

**Review of the EU Policy on Organic Agriculture
Legislation and Action Plan**

Questionnaire to complete at http://ec.europa.eu/agriculture/consultations/organic/2013_en.htm

EPSO submission (section 2 was not open, restricted to individual submissions) 28.3.2013
Comments from some members are in blue FYI as they can't be included in the online questionnaire

1. About You

1.1 You are based in the following country (For international or European organisations, please choose "international"):

- Austria
- Belgium
- Bulgaria
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Iceland
- Norway
- Switzerland
- Other European, non EU
- Non European
- International

1.2 In what capacity are you completing this questionnaire?

- As a citizen of the European Union - to be linked with questions 2.1 to 2.5
- On behalf of a public authority
- On behalf of an industry association or a non-governmental organisation (NGO)
- On behalf of a company
- On behalf of a public authority in a non-EU country
- Other

1.3 Is your association/organisation registered in the European Commission transparency register?

- Yes
- No

1.4 What is the name of your company, organisation or authority?

European Plant Sciences Organisation (EPSO)

1.5 Please specify which interests your organisation represents (multiple answers possible)

- Consumer
- Private control body

- Farmer
- Processor
- Trader
- Retailer
- Public competent authority, public control authority, accreditation body
- National association
- Public authority in a non-EU country
- Advisory service
- Research
- Other

2. ORGANIC CONSUMPTION

If you are replying as a private consumer, please reply to the questions in the following section:

2.1 How 'organic' is your food consumption?

- I try to buy organic as much as possible
- I am a regular consumer of organic products
- I am an occasional consumer of organic products (e.g. IF I CANNOT AVOID BUYING THEM)
- I never consume organic products
- Other
- Would rather not say

2.2 I consume organic products because (several answers possible)

- I'm concerned about the environment
- Organic farming is more sustainable than conventional farming
- I want GMO-free products
- I avoid food containing pesticide residues or residues of other synthetic substances
- Organic products are healthier
- Organic products taste better
- Organic products are higher quality
- I want to consume seasonal and local products
- Organic production respects animal welfare
- For other personal beliefs
- I don't buy organic product (e.g. UNLESS THERE IS NO OTHER CHOICE)
- Other
- Would rather not say

2.3 Where do you buy organic food? (several answers possible)

- In specialised shops
- In supermarkets
- Directly from (an) organic farmer(s)
- From a farmer cooperative
- On a local market
- On the internet
- I buy organic baskets from an association that markets local products
- Other
- Would rather not say

2.4 As a consumer, are you prepared to pay more for organic food than conventional food?

- Yes
- No
- Would rather not say

2.5 If yes, how much?

- Less than 10%
- 10-25%
- 25-50%
- 50-75%
- 75-100%
- More than 100 %
- No opinion

3. SMALL FIRMS

3.1 Does the "harmonisation" (alignment) of rules and control requirements at European level help the development of organic production by small firms in the EU?

- Yes
 No
 No opinion

4. ORGANIC STANDARD

4.1 Should the current European standard for organic products be strengthened?

- Yes
 No
 No opinion

4.2 If yes, how? (several answers possible)

- By making the rules stricter
 By removing all flexibility
 By introducing sanctions (penalties)
 Other opinion

4.3 Testing all organic products for pesticide residues would increase production costs and so make them dearer for consumers. Should this nevertheless be made compulsory?

- Yes
 No
 No opinion

4.4 Should the level of pesticide residues for organic products be set at a lower level than for conventional products?

- Yes
 No
 No opinion

GMOs

Genetically-modified organisms (GMOs) and products produced from or by them are considered incompatible with the concept of organic production. They cannot be used in organic farming or in the processing of organic products

See comment below. This criteria is not applied in a logical or systematic manner

4.5 Is the fact that 'organic', by definition, means 'GMO-free' an important reason why you buy organic?

- Yes
 No
 Would rather not say

Because organic systems are not isolated from the general production chain (cultivation, harvest, transport, storage, processing), the accidental presence of GM crops in organic farming systems can't be completely ruled out. Under the current laws, there is no need to mention the possible presence of GMOs on the label of any food product where the GMO is likely to account for less than 0.9% of the product content. However, lower/stricter labelling requirements are likely to increase costs for consumers.

