

**National Assembly for Wales  
Environment and Sustainability Committee  
ORG 04  
Inquiry into Organic Production and Labelling of Organic Products  
Response from Organic Trade Board**

Committee Clerk  
Environment and Sustainability Committee  
National Assembly for Wales  
Cardiff Bay, CF99 1NA.  
[ES.Comm@wales.gov.uk](mailto:ES.Comm@wales.gov.uk)



The voice of the  
organic industry

**20<sup>th</sup> October 2014**

**Dear Alun Ffred Jones AM**

Thank you for the opportunity to comment on your inquiry into the Organic Production and Labelling of Organic Products.

I am writing to formally set out the views of the Organic Trade Board (OTB), an industry body representing approximately 70% of the UK's organic market. We have 120 members from the largest retailers and brands, processors and smaller companies, some of whom are producers and we have one aim – to grow organic sales in the UK. Some of our members are businesses and producers in Wales, such as Rhug, Trioni, Calon Wen & Welsh Lamb & Beef Producers Ltd.

In summary, our members believe that far from strengthening and growing the organic market in Wales, the proposals would undermine the market significantly at a time when we are finally back on a course of growth. The Welsh organic market in common with that in the rest of the UK suffered greatly in the recession and now sales figures are starting to look up these proposals come at a very bad time.

Having surveyed our membership over the summer and discussed the issue with farmers and their representative bodies, the key concern for them is the proposal that the entire farm holding must be under organic management.

Our members responses suggest that this will:

- reduce the value of Wales' organic market significantly
- reduce Welsh grown produce available and increase imports significantly
- reduce the organic land area in Wales thereby reducing the environmental benefits of organic in Wales

As the Soil Association 2014 Organic market report points out, a significant amount of farmers in Wales withdrew from the Organic Farming Scheme in 2013 and the proposals from the EU will do little to increase remaining organic farmer's confidence.

Almost half of our members are both organic and conventional and their suppliers are too and many would give up organic altogether should this rule come into operation.

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Almost 60% of our members who have mixed holdings said they would give up organic if this rule was to come into operation. Here is a sample of comments from our survey from mixed producers:

- “This will stifle growth and productivity.”
- “It is not financially viable for my whole farm to be organic.”
- “I would have to go back to conventional production and the EU would lose the valuable wildlife it has been trying to protect.”

The second area where our members felt strongly there would be a negative impact is the “Retailer exemption removal.” This would also restrict the organic market in Wales because this would require every shop selling even one or two organic products to be certified, therefore adding a cost burden which could result in them de-stocking their organic lines. Organic sales through independent retailers amount to approximately £10 million each week so this would be a significant blow for the sector to remove this sales outlet.

Our large retailer members have also expressed concerns about this proposal and would resist this wholeheartedly.

Finally, the OTB also feels that the Commission has put far too much weight on their “consumer survey” which they say told them “ordinary consumers want to have the rules strengthened.” This consumer survey was not robust, was a self selecting sample of people, and was not scientifically valid and therefore the Commission should not use it as evidence to support their views. It is irrelevant.

I can confirm I would be happy to give oral evidence, if invited. I am also a member of the Better Organic Business Links steering group at IBERS / Organic Centre Wales and I live in Wales and have a long standing interest in the organic sector here. I was a member of ACOS, the Advisory Committee on Organic Standards and the initiator of the Organic Action Plan in England. I now run the Organic Trade Board & our Organic Naturally Different Consumer campaign and have a good knowledge of the organic market and can represent an industry and consumer view.

Yours sincerely

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

Catherine Fookes  
Organic Trade Board