

Brussels, 27th March 2014

Mr **João Onofre**,
Unit B4 - Organics
DG Agriculture and Rural Development
European Commission
B- 1049 Brussels

RE: Protein Feed - Article 43 of Regulation (EC) No 889/2008

Dear Mr Onofre,

IFOAM EU remains strongly committed to the principle of 100% organic feed and underlines that significant progress was made by organic operators to reach this objective. Nevertheless the organic sector is still facing the problem of protein shortage that is temporarily restrained by Article 43 of Reg. (EC) No 889/2008 which allows a maximum yearly percentage of 5% of non-organic protein feed for calendar years 2013 and 2014.

Our proposed approach is to prolong in a first step this possibility until 2018 with limitations to specific animal species, specific stages of development and specific protein compounds. The exceptional rule laid down in article 43 of Reg. (EC) No 889/2008 concerns porcine and poultry species. Our proposal is to limit it exclusively to piglets up to 35kg and young poultry. In this critical stage of development a lack of protein components and of specific amino acids in the diet regime can easily lead to serious health problems. Considering that the shortage in quantity and in quality doesn't concern all the kind of protein compounds, the proposed approach also foresees to limit the exemption to a number of them e.g. potato and corn proteins or wheat middlings. This prolongation could give the institutions and the sector time to develop efficient research programs and a more established Europe-wide organic feed protein production. The second step foresees an evaluation to be carried out before 2018 to assess whether these two objectives have succeeded to create proper conditions for the further development of organic poultry and porcine production.

This approach would on one hand secure the farmers that will be confronted with the unavailability of the right quality of proteins, on the other hand enable the regulation to develop further towards the principles of organic production by significantly limiting the scope of this exceptional rule.

It is noteworthy to mention a 10-country wide study which is now getting the first results and which shows that still tens of thousands of organic protein feed are missing in Europe (*ICOPP - Improved Contribution of Local Feed to Support 100% Organic Feed Supply to Pigs and Poultry*¹)

¹ <http://www.organicresearchcentre.com/icopp/?page=home>

It should also be considered that the need for protein feeds has accelerated due to the growing demand for organic meat. Recently efforts have been made to increase protein feed supply in Europe, through for example, national actions plans in some Member states that promote local protein feed production. As these action plans are only in their infancy state or don't even exist yet, any significant impact cannot be expected before 2018. In the meantime, other solutions should be explored, e.g. new types of feed produced with simple processes for organic raw material and containing high amounts of amino acids or proteins from worms and insects. Such techniques are ready to be implemented in practice but remain small in scale. On the contrary, the use of isolated synthetic amino acids as feed additive is unacceptable as it does not comply with the principles of Regulation (EC) No 834/2007.

Finally the implementation of protein strategies at EU level and national level can be the only precondition for reaching 100 % organic feed for monogastric animals. It is critical that any measures under the new CAP and an EU protein strategy are closely linked to the development of a new EU Organic Action Plan.

Organic regards,



Marco Schlüter
IFOAM EU Director