



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Mr Pavel Misiga

Head of Unit, Sustainable Food Production & Consumption

Mr Benjamin Caspar

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Dear Mr. Misiga,

Dear Mr. Caspar,

The IFOAM EU Group thanks you for our meeting on November 9th 2011. It was useful to hear your latest thinking, particularly that the decision to open up the Ecolabel for food is being put on hold for the moment.

On our part, we promised to take an active role in further developing Regulation (EC) No 834/2007 as well as Regulation (EC) No 889/2008 towards the inclusion of more environmental requirements in the production, processing and trade. We would be very pleased to work together with you on these questions. We are aware that the forthcoming Commission review of Regulation (EC) No 834/2007 planned for 2012 (with consultation due to commence in the next few months) is extremely relevant to inform the further development of the regulation.

We were very interested to learn about the planned “Communication from Commission on sustainable food” announced as part of the “**Roadmap to a Resource Efficient Europe**”, planned for 2013. We offer our active support to you in the preparation of this, during the preparation, consultation and reporting phases. We believe that the organic regulation already offers a good basis for sustainable production as the existing legal framework integrates the whole value chain in the inspection, verification and certification system based on coherent standards incorporating the whole supply chain from seed production to retailer. It is true that, concerning environmental performance, the holistic approach of organic farming has mainly focused on initial production so far (although some issues are still not fully taken into account, for example water use, energy use & carbon footprint). For subsequent steps in the supply chain (processing, retailing) only requirements for food technology and separation practice exist. Requirements for the demonstration of environmental performance are not yet obligatory. It is exactly this gap in the organic regulation that we would like to close as fast as possible. For this reason the IFOAM EU Group members voted on “introducing further requirements for the ecological performance of operation involved in organic processing and trade” in Regulation (EC) No 834/2007 (see attached letter to DG AGRI of May 30th, 2011). In order to provide for this resolution we will draft a practical suggestion for further developing the organic regulation towards better

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environmental performance of processing and retailing. We will send you our proposal in spring this year.

One idea could be the introduction of an obligatory system for subsequent production - comparable to EMAS but with less constraints. The generated data would give information on the environmental performance of a company. In a second step specific requirements for the environmental performance of organic foods could be introduced. Simultaneously, we will work on process oriented requirements, e.g. packaging material, type of energy etc.

We would be pleased to work together with you on developing powerful, well-targeted solutions in line with your strategy and the planned Commission review of the organic regulation.

We remain available for discussion and clarification at any stage.

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