Position Paper for EC consultation: Action plan for the development of EU organic production

This Position Paper provides further context for the answers provided in our consultation response. It contains extracts of our Policy Notes "Sustainable Agriculture: Challenges and Opportunities for a 21st-century Food System" and "Illicit Trade is Dangerous for Consumers".

On fraudulent imports of organic food:

The popularity of organic food products is a noticeable trend. Consumers seek out organic food, and in markets such as Germany, specialised supermarket chains provide organic-only shops to willing customers. However, the consumer demand for product descriptions matching their content is not necessarily fulfilled, particularly in the realm of organic production.

> Fraudulent import of organic food, or illicit trade of organic foodstuffs, describes products that are inaccurately labelled as organic, or for which the adequate control mechanisms have not been in place.

In its 2019 report titled "The control system for organic products has improved, but some challenges remain", the European Court of Auditors found structural problems with the control system of organic food trade, despite controls being implemented in 1991. In a section on the communication on non-compliance, the ECA writes:

"In Bulgaria, we found that some control bodies notified the competent authority about certain types of non-compliances only through their annual reporting. The competent authority did not notice this during its supervisory activities. In Czechia, we found that on average control bodies took 33 days in 2016 and 55 days in 2017 to report a non-compliance affecting the organic status of a product to the competent authority."

The report also notes that non-compliance communication delays are 38 calendar days on average in the European Union, while existing regulations stipulate that reporting should happen without delay. This means that non-compliant organic products, i.e. fraudulent

organic trade, continues a month on average in the legal circulation of the European single market, without being flagged to consumers. **We believe that if the European Union and its member states are serious about quality control and consumer information and protection, they need detection and reporting mechanisms that outperform the speed of a postal package delivery.**

The European Commission has set up a mechanism of electronic approval for import of organic foodstuffs, integrated into the Trade Control and Expert System (TRACES). This is part of the Action Plan for the Future of Organic Production in the European Union. **It is opportune that with the roadmap laid out by the Farm to Fork strategy on the considerable increase of organic food production in Europe, the Commission ramps up the use of this system by utilising the qualified electronic seal in TRACES for backing up certificates of inspection.** Additionally, improved definitions are necessary to bring the expectations of consumers closer to reality of the organic food sector.

As organic food increases in popularity, paired with the political will to increase its consumption, bad actors are seeking to profit off of the good will of consumers. **We need to avoid the exploitation of the readiness of consumers to pay more for organic products, and guarantee accurate and reliable information by reinforcing regular checks, particularly of third country importers.**

On the environmental aspects of organic food

Organic farming benefits from special derogations in public discourse -- it, in fact, does not face the same scrutiny as other methods of farming. However, organic farming presents many downsides that are not at all compatible with sustainability, by any reasonable definition of that term. For a number of reasons, including its low yields and the consequent need to bring more land into agricultural production, organic farming is particularly detrimental to biodiversity. All these problems are compounded when organic farming is subsumed in the broader social and cultural agenda of “agroecology”.

Increases in GHGs

Credible research has established that moving all current farming to organic farming would increase greenhouse gas (GHG) emissions by up to 70%. Researchers analysed the hypothetical move of Welsh and English farm production to organic and found that reduced crop yields in organic farming increased the need to import food from overseas. Including the GHGs emitted growing that food abroad -- a part of the equation often ignored advocates of organic agriculture -- total GHGs emitted would increase between 21% in the best-case scenario to an astounding 70%, depending on how much natural habitat and forest had to be cleared to make up for the decline caused by England’s and Wales’ switch to organic production.

For the European Union, which aims at a 25% organic production target in Europe, the impact of overseas imports would be even more considerable. While the study assumed

England and Wales would import the majority of the extra food they needed from Europe, a 25% organic EU would be making up its production deficits by importing food grown in less developed countries with considerably less efficient farming methods, which would significantly increase emissions.

Where is the oversight of organic pesticides?

A common misunderstanding that consumers have when it comes to organic agriculture, often perpetuated by political discourse, is that organic food is not treated with pesticides. However, organic farming uses a large range of pesticides.

In 2016, France announced a pesticide reduction target of 50% by 2025, which is similar to the 50% reduction by 2030 target outlined in the Farm To Fork strategy of the European Union. However, both targets are threatened by the increase of pesticide sales in the organic farming industry. In France, said sales have risen considerably in the past years -- sulfur (used in organic farming) is the most heavily used pesticide in France. Copper sulfate is the second most used pesticide in organic agriculture and has been put on a list of “candidates for substitution” after EFSA (European Food Safety Authority) and ECHA (European Chemicals Agency) determined health hazards for soil organisms, farmworkers, birds, and mammals.

Social sustainability for the farming sector

Farmer representatives have criticised the Farm to Fork Strategy's ambition for a 25% organic production target, for the possibility of severe market imbalance. They have the Commission that without increased consumer demand, incentivising organic agriculture could considerably reduce market prices for organic products, due to excessive supply.

We believe that a socially sustainable food system takes into account the situation of farmers, as they are essential to the well-being of consumers. Overburdening the agricultural sector with unachievable and unsustainable targets contradicts the objectives of the European Union.

The German Research Institute for Organic Agriculture (FibL) published the results of a study conducted for the German Federal Environment Agency (UBA) in March 2020. The following deficits of organic agriculture are being highlighted.

- Lack of protection against plant diseases in the special crops of fruit, wine, vegetables and potatoes.
- Lack of protection against pests in individual arable crops.
- Can lead to higher raw material consumption and higher production costs.
- Leads to a negative attitude towards technological innovations.
- Significantly more expensive than conventional agriculture Lowers productivity.