluation of the contribution of new programming to support sector growth and development should be conducted ahead of the EU budget and CAP mid-term review with further actions and targets put forward on this basis.

### Promotional policy for organic farming would need a dedicated budget, more than nice words

- **What has been suggested:** Greater awareness-raising by the Commission of EU funded opportunities to support promotional and information activities towards the internal market and third countries (Action 3). A specific survey consumer awareness of the organic farming scheme as well as regular survey on awareness of the EU organic logo (Action 4). Development of information on how organic farming requirements can be part of public procurement policy (Action 5).
- **Who would be affected:** Farmers, SMEs, consumers and Member States.
- **IFOAM EU assessment:** Greater awareness of the opportunities to promote organic products using EU funds is important to increase stakeholder uptake of such tools and positive attributes of the organic sector acknowledged by the Commission from the best environmental practices and high animal welfare standards to the production of high quality products. The Commission also missed the opportunity to highlight relevance of the CAP school milk and fruit schemes to inform about organic production in schools and increase procurement of environmental sustainable high quality food products in schools. The periodical surveys of consumer awareness of the organic farming scheme and EU organic logo could help prepare the groundwork for increasing consumer knowledge about the enhanced public good delivery of organic farming. The Commission's recognition of the importance of green public procurement (GPP) for increasing consumer awareness and the development of the organic food market is positive. IFOAM EU welcomes that the Commission will revise GPP criteria and provide member states with information material and is willing to contribute to further discussions.
- **What further action is needed:** In the EU promotion policy, a dedicated budget for organic farming is clearly needed. The consumer surveys must be followed by action to further raise awareness of organic products and farming, also highlighting the fact that the costs of organic farming are internalised in overall price of production compared to conventional farming. The Commission and the Member States must give organic food priority in public procurement.

## Organic research and innovation is an important tool towards more sustainable practices in all agriculture - if it would be made a priority in research programmes

- **What has been suggested:** The Commission will help in the identification of research and innovation priorities for organic producers with regard to the challenges resulting from the new organic regulation, amongst others through the organisation of a conference in 2015. The Commission will also take account of the relevant Horizon 2020 instruments to support research and uptake of research results, including a new ERA-Net for organic agriculture.
- **Who would be affected:** Farmers, food processors, SMEs, farm advisers and Member States.
- **IFOAM EU assessment:** The Commission recognises the need for more research and innovation to address the challenges resulting from the new organic regulation and provides a good assessment of research needs. In the introduction of the Action Plan, the Commission also recognises that "Organic production has to maintain its innovative role, in influencing non-organic production with its rules and the techniques applied". The Commission mentions Horizon 2020 and the EIP-AGRI as important policy instruments to support research & innovation for the organic sector. The Commission recognises the role of TP Organics in "providing input into a strategic research and innovation agenda". Despite all the nice words, the Commission does not take any real commitment. IFOAM EU asked for a study analysing organic seed supply in the member states and for an integrated database of seed availability at EU level. Instead the Commission only comes with a recommendation for stakeholders to set-up such a database.
- **What further action is needed:** IFOAM EU demands clearer commitments to ring-fence budgets for research and innovation for agro-ecological and low input approaches. In addition to the research needs identified in the action plan, IFOAM EU would like to highlight the following issues: Research is needed to enable farmers to develop towards the use of 100% organic feed, to increase the percentage of regional feed and to improve animal welfare. A survey and in depth analysis on the availability of organic seed in the different member states and a process to support organic farmers towards the use of 100% organic inputs and seed should be implemented. To provide organic and low input farming with the necessary robust plant varieties and animal breeds, a research strategy for organic breeding is needed. Research is needed to find alternatives for critical inputs (copper, sulphur) and alternative nutrient sources as well as investments to move further towards closed nutrient cycles (e.g. improved compost treatments, biogas slurry, safe use of sewage sludge).

Also socio-economic aspects of organic farming need to be investigated, for example the development of new business models for multi-functional agriculture (e.g. combining bioenergy production, biodiversity management or care farming). More research is needed to find ingredients and techniques compatible with organic food processing. Finally, it should be investigated how organic food and farming contribute to healthy and sustainable diets, and how local food systems can contribute to food security.