The current system whereby products of GM agriculture can be used as feed provided this occurs early enough before killing of animals makes no sense at all. Either do it totally or not at all

Further the allowed use of products of white biotechnology to produce cheese, yoghurt etc without needing to declare as GM is illogical and does not give the consumer a true picture of their role of GMOs in food processing

4.6 Were you aware of this GMO labelling limit?

- Yes
 No
 Would rather not say

4.7 Should organic products be subject to the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO?

- Yes
 No
 No opinion

4.8 If no, should the amount (labelling threshold for accidental presence) of GMOs that must be mentioned on the label of organic products be lower than for conventional products?

- Yes
 No
 No opinion

4.9 As a consumer, are you prepared to pay higher prices for organic products if this were the result of a lower GMO labelling limit?

- Yes
 No
 Would rather not say

Exceptions to the rules

4.10 Do you think European organic farmers and other operators ought to be bound by identical rules in all EU countries?

- Yes
 No
 No opinion

Today organic farmers and other operators can – in specific circumstances, listed in the European legislation – be exempted from production rules and still have their produce certified organic. For instance, when organic seeds are not available on the market, farmers are allowed to use conventional, non-treated seeds. Other exemptions allow them to use non-organic animals.

4.11 Do you think these exemptions should continue?

- Yes
 No
 No opinion

4.12 Should these exemptions from production rules granted to farmers and other operators always be limited in time?

- Yes
 No
 No opinion

Local origin of feed

Under organic livestock production rules, animals should be fed with organic feed primarily obtained from the farm where the animals are kept or from other organic farms in the same region. For herbivores like cows, sheep and goats, at least 60% of the feed must come from the same farm (or, if not possible, the same region). For pigs and poultry, this minimum is 20%.

4.13 Do you think organic livestock should be fed with:

- Feed from any location, as long as it's organic?
 A minimum percentage of feed from the farm or region?
 100% feed from the farm or region?
 100% feed from the farm?
 No opinion

To ensure a healthy, balanced and complete diet for farm animals, their feed ration must include sufficient quantities of proteins.

As Europe does not produce enough organic protein-feed supplies, it has to import organic soya or other organic protein-rich feed.

Precisely. This makes a farce of the whole business

4.14 Do you think that (several answers possible)

- the organic sector should be allowed to continue to rely on these imports if needed?
 EU legislation should give incentives to boost European production of organic protein crops?
 a specific organic protein-crop production strategy should be developed to address this issue?
 synthetic amino acids (currently not allowed in Europe) should be authorised to supplement organic animals' feed rations, as is the case in the United States?
 No opinion

And not only organic

4.15 Animal welfare

Which of the following statements do you agree with? (several answers possible)

Animal welfare standards should be (i) high and (ii) the same, whatever the type of agricultural production.

There should not be specific rules for animal welfare in organic production.

There should be specific rules for animal welfare in organic farming.

Animal welfare standards in organic farming should systematically be higher than in conventional farming.

Animal welfare standards for all types of farming should be strengthened.

Animal welfare standards for organic farming should be strengthened.

The current rules for animal welfare in organic farming are sufficient.

No opinion

4.16 Procedure for authorising substances

Please rate the following categories of substance according to how much authorisation you think should be required for their use in organic farming and production – from 1 (very strict – no substances allowed) to 4 (all substances possible are allowed) .

Fertilisers (2)

Pesticides (2)

Feed materials (1)

Additives (1)

Products for cleaning and disinfection (2)

Processing aids (1)

4.17 Environmental performance

European legislation requires organic producers and traders to respect nature's systems and cycles; ensure the health of soil, water, plants and animals; contribute to a high level of biodiversity and make responsible use of energy and natural resources, such as water, soil, organic matter and air.

Do you think that, in addition to these requirements, producers and traders should be required to implement an environmental management system to measure and evaluate their environmental performance and impacts?

