Regenerative Agriculture & Organic
Position Paper
February 2023
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Executive Summary

Farming practices that aim to regenerate soils, biodiversity and landscapes are at the heart of organic agriculture. The organic movement embraces regenerative principles, all of which are included in organic principles of ecology, health, fairness, and care, and seeks positive collaboration with serious regenerative farmers and actors. The term “regenerative agriculture” was in fact coined in the organic movement to describe the goals of organic agriculture.

The European organic food and farming movement welcomes the adoption of some regenerative practices in conventional farming and seeks allies among serious regenerative actors. We are, however, concerned that the inflationary use of the term is taking forms that undermine the meaning, goals and potential of regenerative agriculture, including organic farming. As there is no single scientific or legal definition of “regenerative agriculture”, the term has been increasingly (mis-)used in recent years to promote and brand approaches that deliver few environmental benefits, while allowing the use of a range of degenerative practices and pesticides with well-known downsides for sustainability goals. Indeed, any farm, product or company can claim to be “regenerative”, making general statements regarding the benefits of “regenerative” farming impossible. This greenwashing misleads and confuses consumers, misdirects investments and policy, undermines serious regenerative actors, and hinders the needed genuine transformation of the food system towards sustainability and agroecology, including organic farming.

This position paper traces the origins of regenerative agriculture and its many roots and connections to organic agriculture, as well as the current use of the term and its associated risks. The European organic movement believes that organic should continue to be at the core of regenerative agriculture and that “regenerative” certification and corporate branding using “regenerative” should be compatible with some key legislative requirements of the organic standard as minimum requirements upon which additional regenerative organic practices are built.

IFOAM Organics Europe also commits to several action points to develop regenerative organic farming and increase collaboration with other regenerative actors.

Introduction

The global climate and environmental crises call for the transition to more sustainable agri-food systems. The potential of organic farming was recently recognised on EU level (with the Farm to Fork target of 25% organic farmland in Europe by 2030), and both organic farming and agroecology have been repeatedly recognised globally as part of the solution to food security, climate change and biodiversity loss. At the same time, the term “regenerative agriculture” has gained popularity within global governance and international development spaces and among agri-food corporations in recent years.

While IFOAM Organics Europe has already expressed its views regarding the synergies and differences between organic and agroecology1, this paper aims to lay down IFOAM Organics Europe’s position on organic and regenerative agriculture.

In recent years, there has been a dramatic increase in the use of the term “regenerative agriculture” in corporate branding, policy circles, by global NGOs, in research agendas, certification schemes and product claims. Some farmers’ organisations are enthusiastically pursuing regenerative principles and practices. “Regenerative” is currently being promoted in a great variety of contexts and by different actors, at both private and public level, whereas the number of scientific studies and publications remains scarce2. Furthermore, a single and clear definition of regenerative agriculture is still lacking. In 2020, a review of 229 journal articles and 25 practitioners’ websites displayed the divergences among stakeholders in referring to this concept, as well as in describing it3. The authors conclude that “wide variance in the definitions used may lead to uncertainty about what different actors mean when they talk about regenerative agriculture”. Indeed, some actors use process-based definitions (i.e., what practices are applied) without being strict about expected (environmental) outcomes, while other actors use outcome-based definitions, without explicitly defining which practices are required to achieve these outcomes, or what methodologies are used to determine outcomes.

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Similarly, another literature review on regenerative agriculture found that a clear definition of the term is missing, but the authors attempted to define regenerative agriculture as “an approach to farming that uses soil conservation as the entry point to regenerate and contribute to multiple provisioning, regulating and supporting ecosystem services, with the objective that this will enhance not only the environmental, but also the social and economic dimensions of sustainable food production”. With such a definition, a common ground between organic and regenerative agriculture could be found since both movements strive for a holistic and sustainable approach to agriculture in which soil is at the center. However, the lack of a single definition of regenerative agriculture has allowed the widespread misuse of the term, leading to the current situation in which “regenerative” is used in corporate branding, where sustainability claims are based on conventional farm systems with few improvements. On the other hand, certain projects and practices originating from regenerative agriculture are genuinely sustainable and contribute to the needed transformation of our food systems. To better understand the extent to which this lack of clarity is problematic, it is useful to first look at some of the meanings attributed to regenerative agriculture (hereinafter, RA). Table 1 below summarises some of the practices and principles of RA and contrasts them with organic agriculture.

