

(Letter sent to all Welsh MEPs)

2 June 2015

Dear (Welsh MEPs)

Environment and Sustainability Committee 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. 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 with great interest. We note that the Rapporteur for the dossier, Mr Martin Häusling MEP, has published his draft report and that discussions and votes on its contents are due to take place in the Agriculture Committee over the next two months.

We strongly support some of the amendments put forward by Mr Häusling in his report and believe that they will succeed in addressing some of the concerns raised by Welsh producers in their evidence to us. In particular, we welcome the following amendments and would be grateful if you would consider supporting these amendments through your colleagues in your political groups:



- Amendment 310: which would enable the practices of tail-docking and de-horning to continue;
- Amendment 177: which would remove the proposed residue threshold for contamination and automatic de-certification;
- Amendments 3 and 120: that would aim to stimulate the production of organic seeds and other reproductive material and provide support for the development of organic feed, seeds and breeding stock through the RDP; and
- Amendment 240: which would require the European Commission to present a report to Parliament and the Council on the availability of organic feed, breeding stock and plant reproductive material by December 2018 as opposed to December 2021.

There are a number of other important issues however that do not appear to be fully addressed in the Draft Report. We would be grateful if you could urge your colleagues in your political groups to support further amendments to address these issues in their amendments to the Draft Report. In particular we would be supportive of further amendments on:

- Ensuring that the current exemptions from organic certification for retailers, contained in the 2007 organic regulation remain. A number of smaller or medium sized shops currently selling one or two local organic products or lines may be dissuaded from doing so in future if they were subject to full certification requirements. The Organics Trade Board estimates that sales through smaller retailers in the UK account for £10 million each week.
- Ensuring that mixed-farming with properly separated and inspected organic and non-organic units can continue to operate. Whilst Amendments 105, 106 are a step in the right direction by allowing mixed farming for a period of ten years we would support further amendments that would enable mixed farming to continue. It is estimated that 25% of organic farms in the UK operate on mixed-farming units.
- Ensuring that the requirements on regional feed are realistic and practical. We welcome Amendments 311, 314 and 317 which reduce to more practical levels the amount of feed that would need to be sourced from the farm or region itself for herbivores, pigs and poultry. However, we are concerned at the Rapporteur's suggestion that a region is defined as NUTS 1 level i.e. an all Wales level. All Welsh stakeholders were universally of the view that our



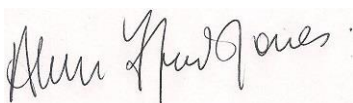
climatic, soil and geographic conditions would mean that sourcing high percentages of feed from Wales only would not be possible at present.

- Providing greater clarity on what the implications of a risk-based assessment might mean. We support Amendment 196 of the Draft Report that would enable annual audits to continue. The continuation of annual inspections were supported by all farming organisations for the reassurance they provide. We would ask however for greater clarity on the Rapporteur's proposals for the inclusion of a risk-based assessment in the certification process as the Draft Report currently states that the criteria would be defined at a later stage.
- Ensuring that exemptions permitting the use of conventional seed and breeding-stock where no organic alternative exists, are allowed continue until such time as is necessary. We are concerned that the proposed timeframe for the removal of the exemptions of 2021 is unrealistic. We believe that no timeframe should be set in legislation until the European Commission has produced a report for the Parliament and Council on the current availability of organic seed, feed and breeding stock.

We also ask that the Rapporteur and Committee fully explore the implications of the proposal to include mass catering establishments such as hospitals within the ambit of the organic certification process. We are concerned that their inclusion may dissuade such establishments from purchasing organic products and would ask that any such impacts are fully explored before being adopted. In addition, whilst in principle Amendment 178 on harmonising decertification procedures would seem to be an improvement on the current proposals we would welcome further clarification on its practical implications for producers and control bodies.

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 hope the information provided in this letter is of use to you in your engagement with this dossier.

Yours sincerely



Alun Ffred Jones AM
Chair of the Environment and Sustainability Committee

