



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Mr Jean-François Hulot
Head of Organic Farming Unit
Directorate-General for Agriculture and Rural Development, Unit H3
European Commission
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17th May 2012

Annexes I, II and XII of Regulation (EC) No 889/2008

Dear Mr Jean-François Hulot,

IFOAM EU Group would like to present its concerns on the Commission working document for amendments to Regulation (EC) No 889/2008, regarding annexes I, II and XII.

Annex I - Fertilizers, soil conditioners and nutrients

IFOAM EU Group supports most of the proposed changes to annex I.

On biogas digestates IFOAM EU Group would like to propose a general clarification. We do not see a reason for listing biogas digestates in the annex as a new entry. It should be possible to use composts and biogas digestates, if they are produced from ingredients and products allowed in organic production as fertilisers and soil conditioners. Restrictions currently in Annex I for those products and ingredients should apply in case of biogas digestates and no further restriction on their use in organic regulation is needed. Thus, we prefer that it should be specified at the beginning of annex I: "Compost and biogas digestates may be used in organic production, only if they are produced from ingredients and products listed below, taking into account provisions given in the 3rd column".

IFOAM EU Group needs more time for reflection on use of hydrolysed protein as fertiliser in organic production.

IFOAM EU Group is against of use of the sapropel. We believe that there is no special need to allow it in organic production. There are enough fertilisers available and soil fertility can be built and maintained without sapropel. Additionally, we are concerned over the quality of sapropel and in particular of the problem of contamination with pesticide residues, and petroleum type substances in sapropel. This was also expressed in the EGTOP's [*Final report on Fertilizers and soil conditioners 30 May and 1st June 2011*](#). Further, the proposal does not mention the need for minimal impact on the aquatic ecosystems during mining of the sapropel. We also want to stress the need to ensure minimization of the risk of bacteriological contamination and the risk of transmission of infection to animals and consumers. Therefore we oppose the inclusion of sapropel in annex I.

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Annex II - Pesticides and plant protection products

IFOAM EU Group supports the proposed changes to the list and specifications of the annex II.

Annex XII - Model of documentary evidence to the operator

IFOAM EU Group supports the need to improve the certificate to solve problems with interpretation in some Member States on differentiation between organic and non-organic products. However, we see the need to be more specific to distinguish between organic products, in-conversion-products and non-organic products under part 5.

We suggest changes as follows (in bold changes to the first working document from the Commission):

5. defined as:

a) organic products,

*b) in-conversion products **of plant origin according to Article 62 of Regulation (EC) No 889/2008***

c) processed feed according to Article 60(2) of Regulation (EC) No 889/2008

*d) non-organic products **(this category includes all products not (yet) organic and products from ~~where~~ parallel production/processing pursuant to Article 11 of Regulation (EC) No 834/2007 ~~occurs~~***

Transparency criteria for inputs

Additionally, we would request that attention should be given to the ORGIN project. The transparent criteria in documents produced by that project should be provided by states requesting changes to organic regulation, to help EGTOP in their judgement of acceptability of new inputs in EU organic production.

Yours faithfully

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

Christopher Stopes
IFOAM EU Group President