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- CELCAA preliminary comments on proposed regulation on organic farming –

CELCAA, the European umbrella representing the trade in agri-food and agri-commodities, is pleased to submit its preliminary comments on the Commission proposal on organic farming COM (2014) 180 final.

General comments

CELCAA welcomes the intention of the Commission to streamline and simplify the rules governing organic production and trade in organic products, with respect to the growing demand for organic products.

Against this background, CELCAA would like to stress that conventional and organic production complement each other, on the EU market as well as on global markets. For the trade sector, it is important that sufficient volumes of organic products are available in order to meet consumers' demand.

Trade impact (Chapter VI)

One of the most important aspects of the legislative proposal is the mandate given to the Commission to negotiate mutual agreement with third countries. CELCAA supports the Commission's proposal for an ambitious and European export dimension that would boost European organic exports. CELCAA encourages the Commission to actively engage in recognition schemes through international agreement, in priority with third countries of relevance for EU exports (USA, Switzerland, Canada, Japan, China, Hong-Kong, Russia to name a few).

Need for longer transitional measures

- For mixed conventional & organic farms (Art. 7)

The European Commission proposes to remove the possibility of mixed conventional/organic farms. CELCAA calls for longer transition period for farms to become organic for the totality of their land. Mixed farms represent a high percentage in countries like France (25%) or Spain (20%) and many other Member States in EU-28. A ban on mixed farms would cause a serious problem that will prevent the sector's growth, in all sectors. In addition, large-size farms cannot be converted into organic rapidly but on the contrary, in a gradual manner. CELCAA therefore calls for the derogation over mixed farms to be maintained.

- For stricter rules governing products and substances used in organic production (Art. 19.2)

An overly rigorous approach would make production more difficult with the risk that supply would not be able to meet demand. CELCAA urges the Commission to closely coordinate with relevant food business operators when drafting implementing acts governing the list of products and substances used in organic production.

- **On animal feed for 100% organic ingredients (Art.11)**

The Commission proposal stipulates an end to exemptions by 31st December 2014, in particular when it comes to animal feed. CELCAA strongly calls for the extension of the transition period until full compliance is achievable. Feeding animals with 100% feed from organic ingredients is not possible as at present there are not sufficient quantities of organic ingredients to produce a balanced diet.

In the poultry sector, to ensure that a bird's health and welfare requirements can be met, compounders have to over-formulate on protein, some of which is then excreted. The use of synthetic amino acids should be allowed, thereby ensuring that a bird can receive sufficient quantities of methionine. One of the alternatives on farm is to grow peas and beans for protein feed. However, these are often not economic in the rotation, hence, the difficulties for farmers to guarantee 100% feed organic ingredients. Derogations should be allowed until 100% organic diets can be provided.

- **Regional origin of animal feed (Art.11)**

If the strategy is to promote the organic sector and its consumption, incentive should be provided to producers and not additional obstacles. Attempts to increase the percentage of feed materials produced on the same holding as the animal production is simply not feasible for many producers, particularly those working with housed stock in the pig and poultry sector.

- **Organic certification and controls (Chapter V)**

CELCAA supports a risk-based approach in the control system. CELCAA also calls on the Commission to apply the proportionality principle: i.e. operators in the chain who do not manipulate the certified organic products, should be granted a derogation – as there is no risk of fraud (i.e. wine sector when product is bottled).

Conclusions

Producers who decide to engage in organic production, either in the European Union or in third countries, should be encouraged to do so. Reducing costs and administrative burdens should be seen as the first priority in that context. CELCAA therefore calls for longer transitional measures and flexibility on the trade regime, so as to guarantee that organic production will still grow to meet European consumers' demand.

CELCAA is the EU umbrella association representing EU organisations covering the trade in cereals, grains, oil, animal feed, agro-supply, wine, meat and meat products, dairy and dairy products, eggs, poultry and game, tobacco, spices and general produces. Members include COCERAL, UECEV, EUCOLAIT, CEEV, EUWEP, GAFTA EU, FETRATAB, CIBC. CELCAA's main objectives are to facilitate understanding of European decision-makers and stakeholders on the role played by the European traders in agri-food products; to act as a platform of dialogue and communication with the European Institutions and to encourage public and general interests in agri-trade issues.

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