Table 1: Regenerative vs. organic principles

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Regenerative principles</th>
<th>Organic principles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil health</td>
<td>• Minimise tillage</td>
<td>• Diversify crop rotations</td>
</tr>
<tr>
<td></td>
<td>• Maintain soil cover</td>
<td>• Maintain soil cover to increase nutrient</td>
</tr>
<tr>
<td></td>
<td>• Build soil carbon</td>
<td>cycling</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Result of the application of compost and</td>
</tr>
<tr>
<td></td>
<td></td>
<td>prolonged crop rotations</td>
</tr>
<tr>
<td>Carbon sequestration</td>
<td>Sequester carbon</td>
<td>Build-up of soil organic matter</td>
</tr>
<tr>
<td>Nutrient cycles</td>
<td>Relying more on biological nutrient cycles</td>
<td>Integration of nitrogen-fixing plants in organic crop rotations, compost, manure...</td>
</tr>
<tr>
<td>Ecotoxicity</td>
<td>Reduce/avoid pesticides</td>
<td>Synthetic pesticides are banned</td>
</tr>
<tr>
<td>Resilience</td>
<td>Encourage water percolation</td>
<td>Higher organic matter in soils leads to greater water retention</td>
</tr>
</tbody>
</table>

1 Regenerative agriculture: a good initial concept

1.1 Organic and regenerative agriculture: the beginnings

Organic agriculture has its origins in the late 19th century. At that time, organic was established as a movement against the industrialisation of farming and a move towards working with nature instead of against it. This phase is referred to as Organic 1.0. Organic 2.0 starts in the 1970s as organic practices are codified into standards and legislation. We currently find ourselves in the Organic 3.0 phase, which is about “bringing organic out of the niche into the mainstream and positioning organic systems as part of the multiple solutions needed to solve the tremendous challenges faced by our planet and our species”.

While many regenerative practices have deep roots in indigenous agriculture and agroforestry, the term “regenerative agriculture” was coined by organic pioneer Robert Rodale in the 1980s as a way of describing the goals of organic agriculture: a regeneration of soil and biodiversity. Soil health was paramount since “the world cannot be fed unless the soil is fed”. It was Robert Rodale’s father, Jerome Irving Rodale, who founded the Rodale Institute in the United States, a non-profit organisation dedicated to growing the organic movement. Regenerative movements are mainly based outside Europe, in countries where the uptake of certified organic farming is less widespread than in Europe (however, initiatives that affiliate themselves with regenerative farming have been recently increasing in Europe). Mostly associated with organic farming in its beginnings, RA rose to popularity in the United States. Unfortunately, many current US advocates of RA hardly refer to Rodale and use the term in various ways.

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5 IFOAM Organics International; more information here.
In 2015, Regeneration International (RI) was founded with the aim to reverse global warming and end world hunger by transitioning towards a more sustainable, “regenerative”, food system. Most of the founders of this movement initially came from the organic community, and the goals are similar to those of the organic pioneers in the EU\textsuperscript{10}. In 2017, André Leu, former president of IFOAM – Organics International, the international association for organic food and farming, became director of RI, further showing the closeness of these two movements\textsuperscript{10}. The rationale behind founding RI was to act on the fourth feature of Organic 3.0, i.e., “Inclusiveness of wider sustainability interests, through alliances with the many movements and organizations that have complementary approaches to truly sustainable food and farming”. The overall aim of regenerative agriculture is therefore to enable the widespread uptake of truly sustainable farming systems and markets based on organic principles. Specifically, one of the arguments used in support of the development of RA is the need to expand the adoption of a new concept of agriculture in contexts that are harder to reach, contributing to the following two objectives: (1) Increasing the adoption of organic principles in mainstream agriculture, improving global sustainability; and (2) Growing the organic sector, whilst making it more sustainable. To support these objectives, there tends to be a focus on the intentions and broad definitions of RA, without focusing extensively on precise rules and prescriptions. Many of these serious actors are driving positive transition on farms towards regenerative practices. They are doing this through farmer education, demonstration farms, policy development, documentation of outcomes, collaborations with research, corporate interests and celebrities\textsuperscript{11}. Several actors have also developed impressive regenerative narratives, communicating effectively and convincingly on regenerating soil health, and the connection between soil, carbon drawdown and the climate challenge. The organic movement applauds this and is inspired by these optimistic narratives with strong visual communication on the soil and landscape regeneration possible in farming. We are also determined that these positive and convincing narratives are not misused by corporate branding based on cosmetic changes in farm practices.