### Data collection

- **What has been suggested:** The Commission will publish regular reports on organic production in the EU (surface area, number of holdings, main production sectors). The Commission will analyse the distribution of added value along the food supply chain and analyse obstacles to joining the organic sector (in particular for small farmers and SMEs in the food processing industry)
- **Who would be affected:** Farmers, food processors, and Member States
- **IFOAM EU assessment:** Good actions, but it is not mentioned how regular "regular reports" are.
- **What further action is needed:** The reports should at least be made on a 2-yearly basis. The Commission should not only analyse obstacles to joining the organic sector, but also draw conclusions from it. Collected data must be used to evaluate the success of this action plan and taken into account for the next organic action plan.

## Monitoring and consumers trust needs more capacities

- **What has been suggested:** Action 10 to 13 - Synergies between Commission, Competent Authorities and Accreditation Bodies will be improved. The Commission will propose to put organic in the TARIC (customs tariff database), therefore import of organic products will be more easily traced. The Commission will also develop a system of electronic certification for import and internal market. Finally the Commission will assist Member States in developing and implementing an organic fraud prevention policy.
- **Who would be affected:** Control authorities, all organic operators, importers in particular
- **IFOAM EU assessment:** The proposed actions are good, but not ambitious enough. Any action on how to manage potential findings of pesticide residue is missing.
- **What further action is needed:** A formalised cross check system at control body level is needed whereby control bodies can cross check lots, volumes available, certificates, residue detections, financial documentation (Invoices etc) and traceability with each other. Standardised documentation would help this process. There should be more capacities for Control Authorities to investigate and trace financial transactions. Cross checks may also be required at the operator level and operators must be more actively involved in monitoring the credibility of the system, for example by checking the conformity of ingredients that they purchase. The approach of the sector about harmonised guidelines on pesticide residue (e.g. IFOAM EU, EOCC or BNN guidelines) should be endorsed by the Commission.

## Organic farming can be a tool for local development in third countries - but the principle of equivalency must be maintained

- **What has been suggested:** Actions 14 to 18 include the continuation of cooperation and support of trade partners in the framework of EU cooperation policy; work on increased convergence of standards among leading organic partners; explore ways to gather and to analyse statistical data on volume and value of trade with third countries; discuss organic rules for aquaculture and wine in the framework of Codex Alimentarius; attempts to increase protection of the EU organic logo in Third countries.
- **Who would be affected:** Trade partners in developing and other third countries, European organic processors, traders, retailers and consumers
- **IFOAM assessment:** To support trade partners in developing countries could have a positive impact on sustainable development in developing countries, and on access to organic products for European consumers. But imposing compliance with the strict EU definition of organic farming to third countries will probably have a negative impact on both the European organic sector (particularly the processing sector), European consumers' access to organic food, as well as organic operators overseas... Organic agriculture is site specific and in different stages of development worldwide. Strict compliance to every provision of standards and control requirements is virtually impossible for most products originating outside the EU. Therefore, adapted solutions have to be assessed and put into place (e.g. as an approach to reduce the Commission work load resulting from supervision of certification bodies: establish synergies in supervising certification for third country imports with trading partners where bilateral recognition exists; multilateral agreements or a common supervision mechanism as long term solution) .
- **What further action is needed:** More concrete action would be desirable to promote export of EU products, for example by supporting participation of EU producers in fairs that are relevant for organic companies. There should be a new action point to proactively expand equivalence agreements with other trading partners. Equivalence agreements may exceptionally - in extremely sensitive cases (as in the EU US agreement) - exclude issues in order to not undermine specific food standards or cultural requirements of the EU or third countries. In these cases, stakeholders must be intensively consulted during the negotiations.

## Horizontal policy frameworks must clear the way for organic production

- **What has been suggested:** While certain challenges have been identified in the introductory text, no action has been suggested on important horizontal policy frameworks that have often devastating effects on the development of organic farming.
- **Who would be affected:** Farmers, food processors, consumers and Member States
- **What further action is needed:** The implementation of the polluter pays principle in cases of contamination with synthetic pesticides or GMOs and moving liability for the costs to prevent contamination to the producers of potentially contaminating substances and crops. Focus the EU legal framework on the marketing of seed and plant propagating material on biodiversity by adapting it to the needs of organic breeding, farmers and gardeners active in breeding and conservation of old varieties as well as those breeding for specific local conditions and quality needs. Create adapted rules for the authorisation of substances from natural sources under the EU fertiliser and plant protection legislation.

## Evaluate the success of actions

- **What further action is needed:** Actions suggested in the action plan must be evaluated every two years for its success and in case of failure, the evaluation should result in suggestions for new measures if applicable.