Introduction

Since 1st July 2010 the new rules for labelling of organic products, including labelling of origin "EU/Non-EU agriculture", became fully valid and are now being implemented. Currently, food labelling with the origin of products and raw materials is regulated by different EU regulations. Origin labelling requirements for organic products have been imposed without proper harmonisation and insufficient consideration of the practical implementation and consequences.

Thus labels can contain multiple indications of origin which creates confusion among consumers. The “EU/Non-EU agriculture” origin labelling for organic food generates unacceptable additional expense for all manufacturers of food composed of more than one ingredient, due to frequent label changes and the need for different packaging for food with differently sourced raw materials. It also does not provide any additional useful information for the consumer as to the origin of the product.

The IFOAM EU Group believes that effective origin labelling is important for organic products and fully supports the use of indications that provide useful information to consumers about where the organic food has been produced.

This position contributes to the ongoing review of organic regulation (EC) No 834/2007. The process is an opportunity to debate the implementation of the rules on origin labelling of organic food.

Provisions in place and current situation


Many processed products carry the indication “EU/non-EU Agriculture”. This has no meaning as food always has to be produced on this earth. The wording “EU/non-EU Agriculture” is also useless, where the product is made from up to 98% local raw materials, with 2% ingredients from outside the EU. Senseless and misleading information is provided for consumers and the cost of this provision must be passed on to the consumer.

For more complex processed food the exception on the level of 2% provides too limited flexibility. For example within sausage products the used percentage of spices and herbs, which predominantly are produced outside of the EU, can easily exceed 2% of agricultural ingredients. Additionally, in case of special ingredients (specific seeds, oils), due to limitations of availability in sufficient quantity or quality, producers are often facing the situation when they switch between suppliers from different countries or regions. For example, a company manufactures a muesli, for which the raisins usually come from Greece resulting in an “EU agriculture” label. However, due to shortage in supply from Greece, Turkish raisins may have to be used from time to time, resulting in the "EU/Non-EU agriculture" wording.
Further, organic manufacturers may have to stock two or more types of packaging case of different sourcing of raw ingredients. The additional costs of stocking different labels are disproportionate in comparison to the relevance of such information for the consumer.

In order to avoid the need to stock two different labels some companies always put 2% non-EU goods in the product, so that they can guarantee the authenticity of the meaningless statement "EU/Non-EU Agriculture" and avoid problem with authorities.

More flexibility is needed to avoid disproportionate costs of multiple packages in relation to goals of labelling of origin. Thus, the 2% exception for agricultural ingredients should be increased.

**PDO products labelling**

PDO products labelled according Regulation (EC) No 834/2007 and 510/2006 might be confusing for consumers. For example, an organic PDO sausage may be labelled with a registered regional label in accordance with Regulation (EC) No 510/2006 and the information “EU/non-EU Agriculture” in accordance with Regulation (EC) No 834/2007 because pepper and other spices from third countries amount to over 2% of the total product weight. This is not consumer information but consumer “confusion”!

**Rules for origin labelling in the fruit and vegetable sector**

In the case of fresh fruits and vegetables, it is compulsory, according to Regulation (EC) No 1580/2007 to label the country of origin of the product, which is actually the country of origin of the raw material because there is no processing. This means that the package is labelled with two statements that mean exactly the same thing, for example “origin France” according to Regulation (EC) No 1580/2007 and “France agriculture” according to Regulation (EC) No 834/2007. In this case, it is possible, according to interpretation by the European Commission of the 15th of April 2010, to label “origin: agriculture France” to satisfy both regulations. This helpful European Commission interpretation should be introduced as a regulation to give it a solid legal basis.

**Rules for origin labelling in the new regulation on food information to consumers (EC) No 1269/2011**

In the New Regulation on Food Information to Consumers (EC) No 1269/2011 the origin labelling by means of labelling “country of origin” or “place of provenance” is mandatory for certain kind of foods, such as meat from pigs, goats, sheep and poultry. Origin labelling is also mandatory where failure to indicate this might mislead the consumer as to the true country of origin or place of provenance of the food.
Definitions of country of origin and place of provenance and labelling requirements of the Regulation (EC) No 1269/2011 are different to the concept of origin labelling required by Regulation (EC) No 834/2007, in which origin labelling is defined as an indication of the place where the agricultural raw materials of which the product is composed have been farmed.

Regulation (EC) No 1269/2011 also requires information about the country of origin or place of provenance of the primary ingredient where it is not the same as the country of origin or the place of provenance of the final product. In this case, it is possible that there must be three different statements about origin on the package of an organic product:

- EU/Non-EU Agriculture as required by Regulation (EC) No 834/2008
- “country of origin” and “place of provenance” of the product as required by Regulation (EC) No 1269/2011
- “country of origin” and “place of provenance” of main ingredient as required by Regulation (EC) No 1269/2011

**IFOAM EU Group proposal for modification**

The IFOAM EU Group is convinced that the origin labelling is an important tool to inform the consumer and that they will increasingly demand it. The obligations must, however, be structured in such a way that these requirements generate clear and meaningful information for the consumer, in particular for processed food. Therefore, IFOAM EU Group asks the Commission to modify the concept for labelling of origin as established in Article 24 of Regulation (EC) No 834/2007 in the following ways:

**Proposal 1**

**Step 1**

The limit of 2% for ingredients of agriculture origin not coming from the mentioned area should be expanded to 5%. This higher limit enables multi ingredients product labels to provide better communication.

**Step 2**

When the ingredients list includes detailed information at a country level on the origin of the main ingredients (>95%) of agriculture origin the general statement on food origin (EU/Non EU agriculture according to Art 24 of Regulation (EC) No 834/2007) is not required.

**Proposal 2**
In the light of the fraud cases, we propose that obligatory information on the origin of agricultural raw material must be provided with the goods, throughout the supply chain for organic ingredients. Currently, sellers of organic food are not obliged to provide this information and buyers are taking additional effort to obtain information from sellers. The obligation of provision of origin during the sell will set responsibilities and facilitate better transfer of information between organic operators. This new instrument will allow improving the security in the organic food chain, ensuring the integrity of organic food. It will enable the operator selling to the final consumer to make a correct statement on the label.

Proposal 3

There should be no double labelling of origin of organic food. If labelling of origin is required by other legislation, labelling with "EU/Non-EU Agriculture" according Regulation (EC) No 834/2008 should not be required.

Double labelling should be avoided in following cases:

1. If organic products are labelled with the country of origin of the primary ingredients as required by new Regulation on Food Information to Consumers Regulation (EC) No 1269/2011 then origin labelling "EU/Non-EU Agriculture" according Regulation (EC) No 834/2008 should not be required. Only products without labelling of origin required by Regulation (EC) No 1269/2011 should be labelled with "EU/Non-EU Agriculture" according Regulation (EC) No 834/2008.

2. In the case of non-processed food such as fresh fruits and vegetables, the labelling of the country of origin should not be doubled. Foods should be labelled with origin based on the requirements of Regulation (EC) No 1580/2007 or Regulation (EC) No 834/2007. Country of origin should be mentioned based on the requirement of one of the above mentioned regulations.