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Working for organic farming in Europe

Mr. João Onofre
Organic Farming Unit
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B-1049 Brussels

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Dear Mr. Onofre,

As pointed out in our letter from May 30th 2011 to DG Agriculture and Rural Development and in accordance with the requirements of Article 1.1 of Regulation (EC) No 834/2007 we propose to introduce into the regulation further requirements for the environmental performance of operations involved in organic processing and trade. This measure allows operators to create credibility in a harmonized way and to live up to the organic self-conception of being a holistic approach capable of offering solutions for society's future challenges.

The idea of defining parameters and evaluating environmental performance is not new. It exists already in the form of a well introduced system which was established 20 years ago, EMAS (eco-management and audit scheme).

The basis for the evaluation of the environmental performance of an operation is the availability of management procedures creating relevant data. Therefore, we propose to introduce into Regulation (EC) No 834/2007, as a first step the requirement that an organic operation producing and trading food and feed has to establish a basic environmental management system. This system must guarantee that the company is able to measure and evaluate its own environmental performance.

All processes of primary production and carried out on farm level are exempted from this obligation. Additionally, the detail approach if and how to exclude smallest companies has to be developed further.

Relevant steps on this process are:

- To define relevant parameters (appropriate for each operation)
- To establish a system that enables the operation to measure and evaluate the results of the selected parameters
- To have appropriate documentation in place
- To have a strategy that guarantees continuous improvement of the environmental performance of the operation.

The established system must be effective while avoiding too much bureaucratic burden especially on small operations. Annex IV C of the EMAS Regulation (EC) No 1221/2009 (see extract in annex II) will

provide flexibility. Core indicators must be adaptable to the needs of all different types of operations taking into account its type and size.

If a company already adheres to an environmental orientation system this is accepted as fulfilling the requirements.

Please find in annex I our proposal to include the idea presented above into Regulation (EC) No 834/2007 and Regulation (EC) No 889/2008 as a legal requirement.

We commend these recommendations to you and remain available for discussion and clarification at any stage.

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

Annex I - IFOAM EU Group proposal for amendments of Regulation (EC) No 834/2007 and Regulation (EC) No 889/2008

Proposals for amendment of Regulation (EC) No 834/2007

New definitions in article 2:

ab) “environmental performance” Reg. (EC) No 1221/2009 article 2.2.
(See annex II)

ac) “direct environmental aspect” Reg. (EC) No 1221/2009 article 2.6
(See annex II)

ad) “core indicators” Reg. (EC) No 1221/2009 Annex IV C point 2 a (See annex II)

Change in article 3 a:

Organic production shall pursue the following general objectives:

a) *establish a sustainable management system (~~for agriculture~~) that:*

New point in article 6:

e) processing and distribution of foods in units which know and improve their environmental performance.

New point in article 7:

e) Processing and distribution of feed in units which know and improve their environmental performance.

New article (e.g. after article 19):

Title: Ecological responsibility in processing and distribution units for feed

(1) For the application of Article 7 e) of this regulation processing and distribution companies with the exception of farm based operations¹ must:

- a) establish and adopt an environmental management system which provides:
- methods for identifying and measuring the direct environmental aspects of the operation based on core indicators (Annex IV of EMAS...),

¹farm based operations in this meaning also cover operators involved in collection of wild plants (see Article 12.2 of Reg. (EC) 834/2007 and Article 70 of Reg. (EC) No 889/2008)

- annual target for the continuous improvement of the environmental performance of the operation,
- a documentation and reporting system.

Environmental management system established in the operation and fulfilling criteria set out above is accepted.

New article (e.g. after article 21):

Title: Ecological responsibility in processing and distribution units for food.

(1) For the application of Article 6 e) of this regulation processing and distribution companies with the exception of farm based operations² must:

a) establish and adopt a management system which provides:

- methods for identifying and measuring the direct environmental aspects of the operation based on core indicators
- annual target for continuous improvement of the environmental performance of the operation
- a documentation and reporting system

Environmental management system established in the operation and fulfilling criteria set out above is accepted.

Proposals for amendment of Regulation (EC) No 889/2008

New point in article 66:

(4) The documentary accounts shall include the result of the measurements of the environmental performance of the operation and performance against targets for improvement of the environmental performance as required in Article 21 (1) a) of Regulation (EC) No 834/2007.

² farm based operations in this meaning also cover operators involved in collection of wild plants (see Article 12.2 of Reg. (EC) 834/2007 and Article 70 of Reg. (EC) No 889/2008)

Annex II

An extract from Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), repealing Regulation (EC) No 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC

Article 2

2. *"environmental performance" means the measurable results of an organisation's management of its environmental aspects;*

6. *"direct environmental aspect" means an environmental aspect associated with activities, products and services of the organisation itself over which it has direct management control;*

Annex IV C

2. Core indicators

(a) Core indicators shall apply to all types of organisations. They focus on performance in the following key environmental areas:

(i) Energy efficiency;

(ii) Material efficiency;

(iii) Water;

(iv) Waste;

(v) Biodiversity; and

(vi) Emissions.

Where an organisation³ concludes that one or more core indicators are not relevant to its significant direct environmental aspects, that organisation may not report on those core indicators. The organisation shall provide justification to that effect with reference to its environmental review.

³ for purpose of organic regulation "organisation" has to be understood as "operator"