



International Federation of  
Organic Agriculture Movements –  
EU Regional Group

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## *Working for organic farming in Europe*

Brussels, 27/09/2011

To

**Janez Potočnik**, European Commissioner for the Environment

*and*

**Dacian Cioloș**, European Commissioner for Agriculture and Rural Development

*Copies sent to: Alina Ujupan and Matjaž Malgaj (Commissioner Cabinets), Jean-François Hulot (DG AGRI), Pavel Misiga and Ferenc Pekar (DG ENVI)*

Dear Commissioner Potočnik,

Dear Commissioner Cioloș,

IFOAM EU Group welcomes the commitment of the Commission to enhance environmentally friendly production by implementing the Community Ecolabelling scheme (Article 6 point 5 of REGULATION (EC) No. 66/2010). We are strongly in favour of creating incentive mechanisms allowing processors to gain benefits for food production that better respect the environment, such as use of resources (energy, water etc.), avoiding pollution, limiting climate change impact and so on. We also support the evidence for environmental progress in the area of food production and particularly within the CAP reform.

However, we are deeply concerned about the intention to extend the scope of the Ecolabel to include agricultural food products, processed foods and products from aquaculture. We have, within the EU, a well functioning certification and control system in place, controlled by Regulation (EC) No. 834/2007 for organic production (agriculture and processing). This delivers many environmental services and other public benefits. Since 1 July 2010 the EU has introduced a new, mandatory label for organic food and farming that now needs to be promoted to consumers.

We fear that the extension of the EU Ecolabel for food will result in two competing labels (Organic and Ecolabel) based on similar characteristics and attributes (no chemical fertilizers, no chemical pesticides, no GMO, good animal welfare etc.) on the food market that will cause not more clarity but more confusion of consumers. This will undermine the achievements and the success of organic production that already sets clear environmental standards in food production and has done so for decades in an increasingly dynamic market. We fear, therefore, that the Commission is at risk of failing to achieve its clearly welcome intention.

To quote Regulation (EC) No. 834/2007 *“Organic production is an overall system of farm management and food production that combines best environmental practices, a high level of biodiversity, the preservation of natural resources, the application of high animal welfare standards and a production method in line with the preference of certain consumers for products produced using natural substances and processes.”* High environmental performance is well defined at the level of agriculture production.

However, we recognise that the environmental requirements of the whole organic food supply chain are not so well described but are constantly being developed. Instead of introducing a new competing label for food, based on some of these ideas, while ignoring others, we propose that the rules for organic processing and trading within Regulation (EC) No. 834/2007 should be improved and further developed. This should concentrate on further improving the environmental performance of organic foods during each production step, including processing and trade. Many organic processors have successfully achieved better environmental performance and show a high degree of self-regulation, independently of existing organic standards and regulations. Some companies have established management tools like the EU Eco-Management and Audit Scheme (EMAS) to secure environmental practices as part of the company's management protocols. Furthermore, the organic sector is working towards cooperative management concepts (code of good conduct<sup>1</sup>) in order to improve the performance throughout the organic food supply chain.

At the level of standards and rules further developments are clearly in progress. For example KRAV from Sweden is pioneering among private standards owners with its organic standards that include some real environmental requirements for processing and distribution.

IFOAM EU Group, on behalf of the organic sector as a whole calls for the introduction into Regulation (EC) No. 834/2007 of additional requirements that an organic operation must meet to achieve an environmental management system that secures *"an effective means to measure and evaluate its environmental performance and impacts"*. Please refer to our letter regarding improvement of organic processing rules within the EU organic regulation, sent to DG Agriculture services on May 2011 (copy attached) for more information and the concepts that we propose for appropriate rules for ecological responsibility.

Consumers must be well informed about the products and be protected from mislabelling. The term "Ecolabel" will cause consumers to presume, wrongly, that products bearing the Ecolabel are Organic, not only as both labels would be based on "environmental friendliness", but also as in some countries terms "eco", "eko" or "öko" are used for organic products and protected according to EU legislation<sup>2</sup>. To protect consumers and their trust in organic production and to prevent confusion among organic operators and other stakeholders, and to maintain the strength of organic labelling, certification, and control; this confusing situation must be avoided. The fact that the use of the term "eco" (and language variants) is specifically restricted to organic food within EU legislation and Codex Alimentarius<sup>3</sup>, is likely to cause a legal

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<sup>1</sup> *Code of Practice for Organic Food Processing* was prepared within QualityLowInputFood (QLIF) Project (<http://orgprints.org/7031/1/beck-2006-code-of-practice.pdf>) and European *Code of Good Organic Practice* has been discussed within SGOP (Specialist Group Organic Processing, internal body within IFOAM EU Group) since 2009. There are private programs on national level already running: e.g. Bio Entreprise Durable® by Synabio in France (<http://www.synabio.com/bioentreprisedurable.html>) and Bio-Duurzaam in the Netherlands.

<sup>2</sup> Article 23 of COUNCIL REGULATION (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91

<sup>3</sup> E.g. the case C-107/04 of the European Court of Justice: Reference for a preliminary ruling from the Tribunal Supremo in *Comité Andaluz de Agricultura Ecológica v Administración General del Estado, Comité Aragonés de Agricultura Ecológica* (Community rules on organic production of agricultural products and indications referring thereto on agricultural products and

problem, over and above any confusion that might result from the similarity of the terms 'Organic' and 'Ecolabel'.

The confusion caused by terms "eco" and "Organic" is faced by both consumers and DG Environment. In the English version of "52 tips for biodiversity"<sup>4</sup> terms like "ECO (food) basket", "garden ecologically" and "ECO cotton" are referring to organic production (see attached pages selected from the publication). This publication, provided by DG Environment as a tool for consumer information, clearly illustrates the "language problem" and potential confusion, which would only be increased by introduction of the EU Ecolabel for food.

Furthermore we believe that clear differentiation between Organic and the proposed EU Ecolabel cannot be easily solved by consumer campaigns as the possibilities for confusion are broad and the differentiation will require impracticable attention to the detail of the distinction. Furthermore, necessary publicity campaigns will be very expensive for the EU, national governments and operators.

We would like to highlight that it is already difficult for consumers to make well considered purchase decisions when confronted with a multitude of food labels. We will have, from 2012 for the first time, one standardized European logo for organic food so it would be counterproductive to pass up this chance. In the meantime it is reasonable to focus on developing the existing system, using and strongly promoting the Organic label, instead of creating another label that will increase confusion rather than provide clarity.

Please find attached a further letter to DG Environment services, which we sent in October 2008. It explains further technical details of our views about the Regulation on a Community Ecolabelling scheme.

Therefore we kindly ask you to not undermine a well developing production system that is already based on environmental and societal benefits. We would be happy to meet you for further discussion.

Yours sincerely,

A handwritten signature in black ink that reads "Christopher Stopes". The signature is written in a cursive, flowing style.

Christopher Stopes  
IFOAM EU Group President

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foodstuffs - National legislation authorizing the use of the term 'bio' in respect of products which have not been organically produced) - Judgment (OJ) [OJ C 217, 03.09.2005, p. 16](#)

<sup>4</sup> [http://ec.europa.eu/environment/nature/info/pubs/docs/brochures/biodiversity\\_tips/en.pdf](http://ec.europa.eu/environment/nature/info/pubs/docs/brochures/biodiversity_tips/en.pdf)