

International Federation  
of Organic Agriculture Movements  
EU Regional Group

Commissioner for  
Agriculture and Rural Development  
Dacian Cioloş  
European Commission  
Brussels

Brussels, 14 November 2013

### **EAFRD Delegated act - organic payments and greening**

Dear Commissioner,

Following recent discussions with you and your officials we wish to express our strong objection to impose a 33% flat-rate reduction to Pillar 2 organic support payments in order to prevent any risk of doubling funding.

Such a blunt and unfounded deduction would by no means be justified and would clearly send the wrong message to farmers about policymakers' commitment to supporting organic farming as part of a drive to improve agricultural sustainability. For instance organic farmers who fulfil greening criteria independent from their organic status because more than 75% of their eligible area consists of grassland (or other herbaceous forage) would be put at a significant competitive disadvantage compared to conventional farmers as a flat-rate deduction would disproportionately and unjustifiably penalise them.

Greening recognition for organic farming clearly aims to deliver a confidence building measure for farmers who are willing to contribute to sustainability by acknowledging the enhanced environmental delivery of organic farms and incentivising organic conversion. The importance of confidence building measures was a key point of the Commission's external 2011 study on the *Use and efficiency of public support measures addressing organic farming*.

Therefore we ask you to consider the following recommendations in development of the implementation rules:

- It should be ensured that no deductions apply for organic farming support under Pillar 2 (Article 30). The automatic greening recognition and full Pillar 2 support is not double-funding, since organic farming is based on a system approach rather than a set of individual agronomic practices. As a result there is no direct overlap between the organic standards and the greening obligations. Instead the EU organic and private standards cover a broader range of integrated sustainability aspects\* that go far beyond the scope of what is required under greening criteria, equivalence practices or certifications schemes (see Annex 1 for overview of environmental benefits through EU organic standards).
- Genuine double funding of new or existing low-level agri-environment-climate measures must not be tolerated. Rural Development measures which cover income forgone and costs incurred for practices to fulfil eligibility greening criteria should in no way be financed under Pillar 2. This is not only in breach of double funding prevention as set out in the agreed legal text, but would threaten 30% minimum spending for the environment for advanced sustainability measures such as organic farming,

and agri- environment-climate measures that build on Pillar 1 greening and target greater environmental ambition.

We wish to reiterate that the central aim of this CAP reform was to increase agricultural sustainability. Any reductions of organic farming support under Pillar 2 would clearly contradict this aim and undermine the confidence building nature of automatic recognition.

I trust that you will seriously consider our recommendations in the ongoing discussions on this proposal and IFOAM EU remains at your disposal to answer further questions.

Yours sincerely



Christopher Stopes, IFOAM EU President

\*"a simple ban (of herbicides) induces a chain reaction on farmers, resulting in more sustainable and productive farming systems. Similar examples can be given with other pesticides, slow-release fertilisers or veterinary medicaments where simple bans or restrictions unleash cascades of environmentally-sound preventive actions." *Urs Niggli, Christian Schader and Matthias Stolze (2010): "Organic farming - an efficient and integrated system approach responding to pressing challenges", in: IFOAM EU (2010): Organic food and farming: A system approach to meet the sustainability challenge ([http://eu.ifoam.org/sites/default/files/page/files/ifoameu\\_policy\\_system\\_approach\\_dossier\\_2010.pdf](http://eu.ifoam.org/sites/default/files/page/files/ifoameu_policy_system_approach_dossier_2010.pdf))*

