National Assembly for Wales
Environment and Sustainability Committee
ORG 05
Inquiry into Organic Production and Labelling of Organic Products
Response from Organic Research Centre

Written evidence from the Organic Research Centre to the National Assembly for Wales Inquiry into organic production and labelling of organic products

1 About the Organic Research Centre

1. The Organic Research Centre is operated by the Progressive Farming Trust Ltd., a registered charity established in 1980 to support research, development and knowledge transfer activities to enable the development of sustainable food and farming systems based on organic/ agroecological approaches. The work of the Organic Research Centre currently covers plant breeding, crop and livestock production systems, agroforestry, environmental impact and sustainability assessment of farming systems, and economic and policy evaluations. Further information on ORC activities can be found at: www.organicresearchcentre.com.
2. ORC was a founding partner in the formation of Organic Centre Wales in 2000 with Welsh Government funding and continues to operate OCW in partnership with IBERS (Aberystwyth University) and ADAS. ORC is currently contracted, on behalf of the OCW partnership, to provide policy and other advice to Welsh Government with respect to the development of the Glastir Organic scheme and the dissemination of related information on-line and through shows and events.
3. ORC has also been involved in international partnerships contracted by the European Commission to evaluate the policy support for organic farming in Europe and the regulations for organic farming in Europe, both of which may be relevant to this Inquiry.

2 The wider benefits of organic farming

4. While the market for organic food and the regulations that underpin it are sometime seem as the primary objective, they were developed as a mean to support the implementation and financial viability of sustainable practice which deliver significant societal benefits.
5. Research carried out across Europe over the last 30 years, particularly in central and northern European countries with higher proportions of organic land management than in the UK, has shown that organic farming offers significant environmental and other benefits, including:
    - Increased **biodiversity**, within fields as well as on field margins, benefiting habitats as well as a wide range of soil, plant, insect, amphibians, bird and wild mammal species, primarily as a consequence of reduced fertilizer and pesticide inputs, and reduced stocking rates
    - Improved **soil conservation and biological activity**, due to better ground cover with vegetation, organic matter additions and maintenance, and impact of biological processes on soil structure and aggregate stability
    - Improved **water quality**, particularly with respect to pesticide residues and eutrophication from nitrate and phosphate loss. There is also some evidence for improved **soil water**

infiltration, reducing water flow rates into river systems and potentially contributing to flood alleviation.

- Reduced **non-renewable resource use**, in particular fossil energy used in fertiliser and pesticide manufacture, but also phosphate and other major mined nutrients
- Reduced **greenhouse gas emissions**, through restoration of soil carbon in rotational systems, reduced nitrogen and fossil energy use, with reduced NO_x and CO_2 emissions balancing, in some cases, higher CH_4 emissions due to reduced productivity of livestock.
- Higher **pollinator** presence, through the use of (flowering) legume species in the fertility building phase of rotations and flowering refuges encouraging pollinators
- Enhanced **agricultural landscapes** – through smaller fields, diversity of enterprises, and species cultivated (including integration of perennial shrubs and trees)

6. Organic farming achieves this through its reliance on:
    - a range of biological processes, such as nitrogen fixation through legumes/rhizobia,
    - species diversity, both cropped and uncropped
    - ecosystem management practices such as refuges to encourage beneficial insects,
    - organic manuring, from livestock, green manures and crop residues, providing energy as well as nutrients to maintain the soil ecosystem,
    - avoidance of high solubility nutrient sources, which can result in excess crop uptake
    - good husbandry practices such as crop rotations and clean grazing systems, and
    - mechanical cultivations

    to reduce or avoid the use non-renewable energy, fertilizer, pesticide and pharmaceutical inputs.
7. The environmental impacts of organic farming may be a result:
    - **directly** from organic practices/ organic regulation requirements, e.g. more biodiversity due to restrictions on biocide use, or
    - **indirectly**, e.g. more farmland birds due to more overwintering stubbles due to more spring cereals sown due to need to alternate sowing periods to control weeds due to non-use of herbicides.
8. Impacts will also vary according to:
    - the type (e.g. horticulture, dairy, mixed cropping and livestock) and
    - intensity (e.g. more intensive lowland or less intensive hill/mountain) of the organic farming system, as well as on
    - the skills and experience of individual producers.
9. Therefore, while it is possible to make a case in general terms for organic farming delivering environmental benefits, it is not possible to guarantee that each organic farm delivers the same basket of specific benefits.
10. The practices used do also impact on aspects of **food quality**, often positively (e.g. fewer residues found on organic food, higher content of some valuable nutritional components) but in some cases also negatively. However, the debate is still on going with respect to the relevance of this for human health – frequent organic consumers tend also to modify their

diets and other behaviours. Some studies have shown reduced pesticide residue levels in human hair and urine samples of organic consumers, but the significance of this is unclear.

