

**IFOAM EU INPUT ON THE CONSULTATION DOCUMENT ON THE
"EUROPEAN ACTION PLAN ON ORGANIC FOOD AND FARMING"**

PRESENTED AT THE ADVISORY GROUP ON ORGANIC FARMING OF 21 NOVEMBER 2013

A new European Organic Action Plan is necessary to enable the continued development of the organic food and farming sector and in order to exploit the public goods and services the sector can deliver to society, there is a need for an EU Organic Action Plan with clear objectives in line with the emerging CAP (both under Pillar 1 and Pillar 2 and including rural development measures), Horizon 2020 and the European Innovation Policy. Actions from the current organic action plan are either executed or obsolete and therefore a new plan is needed. A new Organic Action Plan would outline the strategic role that organic food and farming should play and link with cross cutting and horizontal legislation and political initiatives beyond the organic regulation such as the new Multiannual Financial Framework (2014 - 2020).

It should be emphasised that organic production delivers also to the objectives of the new policy framework and EU 2020 strategy: protection of biodiversity, soil and water, animal welfare, development of rural areas and local food chains, multifunctional agriculture, long term food security, resource sufficiency and that an organic food and farming system is the model for a sustainable agriculture and food production in the future. Organic has potential of 15-20% market share in mid-term future. All over Europe demand for organic products considerably exceeds the supply so that a strong policy for fostering organic farming is needed. IFOAM EU recommends to set a clear aim for organic production to reach by 2020/2030.

Organic food and farming has a role to play that is beyond the organic hectare share of organic land in EU and the fulfillment of perceptions from consumers. The system of organic food and farming is the only sustainable food and farming concept regulated at EU level and delivering urgently needed public goods like protection of biodiversity and water or less climate gas emissions. Therefore it has to play a major role in society and the political and legislative framework. Creative competition between organic systems and integrated or conventional systems can lead to innovation and improved sustainability in all food systems. In many countries organic production has brought to light the need to consider environmental, consumer and social concerns in food systems, stimulating public discussion of the issue, raising awareness and changing expectations. The result has been increased pressure for sustainability across different non organic food production systems.

The organic sector has already generated a multitude of useful new practices for sustainable agriculture – and it will generate more. For example, organic systems can only use a very limited amount of inputs compared to conventional food systems. As a result, organic science has developed a rich knowledgebase of natural methods, e.g. for pest control. Organic systems are modern production systems that integrate new agricultural and agro-ecological technologies wherever and whenever appropriate. Technologies which represent potential risk for the health of human beings or the environment, however, are approached on the basis of the precautionary principle. This means that organic systems offer a low-risk alternative to other more risk-orientated food systems. This is of particular value for policymakers in

providing a range of options which can be assessed and compared in order to identify optimum solutions in the future. Organic production has still huge potential for further development. If its performance is considered relative to investment, the sector is already extraordinarily successful: it can be estimated that organic production has received less than one percent of the research funding and/or subsidies invested in industrial food production.

Modern food production's dependence on fossil fuels and other inputs with limited availability such as phosphorus is becoming more and more a point of relevance, not only because of climate change. Research for the EU's Quality Low Input Food Program has warned that wheat yields could be more than halved by the end of the century as the world's phosphate supplies run out. The avoidance of these inputs on organic farms is one of the reasons why their energy use is generally lower. Experts call for 'transition farming' practices which will make agriculture less dependent on external inputs, particularly fossil fuels, and which will increase the efficiency of resource usage and nutrient cycles. Developing such practices will be a critical task for this century. Organic production can facilitate progress towards low-carbon and resource efficient food systems. The ban on nitrogen that is synthesized with an enormous input of fossil fuels and its replacement by leguminous and organic nitrogen reduces CO₂ emissions considerably, and a core principle of organic systems is to work within closed cycles.

1. EU EXISTING INSTRUMENTS

What type of synergies could be developed among already existing policy instruments? Please consider CAP instruments as well as other European legislative or non-legislative initiatives.

How could awareness of existing EU instruments be increased?

