



AREPO FEEDBACK ON THE COMMISSION CONSULTATION ON THE ACTION PLAN FOR THE DEVELOPMENT OF EU ORGANIC PRODUCTION

The [Association of European Regions for Products of Origin \(AREPO\)](#) is a network of Regions and producer associations that deals with products of origin and EU quality schemes. It represents 33 European regions and over 700 associations of producers for over 50% of European Geographical Indications.

Agriculture and the agri-food industry are essential pillars of our regional economies and they are rooted in our culture and identity. These two sectors play a major role in maintaining economic and social activity in rural areas and are therefore crucial in preserving the territorial balance at regional level. However, agriculture and the food industry also contribute to greenhouse gas emissions and they are particularly concerned with the challenges related to mitigating the effects of climate change.

In this context, **AREPO advocates the emergence of a truly sustainable European food policy, that guarantees access to high-quality and sustainable food to all EU citizens, while ensuring food security and sovereignty, the protection of our environment and a decent living for farmers.**

AREPO considers that the “Farm to Fork” (F2F) strategy and the New European Green Deal represent a unique opportunity to promote more equitable, democratic and sustainable agricultural and food systems, capable of tackling climate change and contributing to the preservation of the environment, by pursuing a bottom-up approach and thus renewing the link between farmers and consumers.

Organic farming is a well-known and EU regulated food production system that contributes to deliver the ecosystem services needed for reaching EU Farm to Fork and Biodiversity targets. As such, it is considered a major pillar of the F2F strategy for a transition towards a European sustainable food system.

In fact, the F2F strategy sets a **target of 25% of EU agricultural land farmed under organic practices by 2030** and defines other priority actions and initiatives aimed at boosting organic production and consumption.

In this context, **AREPO welcomes the Commission initiative to launch a new organic action plan** that must contribute to achieving these objectives. The 25% target is ambitious, and it can be reached only if the right policy tools to support the development of both organic production and demand in a balanced manner are correctly implemented at all relevant levels, namely EU, national, and regional level.

All that considered, AREPO has the following remarks on the role of Regions, methodological approach and proposals for action.

REGIONS AT THE HEART OF ORGANIC AGRICULTURE DEVELOPMENT

All the initiatives related to sustainable agricultural and food transitions are the result of local experiences and practices. It is crucial to establish a common framework and a set of tools at European level, just as it is fundamental to be able to support and adapt these approaches to the needs of the territories in order to achieve change on a broader scale.

Our regions have long been involved in these processes of transforming agricultural and food systems and supporting the development of organic agriculture, in particular through the management and implementation of Regional Rural Development Programs. This decentralization also goes in the direction of a democratisation of EU policies and tools and makes it possible to better meet citizens’ expectations by encouraging multi-stakeholder dialogue at local level.

AREPO welcomes that the Commission intends to set up “a common enabling framework to foster initiatives taken by Member States, regional or local authorities”.



In this context, in order to better address the challenges faced by the need to reach the abovementioned targets as well as to make better use of the available resources:

- **AREPO encourages the European Commission to better associate and systematically consult its Regions in the next steps of both the development and implementation of the new organic action plan.** The decentralization towards EU Regions allows for a multi-stakeholder dialogue at local level which could provide a comprehensive understanding of the major issues at stake as well as the right means to tackle them.
- Furthermore, AREPO reminds to the European Commission that such an ambitious project requires an **integrated and coordinated approach**. This means that this action plan must fit into the wider framework of **EU Common Agricultural Policy**, as well as **be in line with the priorities and objectives of the European Green Deal, running parallel to the Farm to Fork and Biodiversity strategies**.

With regards to the CAP:

- **AREPO regrets the lack of a truly territorial and regional dimension in the Commission's proposals for the CAP post-2020.** A solid vision for the future of rural areas and the role they have to play in our society cannot be achieved without the reintroduction of this territorial logic in the future CAP.
- For the above-mentioned reason, AREPO **calls for the reintroduction of the notion of Regional Management Authorities** for the implementation of rural development interventions and **requests the full association of Regions to the drafting of the National Strategic Plans** and to the coordinating bodies set up by the European Commission.

METHODOLOGICAL REMARKS

- The next organic action plan should include **quantitative, specific, and time-bound objectives with a dedicated budget**, where possible. Objectives should be accompanied with **lists of concrete actions and timetables**. The institution or stakeholder responsible for the implementation of each action should also be clear.
- In order to assess the implementation of the action plan, it is crucial to include **monitoring and evaluation activities** from the outset. Therefore, the Commission should monitor the implementation and produce a **mid-term review**, in order to assess if there are major gaps and evaluate how to close them.

PROPOSALS FOR ACTION

Production

In order to achieve the ambitious target of 25% of EU agricultural land farmed under organic practices by 2030 the current financial support available under rural development **organic farming support measure for conversion and maintenance** should be upheld and strengthened.

Furthermore, as previously said, organic farming has a privileged position to contribute to farm to fork overall objective of transition toward a sustainable food system. In this regard, supporting a further increase in the overall sustainability of organic farms and production could help upscale organic farming contribution to the transition. In this regards we suggest to:

- Introduce within the support for organic farming a specific bonus for those farmers who use seed, or vegetative propagating material, of organic origin.



