



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Brussels, 20 October 2011

To
Jean-François Hulot,
Head of Unit Organic Farming
European Commission
1049 Brussels

Dear Mr. Hulot,

As a result of the recent commission proposals for amendments to Regulation 889/2008, including the latest version received 22/9/2011 regarding animal feed, the IFOAM EU Group would like to present our comments on those proposals and our views on the changes required.

The whole sector in the EU is now informed that there are serious discussions going on, and they expect all kinds of developments. As there was no decision in the last SCOF on the feed issue, the IFOAM EU group asks the COM, as a first and urgent step, to formally prolong the existing rules as soon as possible in order to inform the sector about the production rules that will be in place from January 1, 2012.

As stated earlier the IFOAM EU Group supports the development towards 100 % organic feed for monogastrics. The sector has taken many initiatives to reach a 100 % organic feeding regime by January 1, 2012. However, we are still facing a number of challenges within monogastrics, if 100 % organic feeding will not contain a risk of causing animal welfare problems, lower product quality and higher environmental burden. The challenge can be solved, but unfortunately more development is still needed before the sector, in all it's diversity across the EU, is ready for a 100 % organic feeding regime. .

Our proposals for Monogastrics are as follows:

1. Percentage of allowed conventional feed components

A reduction to 4 %, calculated for the whole life span of the animals, may be possible in the short term. We propose to keep this percentage until 31. December 2015. A further reduction must be the subject of detailed investigation and research before implementation.

2. Provision for young stock

The ages of the animals that could qualify for the additional percentage of non-organic feed ingredients is a very difficult technical topic. IFOAM EU Group is aware of the suggestions from the EGTOP, but we consider that some of these may be insufficient to ensure complete protein nutrition for all types of non ruminants. We therefore propose not to implement any special rules for young animals.

3. Reduction of the list of allowed conventional components

Each country has different protein sources available, both organic and non organic. It is difficult to list the right ones for all regions/countries. The IFOAM EU Group therefore proposes the removal of all unprocessed grains from Section 1.1. of Annex V of the regulation 889/2008. All other products and processed feed materials listed in Annex V should remain available in non organic form, within the non organic percentages to be agreed.

4. Synthetic Amino Acids:

On the subject of synthetic amino acids, IFOAM EU Group maintains our position that synthetic amino acids produced as they currently are have no place in an organic diet. If amino acids were produced from organic sources (e.g plant extracts or by fermentation of organic substrates), this could be also a part of the solution.

5. Origin of feed

IFOAM EU Group believes that a prime objective is to localise feed supply and all parties involved have to work towards this goal. However, it is clear that the approach taken up to now is the wrong way to achieve that goal. Firstly, this is practically impossible in some states, due to the separation of animal production from arable farming, which cannot be reversed immediately. Secondly the important role that processed feed plays in the nutrition of organic monogastrics cannot be easily reversed.

The attempt to localise feed supply should start from a wider perspective: to use feed produced within Europe (not necessarily within the EU). Although it seems impossible to implement such a provision without causing major WTO-discussions the COM should try to find ways around this problem. It is not fair to fight this battle on the back of the organic poultry and pig farmers. The commission should therefore actively research how this objective could be achieved, with a view to setting targets for the proportion of locally derived organic feed in future amendments to the regulation.

For the time being therefore, we cannot support a provision for restricting monogastric feed supply to some regional origin. As pointed out in our letter from 27/9/2011 the sector cannot accept such a serious change within a few months as this would mean a re-construction of the organic poultry, and part of pig, production within the EU. That re-construction would take years to implement and cause serious damage to an already frail sector.

We perceive similar problems for ruminants. IFOAM EU group believes that the current rules for sources of feed for ruminants should remain unaltered at 50 % from the farm or region. Proposals to increase this percentage should not be implemented until results of relevant research are published.

We commend these suggestions to you and trust that they can be included in discussions in SCOF. We are available for explanation and discussion at any stage.

Kind regards

A handwritten signature in dark ink, appearing to read "Marco Schlüter", written on a light-colored rectangular background.

Marco Schlüter
Director

Copy to Alina Ujupan, Mrs Dormal Marino, Maria Angeles Benitez Salas,
Standing Committee on organic farming