

IFOAM Organics Europe suggestions for the new Organic Action plan

IFOAM Organics Europe welcomes the Commission's initiative to publish a new organic action plan (OAP). IFOAM Organics Europe would like to hereby provide suggestions regarding the content of the next OAP. IFOAM Organics Europe believes that **actions should be specific, ambitious and should come with a timeline**. The new OAP should contribute towards achieving the 25% organic land target by 2030, as set out in the Farm to Fork and EU biodiversity strategies.

IFOAM Organics Europe has also given a timeline of when we envisage the following actions to be implemented. The timeline follows the timeframe of the next Multi-annual Financial Framework (MFF) that covers 2021-2027. The numbers at the beginning of each action refers to the following phases of realisation of this action plan:

[1] 2021-2023: initial implementation

[2] 2024-2027: full implementation

[3] 2021-2027: implementation and operation, i.e. maintaining and enhancing previously-implemented actions.

IFOAM Organics Europe's suggestions are divided into **game changers**, which if implemented, would greatly contribute to the Farm to Fork strategy ambitions, as well as further below **more specific actions** divided per topic.

Game changers for achieving Farm to Fork (F2F) strategy goals:

- **[1] Action plans in all member states.** For an EU action plan to work, it must inspire, motivate and mobilise its Member States. As such, **member states should be encouraged to develop their own national organic action plans** with concrete, time-bound actions¹. The Commission should encourage national organic action plans that cover demand, production and innovation/development in all member states². Also regional action plans are a great incentive to develop organic production and demand as they can be better tailored and adapted to the needs of local policy makers and stakeholders³.

A commitment to a national organic action plan within two years should be required before approval of a member states' strategic plan for CAP. These national OAPs should include actions aimed at supporting the development of organic in the whole supply chain, promoting organic public procurement and strengthening the capacity building, to drive market development and assist farmers with conversion and adoption of best practices in organic farming. In this context, Member States should set up objectives for 2027 regarding the target share of organic land and market

¹ For this purpose, it is advisable to consult the publication "organic action plans – development, implementation and evaluation", available here:

[http://orgprints.org/32771/1/IFOAMEU Organic Action Plans Manual Second Edition 2018.pdf](http://orgprints.org/32771/1/IFOAMEU_Organic_Action_Plans_Manual_Second_Edition_2018.pdf).

² The national organic action plans are should work as a resonating board for the many elements that IFOAM Organics Europe suggests in this document, but where policy development and implementation is more easily done at the national (and regional) level, given that one solution will not work as effectively in every single Member State.

³ The SME Organics project team decided to integrate the experiences in the development of regional organic action plans. Results can be found here at page 34: [http://orgprints.org/32771/1/IFOAMEU Organic Action Plans Manual Second Edition 2018.pdf](http://orgprints.org/32771/1/IFOAMEU_Organic_Action_Plans_Manual_Second_Edition_2018.pdf)

development/share in their country, also taking into consideration the objectives of the Farm to Fork strategy. Indeed, a risk for the new organic action plan is that actions will be developed at EU level, without taking into account the realities in different Member States. This has to be avoided as it would weaken the effectiveness of the new organic action plan.