- Increase the biodiversity and sustainability of organic farms through specific subsidies for hedges, auxiliary fauna, reservoir plants, ponds, watering holes for wildlife, nests, rabbit breeding beds, plant cover on woody crops, etc.
- Develop actions aimed at protecting the climate and the environment, such as support for techniques which improve water infiltration into the soil, increasing reserves for crop use and preventing soil erosion or promotion of the use of vegetal covers.
- Support a system aimed toward climate neutrality through incentive for pasture management practices that works as carbon sinks, by closing the biogenic carbon cycle (rapid carbon cycle).
- Encourage the use of renewable energy on farms, agro-industry, and organic market.
- Improve access to and recycling of organic matter on organic farms with a bio-economy perspective through specific technical advice, the preparation of technical materials, facilitating regulatory adaptation, a line of aid for composting and production of bio-fertilizers on farms.
- Eliminate administrative obstacles related to the use of waste to facilitate composting.
- Promoting measures to encourage self-sufficiency of agricultural and livestock holdings (reuse of organic waste for fertilisation, production of livestock feed or self-production of seeds without plant breeders' rights).

Food processing

A good development of the organic agro-industry at local level is key to consolidate the growth of the primary production. It allows to reduce transport costs and to increase sustainability, while developing the rural economy, adding value in the production area. To these purposes, the following actions should be taken:

- Encourage small-scale agro-industries linked to the farm.
- Increase mobile processing facilities for small farms, through targeted support and by facilitating regulatory adaptation of the hygiene package and animal health standards (examples: slaughterhouses, cutting plants, mills, etc.).
- Encouraging shared use of industrial facilities at local level to overcome legal health barriers.
- Support the installation and operation of composting plants in the agro-industrial support lines.
- Encourage the involvement of agro cooperatives in the marketing and transformation of organic products, including participation in food public procurements.
- Increase the use of eco-sustainable packaging and reduce single-use packaging for organic products.

Marketing & Consumption

- Move towards the overall sustainability of environmentally appropriate, economically viable and socially acceptable marketing systems.
- Strengthen and promote sustainable local agro-ecological food systems (bio-districts, agro-ecological networks, etc.) that favour the development of short supply chain and local consumption models linked to regional production, minimising transport needs.
- Support the organisation and participation in national and international organic food fairs and commercial meetings, through technical support and collaboration among public and private entities.



- Increase internal consumption of organic products with financial support for local markets and direct sales, as well as with information and communication campaigns on existing market and operators registered for direct sales.
- Promotion policy should continue to increase consumers' awareness of the EU organic logo as well as of the benefits of organic farming for the environment and animal welfare, with the objective to increase demand for organic products. Part of the yearly budget for EU Promotion policies should be earmarked for actions on organic farming.
- Promote and improve the knowledge of the consumer about organic food through public food procurements for school canteens, hospitals, senior citizen centres, sports facilities, etc. Public procurements are an important policy instrument to allow regions and local authorities to develop long-term partnerships with their local organic producers and to incentivise conventional farmers to convert to organic production. A mandatory target must go hand in hand with capacity building programs related to the Sustainable Public Procurements criteria for both purchasing authorities (at national and local levels) and organic producers organisations.

Research, innovation and training

- Build strong knowledge networks (face-to-face and online) for organic farming, better connecting farmer with farmers abroad as well as farmer with researchers. In particular, a dedicated budget should ensure:
 - the availability and preparation of organic advisers;
 - demonstration of best practice in organic farming;
 - collaboration on knowledge sharing and market development.
- Increase the technical knowledge of organic operators through agro-ecology transfer meetings, publication of technical materials, as well as formal and informal training.
- Support the creation of networks of collaborating farms in organic production, which allow research and collection of operational data, while serving as a model of good practices to be taught and places for transfer meetings.
- Establish an observatory on organic production techniques at European Union level to compile a catalogue of best practices.
- Research and innovation budgets for organic farming under Horizon Europe should be in line with the target of organic farmland. EU R&I should address the specific research needs of organic sector like:
 - organic approaches for cultivation techniques and plant health (i.e. increased use of functional biodiversity and resilient cultivars),
 - organic approaches to sustainable animal production (i.e. use of resilient and robust breeds, herbal medication, husbandry practices respecting animal behaviour),
 - development of deficient organic inputs needed for the upscaling of organic farming (e.g. organic seeds and organic varieties developed through organic plant breeding programmes),
 - possible solutions to address presence of pesticide residues in the environment and therefore potentially in organic products,
 - minimal and careful food processing,
 - contribution of organic production to climate change mitigation,
 - innovative initiatives (ex. superfoods, breeding of insects for human and animal food),
 - and strengthening organic knowledge and innovation systems.



Policy & Regulation

One of the reasons why the prices of organic products are higher than those of conventional ones is that the externalities generated by the production system are not incorporated into the product's cost structure. The "polluter pays" principle is not applied within the agricultural system.

This disparity has created a situation where pesticide residues are basically omnipresent in the environment and therefore potentially present in organic products. To face this issue the European Commission should:

- put forward concrete actions that aim at simplifying the registration of plant protection products (PPPs) suitable for organic, such as natural substances;
- promote further harmonisation regarding the handling of pesticide residue findings, by taking into account the damage that a zero-tolerance approach would do to the organic sector;
- investigate possibilities for placement of liability on pesticide producers and users, on the basis of the polluter pays principle;
- 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.

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