IFOAM EU: Make organic a core measure in the reformed CAP and within the Rural Development Programme (RDP)

Demand for organic products in the EU is much higher than supply of organic production, and the organic market is continuously growing despite the economic crisis. Nevertheless, the land area managed under organic rules in the EU is lacking behind the organic market growth since many years.

The study "Use and efficiency of public support measures addressing organic farming" (Sanders et al. 2011)¹ shows that farmers can be encouraged to convert to and maintain organic farming when a comprehensive set of measures is provided to support this process, such as training and advisory facilities, access to markets and support of marketing as well as payments for the delivery of environmental public goods. Important is also a political climate that is in general supportive of organic farming and creates confidence in political stability and the need for strong links between action plans and rural development programmes.

Within the ongoing CAP reform, organic has been for the first time recognised also under pillar 1 by making organic certified farmers automatically eligible for "greening". Moreover, organic farming support became an article on its own in the Rural Development Programme. As organic farming has a high potential to deliver to the objectives and priorities as formulated in the rural development regulation, it is of utmost importance that the opportunities given² are fully used in the implementation of the CAP:

1. Strong links made between the expansion of organic farming and priorities agreed by Member States and the European Commission under Partnership Agreements set out in the EU Common Strategic Framework to 2020. Organic farming development should be considered across all relevant

¹ Sanders Jörn, Matthias Stolze, Susanne Padel (Editors) (2011), Study Report: Use and efficiency of public support measures addressing organic farming

² see: IFOAM EU Group (2010): Organic food and farming - a system approach to meet the sustainability challenge

operational programme supported by EU structural funds which special emphasis on Rural Development Programmes.

2. Greening under the pillar 1 and support of environmental measures under pillar 2 must be combined in an effective way that supports the development of organic farming. The CAP budget must be used efficiently to raise the environmental performance using article 29 and 30 of EAFRD regulation by incentivising conversion to organic farming and supporting advanced environmental delivery.
3. The prohibition of double funding must be used to boost the environmental performance of the whole CAP. There must be no double funding of low-level environmental measures; Organic farming is a comprehensive approach to sustainability that goes beyond the scope of the basic greening requirements and therefore has a limited risk of double funding. In order to transition greater levels of agricultural sustainability maintenance of and conversion to organic farming must remain more attractive than the uptake of individual environmental practices with less environmental benefits.
4. RDPs are a significant part of the CAP budget. A substantive part of the Rural Development budget (=minimum of 50% goal) should dedicated on national/regional level for organic farming, agri-environment-climate measures and other relevant measures that support the development and expansion of organic farming to drive sustainability in rural areas. It must be ensured that Member States are meeting the mandatory legal obligations for minimum spending (=30%) and they should be encouraged to go beyond this legal requirement over the rural development programming period to 2020.
5. Comprehensive support of organic farming in pillar 2 must not be limited to Article 30, but other measures that are crucial for the development of the sector - such as investments, advisory, cooperation, European Innovation Partnerships, quality schemes - must be clearly recommended by the Commission and used by member states to unlock the potential of organic farming for sustainable food production and development of rural economies. Organic Action Plans should be closely linked to new RDP measures and instruments. For example, dedicated organic farming sub-thematic programmes could help to stimulate a coordinated policy approach to organic farming.
6. To be in line with EU commitments on biodiversity and genetic resources³, agro-biodiversity must be encouraged. Therefore, cross compliance provisions of the Common Agricultural Policy must not hinder organic farmers to use their own seeds, seeds exchanged with other farmers and niche market varieties if they want to benefit from support under the direct payment scheme or RDP measures.
7. European School Milk and Fruit schemes Scheme supported under CAP should put sustainability and health at the heart of their campaigns and organic farming should play a major role in these policies
8. The overall political and legislative framework has to be oriented in fostering organic farming as a model of future farming, promoting the sustainable use of natural resources and production of high quality food. This needs to be addressed in the Common Agricultural Policy, but also in other policies with direct impacts on the development of the food and farming sector including horizontal legislation that regulate food, labelling, controls, GMOs, fertilisers and pesticides. (see also question 4 on innovation).
9. Calculations of support rates for organic production should not account the price of organic products as this penalises farmers or the countries that have effective methods for promoting organic products and can secure a higher market price. It also put organic products at a the competitive disadvantage vis-a-vis with conventional products as in doing the price of organic products will always be higher than conventional products and impedes the development and expansion of the organic market.
10. RDP measures such as business development or training must recognise the diversity and inconclusive development of small holdings and other rural actors to promote a green low-carbon economy rather than increasing administrative burden due to disproportionate requirements at EU level.

