



International Federation of
Organic Agriculture Movements –
EU Regional Group

Working for organic farming in Europe

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Mrs. Mariann Fischer Boel
EU Commissioner
DG Agriculture
European Commission
BE- 1049 Brussels

Labelling of origin article 24 EC Reg. 834/2007

Registered in Sweden, Uppsala
under organisation number
817606-9436

Dear Commissioner,

The current requirements for the labelling of origin of pre-packed organic foods in accordance with article 24 of EC Reg. 834/2007 are causing serious discussion among European organic operators. We see a number of risks for the practical application of these requirements from the beginning of July 2010.

There are several reasons why these requirements should be changed or postponed.

1. Current labelling requirements for place of origin are discussed with respect to all foods in *Proposal for a Regulation of the European Parliament and of the Council on the provision of food information to consumers* /* COM/2008/0040 final - COD 2008/0028 */. The decision-making process is ongoing. We face the possibility that the system established under EC Reg. 834/2007 will be incompatible with the new requirements for labelling of origin to be introduced by the coming EU regulation on labelling, i.e. the regulation on the provision of food information to consumers.
2. There is an ongoing discussion which covers different aspects of origin labelling in the context of the *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on agricultural product quality policy* /* COM/2009/0234 final */, and it is possible that contradictions exist between this and article 24 of EC reg. 834/2007.
3. The requirements in article 24 of EC reg. 834/2007 are not compatible with the labelling concepts on "designation of origin" and "geographical indication" currently active in EU (EC reg. 510/2006). Organic food products with regional labels adopted under EC Reg. 510/2006 as PDO and PGI often have to be labelled with "EU/non EU agriculture".
4. For a number of specific foods we are facing the situation that we will have double labelling of origin. Mandatory indication of origin of fruits,

olive oils, wine, etc. have to be used in addition to the labelling of origin required by article 24 of EC Reg. 834/2007. The result will be that consumers will find products with two indications of origin on the same label – in the worst cases, with contradictory information.

5. The labelling regime as per article 24 of EC 834/2007 does not fulfil its intended function as a communication tool and in some cases may even be actively misleading. The rules stipulate that a product may only be labelled as regional in cases where over 98% of components come from that region. In all other cases, the label must read 'EU/non-EU'. From the consumer's point of view, the 'EU / non-EU' label indicates only that the product components have multiple sources, one or more of which is EU. This information is too general to be of any practical value.

In light of this situation we suspect that the organic sector is being used as a test case for concepts on obligatory labelling of origin which seem to be insufficiently developed and evaluated, and not harmonised with other initiatives on labelling of origin in Europe.

Once agreed, the new labelling requirements under the *Provision of Food Information to Consumers* system should become a basis for re-evaluating requirements established in Article 24 of EC Reg. 834/2007. Article 24 should be harmonised with the *Provision of Food Information to Consumers*, and also with other origin labelling and quality labelling requirements in EC Reg. 510/2006.

We kindly ask you to take our arguments into consideration, as an ill-conceived labelling regime could mislead consumers and impose additional costs for operators, causing serious distortion of the organic food market. We urge the Commission to suspend the requirements of Article 24 of EC Regulation 834/2007 until the other regulations are ready and harmonised. Furthermore, Article 24 of EC Regulation 834/2007 should be aligned with general requirements on origin labelling. Do not hesitate to contact us for further discussion and clarification.

With Kind Regards,

A handwritten signature in black ink that reads "Christopher Stopes". The signature is written in a cursive, flowing style.

Christopher Stopes
President

Copy to: Dormal Marino, Benitez-Salas, Hulot