

MARIANN FISCHER BOEL
MEMBER OF THE EUROPEAN COMMISSION

Brussels, 30 -10- 2006
CAB/D/1309
CAB/A/2406

Dear Mr Schmidt, *Kære Hans Chr.*

Thank you very much for your letter of September 28th where you refer to the revision of Council Regulation on organic farming. I am pleased to see the great interest of Denmark in this file. I am glad to know that you welcome and are overall satisfied with the proposal of the Commission for a new Regulation on organic production. I also appreciate your efforts to make clear your priorities as regards this proposal.

In this regard, let me first indicate, that I have heard the demand to maintain the current Regulatory Committee. In fact, all Member States have pleaded for this, it should as such not be an issue standing in the way of a final agreement.

As regards the EU-logo, the Commission is certainly of the view that in order to promote the common concept of organic production a symbol to clearly identify these products throughout the Community is needed. The Commission proposed a mandatory standardised text fragment 'EU-organic' as an alternative to the EU-logo. Yet, I realise that such a text fragment would probably not be the best way to convey the message of a common concept of organic production. If the option of the EU-organic text fragment is eventually discarded, I would agree with you that the best option would be to make the EU-logo compulsory. This however should certainly not preclude the simultaneous use in the labelling of other national, regional or private logos.

I share your view that the control system must be based on a risk-based approach. Detailed rules will be laid down by Commitology. However, the 'minimum annual visit' has been, for years, a distinctive characteristic of the organic control system, and has contributed to the added value of organic products. For that reason, I am of the view that this 'minimum annual visit' should in principle be maintained and be explicitly mentioned in the Council Regulation.

As regards the supervision of the control system by the Commission, I have to refer to the Official Food and Feed Controls Regulation (OFFC) to which organic production is subject. In fact, the legal framework of OFFC requires Member States to lay down multi-annual national control plans what clearly facilitates supervision tasks.

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I fully agree with you that 'flexibility' provisions in the regulation should not water down the organic rules. You are right, that consumers' confidence and the image of organic production are at stake. Exemptions to the rules shall be granted only on the basis of well founded reasons and in certain cases be limited in time.

As regards, Member States applying stricter rules, I must say that such an approach would be contrary to the spirit of the proposal. It is fundamental that operators in similar conditions are treated equally everywhere in the Communities. In fact, we, at EU level, have to convey a common concept of organic production.

Strengthening the stakeholder involvement is, I agree, really important and I appreciate your suggestions on how this could be achieved.

Finally, you know that I am not convinced about including large-scale kitchens under the scope of the Regulation. In fact I really question how the preparation of organic food in large-scale kitchens could be efficiently controlled. I nevertheless take note of your suggestions based on a year long experience at national level.

Yours sincerely,



Mariann FISCHER BOEL