Besides Rural Development Programmes, critical are the synergies with many other horizontal legislations

³ EU Biodiversity Target 2020 and Vision 2050, The Convention on Biological Diversity, The International Treaty on Plant Genetic Resources for Food and Agriculture

that regulate e.g. food, labelling, controls, GMO, pesticides.

2. TECHNICAL CONSTRAINTS

What non-legislative initiatives could be consider addressing the main technical constraints of organic farmers?

In particular:

- What initiatives could be consider tackling lack of protein sources?
- What initiatives to consider tackling lack of organic seeds and vegetative material?

IFOAM EU:

Q1. Protein sources

Recently efforts have been made to increase protein feed supply in Europe, through for example, national actions plans that promote local protein feed production. As many of these action plans are only in their infancy state any significant impact cannot be expected before 2018. Farmers also continue to confront challenges with protein cultivation, which are being tackled in research projects, but still need time to be developed and implemented at farm level. Furthermore the need for protein feeds has accelerated due to the growing demand from new poultry and pork operations with insufficient own feed production.

Crop rotation as a greening requirement for all farmers under CAP would improve general production and infrastructure in protein crops in EU but support is necessary for plant breeding activities, protein crops production and investment in research and EIP.

Use of alternatives protein components should be explored (e.g. food waste, insect proteins).

Fundamental is the availability of data to enable the solution of the problem.

Q2. Seed and plant propagating material

The Organic Action Plan must foresee measures to increase the availability and ensure access to appropriate organic seed, vegetative propagating material and local varieties in all member states and on all organic farms. Maintaining and developing a wide diversity of plant varieties (and animal breeds) that are adapted to different environmental conditions and that show robust performance under low-input management makes sense in connection with the EU biodiversity strategy and is also an investment for food security, particularly as food production in the near future may need to react to changing climate conditions and higher input prices. Already today, organic breeders and farmers seek to maintain and develop breeds and varieties that perform consistently under organic conditions, but they struggle with restrictive rules for the marketing of their seed and a lack of financial investment in breeding programmes. The EU's legal framework for the marketing of seed is now under revision. The new rules must be tailored in a way that facilitates market access for small breeders such as breeders of organic and locally adapted varieties. Recommendations:

- Improve market access for traditional, locally-adapted, organic and open-pollinating varieties of seed, conservation varieties and seed mixtures.
- Establish a European-wide legal framework that ensures the maintenance of freedom from GMO contamination. Under this framework, a labelling threshold for the adventitious and technically unavoidable presence of GMOs in GMO-free seeds must be set at technical detection limit.
- Guarantee transparency of breeding methods so that organic breeders, farmers and gardeners can choose appropriate seed.
- Adequately finance 10-year breeding programmes for locally adapted and organic plant varieties and animal breeds, to enhance agro-biodiversity, strengthen the capacities of the food sector to adapt to climate change, and maximise the yield potential of organic farming.

Database

- To increase market transparency and to encourage cooperations between neighbouring regions, across state and language borders, the Commission should improve the existing system and set up and facilitate a European organic seed database for the availability of organic seed and vegetative propagating material. The database should be accessible for farmers and seed providers in all member states in the respective 24 languages.
- The process to fill in and access to data must be kept simple, also for those seed suppliers that operate cross borders (e.g. through an automatic translation tool for the basic data and a check list in which countries the material is available).
- the database should provide flexibility to fill in additional information that might be important for some end users (e.g. on breeding techniques used)
- Availability of a variety shown in this European database shall be a means of information and cannot be equalled with a stop of the derogation for all regions.