11. While the lower yields and stocking rates associated with organic production (typical of conventional systems in the 1970s) are relevant, many of the benefits described are still valid on a per unit food produced as well as per hectare basis. Despite the lower yields, which are more marked in countries with high intensity conventional systems, and taking account of issues relating to whole system productivity, utilization of crops, food waste and diet, organic farming through conserving soil, water, biodiversity and non-renewable resources still has a contribution to make to **global food security**.
12. Specialist markets and agri-environmental policy support help to ensure that the **profitability** of organic farms remains similar to, and in some cases higher, than that of comparable conventional farms, as shown by the analysis of Farm Business Survey data.
13. It is important that the EU regulations designed to underpin the market for organic products also support the delivery of the underlying organic principles, best practices and public good delivery.

3 The current regulatory framework for organic farming in Europe

14. The organic sector in Europe has grown substantially in the last 30 years, both in land area and retail sales. At the end of 2012, 11.2 million ha of land were certified on 320,000 holdings, with a retail sales value of €22.8 billion, representing 41% of global organic sales.
15. During this period the EC introduced two consecutive regulations governing the production, labelling and inspection of organic food and farming. In 1992, an EU-wide definition of organic farming was introduced with the Council Regulation (EEC) 2092/91. This provided the basis for consumer trust and for policy support, and has helped protect organic farmers against false and misleading organic claims. After many amendments this first regulation was replaced in 2009 by the current Council Regulation (EC) 834/2007 and its implementing rules.
16. Under the EU organic regulations past and present, all food products sold as organic (or biological/ecological as synonyms) must by law follow certain standards (both European and national), and have to be regularly inspected and certified by approved certification bodies. Certification of the holding is also a condition of eligibility for the organic farming support schemes throughout the UK as in the rest of Europe.
17. Currently, two Regulations together set out the legal basis for organic production in the EU: **Council Regulation (EC) 834/2007** on organic food sets out objectives and principles of organic production as well as basic requirements for plant and livestock production, aquaculture, compound feed, the preparation of products (i.e. processing), and criteria for the approval of substances. The **Commission Regulation (EC) 889/2008** lays down more detail on the implementation for crop and livestock production incl. aquaculture, seaweed and yeast production, processed products, wine, packaging, transport and storage, labelling, and inspection, and Annexes listing permitted inputs.
18. The **scope** of the EU regulations covers all operators along the whole organic food supply chain; only catering and some parts of retail are exempt, the former can be covered by national regulations. Private standard owners, but not governments or government agencies, can have stricter rules.
19. **Defra** has the legislative function of the Competent Authority for the whole of the UK**,** responsible for implementing the EU regulations in the UK. Defra has issued Guidance

Documents on European Organic Standards to assist producers, processors and importers with the implications of the new regime for UK producers[1]. Defra is assisted by the UK Accreditation Service (UKAS) in licensing the UK organic certification (control) bodies and for overseeing their inspection activities[2]. Currently eight certification bodies are accredited to operate in the UK; the three main ones operating in Wales are: Organic Farmers and Growers Ltd. (OF&G), Quality Welsh Food Certification (QWFC) and Soil Association Certification Ltd. (SA Cert).

20. The three main objectives of organic farming set out in Article 3 of EC Reg 834/2007 can be summarised as:

    - establish a sustainable management system for agriculture methods
    - aim at producing products of high quality; and
    - aim at producing a wide variety of foods and other agricultural products that respond to consumers' demand for goods produced by the use of processes that do not harm the environment, human health, plant health or animal health and welfare.