International Federation  
of Organic Agriculture Movements  
EU Regional Group

## Annex 1

### Environmental and rural development relevant prescriptions in EU organic regulations

Prescription category/detail	EU org. reg. articles*	Biodiversity	Energy	Water	Soils	Air	Climate	Animal health/welfare	Safe/quality products	Rural econ./vitality	Landscape
Obligations to use good husbandry practices & protect environment (Reg. A: Article 4(a)iv and 5)											
Multiannual crop rotation including legumes and other green manures	A: 12.1 (b)	✓	✓	✓	✓	✓	✓				✓
Tillage and cultivation practices that maintain organic matter and protect soil	A: 12.1 (a)	✓	✓	✓	✓		(✓)				
Maintain crop health through prevention (natural enemies, the choice of species and varieties, crop rotation) cultivation techniques and thermal processes	A: 12.1 (g)	✓	✓		✓	✓			✓		✓
Number of livestock limited to minimise overgrazing, poaching, soil erosion or pollution	A: 14.1 (b) iv	✓		✓	✓			✓			✓
Stocking density and use of livestock manure restricted to maximum of 170 kg N/ha/year	B: 3 & 15.1	✓	✓	✓	✓		✓	✓			
Preference for inputs from organic origin (Reg A: Article 4b with exceptions (4d))											
Only organic seed (with exceptions)	A: 12.1										
Only organic feed (with 5% exceptional rule for monogastrics)	A: 14 (d) ii	✓	✓	✓	✓	✓	✓	✓	✓		
Livestock feed primarily from holding or	A: 14.1 (d)	✓	✓	✓	✓		✓	✓			✓

Prescription category/detail	EU org. reg. articles*	Biodiversity	Energy	Water	Soils	Air	Climate	Animal health/welfare	Safe/quality products	Rural econ./vitality	Land-scape
same region (with exceptions)											
Organic products at least 95% organically produced ingredients									✓	✓	
Manage entire holding organically (with exceptions)	A: 11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Strict control/prohibition of external inputs, minimisation of the use of non-renewable resources and recycling of wastes and by-products (Reg A: Articles 4(a)iii, (b), (c), 5(b),(c))											
Only permitted fertilisers : low-solubility mineral fertiliser and soil conditioners when need proven	A: 4 (b) iii B: 3, Annex I	✓		✓	✓				✓		
No mineral nitrogen fertilisers	A: 12.1 (e)	✓	✓	✓	✓		✓		✓		
No herbicides, only authorised products can be used	A: 12 (h), B: Annex II	✓	✓	✓	✓		✓		✓		✓
No use of most pesticides/fungicides, only authorised plant protection products when established threat	A: 12.1 (h), B: Annex II	✓		✓	✓		✓		✓		
No landless livestock production (e.g. free range requirement for poultry)	B: 16	✓	✓			✓	✓	✓	✓		✓
Housing design/stocking rate specifications	A: 14b B: 10-18, Annex 3							✓			
Restricted use of medications, esp. prophylactic	A: 14e B: 23-25							✓	✓		
No hydroponic production	B: 4			✓	✓						✓
No use of GMOs	A: 9	✓							✓		
Restricted list of processing aids	B: 28, Anx 8,9								✓		



\*Article numbers refer to Council Regulation (EC) 834/2007 [A] and Commission Regulation (EC) 889/2008 [B]

Rue du Commerce 124 - 1000 Brussels - Belgium - Phone: +32-2-280 12 23 - Fax: +32-2-735 73 81 - Email: info@ifoam-eu.org

## **Adapted from analysis of environmentally and rural development relevant prescriptions included in EU organic regulations/ production standards**

Version 20/10/13, prepared by Nic Lampkin (ORC) with input from ORC and FIBL colleagues.

The impact columns in this table relate to the requirements of both the organic and rural development regulations and in particular the topics mentioned in the Article 30 Organic Farming draft measure fiche. It should be noted that impacts may be a direct result of the regulation requirements, e.g. more biodiversity due to restrictions on biocide use, or indirect, e.g. more farmland birds due to more overwintering stubbles due to more spring cereals sown due to need to alternate sowing periods to control weeds due to non-use of herbicides. Indirect impacts, while important, are less easy to verify. Impacts will also vary according to the type (e.g. horticulture, dairy) and intensity (e.g. more intensive lowland or less intensive hill/mountain) of the organic farming system. It is assumed that verification is focused on the direct impacts of the prescriptions that are monitored as part of organic inspection procedures. A literature review of supporting evidence for the tables is in preparation.