

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

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Presentation Paper
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Organic Feed issues

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Department
for Environment
Food & Rural Affairs

Proposed Regulation on organic production and labelling of organic products

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Plan

- Background
- Outline of the Commission proposals
- Industry views
- UK position
- Negotiations so far
- Next steps
- Your input



Background

- Commission review of legislative and non-legislative framework for organic production
- Aim to target inconsistencies, gaps and ineffective measures, simplify and reduce regulatory costs
- 3 options put forward
 - Improved status quo
 - Market driven
 - **Principle driven**
- Rationale - Fourfold increase in organic market in 10 years but organic area only doubled

Some issues and problems identified...

- Obstacles to the development of organic production in the EU
 - Insufficient conversion to organic farming, small farmers are not joining
 - Complex legislation, High administrative burden
- Risks of loss of consumer confidence
 - Due to fraud cases, rules watered down
- Unfair competition and threat to the functioning of the internal market
 - Too many exceptions, different rules applied for imports
 - Weaknesses in controls

Which led to the conclusion that....

“the existing organic policy and legal framework does not provide the appropriate basis for the sustainable development of organic production in the EU”

The Commission proposed a new Regulation to...

- CLARIFY the rules
- ADDRESS GAPS in the legislation
- GUARANTEE fair competition
- ADDRESS CONSUMERS' evolving concerns (environment, quality)
- REMOVE exemptions to the rules
- STREAMLINE the control system
- REFORM the trade regime



The key chapters cover....

- Scope (Chapter I)
- Production rules (Chapter III)
- Labelling (Chapter IV)
- Organic certification (Chapter V)
- Trade with third countries (Chapter VI)

Production rules (Chapter III)

- Entire holding under to be managed under organic requirements
- Environmental Management System for operators other than farmers and aquaculture producers
- No retroactive recognition as part of conversion
- Presence of non-authorized products or substances
- Transitional rules
- Removal of exceptional rules (e.g. use of 5% non-organic feed) except in catastrophic circumstances

Feed

- **Source**

- Increase in percentage of feed required to be sourced from the holding or 'region'
 - from 60% to 90% for bovine, ovine and caprine
 - from 20% to 60% for porcine and poultry

- **Ingredients**

- non-organic feed materials from plant origin will be no longer permitted for use
- no longer able to temporarily authorise the use of non-organic ingredients (delegated act for catastrophic circumstances)
- certain feed materials, additives and processing aids will be listed in an implementing act.

- **Changes to % of in conversion feed allowed**

- **Delegated Acts**

Labelling (Chapter IV)

- The labelling provisions cover organically produced products, ingredients or feed materials.
- The Commission is empowered to adopt a Delegated Act to establish specific labelling and compositional requirements applicable to feed and ingredients thereof.

Organic certification (Chapter V)

- Certification of all operators in organic chain
- Group certification
- Limit to one Control Body for same group of products

Controls

- Risk based approach to controls – removes requirement for annual inspections
- Uniform measures applied across Member States in similar cases of non-compliance.

Trade with Third Countries (Chapter VI)

- New provisions on export, to facilitate access of EU organic products to the international market (Art.27)
- Move from equivalence to compliance for CBs (Arts. 28 and 29) – potential implications for feed imports
- Reinforced rules for accreditation of CBs (ABs need to be members of IAF) (Art. 29(3))
- Recognition of equivalence of TC granted only through international mutual agreements (Art. 30)

Industry Views

Positive

- Risk-based approach to controls
- Reciprocal trade agreements
- Environmental Management System for certain operators
- Group Certification

Negative

- Removal of exceptions
- Requirement for whole unit to be organic
- Thresholds for non-authorized substances
- Requirement to use increased percentage of feed from holding/region
- Number of Delegated Acts
- Move to compliance system for Control Bodies in Third Countries
- Removal of retailer exemption

Specific feed concerns

- Requirement to use increased percentage of feed from holding/region
- Loss of ability to use small % of non-organic ingredients (for mono-gastrics)
- Uncertainty about list of authorised feed materials, additives and processing aids



UK position

- No need for such significant changes
- Some positive changes – aim to build on these and negotiate significant changes.
- Concerns about stricter rules resulting in a shrinking sector
- Concerns about increased regulatory burden
- Concerns that in certain areas the proposal does not realise the aims and has the opposite effect
- Concerns about the Commission's Impact Assessment
- Concerns about focus on consumer confidence

Negotiations so far

- Working Party discussions have covered all the articles in the basic text
- Discussions have now moved on to the detailed production rules in the Annexes
- The UK has voiced initial concerns based on the consultation so far and has submitted written comments
- Views of other Member States appear well aligned with ours
- European Parliament and Council positions are expected by the end of the year.

Next Steps

- Read through of the Annexes in the Working Parties
- Confirm UK negotiating position
- Work with other Member States to strengthen negotiating position
- Work with MEPs to inform their opinions
- Submit suggested amendments to Commission
- Negotiate changes to the proposal before it comes into force in July 2017

Your input

- Feed in any views or concerns to organic.standards@defra.gsi.gov.uk
- Provide any data or information that you have that could contribute to our assessment of the impacts.

