



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Mr Jean-François Hulot
DG Agriculture & Rural Development, Unit H3
European Commission
BE-1049 Brussels

28th March 2012

Dear Mr Hulot,

The IFOAM EU Group would like to present its main concerns on the recent Commission proposals for amendments to Regulation (EC) No 889/2008, regarding animal feed. Particularly, the latest version presented for the TBT consultations to be discussed and voted on at the coming SCOF meeting.

The IFOAM EU Group confirms that the organic sector aims to develop towards 100 % organic feed for monogastrics. As stated in our previous letter of 20th October 2011, the sector has taken many initiatives to meet this goal, but there are still a number of challenges and more development is still needed before the whole sector across the EU will be able to keep animals on a 100 % organic feeding regime. Please see our comments in our previous communications, listed below, the details of which we will not repeat here.

Our main concern today is on the time line for implementing the new feed regime. If we understand the proposal correctly, the new rules will come into force retrospectively from the 1st of January 2012. From our point of view, this is a procedural mistake that must be corrected, the sector cannot follow unpublished rules. To give the sector legal security we therefore urge the Commission to:

- prolong the feed provisions that were in place to the end of 2011, until the date when the new rules will come into force, and
- give the sector time to be informed about the new rules by putting them into force after a sufficient transition time.

We trust that you will take this important comment into account.

Best regards

A handwritten signature in black ink that reads 'Christopher Stopes'. The signature is written in a cursive style and is placed on a light green rectangular background.

Christopher Stopes
IFOAM EU Group President

Attachments:

[IFOAM EU Group letter on organic feed](#) of October 20, 2011

[IFOAM EU Group letter on organic feed](#) of September 27, 2011 - Regulation

[IFOAM EU Group letter on 100% organic feed for monogastric animals](#) of November 19, 2010