

Mr Martin Häusling MEP
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2 June 2015

Dear Mr Häusling

National Assembly for Wales – Inquiry into proposed regulation on Organic Production and Labelling

As you'll be aware, [from the letter sent to you on the 13 January 2015](#), the Environment and Sustainability Committee of the National Assembly for Wales has been undertaking work to consider the impacts of the European Commission's proposals on organic production and labelling on producers in Wales.

Whilst the Committee wholeheartedly supports the European Commission's aims of supporting the expansion of the organics sector across the EU, we have a number of grave concerns about the practical implications of the proposals for organics producers. I re-attach a copy of our original letter which sets out the evidence the Committee gathered in greater detail.

Since January we have been following the progress of the dossier through the European Parliament. We note with great interest that you have published your Draft Report on the dossier. We strongly welcome some of the amendments put forward in your Draft Report and believe that they offer significant improvements to the proposals put forward by the European Commission. We particularly welcome the inclusion of more information in the text of the regulation as opposed to delegated or implementing Acts and Amendments 3, 120, 177, 240, 310, 311, 314 and 317. We also welcome in part amendments 105, 106 and 196.



In addition, there are a number of issues for organic producers in Wales which we would be grateful if you could give further consideration to:

- 25% of farms in the UK operate properly separated and inspected organic and non-organic units. We are concerned that the ending of this exemption even after a ten-year period could lead to some producers leaving the industry.
- Many small and medium sized retailers in Wales and the UK may sell one or two pre-packaged organic products to end consumers. It has been estimated that these kinds of sales are worth £10 million a week to organic producers. We are concerned that unless exempted from certification requirements these retailers may no longer opt to sell organic produce.
- We believe that your suggested amendments to reduce the percentage of feed sourced from a farm or region are far more practical and realistic at this time than the European Commission's proposals. However, we cannot support the proposal that a region equates to NUTS 1. For us it would mean that feed would need to be sourced from Wales itself which due to our geographic and climatic conditions is not practically possible.
- We strongly support your proposal to require the European Commission to produce its report on the availability of organic seed, feed and breeding stock by 2018 and many of your proposals for stimulating the further development of these sectors. However, we remain unconvinced that a deadline of 2021 for the removal of the exemptions of conventional seed and breeding stock is realistic given the current state of development of these products. We would ask that no deadline is set until such time as the Commission has reported in 2018 on their current state of availability.
- We welcome Amendment 196 in relation to its proposals to allow the continuation of annual inspections but we are unclear about the practical implications of your suggested amendments harmonising the risk-based approach for producers and control bodies.
- We have some concern that the inclusion of mass catering within the certification process might dissuade organisations such as hospitals from procuring organic produce. We therefore look forward to hearing further discussions on the practical

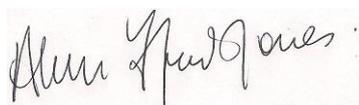


implications of their inclusion within the discussion in the Agriculture Committee on the Draft Report.

We will continue to monitor progress of this dossier through the European Parliament and look forward to engaging further with you on these issues in the near future. We have written to our Welsh MEPs asking them to support some of the important amendments made in your Draft Report and highlighting the further areas of concern for organic producers in Wales.

We hope the information provided in this letter is of use to you in your deliberations and wish you well with your work on the dossier.

Yours sincerely

A handwritten signature in black ink on a light-colored rectangular background. The signature is written in a cursive style and reads "Alun Ffred Jones".

Alun Ffred Jones AM

Chair of the Environment and Sustainability Committee