Breeding and multiplication for organic farming

To increase the availability of varieties and plant reproduction material suited for organic farming, the action plan should foresee measures to encourage organic breeding and multiplication activities as well as research for this purpose, with special regard to participatory breeding.

3. CONFIDENCE OF CONSUMER IN THE EU ORGANIC FARMING SCHEME

- How could the awareness of the EU consumer be increased as to the organic farming scheme, including control measures?
- How could the awareness of the EU consumer be increased as to the EU organic logo?
- Is there a need for further initiatives at Member State and/or Commission level to complement and accompany the proposed legislative measures on controls so that the organics control system is better fit for purpose? Which ones and how?"
- Electronic certification: What role can electronic certification play for imports? And for circulation of goods in the EU?
- Anti-fraud: What anti-fraud initiatives can be considered by the Commission?
- Accreditation: What synergies and simplifications should be explored between accreditation authorities, competent authorities, European cooperation for accreditation and the Commission to improve controls and supervision of controls in the EU?

IFOAM EU:

Q1 & Q3. Controls :Please see IFOAM EU position on controls⁴.

Q2. Organic logo: A new promotion campaign on organic products is needed, also due to the new organic logo that is not well known yet - at least not by occasional organic consumers. Furthermore, financial support for the marketing of organic products is one important way to assist production and consumption of organic products. The most important component is effective consumer education, information and awareness-raising. Promotion campaign to invite farmers to convert to Organic Farming is also needed.

Rural Development Programme should be used to finance:

- Campaigns for organic food: Public Relation, advertising, in-store activities, coordination with

⁴ http://eu.ifoam.org/sites/default/files/page/files/ifoameu_reg_control_position_201210.pdf

supermarkets. Also campaigns for organic food groups such as dairy, meat etc.

- Measures to support the green public procurement. Green public procurement is also a way to deliver information to the consumers.
- Organic food festivals and organic stands at other food and environment festivals.
- Consumer information materials, web-communication etc.
- Campaigns and information to public institutions regarding purchasing of organic food.
- Competitions/Public Relation regarding best organic food products
- Consumer events such as harvest markets, also at the national level
- Education in schools

Q4. Electronic certification : it would increase the efficiency of the current import system and would replace the current paper-based system that is not coherent with the reality and the timeframe of import activities.

Q5. Anti-fraud:

- A clear and harmonised information system must be established between the involved Authorities to aid investigation and action in cases of fraud;
- A formalised cross check system at control body level is needed whereby control bodies can cross check lots, volumes available, certificates, residue detections, financial documentation (Invoices etc) and traceability with each other. Standardised documentation would help this process. Response from control bodies receiving requests for cross check information must be mandatory and within defined timescales. Responses of control bodies should be audited by accreditors or supervision authorities. There should be clearer and stronger requirements and abilities for Control Bodies and Control Authorities to investigate and trace financial transactions.
- Cross checks may also be required at the operator level and operators must be more actively involved in monitoring the credibility of the system, for example by checking the conformity of ingredients that they purchase.
- The Commission should endorse the approach of the sector about harmonised guidelines on pesticide residue (e.g. IFOAM EU and EOCC guidelines)

Q6. Accreditation:

- There should be clear strengthening of international accreditation outside the EU with a clear requirement that accreditation bodies operating outside the EU should have wide international experience dedicated to organic accreditation. As for international activities, the possibility for control bodies to choose accreditors other than the National ones (e.g. IOAS) should stay.
- There must be clear guidelines for accreditors to improve consistency. These must be adopted by all accreditors. Ideally COM should develop these guidelines with input from CBs and accreditors;
- Similarly there should be guidelines and supervision for the competent authorities to ensure consistency in their management of control bodies.
- There must be a complaints and referral system publically available to enable operators and control bodies to make complaints about accreditors and competent authorities. This system must be able to handle complaints at the European Accreditation level, so be managed by the Commission.

4. RESEARCH

The members of the group are invited to give their views on the following questions:

- Uptake of research and innovative practices: What has been the uptake of the research results by the sector? How can this be measured?
 - Dissemination of research results: Is there a need to further disseminate results of research and improve the transfer of best practices? How?
 - How can we improve innovation at farm level?
- How can the organic sector make the most out of the European Innovation Partnership?