21. *Organic farming principles* are defined in Article 4 of EC Reg 834/2007. These principles are legally binding and should be considered together with the implementing rules. The three main principles can be summarised as:

    - the appropriate design and management of biological processes based on ecological systems using natural resources, living organism and mechanical methods
    - the restriction of the use of external inputs;
    - the strict limitation of the use of chemically synthesised inputs to exceptional cases.

22. The principles also foresee the potential for the adaptation of the rules under certain specified conditions in light of local conditions, stages of development and specific husbandry practices but there have been very few exceptions granted under these rules. In addition, specific principles are defined for farming, processing of organic food and processing of organic feed.

23. The use of GMOs in organic products is prohibited. To determine whether an input is GM free, the operator can rely on the labels in line with the Directive 2001/18/EC.

24. On pre-packaged goods the use of the new EU logo (Euroleaf) became mandatory in July 2012. The label also has to show an indication of the place of origin of the raw materials and the code number of the control body that carried out the most recent inspection of the product (GB Organic Certification XX). Only products containing more than 95% organic ingredients can be labelled as organic; products with lower organic content can declare the organic origin of raw materials on the ingredient list, but must still be produced under the control of an approved certification body to do this. The name, initials or logo of the certifier can be used in addition.

25. The *use of permitted inputs* is regulated in the relevant sections for crops, livestock and processing with lists of permitted inputs in the Annexes of Regulation (EC) 889/2009. Agricultural raw materials should mainly come from organic origin, with some exceptions.

26. The *control system* requires an annual verification of each operator, carried out by an organic control/certification body leading to certification. The control system is linked to the European Regulation on control systems for food (EC/882/2007) which is currently under review. It is at present not clear whether this will result in changes to the organic control system in the near

1.

[1] www.defra.gov.uk/foodfarm/growing/organic/standards/pdf/guidance-document-jan2010.pdf

[2] Up-to-date list of certification bodies at www.gov.uk/organic-certification-and-standards

future. All UK certification bodies have to be accredited by UKAS[3] in accordance with the requirements for bodies operating product certification systems (EN 45011 or ISO 65). Irish Certification Bodies currently operating in the UK are accredited in Ireland and use IE control body numbers.

27. Some *certification bodies* in the UK operate their *own standards*, which may include higher specifications than those required by the EU Regulations, particularly with regard to livestock husbandry, environmental requirements, and to the use of certain inputs. Regular updates to such standards are distributed to licensees in the form of newsletters. Some control bodies have or are aiming to develop standards in new areas currently not regulated in detail by the EU, such as catering, pullet rearing and transplant production.

4 The external evaluation of the current regulations

28. In 2012, the European Commission contracted an external ex-post evaluation of the existing regulation to run alongside an internal ex-ante impact assessment of the new one. ORC (represented by Dr Susanne Padel) was part of the international evaluation team that under this evaluation). Here we summarise some of the key conclusions. [4]

4.1 Scope of the external evaluation

29. The scope of the external evaluation was to explore the adequacy of the current rules for organic production, controls, labelling and trade with third countries, with respect to achieving the objectives as they are stated in the in Articles 1 and 3 of the Regulation. These are to provide a basis for sustainable development of organic production, while ensuring the effective functioning of the internal market, guaranteeing fair competition, and ensuring consumer confidence and protecting consumer interests. Furthermore, organic production shall establish a sustainable management system for agriculture, aimed at respecting nature's systems and cycles, contributing to high levels of biodiversity, protecting natural resources, producing products of high quality and a wide variety of foods and other agricultural products that respond to consumers' demand.

30. The EC specified eight evaluation questions (EQs) that the team had to address. Key conclusions summarised in this evidence relate to production and processing rules including objectives, principles and some exceptional rules (EQ2); control systems (EQ3); import regime (EQ4) and labeling/consumer perception of organic farming (EQ5). The report also addresses further questions relating to the scope (EQ1), degree of simplification of the current legislation compared to before 2009 (EQ6), creation of EU added value (EQ7) and sustainable development of the organic farming sector (EQ8)

31. This evidence focuses on results relating to production rules, the control rules and consumer perceptions.

4.2 Evidence considered in the evaluation

32. The evaluation was based on the following sources:

- 13 national case studies (consisting of 246 interviews with key stakeholders, and an analysis of national regulations, private standards and grey literature) which provided in-depth knowledge of the implementation of legislation in individual EU Member States.