Yes

No

No opinion

5. LABELLING LOGO

5.1 Do you know the European organic logo?

Yes

No

Would rather not say

5.2 How do you recognise organic products? (several answers possible)

The word "organic" on the label

The European organic logo on the label

A national organic logo on the label

(A) private logo(s) on the label

(A) private brand(s) on the label

An indication of the place of origin

I buy directly from an organic producer and the product is sold without packaging or labels

Other

Would rather not say

6. PROMOTION – INFORMATION

6.1 Do you think consumers need more information on organic products?

Yes

No

No opinion

6.2 What's your opinion of the European [Commission website on organic farming?](#)

Do you find the information you need?

- Yes always,
- Often
- Sometimes,
- Never
- I don't know this site
- I don't use this site
- No opinion

7. CONTROLS

Controls on operators

European organic legislation requires EU governments to set up a system of controls, run by one or more national authorities. These authorities may delegate monitoring tasks to private control bodies, under specific conditions. This possibility is widely used in Europe.

7.1 Do you trust products certified as “organic”?

- Yes
- No
- Would rather not say

7.2 Did you know that all European organic operators are inspected at least once a year?

- Yes
- No

7.3 Would you agree that organic operators with a proven track record of abiding by the rules could be inspected less often, for instance every 2 or 3 years?

- Yes
- No
- No opinion

7.4 Even if the cost of organic food were to go up as a result, do you think the control system of organic products sold in Europe should be improved?

- Yes
- No
- No opinion

7.5 If yes, how could this be done? (several answers possible)

- By developing electronic means to ensure traceability
- With a European database listing all certified organic operators in Europe
- By improving European statistical data on organic products
- By improving controls at all levels of the production chain
- By improving controls on imported organic products
- Other

Group certification

In several European countries, there are small farmers who apply the principles and rules of organic farming but can't sell their products as organic for various reasons, e.g.: they don't have access to certification, since it is too costly, given their small organic production volumes they aren't able to manage the documentation and records required by the European control system.

One way of enabling such farmers to access certification and sell their products as organic could be on a joint basis, through farmer groups. Because these groups would have their own internal control systems, it wouldn't be necessary to inspect all farmers in the group, just a sample.

7.6 Do you think that group certification – which is allowed for organic farmers in some non-EU countries, should be allowed in the EU?

- Yes
- No
- No opinion

8. TRADE WITH NON-EU COUNTRIES

The EU is a major importer of organic products and one of the two largest markets for organic products. The EU has developed specific agreements or arrangements with countries where organic standards and control systems are recognised as equivalent. This means their standards are capable of meeting the objectives and principles of European organic farming and ensure the same level of product conformity. The EU has also recognised directly some private inspection bodies which apply equivalent standards in non-EU countries. In addition, during a transition period, EU countries can grant import authorisation for organic products.

8.1 The EU market is open to imports of organic products from non-EU countries. Do you agree that non-EU countries exporting to the EU should open their market to organic products produced in EU countries?

- Yes
- No
- No opinion

8.2 When negotiating trade arrangements for organic products with countries outside the EU, which objectives are the most important for the EU? (several answers possible)

- Helping organic farmers and other operators from developing countries to expand their production and exports of organic products
- Help developing more sustainable and eco-friendly agricultural practices in other countries
- Meeting the demand of European consumers for more and cheaper organic products
- Responding to European food industry demands for more and cheaper organic agricultural raw material
- Ensuring new outlets in non-EU countries for European organic products and helping the development of European organic production
- Ensuring a continuous supply, to avoid disruptions on the European organic market
- Maintaining the trust of European consumers
- Protecting the interests of European organic producers
- No opinion

9. RESEARCH AND INNOVATION

9.1 In which areas are research and innovation most needed in organic farming? (several answers possible)

- Seeds and plant propagating material adapted to low-input agriculture
- Low-growth strains of animals
- Local production of protein-rich crops
- Co-existence of organic farming with conventional farming and GMOs
- Economic and social dimension of organic farming
- Waste management
- Other areas
- No opinion

9.2 Do you think there should be a public budget reserved exclusively for research into organic production?

- Yes
- No
- No opinion

10. COMMENTS AND SUGGESTIONS

If you have any suggestions about the upcoming revision of the EU organic farming policy, you can email them to AGRI-ORGANIC-CONSULTATION@ec.europa.eu