IFOAM EU:

Organic research is the right instrument to enable the regulation to get closer to the organic principles and to foster the further development of the sector. e.g. Research on the protein feed could help the sector to put an end to the current 5% non-organic protein quota exemption allowed in organic feed.

IFOAM EU welcomes the EIP for Agricultural Productivity and Sustainability (EIP-AGRI) as an important step to improve communication between actors and foster innovation in the agricultural sector. Horizon 2020 is, besides the rural development regulation, the most important instrument for implementing the EIP-AGRI. **A funding line of 10% of the budget for agricultural research & innovation should be established for the needs of the organic food & farming sector**, in Horizon 2020 in the first place but also in other instruments implementing the EIP-AGRI, as well as in transnational and national research programmes. This figure is in line with the 5% of agricultural land which is nowadays managed organically in the EU and the potential of 15-20% the organic sector has in the medium to long-term. Public investment in organic research & innovation is also justified by the fact that it is not in the interest of input suppliers, who are major research investors in the conventional agricultural sector. Indeed, further development of the organic sector exactly reduces dependency on their inputs.

The investment at European and national level in research relevant to the organic sector has up to now resulted in unevenly uptake by farmers over Europe. Reasons are not fully understood, but the diversity of organic practices and knowledge, and the fact that this knowledge and practices are often location-specific, pose additional challenges to their exchange. The organic sector needs a knowledge platform promoting knowledge exchange and delivering accessible and long-term available end-user material. **Therefore one of the thematic networks funded in 2014 under the Horizon 2020 call "ISIB-2-2014/2015: Closing the research and innovation divide: the crucial role of innovation support services and knowledge exchange" should specifically address organic farming techniques.**

The organic research community has maintained research capacity in areas that were low priority to the wider agricultural research community over the last twenty years. Many of these research areas are now seen as of wider strategic significance, e.g. making use of ecosystem services and maintaining these, and protein crop production. Therefore, **organic approaches should be mainstreamed in research & innovation funding.**

The EIP-AGRI offers the opportunity to individual farms to take directly part in Horizon 2020, in the so-called multi-actor projects. This is a welcome step to assure relevance of research & innovation for farming practice. Contradictions exist however, with other developments in EU policy, e.g. the tendency to fund fewer but larger projects. These may mainly benefit big research institutes and companies that have the capacity to manage the accordingly big budgets. This makes it difficult for individual farmers or SMEs to participate which could act against considering organic approaches. **Therefore a significant share of the Horizon 2020 budget should be made available for small-scale projects.** It must be ensured that the organic sector which is based on family farms and SMEs can fully participate in the multi-actor

projects.

IFOAM EU finally recommends that an obligatory requirement for every research project should be the dissemination to stakeholders.

5. BETTER KNOWLEDGE OF THE SECTOR

What type of data would be necessary to increase knowledge of the organic farming sector?

- Data on farming production and processing in the EU.
- Economic data of organic farms.
- Data on distribution of added value along the chain.
- Data on trade:
 - Volume and value of imports of organic products to the EU.
 - Volume and value of exports.
- Knowledge of the scheme by the consumer (including EU logo)?
- Obstacles and incentives to join the organic sector, in particular for small farms and enterprises.

What data would be relevant to better implemented EU policy in the EU?

What could be the most efficient means to collect and analyse the data?

IFOAM EU:

We recommend that improving data collection should be one action point of a new European Organic Action Plan. One major obstacle is that data already collected is not used due to lack of harmonisation and methodology. Therefore the harmonisation of methodology in data collection is of utmost importance - e.g. in order to use data already collected by authorities. Nowadays, the data collected by authorities and member states is not used in a harmonised way. The data therefore is lost or often not usable since if system used may differs a lot from country to country

Easily available and up-to-date statistics are important for monitoring the market expansion of organic products and adjusting policy accordingly. Data collection should be coordinated through the data collection infrastructure already in place but should be shown separately (e.g. within import and export statistics, agriculture and food production statistics), including the tax system and general surveys for agriculture as practiced in some countries already. Wherever operators and/or certifiers are involved, they should be reimbursed for their extra efforts. Data collection costs should not be borne by organic operators but by the existing funding structures for data collection tools.