1.

[3] www.ukas.com/about_accreditation/accredited_bodies

[4] The full report can be found at http://ec.europa.eu/agriculture/evaluation/market-and-income-reports/organic-farming-2013_en.htm

- Specific case studies of one fraud case 'Gatto con gli stivali' to understand how effectively the control system deals with fraud.
- Web-based stakeholder survey with 265 respondents, mainly about their attitudes to the control systems.
- Case studies of three 'suspected' cases of organic products imported from countries outside the EU to understand the adequacy and effectiveness of the import regime.
- Interviews with EU-level stakeholders/experts, supplemented by the analysis of a large number of relevant European documents.
- Web-based consumer survey with 3 000 respondents conducted in six Member States (Estonia, France, Germany, Italy, Poland and the United Kingdom) to fill gaps in the literature regarding the degree of knowledge about, and the perception of the EU organic logo and some other issues.

4.3 Key conclusions

4.3.1 Production rules including overall objectives and principles

33. The evaluation concluded that the Regulation is generally adequate and provides a sound basis for sustainable development of organic production in the European Union, but pointed to a number of areas where the regulatory framework could be improved.
34. Scientific literature confirms that organic farming delivers in developing a sustainable management system for agriculture and some of these effects can be directly linked to the rules laid down in the Regulation (see section 2 above).
35. Stating the objectives and principles of organic agriculture within the Regulation has contributed to a more harmonised perception of the concept of organic farming, particularly among control bodies and competent authorities.
36. However, not all areas for which objectives and principles are stated are detailed in the rules: for example, in relation to energy use and water management.
37. Nor do the production rules fully limit the intensification of some production sectors, such as housing for poultry or greenhouse production.

4.3.2 Simplification/red tape reduction

38. One aim of the 2009 revision resulting in Regulation 834/2007 was simplification, which in the context of agricultural policies in Europe means reducing red tape for both farmers and administrators by making rules more transparent, easier to understand and less burdensome to comply with.
39. The evaluation concluded that the current legislative framework for organic farming has significantly improved transparency compared with before 2009, but it has not simplified administration and management.

4.3.3 Exceptional rules

40. The system of exceptional rules was established to cater for differences in the state of development of the organic sector throughout Europe when the Regulation came into force.
41. The evaluation examined three exceptional rules which allow for the use of non-organic inputs (young poultry, feed for monogastrics and seeds) and found each case to be different regarding the extent of use of exceptions and the present availability of organic inputs.

42. The present system of exceptional rules has not resulted in improvements in the availability of organic supplies for all inputs. However, lack of data across the EU and all sectors prevents firm judgment being reached in all cases.

4.3.4 Control, labelling and consumer awareness

43. The rules relating to control were found to be mainly adequate, but effectiveness and efficiency could be improved through moving to a system based on risk-assessment.
44. In some member states shortcomings in the supervision of the control bodies and in the information exchange were noted.
45. The labelling rules address the use of the protected terms and include provision on the EU organic logo, which aims to increase recognition of organic products in all EU countries.
46. Across six countries, a quarter of respondents recognised the new EU organic logo, ranging from 13% in Poland to 17% in the UK and 36% in Estonia.
47. High recognition in France (35%) was attributed to the fact that the 'Euroleaf' has been clearly associated with the well-established French national AB logo.
48. It is recommended to explore how the logo could be more visually associated with the protected terms, for example by stating the indication of the control body in the same colour and directly next to the logo.
49. The majority of respondents to a consumer survey (3000 participants in total, 500 each in six countries) were familiar with the main issues of organic farming, such as growing without the use of synthetic chemicals, and production by methods protecting the environment or without the use of genetically modified seeds.
50. However a large proportion also thought that some 'incorrect' statements were part of the legal definition, such as 'needs to be produced on small farms' and 'needs to be produced locally'.

4.3.5 Import regime

51. In the last two decades, organic supply and distribution chains have become increasingly organised globally. For farmers and consumers in the EU, it is important that organic products from third countries are produced according to equal requirements and that control systems guarantee conformity to the same extent as within the EU.
52. The present import regime was judged to be largely adequate in terms of achieving the global objectives of the Regulation, but with some shortcomings mainly in relation to the resources required to assess equivalence. Importers reported that the process can be rather slow and remains only paper based.