- **[1]** Member states with strong organic markets (e.g. Denmark) are characterized by strong non governmental market development capacity, allowing partnerships with retail and food service leaders, and strong consumer awareness efforts. As such, **the Commission should support market development capacity in national and regional NGOs by requiring this as part of national organic action plans, and by promoting sharing of best practice in organic market development across member states.** These capacity building activities should be increased and extra support should be foreseen for those member states where the development of organic is not yet fully deployed (e.g. Central Eastern European countries such as Poland, Hungary, the Czech Republic, Slovakia, etc).
- **[3] Level playing field in the food market.** Price differentials are a critical barrier to the expansion of the organic market and organic farm area. The new organic action plan should be ambitious regarding the **internalisation of external costs** (e.g. from the use of plant protection products) that is the primary cause of lower prices for conventional food. In this context, the Commission could offer guidance to Member States on how to mainstream environmental considerations into fiscal and competition policies, with examples of best practice such as the pesticide fee structure in Denmark. Particularly, Member States together with the European Commission should explore the feasibility of introducing a reduced VAT for EU certified environmentally-friendly products such as organic products, and/or an increased VAT for harmful, synthetics inputs such as plant protection products⁴.
 - **[1]** The Commission should further promote the EU logo among EU citizens and consumers. In this context, it is paramount that **consumer surveys about organic are followed by action to further raise awareness of organic production and farming.** Citizens should be more aware of the fact that organic contributes to the internalization of environmental costs, i.e. taking the external costs of pollution of the environment as part of the total costs of the product, so that nature does not “pay” for the production of agricultural commodities. Consumers should be given more information (in quantity and quality) about the EU organic logo and what it stands for, and about the benefits of organic farming for the environment and animal welfare. Consumers should also understand the potential difference, if any, between national organic logos and the EU organic logo. In order to achieve this, involvement of local and regional authorities is crucial, especially in terms of awareness raising and information activities.
- **[1]** Green public procurement is one of the measures that will contribute to reaching the 25% target. In line with the push-pull approach that has been successful in countries like Denmark, it is essential to ensure that organic production and demand grow in parallel, and policy tools like GPP are of paramount importance. As GPP criteria are not mandatory, a political and needed action would be for the Commission to open a dialogue with Member States to discuss about **a mandatory target for organic in GPP.** There is a need for mandatory, progressive, sustainable food procurement in all EU schools, kindergartens and other public canteens with at least 20% of products from organic agriculture by 2022; this percentage would increase year after year, reaching 60% by 2030. Please see the section below for more actions on green public procurement.
- **Address issues related to plant protection products (PPPs).** In order to face the issue of pesticide residues being basically omnipresent in the environment and therefore potentially present in organic products, the European Commission should:
 - **[3]** Increase the budget for research and innovation for organic agricultural methods in a constant and progressive pace, following the development of the sector, with the aim of

⁴ This would be in line with the Farm to Fork strategy which states that “EU tax systems should also aim to ensure that the price of different foods reflects their real costs in terms of use of finite natural resources, pollution, GHG emissions and other environmental externalities.”

- providing R&I solutions for plant protection products and alternatives to contentious products,
- **[2]** Ensure that appropriate, proportionate and specific procedures are in place to evaluate and authorise natural substances,
- **[1]** Put forward concrete actions that aim at simplifying the registration of plant protection products (PPPs) suitable for organic,
- **[1]** Promote further harmonisation of the handling of pesticide residue findings, by taking into account the damage that a zero-tolerance approach would do to the organic sector,
- **[2]** Investigate possibilities for placement of liability on pesticide producers and users, on the basis of the polluter pays principle,
- **[2]** Investigate findings of pesticides (such as prosulfocarb) in organic fruit and greens (from rain and dew) as basis for placement of possible liability or ban on these substances,
- **[2]** Inform and create the capacities to tackle the issue of pesticides at every level of the organic value chain, including transport, storage, processing and packaging,
- **[2]** Harmonise the possibilities to use the same pesticides and fertilisers in all Member States to ensure equal competition for farmers, e.g. the use of some pesticides and fertilisers that give good results and are in line with organic principles is not allowed in Poland, although they are registered in other Member States.

More details on specific actions by topic

Horizontal action: monitoring and reviewing the success of the new organic action plan

- **[3]** The new action plan should include **a review of how well the action plan is working**. It is crucial to monitor the implementation of the action plan, including implementation in the member states and produce a mid-term review of the action plan. If there are major gaps in the implementation of the action plan, the European Commission should evaluate how to close these gaps. As such, this evaluation review should result in suggestions for new measures, if applicable, and consider whether the action plan is adequately contributing to reaching the target in the Farm to Fork strategy, for 25% organic land by 2030. Such review should be publicly available, including information about how well the action plan is being is working in the different Member States.

Boosting the demand for organic: Green Public Procurement & organic school schemes

- **[1]** Green public procurement (GPP) is one of the measures that will contribute to reaching the 25% target. In line with the push-pull approach that has been successful in countries like Denmark, it is essential to ensure that organic production and demand grow in parallel, and policy tools like GPP are of paramount importance. As GPP criteria are not mandatory, a political and needed action would be for the Commission to open a dialogue with Member States, regions and local authorities to discuss about **a mandatory target for organic in GPP**. There is a need for mandatory, progressive, sustainable food procurement in all EU schools, kindergartens and other public canteens with at least 20% of products from organic agriculture by 2022; this percentage would increase year after year, reaching 60% by 2030.
- **[1]** The Commission should research how well the GPP guidelines are currently implemented in the several Member States, and depending on the outcome of this analysis, it should look into increasing the uptake of the EU GPP, including very specific focus on best practice in promoting purchases of organic food. Also, the Commission should **gather / harmonize the data collection of Member states regarding organic procurement in European canteens**. Data collection is needed in this context to analyze and compare the efforts done by Member States in this field annually.
- **[1]** Green public procurement is one of those areas for organic development where **regional and local authorities must be involved**. The new action plan should include actions that the European Commission can take on GPP, as well as actions that **involve national authorities, and more so regional and local authorities**. The Committee of the Regions (CoR) could be involved when it comes to liaising with regional authorities on GPP. For the new organic action plan to be effective, local and regional authorities must be involved particularly for integrating goals and requirements for organic

