Dear Commissioner,

The IFOAM EU Group welcomes the Commission’s attempt to reinforce the strategy for promoting the tastes of Europe, as expressed with the publication of the Green Paper on promotion measures and information provision for agricultural products.

Promotional and information tools can play an important role in connecting consumers with the quality, traditions and added-value of European agricultural and food products. With regard to the reform of the Common Agricultural Policy, the organic sector emphasises that EU agriculture-related policies must aim to guarantee the sustainable production and consumption of safe, nutritious, quality food, while also increasingly focusing on providing employment opportunities and public goods such as a healthy environment and preventing climate change. We welcome the fact that the Green Paper emphasises the need to use promotion funds to promote healthy diets and to encourage local and regional food systems as part of this strategy. The Organic sector can play a key role in the promotion of sustainable production and consumption of food; it also delivers high-quality healthy food and can significantly contribute to the creation of employment in rural areas. But its benefits from promotional campaigns have as of yet been limited and need to be further explored.

The IFOAM EU Group did not participate in the stakeholder consultation as it did not work out specific opinions on all the questions that were included in the official questionnaire, but would like to comment on the following points:

**Promotion of Organic Food:** Campaigns – on EU and national level - financed under this scheme that targeted organic food supported promotional activities for organic products and were of help for the
development of organic markets. Organic products should be prioritised among product ranges covered by the scheme. It is important to promote organic products and their quality among consumers, and additional campaigns will result in increased recognition of the new organic production logo of the European Union. It should be noted that no promotional activities are foreseen to promote the new organic logo, which is mandatory for organic products from the EU since 1 July 2010, as the former promotion campaign for organic farming used the old organic logo. The IFOAM EU Group considers it of utmost importance to earmark a sufficient budget for the promotion of organic farming, including the EU organic logo, to make it known throughout the EU. Otherwise, the EU risks that consumers will not take any notice of the EU logo, let alone the better established national or private logos.

Furthermore, it is important to make consumers more aware that terms such as “organic”, “ecologic” and “biologique” are legally protected; they can only be used for products produced according to the EU rules for organic production laid down in EC Regulation 834/2007, as well as in the Codex Alimentarius Guidelines for organically-produced food.

**Multi-product campaigns:** The suggested approach towards multi-product campaigns would be a step forward to promote specific quality aspects such as organic products of a certain region. Applicants should have the freedom to plan the promotional campaign and also market individual products of a multi-product campaign separately.

**Support for local markets:** The IFOAM EU Group welcomes the Commission’s intention to support the further development of local markets through consumer information and support for farmers who wish to invest in local marketing through the rural development programmes. Such approaches should focus on small and medium enterprises, and should consider sustainability of the production process, with organic farming as a leading model. Whereas the existing labelling schemes PGI and PDO could play an important role in this strategy, the IFOAM EU Group cautions about establishing any new EU labels that would distinguish local products. The reasons for this are firstly to avoid a further increase in the number of EU food labels that could lead to consumer distortion, and secondly as local marketing must be based on local and regional structures and an EU logo would not necessarily benefit small, local producers.

**Access to promotional food schemes:** The IFOAM EU Group would like to see broadened access to schemes, allowing different professional organisations in one or more Member States or at European level to apply for and conduct promotional measures. The possibility to conduct multi-country campaigns would be a strengthening of the scheme - promotional programmes involving more than one EU country might allow for more efficient use of funds. For organic farming and other food sectors it is important to allow public, private or public-private partnerships to conduct campaigns and promotion with inclusion of all relevant stakeholders. The involvement of EU umbrella organisations to
conduct campaigns with their member organisations in Member States in the promotion campaign would be very beneficial in this case.

**Ad-hoc campaigns in case of crisis:** The reviewed scheme should aim for simplification and reduction of bureaucracy. Additionally, IFOAM EU Group hopes that this approach would also allow faster preparation of campaigns, especially in times of crises. So far this year, the E.Coli crisis has not yet been followed up by any promotional measures under the scheme. If information campaigns were to be started early the losses incurred by many farmers could be minimised.

**Exclusion of GMO-food:** Promotional measures should be directed to promote the high quality standards of EU agricultural products. It is important to focus on quality products, produced with respect to the environment and high animal welfare. Any products from Genetically-Modified Organisms must therefore be excluded from these schemes.

The IFOAM EU Group would appreciate if you could take this letter into consideration when evaluating the responses to the stakeholder consultations.

Yours sincerely,

Christopher Stopes, President