6. EXTERNAL DIMENSION OF EU ORGANIC FARMING

- What mechanisms can be considered to facilitate exports in organic farming? What type of products? For what markets?
- What mechanisms could be considered to increase transparency as to arrangements and agreements with Third countries on trade of organic products?
- What cooperation on organic farming should the EU consider with developing countries?
- How could the EU increase knowledge of trade flows (imports and exports) between the EU and Third countries?

IFOAM EU:

Q1. Exports: to facilitate exports towards third countries by reducing the bureaucratic burden. Multilateral agreement should be preferred to bi-lateral agreements. Such multilateral agreements should be based on internationally developed tools, such as the Equitool developed by the ITF (International Task Force on Harmonization and Equivalence in Organic Agriculture), and its annex the COROS (Common Objectives and Requirements of Organic Standards). It is important that all the equivalency agreements guarantee a mutual and fair recognition. It is important that all the equivalency agreements guarantee a mutual and fair recognition. Furthermore clearer guidelines on how the current equivalency agreements apply should be produced.

It is also necessary to financially support the following activities:

- Customer contacts to retailers & foodservice customers in EU and non-EU markets - e.g. follow-up activities after fair participation.
- Fairs, that are relevant for organic companies in EU markets and third countries (focusing on specific products for specific countries)

Q2 & Q3. Transparency and Cooperation: To take into account the substantial socio-economic, climatic, language and cultural differences, it is important that the commission remains open to the choice of locally developed and locally relevant standards by Control Bodies that apply for EU equivalence. Ideally, this should be done by allowing one Control Body to apply with different standards for different regions of the world, and by providing transparency on which standard is accepted for which region. The commission should encourage Control Bodies applying with the same regional standard to use a jointly agreed equivalence assessment for that standard or to rely on previous equivalence decisions as a precedent for acceptability of standards. In the long term the commission should de-link the approval of equivalent standards for a particular region from the approval of Control Bodies using that standard. As the trend towards regional organic standards development by governments and the private sector continues (e.g. East Africa, Pacific Islands, Central America, South-East Asia), this de-linking will position the commission to more easily cooperate with other regions.

In order to develop the organic agriculture sector in developing countries both for the benefit of poverty stricken smallholder farmers and for climate change adaptation a number of key interventions should be supported.

- Development of national and regional organic standards is a precondition for development of an effective conformity assessment system for organic farming that can support initiatives in marketing, research, certification and agricultural extension targeted towards the organic agriculture sector. It is however important that those national or regional standards be assessed for their international acceptability, preferably by an independent international institution.
- Institutionalised frameworks and systems for verification and coordination of national and regional organic products and certification standards.
- Equivalency of national and regional organic product standards and certification standards to the EU standards is another key issue. In general, equivalency assessments of each national organic regulation or standard takes too much time and resources, considering the total number of regulations and standards that would ultimately need to be assessed. We recommend building on existing equivalence assessment programs, such as the IFOAM Family of Standards that is based on equivalence assessments of each standard against the COROS. Approval into the IFOAM Family of Standards could, for example, be a baseline requirement for all regulations and standards applying for equivalence by the EU, and this would serve as a first filter to identify credible organic standards and to identify the weaknesses that might require further investigation or negotiation.

7. Other points to be considered

IFOAM EU:

a) Improve general legislation to protect organic from GM contamination

As stated above we think that the organic regulation itself does not need to be adapted. However, the general legal framework must better protect organic production. Consumers in the EU clearly oppose GMOs in all food products and expect an organic product to be produced without GMO. The most efficient way to guarantee that producers can keep their products free of GMOs would be not to grow them in Europe. Several cases of contamination have already occurred within the Community due to pollination and to commingling at all stages of the food chain (seed, transport, storage and processing). These contamination cases, plus the establishment of additional quality assurance systems, have already cost the organic sector tremendous sums of money; legislation dealing with GMO contamination fails to observe the Polluter-Pays Principle.

