

Brussels, 18th February 2014

Mr João Onofre,
Unit B4 - Organic Farming
DG Agriculture and Rural Development
European Commission
B - 1049 Brussels

Dear Mr Onofre,

Specific productions and traditional-used substances in organic farming could be significantly affected during the process of alignment between organic regulations and horizontal legislations.

It is the case of organic vineyards and organic wine production.

The fungal disease *downy mildew* is the main threat for vineyards. Today in many European countries there is a strong tendency to reduce the use of copper and copper-based products in agriculture, which represented for decades the main protection instruments against this disease.

Especially in these countries, over the past years, organic vine growers have experienced many alternative products and farming practices aiming at decreasing the use of copper but to date no actual effective solution has been found.

IFOAM EU calls the Commission to put more efforts and to further support research policies and projects aiming at exploring farming practices and alternative products that could replace the use of copper and treat *downy mildew* in organic viticulture. Until new solutions are found, IFOAM EU recommends to continue allowing all the traditional substances which to date have been used by organic vine growers (e.g. as for the current organic regulation, up to 6 kg copper per hectare per year are allowed).

Besides copper, the only product that showed a significant efficacy in organic viticulture - in particular when it is used within a protection strategy along with copper - is potassium phosphonates. Until October 2013 this product was allowed at Member State level as plant strengthener for organic farming in a number of countries, e.g. Germany, Luxembourg, Belgium, Czech Republic, Slovakia, Hungary.

The alignment of Annex II of Regulation (EC) No 889/2008 with horizontal Regulation on plant protection products (EC) No 1107/2009 is leading to the ban of this substance in organic viticulture. On April 2013 potassium phosphonates were approved as an active substance in accordance with Regulation (EC) No 1107/2009 and this recognition entered into force on 1 October 2013. This change of status from plant strengthener to active substance entails that phosphonates have to be included in Annex II of Regulation (EC) No 889/2008 to be used in organic farming.

The character of phosphonates has been well examined and described¹.

IFOAM EU acknowledges that an application to include this substance in Annex II of Reg. (EC) No 889/2008 and a dossier have been submitted in May 2013 by the German competent authority but also that an opinion of the Expert Group for Technical Advice in Organic Production (EGTOP) is not yet present and no specific mandate has been given to evaluate it.

This still-unclear timeframe entails a serious issue within the organic viticulture sector since there is not certainty that a decision will be taken before next production season. Therefore we urge the Commission to take into consideration this process that could have serious negative impact on the production of organic wine in many European regions and to find a solution for allowing temporarily phosphonates in organic viticulture.

Organic regards,



Marco Schlüter
IFOAM EU Director

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