



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

President: Christopher Stopes

Director: Marco Schlüter

European Office
Rue du Commerce 124
1000 Brussels
Belgium

Phone: +32-2-280 1223
Fax: +32-2-735 7381
Email: info@ifoam-eu.org

Registered in Sweden, Uppsala
under organisation number
817606-9436

Mr. Jean-François Hulot
Head of Unit, Organic Farming
European Commission
BE- 1049 Brussels

Brussels 12/11/2009

Labelling of origin

Dear Mr Hulot,

The current requirements for the labelling of origin of processed organic foods in accordance with the requirements laid down in article 24 of EC reg. 834/2007 are causing serious discussion among European organic operators.

The aim of this letter is to contribute to the process with an analysis of the situation and to give proposals for solutions. (See also our letter of May 8th this year where we asked for a change in EC reg. 834/2007.)

In the course of discussions over recent months, we came to the realisation that changing EC reg. 834/2007 would be very complicated. Therefore we have worked on three suggestions for changes to the wording of the implementation rules (EC reg. 889/2008) which will improve on the current situation in the organic sector, as regulated by EC reg. 834/2007.

Firstly we propose a relaxation of the rules to allow operators the choice of *either* labelling according to the rules given in article 24 (1) c) of EC reg. 834/2007 *or* offering this information in the ingredients list. The advantage of this approach would be that it offers more detailed information to the consumer.

In cases where other requirements (CMOs on fruit, vegetables, olive oil etc.) require labelling of origin, article 24 of EC reg. 834/2007 should not apply. A double labelling of the place of origin is not useful and might mislead the consumer by being contradictory.

Moreover, we think it would be very helpful to recognise and account for the practical reality on the market. The origin of raw materials can differ over the year because of seasonality and availability, forcing producers to make frequent changes to their packaging (at least twice a year). We ask for a certain flexibility in such circumstances.

We have drafted some legal wording as a basis for a discussion on how to transfer our ideas into the EC reg. 889/2008:

Title III

Article XX

For the purpose of implementation of the requirements for labelling of origin in article 24 (1) c) of EC Reg. 834/2007 the following regulation should apply:

(1) Alternatively to article 58 (2) of EC Reg. 889/2008 the indication of origin of agricultural ingredients can be given in the following form: the origin of the main¹ agricultural ingredients has to be identified in the ingredients list. This information can take reference to the community, the member state or the third country. This information can be written in full or in abbreviated form, in accordance with ISO 3166.

[For example:

Ingredients list: Organic flour Austria, organic butter Denmark, Organic raisins Egypt, yeast, salt

or

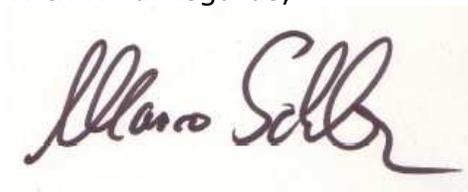
Ingredients list: Organic flour A, organic butter DK, Organic raisins ET, yeast, salt.]

(2) The indication of origin in accordance with article 24 (1) c) of EC Reg. 834/2007 can be replaced by other legally required indications of origin according to the type of food (for example EC Reg. 1234/2007 for olive oil or fruits,...this list has to be completed,) or by a protected "designation of origin" or "geographical indication" in accordance with EC Reg. 510/2006.

(3) In case of temporary unavailability² of an ingredient of up to a maximum of 15 % (by weight) per calendar year, a change of the indication of the place of origin on the label is not required. This should be applicable for both the labelling procedure as given in article (1) c) of 24 EC Reg. 834/2007 and the procedure given in article XX paragraph 1 of EC Reg. 889/2008.

We hope you will take our concerns and proposals into consideration. Do not hesitate to contact us for more explanation and further discussion.

With Kind Regards,

A handwritten signature in dark ink, appearing to read "Marco Schlüter", is written on a light-colored rectangular background.

Marco Schlüter
Director

Copy to: SCOF, organic unit

¹ "Main agricultural ingredient" has to be defined

² "unavailability" has to be defined (or linked with article 29 of 889/2008)