food in sustainable public and ideally private food service procurement, as well as for information activities and awareness raising about the benefits of organic to citizens. In this context, there must be specific awareness raising programs about GPP criteria at regional and local level and the use of such criteria should be encouraged. Member States should support a mobile tender team the mission of which is to advise local and regional government on how to increase organic purchasing and green public procurement in an efficient and straightforward way. Member states should report their progress in the area of food procurement, including contribution to organic goals, to the European Commission.

- **[3]** The use of GPP and national targets for the share of organic products in public (and private) canteens should be accompanied by **capacity-building actions towards regional producers organisations** to ensure that they have the organisational capacity to reply to tenders. Public procurements should also provide opportunities for public buyers to build long-term partnerships with organic producers in their region giving additional value to procurement of local and regional food.
- **[2]** The Commission and Member States should **identify bottlenecks** (e.g. meat production) and propose measures to overcome them by using policy and GPP to ensure that all types of organic production will have an outlet.
- **[2]** The Commission should adjust EU financing for school milk and fruit schemes so that Member States receive **20% higher joint financing from the EU for organic programmes**.

Future organic farmers : Prioritize and facilitate the renewal of generations in organic

The new organic action plan shall empower the EU and the member states to meet the challenge of generational renewal in agriculture, thanks to an ambitious policy on access to land. Throughout the EU, the age pyramid is such that conversions to organic farming will not be enough to meet the objective of 25% organic farmland by 2030m mainly because the current national policies regarding young farmers' setting-up or the transmission of a farm to a new farmer are not tailored to develop organic.

The OAP shall therefore endow the EU with a strong and ambitious policy regarding the transmission of organic farmland (so that each land converted to organic stays in organic) and the setting-up of young organic farmers in organic (so that organic land can be converted to organic when a new farmer takes up a farm). Strong policy measures such as the following should be coordinated at EU level and implemented in each member state:

- Advisory work: budget shall be specifically dedicated to finance advisory and accompanying work by organic farming organisations towards new farmers willing to set up in organic.
- Access to organic farmland:
 - Member states shall establish legal and fiscal framework to incentivize the maintenance of organic farmland in organic when an organic farmers retires and transmits his farm to a young farmer. For example, positive fiscal provisions could incentivize the maintenance of the farmland in organic, whereas negative fiscal provisions could penalize abandoning organic farming.
 - The EU commission with the cooperation of shall establish an EU-wide observatory of the organic farmland: monitoring of surfaces in organic, price of organic farmland, report on evolution of prices and surfaces, etc.
- Measures related to the Young Farmer Grant in the CAP:
 - Strategic National Plans of Members states shall prioritise the project of young farmers willing to set-up in organic.
 - SNP shall ensure that young farmers get an additional reward if setting-up in organic.
- Access to bank financing : Member states shall revise their policy to ensure that young farmers setting-up in organic are not stopped by banking capacities.

- Certification of organic farming: Member states shall create measures to take over the certification costs of young organic farmers the first years after setting-up⁵

Food fraud prevention

In order to facilitate fraud prevention and guarantee the integrity of the supply chain, the following is crucial:

- **[1]** A discussion with Member States and stakeholders on how certification and control should develop in organic, should consider the expected rapid growth of organic land and number of operators as well as the use of all the available IT technologies. An **open debate on the future of control and certification in organic** is needed. The **complexity of the organic supply chain** is one of the most important issues to focus on. Involvement of stakeholders representing all steps of the chain is key to better understand potential risky areas.
- **[1]** Facilitate an efficient and quick **exchange 1) between control actors and 2) between operators and control actors**. Facilitate the use of data collected by different actors to address potential fraud identification. Support the harmonization, collection and pooling of data, respecting data protection standards, with the purpose of assessing and better identifying critical and risk points of the system.
- **[2] Minimum criteria for qualification and training on control actors should be established**. This would include the Commission, competent authorities, control bodies and authorities, and accreditation bodies.
- **[2]** Explore the possibilities of **increasing personal liability of fraudsters**. Fines by public and private certifiers and inspection bodies should be such that they make fraud a risk to any food company/traders' existence. The Commission should strengthen transparency regarding fraud, standards violations and sanctions applied by public and private certifiers and inspection bodies.
- **[2]** A specific focus should be given to **grower group systems**. As around 80 % of all organic farmers world-wide are organized in grower groups, their specific potential in reaching organic compliance through capacity building should be further exploited by reflecting optimal regulatory frameworks, control tools, governance and training schemes.
- **[2]** Use IT technologies to **decrease the paper burden and the total number of notifications**. This will free resources to focus on the actual control and supervision activities.

Promote conversion to organic practices

- **[1]** When designing their CAP strategic plan, member states should assess their respective organic sector and integrate a support strategy in the national rules, including a national target to increase organically managed land. To ensure organic farmers have a chance to benefit from CAP support in all EU countries, **this national target on organic farming and a commitment to prepare a national organic action plan should be compulsory for member states to have their Strategic Plans approved**. This target should be in line with the F2F strategy target of the 25%, ensuring that the sector development at national level contributes to achieving the 25% by 2030. The specific target should be decided at the national level, in discussion with the Commission and the organic and broader food and farming sector and should represent a fair and realistic contribution to the EU objective. A national target should cover organic area, market share and share of public procurement. National action plans should cover all three axes (demand, production and innovation/development) and **both push and pull strategies**, combining conversion promotion with market and sector development.
- **[1] Assist member states with innovative ecoschemes that accelerate organic growth**. Growth in the organic farm area, and the economic sustainability of organic farms will be significantly impacted by decisions in the member states regarding implementation of the CAP. It should be expanded to include sharing best organic practice in pillar 2, and the EU Organic Action Plan should include a targeted assistance to member states, and an active sharing of best practices among member states

⁵ Recommendation N°16 of the French Economic, social and environmental committee, [Report on the future of agriculture](#).

and organic stakeholders, regarding design of ecoschemes that encourage conversion to organic farming, and avoidance of national policies that undermine organic farming.

- **[1] Adequate budget should be provided to conversion and maintenance of organic farming at national level**, either through rural development measures as in the current CAP (pillar 2), or through newly introduced eco-schemes (in pillar 1), or a combination of both. IFOAM Organics Europe recommends that Member States dedicate a minimum share of 30% of their first pillar envelope to eco-schemes, and this percentage should increase over the years. Organic farmers should be eligible to specific organic eco-schemes, but this should not prevent them from accessing other eco-schemes (on biodiversity, climate, high-nature value farming or animal welfare).
- **[1] Member States should be encouraged to set a dedicated budget to ensure the availability and preparation of organic advisers**; demonstration of best practice in organic farming; collaboration on knowledge sharing and market development. Member States must integrate organic innovation/education, and market development/consumer awareness schemes in their national Agricultural Knowledge and Innovation Systems (AKIS) and in the rural development programmes. Support should be available also for those organic farmers that are in need of readily and easily available agroecological knowledge transfer, advice and innovation. Importantly, **farmers that are envisaging to convert to organic must have the best advice at their disposal when it comes to organic practices** that preserve biodiversity and support happiness in rural areas. National AKIS need to integrate a specific targeted section on organic knowledge, these targeted section need to be feed by all existing research and innovation projects of the organic sector. The commission should check the organic component when evaluating the national AKIS.
- **[1] CAP support should also include free “conversion checks”** for any farmer interested in conversion to organic farming, so that farmers can ask for advice and get a clear picture what conversion would mean on their farm⁶.
- **[2] The Commission Initiative Better Training for Safer Food** should be further developed to include training about managing a land under organic practices, as well as about the changes that are underway with the new organic regulation. This training could be expanded to additional target groups, in addition to control authorities.
- **[2] The Commission should work on a [blueprint for sectoral cooperation on skills](#)** specifically for the organic sector, which should include *inter alia* farmers, processors, retailers, control bodies and researchers working together to achieve the 25% target.
- **[3] The creation of bio-districts⁷** should be encouraged within Member States and regional authorities. Bio-districts are an innovative instrument that is all about an integrated approach to sustainable development in which local authorities play an important role. Bio-districts have beneficial impacts in terms of environmental, economic and social sustainability.