1.2 Regenerative agriculture and organic agriculture

1.2.1 Similarities

The similarities between organic agriculture and regenerative agriculture, as intended by its organic founders, far outweigh their differences, and the history and goals of these two movements are heavily intertwined. Regenerative and organic are aligned on the principles. In fact, all regenerative principles are embedded in the organic principles of health, ecology, fairness, and care. The following five principles are most often associated with RA\textsuperscript{12}:

- Don’t disturb the soil.
- Keep the soil surface covered.
- Keep living roots in the soil.
- Grow a diverse range of crops.
- Bring grazing animals back to the land.

Regenerative agriculture has at its heart the concept of soil health, which is also central to organic farming. Among the four principles of organic agriculture, there is the health principle, according to which “Organic Agriculture should sustain and enhance the health of soil, plant, animal, human and planet as one and indivisible”\textsuperscript{13}. As stated by IFOAM Organics Europe, ”Immunity, resilience, and regeneration are key characteristics of health. A healthy soil and high biodiversity are at the core of successful organic farming, rather than a massive use of inputs”\textsuperscript{14}. Regenerative practices are also widespread in organic farming, for instance, cover crops, crop rotation, composting, and intercropping, with an emphasis on soil enriching practices, e.g., zero till or reduced tillage\textsuperscript{15}. For Regeneration International, the criteria to analyse the overall regenerative performance of a farming system are the four principles of organic farming: health, ecology, fairness, and care\textsuperscript{16}. In other words, a holistic

\textsuperscript{10} About Regeneration International. Here.
\textsuperscript{11} https://kissthegroundmovie.com/
\textsuperscript{12} https://groundswellmovie.com/principles-of-regenerative-agriculture/
\textsuperscript{14} IFOAM Organics Europe. Biodiversity, soil and water. Producing food while preserving our natural resources. Available here.
sustainability assessment, rather than a narrow “regenerative” definition based, for instance, on soil carbon alone.

### 1.2.2 Differences between organic and regenerative agriculture

While the origins and the goals of regenerative agriculture and organic agriculture are similar, the main difference is that the use of the term “organic” is subject to a clear legal framework in most regions of the world, whereas “regenerative” is not. This means that a farm or a company can call themselves “regenerative” or write “regenerative” on the packaging of their food product without being bound to follow a particular production method. While the words “organic”, “eco” and “bio” are defined and protected at EU level\(^\text{17}\), the term RA is not.

Another important difference is that, given the many, non-legally binding, definitions of RA, this term does not per se prohibit the use of synthetic pesticides and fertilisers, nor the use of GMOs\(^\text{18}\). This increases the risk that the concept of RA is claimed by industrial agribusiness corporates, whereas organic farming clearly prohibits the use of these substances and organisms in the production process and works with natural processes to optimize productivity and reduce input dependency.

The legal definition of a range of concrete practices is a clear benefit of organic to consumers, policymakers, etc. and the baseline for achieving the desired outcome or objective, and the organic guarantee system of standards, inspection and certification of these practices is a unique infrastructure not found in RA. Still, the focus of RA on outcomes can be a source of inspiration for the organic farming and food sector. Outcomes for soil carbon or biodiversity may not become a part of organic standards, but they could be valuable tools for farmers to improve organic practices and could gain an important role in the certification and marketing of organic foods. Measurements of outcomes for carbon sequestration or biodiversity are also becoming monetised, and it is important that organic farmers also benefit from the more legitimate forms of payment for carbon services, via public or private financing. The organic sector must build partnerships and rise to this challenge.\(^\text{19}\) While the EU and USDA organic legislation remain the minimum baseline for all organic standards and practices, private standards like Regenerative Organic Certified (ROC) in the USA and standards by KRAV\(^\text{20}\), Naturland\(^\text{21}\), or FNAB, to mention but a few, in the EU go further by, for instance, including additional standards for soil improvement, biodiversity or social fairness. Organic principles of fairness, food sovereignty and justice in supply chains are very seldom part of corporate regenerative concepts and could be a core differentiating factor in the organic and agroecology movements.