Recommendations:

- IFOAM EU Group urges for establishment of more effective protection and liability measures at the EU level, protecting operators serving a non-GMO market; non-GMO food production must continue to be possible in all Member States and regions.
- Regulation EC 2003/1829 allows exemption from GMO labeling requirements for foods and feed “containing material which contains, consists of or is produced from GMOs in a proportion no higher than 0.9 per cent [...] provided that this presence is adventitious or technically unavoidable”. It must be ensured that everyone understands that the requirement is to aim for no GM in non-GM food as in organic, and that this 0.9 per cent labeling threshold only applies where operators aim for no GM, and contamination between zero and 0.9% occurs by accident or is unavoidable, and is only used for labeling purposes in those circumstances, as enshrined in law, and is not abused as a production standard or a contamination target value.
- Protect organic farmers’ and processors’ legal rights not to be subject to any contamination, and ensure there is liability for compensation where contamination is found.
- Implement measures to ensure the companies that develop and market GMOs are fully responsible for their crops, thereby enshrining the Polluter Pays Principle.
- Implement measures that oblige the initial applicant for a specific GMO event to develop and make available validated testing methods for these organisms before release, so they can be properly identified.
- Facilitate national and regional bans on the cultivation of GMOs while enforcing the strictest possible standards for health, environmental and socio-economic risk assessment, and applying the precautionary principle in risk management.
Start a political initiative facilitating access for farmers and processors to non-GMO inputs (seed, feed, processing aids and additives).

b) Public procurement

Another priority should be to promote best practice examples with Green Public Procurement guidance⁵. Organic public procurement is an effective way to enhance the development of this production method. We recommend including an action to increase the use of organic ingredients and organic meals in the canteen of the European Commission and other EU institutions and public institutions in the member states. For example, the Danish organic action plan target is 60% of organic food in all public canteens. IFOAM EU suggests that EU canteens commit to offer at least one organic meal and 20% organic food that will progressively increase over the years.

⁵ <http://ec.europa.eu/environment/gpp/pdf/handbook.pdf>

c) Facilitate the registration of traditional substances used in organic farming

Measures supporting the work necessary to register traditional plant protection substances used in organic farming are critical. According to the horizontal regulation (EC) No 1107/2009 every substance used as plant protection product in agriculture has to be authorised for its placing on the market. This regulation applies to active substances, safeners and synergists and also to adjuvants and co-formulants.

Organic regulations shall align to the horizontal legislation and as a consequence all the substances listed in annex II of Reg. (EC) No 889/2008 have to be previously authorised under the new procedure and listed in the Implementing Regulation (UE) No 540/2011. Besides substances included in annex II, many traditional products are today authorised at Member State level and used since decades in organic farming. They also face the prospect of being forbidden in organic agriculture. Registration of substances is a time consuming and costly process. Furthermore products traditionally used in organic farming usually have not big commercial interests behind. Supporting this process would mean to avoid that organic farmers face a situation of lack of alternatives in the choice of protection products.

Recommendations:

- Financial support for application and registration on traditional substances used in organic farming.
- To guarantee regular and quick procedure for including substances registered under horizontal Reg. (EC) No 1107/2009 into annex II of Reg. (EC) No 889/2008.
- To support research projects which aim at exploring alternatives to current controversial substances e.g. copper.

d) Development of Organic Farming assisted by the Regulation

It is necessary to identify solutions that make regulation an instrument which enables a dynamic development of organic farming e.g. by supporting initiatives which target new needs . These new needs could come from special interests among the consumers or could be necessary to get closer to the organic principles and aims (e.g. biodiversity, climate, environmental performance, packaging material, plant breeding techniques, nanotechnology).

e) How to deal with the heterogeneity within the EU

The Commission in close cooperation with the sector should identify good solutions to deal with the heterogeneity and diversity within the EU with regard to climate, structure and level of development of the organic food and farming sector. These solutions should bring the regulation forward without hampering the development of organic farming in countries where the sector is less mature.