Working for organic farming in Europe

International Federation of Organic Agriculture Movements – EU Regional Group

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Christine Gerstgrasser,
H3 Organic Unit,
DG Agriculture and Rural Development
Brussels

Dear Christina Gerstgrasser,

EU/US equivalence agreement: control measures for livestock products

Further to the meeting of the Advisory Group on Organic Farming on 12th June, I attach the proposed approach to verify compliance to the NOP standard regarding antibiotics for livestock products. This has been prepared by the IFOAM EU Group in collaboration with EOCC.

The proposed approach is based on the verification of the records of veterinary products used required in Regulation 889/2008 as amended by Regulation 126/2012 and will allow control bodies to verify that the requirements of the NOP standards 205.236 and 205.238 are observed by operators producing livestock products for export to the US.

Please do let me know if you have any comments on the proposed approach. I would be grateful if you could confirm that this is appropriate to forward to your colleagues in Washington responsible for the NOP.

With thanks and best wishes,

Marco Schlüter
IFOAM EU Group Director

EU organic control body verification of EU organic 'animal products produced without the use of antibiotics' for export to the USA

IFOAM EU Group and EOCC
July 2012

Purpose and summary

This document outlines the way in which EU organic control bodies will verify that the conditions laid down in the EU regulation concerning the restrictions on use of antibiotics in animal products for export to the USA are met. EU control bodies will issue complementary documentary evidence to confirm that the animal products have been produced without the use of antibiotics and therefore can be exported to the USA.

Verification of livestock records of the operator

Control bodies currently verify the livestock records of the operator, including regarding veterinary treatment and the use of antibiotics, as specified in Articles , 76 and 77 of Regulation 889/2008. Control bodies currently verify compliance with the production rules regarding the use of antibiotics as specified in Articles 23(2) and 24(2), 24(3), 24(4) and 24(5) of Regulation 889/2008:

> ***Livestock records***
> *889.76 Livestock records shall be compiled in the form of a register and kept available to the control authorities or bodies at all times at the premises of the holding. Such records shall provide a full description of the herd or flock management system comprising at least the following information:*
> *(a) as regards animals arriving at the holding: origin and date of arrival, conversion period, identification mark and veterinary record;*
> *(b) as regards livestock leaving the holding: age, number of heads, weight in case of slaughter, identification mark and destination;*
> *(c) details of any animals lost and reasons thereof;*
> *(d) as regards feed: type, including feed supplements, proportions of various ingredients of rations and periods of access to free-range areas, periods of transhumance where restrictions apply;*
> *(e) as regards disease prevention and treatment and veterinary care: date of treatment, details of the diagnosis, the posology; type of treatment product, the indication of the active pharmacological substances involved method of treatment and veterinary prescription for veterinary care with reasons and withdrawal periods applying before livestock products can be marketed labelled as organic.*
> ***Control measures on veterinary medicinal products for livestock***
> *889.77 Whenever veterinary medicinal products are used the information according to Article 76(e) is to be declared to the control authority or body before the livestock or livestock products are marketed as organically produced. Livestock treated shall be clearly identified, individually in the case of large animals; individually, or by batch, or by hive, in the case of poultry, small animals and bees.*

Complementary documentary evidence issued by EU control body

The documentary evidence to be completed by the control authority and control body to demonstrate compliance by operators is as specified in Article 63(1)(d), Article 68 and Annex XII(a) and (b) of Regulation 889/2008 (as amended by Regulation 126/2012). The complementary documentary evidence shall contain in box 2 of the model set out in Annex XIIa the relevant entry listed in Annex XIIb – in English: “animal products produced without the use of antibiotics”.

Conclusion

Detailed records of use of veterinary products by EU operators will be used to confirm that production methods not using antibiotics have been used for export to the USA of animal products produced without the use of antibiotics. Complementary documentary evidence, as specified in EU Regulation 889/2008, will be completed by EU control bodies to confirm compliance of operators.