Given the principles, roots, original intentions and current ambiguity in RA, the term **regenerative agriculture should – when used in policy and market environments – build on the solid baseline requirements of the EU organic regulation.** This will reduce the frequency of market and policy claims based on minimal changes in practices. Serious regenerative actors will need a legal definition, third-party certification, etc. to make claims.

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\(^{17}\) As per Article 30 of Regulation 888/2018 on organic production and labelling of organic products.

\(^{18}\) In the literature review mentioned under footnote 2, it appeared that 12.4% of definitions of regenerative agriculture found in journal articles prohibited the use of synthetic pesticides. While the prohibition of GMOs is not explicitly stated in the literature review, there are examples of so-called regenerative practices that use GMOs. For instance, Syngenta’s CEO Erik Fyrwald advocates for so-called regenerative farming that uses crop rotation techniques from organic farming and the targeted use of pesticides and GMOs to increase yields. More information [here](#).

\(^{19}\) A new effort to bring together the regenerative organic principles and the organic strengths in standard setting and certification is at work especially in the USA. The term “regenerative organic agriculture” describes "a holistic systems approach to agriculture that encourages continual on farm innovation for environmental, social, economic and spiritual wellbeing" (Rodale Institute, Regenerative Organic Agriculture and Climate Change. A Down-to-Earth Solution to Global Warming, 2020. White paper available [here](#)). The link with organic farming is clear: as a matter of fact, the terminology used is “regenerative organic”, not just regenerative agriculture. Just like the term “regenerative”, the term “regenerative organic” is not legally defined, but the Regenerative Organic Alliance has developed private standards that certify such practices via Regenerative Organic Certified (ROC) in the US (ROC, [here](#)).

\(^{20}\) KRAV is the main certification organisation for organic production in Sweden. The KRAV certification and label goes beyond the EU organic requirements, including corporate responsibility requirements dealing with the social aspects throughout the supply chain.

\(^{21}\) is the German organic label, and one of the major associations for organic agriculture in the world. Naturland’s standards go beyond the EU organic regulations by integrating the social responsibility towards workers on Naturland farms.

\(^{22}\) FNAB is the French association gathering French organic farmers, with a central governance and regional and local groups. They launched in 2020 their own label “Bio. Français. Equitable”. The label complies with the 6 criteria of the French law on fair trade, as well as additional environmental criteria.
2 Regenerative agriculture today: too often misused

The absence of an agreed definition of the term “regenerative agriculture” leads to confusion, shortcomings, and opportunities for greenwashing.

2.1 A proliferation of terms and meanings

The Rodale Institute and Regeneration International, along with other organisations, are aware of the threats linked to the lack of a unique definition of RA. They have developed and signed the following definition: “RA describes farming and grazing practices that, among other benefits, reverse climate change by rebuilding soil organic matter and restoring degraded soil biodiversity – resulting in both carbon drawdown and improving the water cycle. Specifically, Regenerative Agriculture is a holistic land management practice that leverages the power of photosynthesis in plants to close the carbon cycle, and build soil health, crop resilience and nutrient density.”

Even if most signatories are committed to organic farming, the definition does not refer to organic, also because one of the aims of the movement is “to encourage and enable as many farmers and ranchers as possible to work in a regenerative way, even if they currently choose not to go through organic certification.”

Thus, whilst some organisations and researchers refer to RA as being very close to organic farming, e.g., the Rodale Institute and RI, others allow practices that are not permitted in organic food production and do not consider environmental integrity and the principle of ecology; they rather apply a singular focus on soil organic matter. This kind of RA is closely related to conventional farming and is subject to greenwashing.

2.2 The risk of greenwashing

RA is increasingly attracting the interest of some of the biggest agri-food actors. Lacking a clear, common definition and providing powerful communicative elements, RA allows companies wide discretion in how they engage and how many, or how few, changes they make in production. This combination is attractive for companies but also an open invitation to greenwashing, where small steps are promoted as significant regenerative solutions to climate, soil health and biodiversity.

