



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 12 23

Fax: +32-2-735 73 81

Email: info@ifoam-eu.org

Registered in Sweden, Uppsala
under organisation number
817606-9436

Working for organic farming in Europe

Mr. João Onofre
Organic Farming Unit
DG Agri, European Commission
B-1049 Brussels

6 July 2012

Annexes I, II, XII and Article 21 of Regulation (EC) No 889/2008

Dear Mr. Onofre,

The IFOAM EU Group would like to present our concerns to the Commission working document for amendments to Regulation (EC) No 889/2008 (version presented for SCOF 10-11 July 2012), with special regards on Annexes I, II, XII and Article 21. The following concerns are in addition to the IFOAM EU Group position already outlined in our letter of May 17, 2012.

Article 2 - Definition of factory farming

At the moment the interpretation of factory farming is left to the Member States or to control bodies. It might be helpful to define it at the EU-Level but the IFOAM EU Group is of the opinion that the proposal does not adequately fulfil the requirement. It again uses wording that needs further interpretation like “industrial management” and “heavily reliant”. It also contains a mistake as there is no “not permitted veterinary treatment” in the Organic Regulation. We therefore propose to leave the situation as it is, but implement the provision to notify the existing systems in the Member States. After having collected this information it might be possible to find a wording which is sufficient to meet the goal.

Article 21 - Feed from holdings in conversion

The IFOAM EU Group thinks that the given proposal does not meet the intention expressed in recital 8 and furthermore it might lead to consumer mistrust due to the high proportion of conventional feed that it would allow in the production of organic livestock. Before introducing further changes to the feed provisions, a sound analysis should be made, with goals clearly defined and proposals formulated that enable progress in the right direction.

Annex I - Fertilizers, soil conditioners and nutrients

On biogas digestates, the IFOAM EU Group would like repeat the position outlined in our previous letter. 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 the 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”.

We appreciate that restrictions in organic farming for category products or by-products of animal origin have been deleted. However we are surprised that these restrictions are still kept for biogas digestate.

The IFOAM EU Group is against of use of the sapropel and believes that there is no special need to allow it in organic production. There are enough fertilisers listed in Annex I. In some Member States low availability of fertilisers (and other production inputs) for organic production might be related to an immature market for fertilisers. The administrative burden of registration of commercial products by national authorities can be another reason, whilst the situation might be exacerbated due to shortage of supply in a small, unorganised and undeveloped market. It seems that the problem is systemic and requires systemic solutions. Adding sapropel, the suitability of which for organic production is questioned, will not solve the problem. In Austria for example, the registration of sapropel as a fertilizer has been refused due to unclear composition, source of the product and contamination risks.

The use of sapropel obtained from fresh water body management is not acceptable. The quality of such sapropel can be questioned, firstly as it is exposed to pollution and secondly its analysis and authorisation will not prevent introduction of contaminants into organic soil by sapropel. Additionally, sapropel produced in waste water cleaning facilities should never be accepted, as it might pose a risk of contamination and microbiological hazard. Sapropel extracted from former lakes (in this case we cannot talk about fresh water body management) is also unacceptable in organic agriculture as its extraction causes irreversible changes to the environment.

Additionally, the IFOAM EU Group would like to highlight that in cases like this it should be clarified that the control of contamination levels (e.g. heavy metals) of marketed production inputs is not the responsibility of organic certification bodies. This should be controlled

and products should be authorized for marketing by other national authority bodies.

There has been a change regarding “basic slag” in Annex I which was not intended during the revision process as the former Regulation (EEC) No 2092/91 has been transferred to Regulation (EC) No 834/2007 and Regulation (EC) No 889/2008. For basic slag, a reference to Regulation (EC) No 2003/2003 has been added. This should be corrected and the former legal status should be re-established.

Annex II - Pesticides and plant protection products

At the moment the IFOAM EU Group is not able to comment on Annex II as we are not sure how the final annex will look like due to review program under Directive 91/414/EEC. Specific input will be given to this process by the IFOAM EU Group. However, we must emphasise that most of the substances deleted in the proposal on the basis of the review process are widely used and of utmost importance for the organic sector, e.g. Quassia, calcium hydroxide, lecithin and beeswax. Therefore ways must be found to keep these substances on the positive list.

A new issue we want to bring forward is on plant oils: It might be useful to specify the origin of plant oils allowed. Currently some plant oils can be produced synthetically (e.g. geraniol). Only natural plants oils should be allowed. This can be widened to include “bees wax and other natural waxes” and “natural resins”.

Annex XII - Model of documentary evidence to the operator

The IFOAM EU Group supports the need to improve the obligatory model for the certificate to secure integrity and credibility of the organic sector (see the previous IFOAM EU Group letter). Thus the IFOAM EU would like to see the issue of the form of the certificate coming back on the agenda soon.

Yours faithfully

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read "Marco Schlüter".

Marco Schlüter

IFOAM EU Group Director