



**European Organic Certifiers Council**

# **Revision of Regulation 834/2007 and legislative proposal for a New Organic EU Regulation**

## **EOCC statements**

**European Economic and Social Committee**

Section for Agriculture, Rural Development and the Environment

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# EOCC statements

## **1. Most relevant problems**

- Current legislation
- Commission's proposal for new organic Regulation

## **2. Challenges & aims**

## **3. Proposals and suggestions**



## **Problems with current legislation : indicators**

- unfair competition among operators
- increasing administrative burden
- fraud cases affecting the EU market and consumer confidence
- increasing complexity of product flows



## **Problems with current legislation : causes**

- different interpretations of production rules at Competent Authority level
- differences in control systems at Competent Authority level
- increasing need for effective exchange of relevant information



## **Problems with Commission's proposal**

-stakeholders have **not asked for full revision**

The full revision is resulting in structural problems:

-legal uncertainty for operators and CB's in the EU and non EU

-lack of initiatives to solve existing structural problems in application of current legislation

## **Problems with Commission's proposal**

Problems with the content :

- high number of references to unknown delegated and implementing Acts
- the change of rules and requirements for control and certification activities is expected to reduce quality of control and certification
- increasing complexity of the legal framework
- lack of initiatives for more harmonised application and supervision

# Challenges & Aims

Better  
supervision

Better  
controls

Fair  
competition  
among  
operators

Simplification  
of legislative  
framework

Harmonised  
application of  
legislation

Improved  
operators  
confidence

Improved  
consumers  
confidence

Steady  
Organic  
market  
development



# **EOCC suggestions and proposals**

## **Improved status quo of Reg 834/2007 :**

### **To maintain:**

- Labelling rules,
- Control system with annual controls, physical controls, mandatory sampling, notification and submission to control system, existing exception for notification, measures in case of irregularities, infringements and suspicion thereof, catalog of measures, minimum control requirements,...

# **EOCC suggestions and proposals**

## **Improved status quo of Reg 834/2007 :**

### **Add** what is missing

Mass catering, group certification, specific labelling rules, notification of subcontractors, ...

### **Improve** what is still weak

- Requirements for supervision, conversion rules, transparency in the import system, tools for exchange of information, 100% organic agricultural ingredients in organic food, compulsory indications, minimum content of certificate, ...

### **Delete** what is no longer necessary

- references to Reg 882/2004, ...