For example, Unilever has called for a systemic change: transforming the way we use land everywhere, and has formulated principles and guidelines of how to use RA, and what it is. Stated outcomes include: “Produce crops with sufficient yield and nutritional quality to meet existing and future needs, while keeping resource inputs as low as possible.”

However, the way in which to achieve such goals is described vaguely, and it is not explicitly mentioned what methods are allowed or applied: “The most appropriate regenerative practices are likely to be region, climate and crop specific. However, changing to a regenerative focus is likely to include, for instance, improving crop rotations, adoption of cover cropping, composting, mulching and conservation tillage practices.”

PepsiCo has pledged to adopt RA practices on 7 million acres, and Cargill pledged to do the same on 10 million acres by 2030. General Mills announced that “it will advance regenerative agriculture on 1 million acres of farmland by 2030 to make a meaningful difference through Regenerative Agriculture, which we define as holistic, principles-based approach to farming and ranching that seeks to strengthen ecosystems and community resilience.”

Moreover, the CEO of Syngenta group, one of the world’s largest producers of pesticides and fertilizers, said that “the truly sustainable future of farming – I call it regenerative agriculture – is now taking shape.”

Unsurprisingly, there is no reference to organic farming in this statement, as promoting farming practices that do not rely on the use of synthetic pesticides is in contradiction with the core business of such companies. Examples of other companies that have been branding based on their intention to move to regenerative agriculture are Danone, Nestlé, and Unilever.

While there are some ambitious and truly environmentally and climate-friendly initiatives and projects that use the concept of “regenerative”, the meaning of RA embraced by some multinational companies seems to offer only a slightly less damaging form of conventional agriculture, or forms of conservation agriculture, focusing solely on soil health and crop rotation. These are narrowly focused approaches compared to the

more ambitious and legally defined concept of organic farming, which offers a holistic approach, providing benefits across sustainability goals, and guaranteeing the elimination or minimisation of external inputs like pesticides. Even if RA, as defined by the food corporations themselves, can entail some benefits for the soil, presenting it as the best farming solution to combat the climate and environmental crises and the progressive loss of biodiversity is a form of greenwashing. Indeed, a closer look at the agricultural practices described as “regenerative” by these actors reveals mainly references to reduced or no-till farming or the integration of cover crops\(^3\), which, on their own, are insufficient to transition towards more sustainable food systems. At the same time, they may use other clearly unsustainable methods that in the end neutralise or even undermine the positive effect of that single practice. An example could be the termination of cover crops by glyphosate in order to prepare the field for the main crop. Applying a few practices in isolation is not in line with RA, as defined by the regenerative organic movement developed in the United States\(^3\). Like cover crops and green manure, crop rotation is a minimum good practice, and a company that only performs crop rotation and claims to be “regenerative” is abusing the word and misleading consumers as regards the true environmental benefits this company is having.

It is moreover problematic that a number of the actors and companies that now claim to promote RA are the same that have contributed to – and continue to work for – the spread of intensive and industrial agriculture, which causes environmental damages, or that rely on the sale of inputs such as synthetic pesticides or fertilisers. The approach adopted by RI towards greenwashing and market confusion is to actively call out these corporations as “degenerative” – the opposite of regenerative – since contributing to the damage of the environment, soil, and health, due to the use, for instance, of synthetic pesticides, fertilisers, etc. Organic, on the other hand, is part of the solution to mitigating the effects of climate change and addressing the biodiversity crisis, entailing a holistic transformation of the farming system that considers soil health, plant health, and ecosystem health as one.

2.3 Regenerative labels: increasing consumer and market confusion

The variety of definitions and understandings of RA is leading to yet another consequence: the proliferation of different private labels that certify agri-food products produced with RA methods in a time during which businesses and consumers are overwhelmed by a massive number of private labels. The Ecolabel Index currently tracks 455 ecolabels (for food and non-food), 231 of which are active in Europe\(^3\). The development of these new private certification schemes on RA, when the concept of RA itself still lacks a legally binding definition and practice-setting, will confuse and undoubtedly mislead consumers, while it is also a threat to the fair and correct functioning of the agri-food market.