Improving data collection and comparison & use of technologies

- **[2] The action plan might consider the possibility of pooling resources and harmonizing data collection efforts in the field of organic agriculture consumption.** Member States and other relevant actors are developing their own surveys regarding the organic sector. The commission is in the position of providing a common platform for a better exchange of information between stakeholders involved in the data collection of the organic sector. A conference might be organized with the view of facilitating harmonization in the process of data collection related to the organic sector.

⁶ Free conversion plans are already a reality in Denmark. They are more thoroughly described in this report on page 11: https://projekter.aau.dk/projekter/files/260040919/MT_IFS_Camilla_Lund.pdf

⁷ Bio-districts stem from a collaboration between farmers, citizens/consumers, local public administrations, as well as fair trade groups, national and regional parks, protected natural areas, commercial, touristic and cultural enterprises, and social cultural and environmental associations who act according to the principles and methods of organic production and consumption. This tightly knit network is a force to be reckoned with when it comes to transforming the territory.

- **[3]** Ensure the **harmonization of data collection** on organic between Eurostat and Member States.
- **[3]** Ensure the **collection of comparable data and enough representativity for the comparison between the organic and conventional farming system** at European level in the forthcoming Farm Sustainability Data Network proposed in the F2F strategy. In this context, include data such as impact on biodiversity, soil fertility, animal welfare etc.
- **[2]** The EU market Observatories' should **provide comparable data on the prices of organic products**, to better inform all actors of the value chain.
- **[2]** Include the organic sector in the **European Food Prices Monitoring Tool**, allowing for the comparison of organic and conventional value chains.
- **[2]** The **use of digital technologies**, including precision farming and blockchain, can play a role in the development of organic farming. In order to increase organic production and its efficiency, it is important to upscale modern technologies that are in line with the organic principles of health, fairness, care and ecology.

Encouraging the development of (organic) short supply chains

- **[2]** The Commission should **promote data collection on short organic supply chain at national level** in order to better inform the implementation of the objectives of the legislation.
- **[2]** There is a widening gap between the used technologies applied in small and large-scale businesses/processing facilities/farms. This gap varies between Member States, but is quite obvious in CEE countries. The adoption of large-scale technologies (and digital solutions) to small-scale in organics would be very welcome as well as related innovation and research to find new ones specific to small-scale production. Knowledge-sharing and technical advisory services are irremissible. Digital solutions must be emphasized since precision and digital technologies are largely preferred and applied by large-scale farmers and producers since these businesses have the capacity to use these technologies. And vice versa, these technologies are developed for and marketed to large-scale users, usually disregarding the needs of small-scale users. Therefore, **the adoption (and R&I) of digital technologies for short supply chains and (and their accessibility) for small-scale organic processors would be essential as well as relevant technical knowledge sharing, education among stakeholders.**

Improving animal welfare

- **[1]** In order to **improve animal welfare, breeding programmes should be set up for organic livestock production**. There is an urgent need for the breeding of more robust, climate resilient animals which require less high-quality protein feed, and which may be used for multiple purposes. Breeds are needed that can live good quality, healthy lives on the farm.
- **[3]** It is necessary to research alternative sources of vitamin B and alternative sources of proteins; it is important to clarify that **there is no 'organic' vitamin B**. We need to find alternatives to GM-produced vitamin B2 (riboflavin). There are two alternatives to GM-produced vitamin B: (1) non-GM produced Vitamin B and/or (2) organic material rich in Vitamin B, (3) roughages intake in birds triggers fermentative digestion which contributes to the production of vitamin B by the birds themselves. In addition, **the Commission should support research into real requirements of vitamins B as well as other vitamins, in organic livestock** (which are currently probably overestimated) as well as intake of roughages stimulating vitamin B production in animals. This research will allow to reduce supplementation of vitamins in organic livestock systems, while ensuring animal health. Similarly, more precise protein recommendations need to be developed, and the use of slow-growing breeds which need less protein should be stimulated. It should be noted that alternative sources of proteins does not only mean exploring new crops, but also better valorising by-products and waste streams of the (organic) food industry.
- **[3]** In terms of animal health, the **use of herbal medicines** as an alternative to antibiotics and anthelmintics should be stimulated. Farmers should be supported to implement Animal Health and Welfare Plans for the prevention of diseases.
- **[3]** An **EU animal welfare label is not recommended**. EU already has known logo and standards for animal welfare through the organic standard and logo. In case the Commission decides to move

forward with plans for an EU animal welfare label, organic should have its own top category, like it is the case for the successful labelling of eggs. Any other approach could lead to consumer confusion, open the door to greenwashing or weaken the value of the EU organic logo in consumers' perception.