4.4 Overall assessment

53. The evaluation revealed that the Regulation provides the EU with added value, notably by defining the common rules for the organic market.
54. It has also contributed to the development of the organic farming sector, but regulation is only one factor among many; others include commodity markets, support payments for conventional and organic farming and consumer demand for organic products.
55. Organic sector development continues to vary between Member States, from those in the early stages of development to well established, maturing markets.

56. Barriers to organic conversion continue to exist throughout the EU but again vary in different Member States.

5 The new EC organic regulation proposals

57. In our view, the new EU proposal[5] is a mix of good intentions and inadequately thought out provisions, based on a very limited assessment of the impact on organic production, as opposed to consumer perspectives, and with too much detail left to delegated acts.
58. Due to be introduced in 2017 (in the middle of Glastir Organic 5-year agreements), it could lead to a serious decline in the organic sector. Even before that, the proposals will generate much uncertainty, and may lead to some producers deciding not to sign up for long-term support agreements at this stage.
59. The EC's clear statement that it is setting out to create a regulation based on organic principles and in accord with people's expectations of organic, and to bring these into practice, should be welcomed. But there are specific concerns about individual proposals - in summary, the proposed regulation will:
    - End all derogations or 'exceptional rules', which means all certified producers will be required to use 100% organic inputs and agricultural ingredients including seed, livestock (including chicks), livestock feed and ingredients for food processing. Transitional rules will be provided separately in a delegated act.
    - End parallel production including the use of nonorganic livestock on conventional land. It will require the whole farm (unit/holding - not clearly defined) – to be 100% organic.
    - Require that all livestock feed – in the case of cattle and sheep, or 60% for pigs and poultry, comes from the farm or 'region', but it does not define what is meant by 'region'.
    - Require automatic decertification following low levels of contamination from an 'unapproved substance' (pesticide) even if the contamination is beyond the control of the operator (including farmers). This will create a huge inspection burden which will largely fall on the operator.
    - Risk based controls will be introduced removing the need for annual inspections for low risk operators. In principle, provided that the process is well defined, we support this.
    - Group certification will be introduced to encourage smaller producers (under 5ha) to become certified. Whilst it should be applauded to reduce certification costs for them, some certification bodies are opposed to this and there are likely to be complaints of unfair treatment from small farmers with holdings over 5ha. The Welsh Government has commissioned from OCW a scoping study to examine how a co-operative scheme might address the needs of small-scale producers and potentially integrate a group certification approach. This could provide an opportunity to pilot this new approach under official supervision.
    - Control is to be split between DG Agri and DG Sanco with the later taking the lead in the context of general EU food and feed regulations. We are concerned that this may result in an end-product rather than process-focused approach to organic certification which is inappropriate to dealing with the nuances of an ecological approach to production processes and systems.

1.

[5] The new proposal and all the supporting documents can be found at http://ec.europa.eu/agriculture/organic/home_en

- Only one certifier will be allowed in any specific supply chain. This is intended to avoid cracks and opportunity for fraud or miss-selling. It is unclear how it will work and whether it constitutes unwarranted intervention in the Single Market.
- Harmonisation of actions for non-compliance throughout the EU will be introduced but there is no definition or detail.
- Some good intentions are expressed about harmonizing third country equivalence and controls but changes could impact both positively and negatively on domestic production. There is also significant concern that the emphasis on strict compliance rather than equivalence could exclude many developing countries from EU markets, as they do not have the negotiating strength to reach equivalence agreements.

5.1 Key concerns about the new regulation

5.1.1 Uneven development of the organic sector in parts of the EU

60. Organic farming is a biologically based production system that is practised across the ecologically and culturally diverse European Union. As a result it is variable in its development and proximity to being able to put all its principles into practice.

61. In terms of availability of organic inputs, some countries are much better developed than others, but all have problem areas. At this moment there are few, if any, parts of the EU where the organic sector could operate without some use of non-organic inputs and it is uncertain when this situation can change. DG Agri, the responsible part of the EC, believes that removing derogations will strengthen the organic sector's integrity and environmental performance; although they have produced limited evidence to support the latter claim.

