



Brussels,
D(2008) G:\B GMO\B130 - ECoB\B133 -
Stakeholders Consultation\Organic
Advisory Group\081014 Minutes 1st
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European Coexistence Bureau (ECoB) - Best Practice Document for Maize Crop Production

SUMMARY OF THE CONSULTATION OF THE ADVISORY GROUP ON ORGANIC FARMING OF 14.10.2008

The work of the European Co-Existence Bureau Technical Working Group on Maize Crop Production is accompanied by a stakeholder consultation process, which involves, in particular, the relevant Advisory Groups managed by DG AGRI.

The Advisory Group on Organic Farming was consulted at its meeting of 14 October 2008, which was held at the DG AGRI premises in Brussels.

Composition of the Advisory Group on Organic Farming

The Advisory Group on Organic Farming was established by Commission Decision 2004/391/EC on the advisory groups dealing with matters covered by the common agricultural policy¹.

The following organisations are represented in this Advisory Group:

<u>Sectors / seats</u>	<u>Name of organisation</u>	<u>Nber of seats</u>
Farmers, agriculturals & cooperatives / 9	COPA-COGECA	7
	CPE	1
	CEJA	1
Traders / 3	CELCAA	3
Industry / 3	CIAA	3
Workers / 1	EFFAT	1

¹ OJ L 120/50 of 24.4.2004

Consumers / 3	BEUC	3
Environmentalists / 1	BEE/EEB Birdlife Forum for Nature WWF	1
Others / 7	IFOAM <i>FLOATING</i> Animal Welfare	5 1 1

Full names of abbreviations:

- COPA-COGECA: European Committee of Agricultural Producers and Co-operatives
- CPE: European Farmers Coordination
- CEJA: European Council of Young Farmers
- CELCAA: European Liaison Committee for the Agricultural and Agri-Food Trade
- CIAA: Confederation of the Food and Drink Industries in the EU
- EFFAT: European Social Partners of Agriculture
- BEUC: European Consumers' Organisation
- BEE/EEB: European Environmental Bureau
- WWF: World Wildlife Fund
- IFOAM: International Federation of Organic Agriculture Movements

Procedure of consultation:

The consultation was announced in written on 1 August 2008 to the Members of the Advisory Committee. Members received the Mandate for the European Co-existence Bureau and a Background Document on coexistence in maize crop production (see Annex 1).

At the meeting of 14 October 2008, DG AGRI made a presentation covering the following main points (see Annex 2 for the presentation):

- An overview of co-existence of genetically modified crops with conventional and organic agriculture;
- The Council conclusions of May 2006 that provide a mandate for the Commission for further work on co-existence;
- The work principles and structure of the ECoB;
- The aim of the Best Practice Document;

- The Technical Working Group for Maize Crop Production, its scope of work and draft timetable; and
- The stakeholder consultation process.

Concerning the last point DG AGRI explained that the present meeting marks the beginning of a longer consultation process of the Advisory Group. Members of the group will also be consulted on the Best Practice Document for co-existence measures in draft stage, once these are made available from the work of the Technical Working Group.

Following the presentation the floor was open to the participants of the meeting for comments, views and opinions.

The participants were also invited to submit any comments on the documents previously distributed or the process within the two following weeks after 14 October 2008.

Comments received during the consultation:

IFOAM stressed that according to Regulation (EG) 834/2007, the use of genetically modified organisms is not allowed in organic farming. This strict prohibition requires systematic controls to rule out that GMOs may end up in the organic farming production process, for instance in animal feed. The question was raised to which extent control measures are included in the scope of the ECoB. IFOAM furthermore criticised that co-existence measures be linked to the labelling threshold, and do not aim to achieve lower levels of GMO admixture.

DG AGRI responded that the scope of the work only includes the technical segregation measures between GM crop cultivation and non-GM crop cultivation. Monitoring is outside the scope of the activity as this is already required to implement Community legislation on labelling of GMOs. Member States do not need further guidance in this area. As regards the prohibition of GMOs in organic farming care has to be taken to avoid GMO admixture to require the labelling of the affected products as these could no longer be used in organic farming. The rules on labelling of GM food and feed are laid down in Regulation (EC) 1829/2003 on GM food and feed and apply for conventional and organic products alike.

CELCAA asked whether private purity standards, e.g. requiring GMO absence below the detection limit or 0.1% would be covered by the activity of the ECoB.

DG AGRI responded that the ECoB will develop guidelines that aim at ensuring compliance with the requirements set out at Community legislation. Private standards not linked to Community legislation are not covered.

The EEB pointed at the opinion presented by Greenpeace and Friends of the Earth at the occasion of the Advisory Committee on Rural Development on 10 October 2008, according to which the link between co-existence measures and labelling thresholds is put in question. The Commission should not advocate the use of the 0.9% threshold as a reference for co-existence measures. Furthermore, some Member States have adopted measures that are stricter and target maximum levels of GMO admixture well below the labelling thresholds.

DG AGRI responded that the Commission is currently in the process to drafting a report on the implementation of national co-existence legislation, which is intended to be adopted by early 2009. In preparation to this report, the majority of Member States has indicated to have based the national coexistence measures on the labelling thresholds. Finally, DG AGRI stressed that the expression of stakeholder opinions are important in

the process of developing technical guidance for co-existence measures and encouraged Members of the Advisory Group to submit written contributions.