

**ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS**

**65th Meeting of ACAF on 22 October 2014**

Presentation Paper  
Nick Turner – Defra

**Organic Feed issues**

**Secretariat  
October 2014**



Department  
for Environment  
Food & Rural Affairs

# Proposed Regulation on organic production and labelling of organic products

Presented by: Nicolas Turner  
Date: 22 October 2014

# 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](mailto:organic.standards@defra.gsi.gov.uk)
- Provide any data or information that you have that could contribute to our assessment of the impacts.