62. Many countries have major structural obstacles ranging from the make-up of farms to lack of production capacity and market shape and development, not to mention ongoing technical issues, such as nutrition for some classes of livestock and the virtual non-existence of organic plant breeding and organic seed production for a whole range of crops grown including many vegetables, forage crops and even trees.

5.1.2 Derogations (exceptional rules)

63. Derogations (or exceptional rules) have been applied to encourage the development of the organic sector, in particular in areas where fully organic status inputs have very restricted availability. While it has been frustrating at times to see extensions to the time limits for some of these, there has been some progress. For example, the organic ruminant livestock sector has adapted well to feeding 100% organic rations since the derogation was removed. Some derogations are still needed, for example in relation to organic seeds for minor crops. Pretending they are not could lead either to a contraction of organic production in some parts of the sector, to reduced crop diversity or to higher production costs.

64. The Commission does acknowledge this in its impact assessment and also that "stricter rules can be seen as a barrier to conversion, notably because insufficient availability of inputs such as seeds in their organic form when stricter rules are implemented. It expects this to only be a short-term effect, but we are unclear what this conclusion is based on.

65. The use of delegated acts (see below) for the transition from the current rules to the new ones means that the detail of when and which derogation will be phased out is not transparent at present.

66. Given the EC's clearly stated belief that the public want to see an end to exemptions and derogations and that terminating these 'exceptional acts' will speed up the development of

the organic sector, it can be assumed that, initially at least, the EC will seek to act in a robust and rather inflexible way. It is this and the surrounding uncertainty which could devastate the sector.

5.2 Delegated powers

67. A major problem is that it is unclear how rigidly the new regulation will be implemented. The Commission is proposing to give itself 'the power to adopt acts to supplement or amend elements of this Regulation' through 'delegated acts' in substantial areas of the provisions.

68. Whilst it can call on a panel of experts for advice it is not obliged to do so and it certainly does not have to hold wide or full stakeholder consultation or engagement on all issues; nor does it have to publish a programme or timetable for its use of such powers.

69. It does have to report their use to the Council of Ministers and the European Parliament but in practice, unless there is a political dimension, this is a formality. The only thing the proposed regulation tells us about how delegated powers will be used is that the EC is obliged to issue a report on the availability of organic seed and plant reproductive material at the end of 2021. In all other areas it is uncertain how flexibly or otherwise delegated acts will be used.

5.2.1 Inadequate impact assessment

70. The EC has placed much emphasis on the views expressed by citizens. Alongside the proposal the EC has published its own impact assessment, but it looks as if the EC has been overwhelmed by its own good intentions and swamped by the unbalanced responses, mainly from consumers, of which 60% from France, to a poorly-framed public consultation.

71. Overall and in some specifics the proposals are farreaching and will have a huge impact on some individual operators, some types of organic businesses and the viability of the whole EU organic sector in its current form. The impact on producers has not been adequately assessed.

72. However, the EC has built its proposals on the moral authority of the goal of enhancing the integrity of organic production in response to public demand. The perspectives of the organic sector and member states can be cast as protecting vested interests. This would be very short-sighted. Without producers who are willing to farm organically the expectations of consumers for a high quality organic product with low residues cannot be met.

5.3 Conclusion

73. It is clear from both the EC's internal review and the commissioned external evaluation of the existing regulation that some improvements had to be made, including adaptation to the Lisbon treaty. But it is far from clear that a whole new regulation is needed – the existing regulation could be adapted.

74. If a new regulation is to be progressed, then substantial redrafting will be required to ensure that organic principles are properly set out, more of the implementing rules are specified in advance and not left to delegated acts, and the rules are not made too tight or burdensome as to cause severe damage to the organic sector and the delivery of public benefits now widely supported under agri-environmental and other rural development measures.

