Background information on Environmental Performance in Organic Production

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Since 2011 IFOAM EU has asked for the introduction of requirements obliging organic processors and traders to set a basic and simple internal system to measure the environmental performance of their company. The Commission proposal has taken up this advice of IFOAM EU, but the way it is proposed doesn’t completely match the organic processing sector peculiarities. Therefore with this background paper we would like to explain better the IFOAM EU proposal.

History: reasons for the need for environmental performance monitoring for organic processing companies in the regulatory framework

1. Mega-trend sustainability aspects

In the European food market the sustainability aspect (environmental, social and economic) became a mega trend over the last years. Besides the organic regulation, many organic operators and especially the big retailers started private programs and partly set up new labeling and communication activities focusing on environmental and sustainability responsibility. A further step forward can be done and incentive mechanisms can be created to further respect the environment by controlling and improving the use of resources (energy, water etc.), avoiding pollution and limiting climate change impact.

2. Misleading problem with possible Ecolabel for food and drink sector

There is an on hold project to expand the EU Ecolabel scheme to food and drink. The EU Ecolabel is a voluntary label established by the EU Commission in 1992, which helps to identify products and services which have a reduced environmental impact throughout their production cycle. Currently, it applies to several categories of products and services such as cloths, cleaning products, electronic equipment, paper products, holiday accommodation etc. It doesn’t apply to the food and drink sector. The organic sector considers that introducing the Ecolabel for food and drink products would mislead the consumer. The Ecolabel would easily suggest that products are environmental AND organic, even if it is not the case, and this would harm the organic labelled products.

The aim to avoid the EU Ecolabel to be expanded to food and drink products remains strong; it would be a dramatic decision for the organic sector.

Both the mega-trend in sustainability aspects and the need to avoid the Ecolabel for food and drink, has lead to the need to include an instrument for monitoring environmental performance into the organic regulation. The organic sector needs to show that organic operators supervise and manage key environmental indicators.

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**EMAS explanation**

In the ongoing discussions on the organic regulation proposal some political players proposed to use EMAS as a system for delivering such information. EMAS (Eco-Management and Audit Scheme) is a voluntary environmental management instrument established by the EU Commission in 1993 based on key performance indicators. It is a scheme for companies to assess, manage and continuously improve their environmental performance. EMAS is a sophisticated and complex management system².

**Why EMAS doesn’t fit to all organic operators**

Even if it seems at first sight the easiest solution, IFOAM EU is not in favour of obliging organic operators to register under the EU EMAS scheme, as proposed by the Commission in the legislative proposal.

Establishing complex concepts like EMAS (or ISO 14001) with an additional certification system is a much too far reaching approach with a tremendous additional burden (workload and costs) for involved organic operators. The organic operators in Europe are quite diverse, both in scale and development of their businesses as well as the socio-cultural and economical background and level of organic production established within the operation. Proposing such systems has a high potential to exclude many operations (processing and trade) from the organic sector, especially in members states where organic sector is not yet sufficiently developed. This risk must be avoided.

It is highly important to define requirements which meet the needs of the diverse organic operators all over Europe. In order to establish an additional value of environmental responsibility within the organic chain it is important to establish a concept that as many operators as possible can join.

**IFOAM EU proposal**

Therefore IFOAM EU proposed to introduce an obligation for all processing and trading operations (excluding retailers) to fulfill basic environmental requirements in order to demonstrate their environmental performance. This must not require the implementation of a full EMAS scheme with additional certification requirements, this would be too much of a burden on organic operators. Which IFOAM EU believes would be detrimental to the sector.

All processes of primary production carried out at farm level and the smallest processors should be exempted. Bureaucratic burden and additional costs should be avoided in particular for small operations.

According to the IFOAM EU proposal, the procedure should include the following steps:

1) To define relevant parameters (appropriate for each operation) by establishing methods for identifying and measuring the direct environmental aspects (e.g. water use) of the operation based on core indicators (e.g. m³ water used per year).

2) To have a strategy including annual targets that guarantees continuous improvement of the environmental performance of the operation

3) To have appropriate documentation in place.

Verification of the fulfillment of these requirements must be part of the organic control and certification system. Therefore parameters must be used that can be checked during the organic inspection.