- **[2]** The Commission should **strengthen awareness raising actions to consumers on the benefits of organic farming for animal welfare**, as well as allocate resources in order to explain the difference between organic and a new logo for animal welfare.

Organic farming is knowledge-intensive: Focus on awareness raising, research & innovation

AKIS & technical advice

- **[1]** **Technical advice and information must be readily available for farmers**, including in very remote areas. The Commission should provide support for a European network of organic advisory services, strongly embedded in national or regional agricultural knowledge and innovation systems (AKIS). This network would *inter alia* aim to improve production methods of organic farms and generally increase the standard of living of the farmers and their families. The network should be complemented with online knowledge exchange, digitally supported farmer field schools and knowledge reservoirs.
- **[1]** Organic farming methods are knowledge intensive. Member States need to **build strong knowledge networks for organic farming**. As part of the CAP Strategic Plans (article 13 and 72), Member States should support or set up advisory services supporting conventional farmers willing to convert to organic farming and new entrants willing to start organic farming.

R&I programmes

- **[1]** Clear commitments to **ringfence 25% of the budget for research and innovation for organic farming and agro-ecological approaches** are needed, both in national research and innovation (R&I) programmes and European frameworks (e.g. Horizon Europe). This can be done by linking the percentage of funding for research and innovation in organic to the goal of the share of land (i.e 25% at EU level).
- **[2]** **In terms of preparing research agendas for the organic sector, the European Commission should work with TP Organics**. TP Organics has been recognised by the European Commission as European Technology Platform for Organic Food and Farming. TP Organics unites companies, small & medium enterprises, researchers, farmers, consumers, and civil society organisations active in the organic value chain from production, input & supply to food processing, marketing and consumption to develop research & innovation agendas and roadmaps for research action at EU and national level.
- **[3]** The European Commission should stimulate and foster cooperation between research communities working on organic and conventional food and farming. Building on organic approaches can help the conventional sector become more sustainable while the organic sector may in some cases learn from innovation in the conventional sector (e.g. digital solutions, integrated pest management...). Therefore, **all calls under Horizon Europe that are not specifically for the organic sector, yet are relevant for it, should state that they will benefit and address "both the conventional and organic sector"**.
- **[1]** In order to achieve a balanced development of the organic sector across the EU, collaboration in research is crucial. CORE Organic, one of the first ERA-NETs, has fostered collaboration in organic farming and food production research for 15 years, with dedication from most Member States. Since there won't be ERA-NETs in Horizon Europe, there will be a need for other mechanisms to support this network. **The first Work Programme of Horizon Europe should include a specific Coordination and Support Action allowing CORE Organic to continue its activities**.
- **[1]** The European Commission is preparing a Partnership for Agroecology Living Labs. It will be a key strategic instrument to support the upscaling of organic food & farming and agroecology. It presents a huge opportunity to align Member State efforts, pool resources and bring R&I for agroecology and organic to a higher level. Organic farmers are the pioneers of agroecology, and the experience of organic presents a key asset in the context of the partnership. **Organic farmers should be fully involved in the partnership**. Building on experiences and results of previous networks, in particular

ERA-NET CORE Organic will be crucial for the success of the partnership. CORE Organic should have a strong role in the partnership.

Replacing inputs

The main hurdle preventing replacement of contentious inputs is to get alternatives on the market. Companies willing to produce and market alternatives face several regulatory burdens. IFOAM Organics Europe recommends the following:

- **[2] Introduce a definition and a separate category for natural substances in horizontal legislations.** The current EU regulatory framework for inputs is primarily designed to evaluate chemical (mono-constituent) substances, well defined on single molecular level. There are technical difficulties to adapt the registration criteria to usually highly complex, natural substances. The requirements for data, risk assessment and exposure modelling have been designed for highly efficient, single molecules, whereas for example, plants rich in secondary metabolites contain often more than 100 different single compounds. Furthermore, very different terminologies like 'biological', 'natural' 'naturally-occurring' or 'nature-identical' substances are used in different legislations without in-depth description nor uniform definition.
- **[2] Expand knowledge of experts in Member States and EU authorities about natural substances.** The harmonisation of the evaluation process in the Member States as well as expert coordination of different fields (like plant protection or animal health and welfare) could help to streamline procedures for substance authorisation and reduce workload and delays of applications and facilitate mutual recognition.
- **[1] Public money for natural substances of public interest.** Many natural substances have a long history of safe use, but the market segment is small and often it is not possible to obtain intellectual property rights. Since the registration process is very costly and time consuming, there is only very limited return on investment for SMEs producing natural substances. Consequently, these substances will no longer be available for farmers because of simple economic reasons. Therefore, the EU and Member States should invest in the development and production of natural substances.

Improving procedures

It is crucial to reduce the current time lag of up to several years from the approval in the horizontal regulation to the inclusion in the annexes of the organic regulation. Furthermore, the predictability for acceptance for novel inputs in the organic sector needs to be improved.

- **[1] Introduce a non-binding, ex ante assessment procedure to predict compatibility of inputs with the organic standard.** The assessment can for example be carried out by the EGTOP. This would give security to companies to invest in new products and therefore facilitate innovation and at the same time speed up the whole authorisation process.
- **[2] In order to speed up the process the EGTOP needs to be further professionalised in terms of funding and procedures.** Alternative inputs (e.g. alternatives to copper) need to get faster on the market. For this reason, EGTOP should work faster and more efficient. **Professional experts need to be remunerated adequately and a clear and binding timeframe** from the request to the final opinion on the suitability for organic farming should be introduced.

Organic and food production in schools

- **[2] Member States should be encouraged to incorporate lessons about food production and consumption, as well as environment-related topics** such as climate change in school curricula. Indeed, there is a need to raise awareness about the impacts of different methods of food production and consumption. This has successfully been done in some Member States (e.g. Austria) and suggests that a common framework will represent an added value for the present action plan.

Organic seeds and organic varieties

- **[2] In order to phase out the use of non-organic seed, the European Commission and Member States should enable a better functioning organic seed market.** The European Commission should support the implementation of a **EU router database that connects the organic seed databases of the individual Member States.** This shall increase the transparency on available organic seed offer within the EU and create a level playing field on organic seed trade. The European Commission should collect better

and more harmonised data on the use of non-organic seeds (derogations) from the Member States allowing better targeted policy actions.

- **[2]** The commission should ensure available funding for the development of the **7-year temporary experiment on organic varieties** established in the reg 848/2018 in order to ensure that it is implemented widely and it covers the maximum diversity of countries of the EU, especially those with a reduced development of the organic breeding sector.

Increasing the amount of carbon in soils

- The F2F strategy states that “the Commission will develop a regulatory framework for certifying carbon removals based on robust and transparent carbon accounting to monitor and verify the authenticity of carbon removals”. IFOAM Organics Europe thinks that it is a good idea to incentivise farmers to pay attention to soil health and to adopt practices that increase the amount of carbon in soils, like standard organic practices do. However, it is not a good idea to limit consumer information through labelling solely to single aspects like “carbon”. Focusing on single aspects on a label is misleading and does not do justice to the multiple benefits delivered by system approaches like organic farming. IFOAM Organics Europe supports “carbon farming” initiatives and policies aimed at incentivizing farmers to improve their practices to increase carbon sequestration, but opposes carbon labelling initiatives, whether they are supposed to apply to all farmers or only to organic farmers. Therefore, **the European Commission should support agricultural practices that increase the amount of carbon in soils, without developing a label that would reward solely this aspect of sustainable agricultural practices.**

Organic in third countries

- **[2]** IFOAM Organics Europe wonders whether the promotion of EU organic products in targeted growing third countries markets is also foreseen under the work programs of the promotion policy. **A concrete action would be desirable to promote export of EU organic products**, e.g. by supporting participation of EU producers in fairs relevant for organic companies, as well as the protection of the EU logo in foreign markets.
- **[2]** The organic action plan should promote the **development of organic in third countries**, an issue that is also critical to development of breadth and supply of ingredients for the organic market in the EU, when organic products are imported. The Commission should provide trainings to operators in third countries regarding the changes that come with the new organic regulation that might impact their business. It is also important to support the development of the organic sector in third countries as a way to achieve the SDGs.
When negotiating trade agreements with third countries, terms for organic trade can be improved, and practices such as land grabbing that harm local economies, should be prohibited.