6 The new EU organic action plan

75. On 24th March, the European Commission published its action plan for organic food and farming from 2014-2020[6]. The last one, published in 2004, heralded significant changes in the organic regulations leading to their publication in 2007/08. This one focuses more on support actions, with the Commission undertaking to:

- Increase awareness of EU policy instruments by:
  1. publishing an informative document in 2014 for farmers, processors and retailers, outlining organic regulations and policy support;
  2. including organic farming as a specific theme in CAP information measures;
- Ensure awareness of EU organic regulations and the logo, by
  3. continuing to raise awareness of the information and promotion support available.
  4. conducting surveys on consumers' awareness of the EU organic logo and confidence in and understanding of the EU organic farming scheme;
  5. revising its Green Public Procurement criteria by the end of 2015 and developing specific information material on organic products in public procurement.
- Promote research and innovation to overcome challenges in organic rules, by
  6. organising a research and innovation priorities conference in 2015;
  7. strengthening research, exchange and uptake of research results in Horizon 2020 ERA-Net and other research funding frameworks;
- Undertake monitoring and evaluation, by
  8. publishing regular reports on EU organic production statistics;
  9. analysing added value in organic food supply chains and barriers to entry;
- Ensure consumer confidence in organic products, by
  10. encouraging Member States to explore synergies and simplifications between activities of Accreditation Bodies and Competent Authorities;
  11. proposing the integration of organic regulation requirements in the TARIC database;
  12. developing electronic certification of imports for the internal market
  13. assisting Member States in developing and implementing an organic fraud prevention policy;
- Reinforce the external (trade) dimension of EU organicproduction, by
  14. continuing to support and cooperate with trade partners in developing countries;
  15. considering increased convergence of standards among leading organic partners and explore the possibility of a plurilateral agreement;
  16. exploring different possibilities to gather and to analyse statistical data on volume and value of trade with third countries;
  17. supporting the development of Codex Alimentarius rules on aquaculture organic wine;
  18. increasing protection of the EU organic logo in Third countries.

76. With respect to action points 1 and 2, it is unclear to what extent EU efforts can add to those already being undertaken by Member States, and in many cases there is a more urgent need for Member States to fully utilize the opportunities provided through the Rural Development Regulations and other support programmes to support their organic sectors and to communicate that support to stakeholders.

1. ———

[6] *http://ec.europa.eu/agriculture/organic/documents/eu-policy/european-action-plan/act_en.pdf*

77. With respect to action points 3 and 4, the issue of promotion and consumer awareness of the EU logo and certification is important. Within the UK, EU promotion funding has been secured, but without a Member State match-funding contribution, and all match-funding provided by organic businesses through a common fund. Although organic producers pay levies to levy companies such as Hybu Cig Cymru and Dairyco just like any other producers, and some of those funds are used for promotional activities, they are not used to address the specific promotional needs of organic producers and this is an issue that does need to be addressed.
78. With respect to action point 5 on Green Procurement, there are significant opportunities for the inclusion of organic products within public procurement specifications, not least because organic is defined by EU regulations, and this initiative is to be welcomed provided that it is then taken up by procurers at all levels in the Welsh context. Some progress has been made with the adoption of the Food for Life certification by several Welsh institutions, but the organic component of this initiative is still relatively low and further actions could be taken place specific emphasis on organic food.
79. With respect to action points 6 and 7, Defra has in the past played a significant role in funding organic research in England and Wales. However, in recent years Defra has significantly reduced its funding for organic research and the EU is the only major funder of organic research now available to address UK needs, so these action points are important. The willingness of commercial partners to invest in organic research has been low (apart from the occasional involvement of multiple retailers), as there are few opportunities for input manufactures to gain returns on their investments from selling inputs to organic producers. The levy bodies have also not placed a high priority on addressing organic research needs, despite the levies paid by organic producers.
80. The emphasis in action points 8 and 9 on statistics, monitoring and evaluation is to be welcomed, but this area has been under-resourced historically and there is currently no indication of significant additional resources in future. There is a real need for an EU level observatory with sufficient resources to ensure these points are addressed. At the same time, there is also a need for a UK observatory to ensure that the organic sector can have access to the same levels of production, price, consumption and other market data that the rest of the agricultural sector takes for granted. Again, levy bodies could play a greater role in this process.
81. The remaining action points relate to the implementation of the EU organic regulations. While they are likely to contribute to making the regulation process more effective and efficient, the overall effect could be undermined if the regulation itself is not appropriate.

Prof. Nicolas Lampkin and Dr. Susanne Padel

24th October 2014