Developing further certification schemes or private standards on an undefined concept is ending up – as it is currently happening – in a chaotic situation with a plethora of private initiatives that differ slightly to massively between one another. To prevent confusion and greenwashing, it is important that boundaries are drawn to define which practices are regenerative, and which practices are not regenerative (such as the use of GMOs, of synthetic pesticides, industrial animal husbandry, and hydroponics). Formulating iterative levels that express the differences between RA initiatives and their levels of transition to a truly regenerative farming system would help to ensure that both smaller changes and more ambitious transformations are acknowledged. Such an approach would ensure that farmers who considering transitioning to an organic production system in the longer run, could do so as they would not be locked in practices that rely on synthetic pesticides and inputs.

<table>
<thead>
<tr>
<th>Regenerative levels</th>
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<tbody>
<tr>
<td>1. Using regenerative practices on conventional farms (practices that do not hinder the transition to organic farming such as GMOs, industrial animal husbandry, vertical farming, hydroponics)</td>
</tr>
<tr>
<td>2. EU Organic/NOP/JOP standards with many obligations on regenerative practices and principles</td>
</tr>
<tr>
<td>3. Regenerative Organic Standards (like ROA standard with organic as the baseline(^3))</td>
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</tbody>
</table>

\(^3\) As an example, Syngenta’s, Cargill’s and PepsiCo’s communications about upscaling regenerative agriculture available [here](https://regenorganic.org/wp-content/uploads/2021/02/ROC_ROC_STD_FR_v5.pdf) and [here](https://www.ecolabelindex.com).


\(^3\) Ecolabel Index. Available at: [https://www.ecolabelindex.com](https://www.ecolabelindex.com).
Considering the above, and given the origins of RA, the European organic movement views most RA as far below the legislative requirements for organic. The use of “regenerative” to supplement and correct missing elements in some organic standards is very context specific (e.g., ROC supplementing USDA organic standards in the US). An ambition could be that the term “regenerative” refers to production systems building on and exceeding organic minimum standards, and is referred to as “Regenerative Organic”.

**Conclusions**

It is important to look at what is behind an initiative, or a project described as “regenerative”: it can be highly sustainable and truly environmentally friendly or simply a form of greenwashing. RA and organic agriculture have a shared history and common goals but one significant difference: the minimum practices employed in organic agriculture are legally defined, whereas the practices employed in RA are not. This lack of definition of RA is attractive to companies that seek to rebrand themselves as “regenerative” without changing many practices. This is unfair to serious actors in the organic and regenerative movements and lowers the bar on regenerative agriculture, which originally was, like organic, about a transformation of the whole food system rather than “picking and choosing” one measure that has some environmental benefit, while still carrying out other environmentally damaging practices.

There is a need to go back to the initial meaning and holistic approach to regenerative agriculture in order to support the transition to more sustainable food systems and to prevent greenwashing. While promoting regenerative practices in conventional farming is laudable, use of “regenerative” in the market as regenerative branding and certification should, as a minimum, utilise the current legislative requirements for organic agriculture as its foundation. RA needs to be protected against greenwashing attempts.

The organic movement and IFOAM Organics Europe will commit to the following actions:

- Call out greenwashing in the use of “regenerative” by less serious actors.
- Seek collaborations with serious regenerative actors on joint goals for developing truly regenerative agriculture and policy.
- Continue to develop organic farming practices towards more regenerative organic best practices.
- Promote organic as the most credible foundation for regenerative practices, policy initiatives, corporate branding and product claims.
- Ensure inclusion of organic farming as a regenerative pathway in all policy, market and philanthropic arenas where “regenerative” is already achieving momentum.
- Explore and promote more outcome-oriented, practical documentation tools for organic benefits, as a basis for payments for farm eco-services and a tool for organic farm improvement, for policymakers and organic communications.
- Improve organic communications towards a stronger nature aesthetic and optimistic values-based communication with inspiration from the regenerative movement, bringing the regenerative organic narrative, including focus on soil health and climate, front and centre in organic communications.
- Promote Regenerative Organic Certification, where relevant, to position organics in the market and advance regenerative focus on organic farms.
- Maintain focus on a truly transformative, holistic agenda and increase focus on the organic principle of Fairness, which is lacking in RA, to improve food sovereignty, cooperative ownership, and a fair sharing of risks and rewards of organic production.