

FINAL MINUTES

Meeting of the Civil Dialogue Group Organic Farming

Date: 10 July 2020

Chair: Mrs Marian BLOM (IFOAM EU)

Organisations present: All Organisations were present.

1. Nature of the meeting

The meeting was non-public. Meeting organised by videoconference Webex.

2. Approval of the agenda

Adoption of the minutes of the previous meeting (16/10/2019) by written procedures

3. List of points discussed

3.1. Farm to fork strategy and new Organic Action Plan: Process and involvement of stakeholders

The Commission (from now on **COM**) presented the Farm to fork and Biodiversity strategies which are both included in the Green Deal adopted in Mai. The main objective is to reach at least 25% of EU agricultural land under organic farming in 2030, therefore, to shift the vision of how we transform the food system (production, preparation, distribution (etc...)) in a sustainable way.

COM informed that the EU is currently in a transition to a more sustainable food system to reach the targets. COM added that both of the strategies are complementary and involve all sectors of the EU economy which will contribute to reach the objectives.

COM highlighted that the farm to fork strategy is the beginning of a process that launches a debate which will continue as soon as the individual actions will follow up. COM emphasized that among the objectives is to limit the impacts on the environment and assure that the farmsectors' economic sustainability and social aspects are maintained.

COM underlined the faced challenges as regards: (1) The social aspects for the need to ensure a good quality food for consumers, social rights workers in food chain (etc...) (2) The environmental sustainability to tackle climate, protect the environment, preserve biodiversity (etc...) (3) The economic aspects to safeguard fair incomes for farmers, involve more young farmers (etc...).

In order to reach the Farm to fork strategy, COM accentuated the existence of 4 targets for sustainable food production: (1) the reduction of 50% of chemical pesticide (2) reduction of nutrient loss by at least 50% and fertilisers by at least 20% (3) decrease of antimicrobials for farmed animals and in aquaculture by 50% (4) achieve at least 25% of the EU's agricultural land under organic farming.

Luigi Tozzi (**COPA**) said that organic is not able to ensure food security. He added that, in Italy, if the 25% target is reached, there will be an import from non-EU countries. And asked about the plan of COM to prevent the organic import.

COM answered that reaching the self-sufficiency in organic products is important, however, import is not prohibited in to monitor food security as well as the impact of the strategy implementation. IT will be closely followed up.

Luca Capodiecì (**FEFANA**) referred to the EC F2F strategy objective linked to the reduction of the environmental impact of animal production via a facilitated placing on the market of sustainable and innovative feed additives. He asked COM if organic farmers will benefit from such an action. COM clarified that this specific strategy action point is foreseen to be delivered by the end of 2021 and aims to contribute more to a sustainable animal production.

As regard the Organic Action Plan (**AOP**), COM informed the actions are still a draft with the intention to pave the way to 25%, they will be put into a public consultation right after the summer break for comments. COM added that a solid balance should be established between the supply and demand to not have a depletion of the organic system.

COM reported that during the last CDG on quality and promotion, a draft program to dedicate an amount for the promotion of organic products in the EU and third countries markets was suggested. AOP will be proposed for adoption during the first quarter of 2021.

Emanuele Busacca (**IFOAM OE**) asked about the timeline of the public consultation. COM informed that a period is needed for the translation and that the consultation will stay for 8 to 12 weeks.

Luigi Tozzi (**COPA**) asked about the calculation method to achieve the EU targets and if it is based on each MS individually. COM informed that there are no calculation methods yet, but recommendation to MS will be addressed during the process.

Emanuele Busacca (**IFOAM OE**) advised to learn from the limitations of the current OAP. He added that there is a need for quantitative, time-bound objectives as well as dedicated budgets in the next OAP to have more impact. Moreover, he asked COM about the dedicated budget as the current OAP does not include crucial actions for MS neither at regional nor at local level.

COM clarified that AOP is not a legislative instrumentation and that there is no budget linked to it. Com is using CAP budget, and the possibility to utilize all recommendations to use the budget considering the EU targets.

Aira Sevón (**ECVC**) asked about the participation of organic farmers at MS level. COM clarified that the participation of MS depends on the type of action with a need to have cocreation.

Wolfram Dienel (**DBV**) questioned the commission about the plan for the AOP, if it will be first commented in the online consultation or if it will be a consultation with open questions. **COM** told that the draft AOP will not be provided as first, the idea is to first have a consultation and come back with the draft.

3.2.State of play of the discussion on delegated acts (DA) and implementing acts (IA) of the new organic regulation (EU) 2018/848

Nicolas Verlet (**COM**) informed that the preliminary drafts of IA and DA of all topics have been submitted to the relevant committee (GREX for DA and COP for IA), some acts are more advanced than others, but are all under an intense consultation process in which all detailed comments from EU Parliament, Council and stakeholders are taken into account.

He notified that COM is trying to find a consensus and a mutually acceptable alternative between EU institutions, committees and stakeholders on all these rules. This approach is considered successful as the Production rules were unanimously accepted by Member States (MS) (only 2 abstentions), but it requested almost 2 years of intensive consultation.

3.2.1 Production rules & PRM/Heterogeneous material

Laurance Bonafos (COM) presented the state of play of the secondary legislation on production rules and PRM as well as heterogeneous material. She specified that the adoption of the acts by COM means that the Inter-Services Consultation (ISC) as well as the feedback mechanisms are done. Then, the acts are sent to the EP and Council for scrutiny and is published only after their agreement.

She informed that there are **6 DAs** in total:

- (1) As regards the exceptional rules in organic farming (DA supplementing on catastrophic circumstances), the COM informed that there is not a lot of changes compared to the current Regulation. the acts are ready to be adopted by COM but have not been sent yet to EP and council due to the Covid-19 pandemic. The EP requested to not have all DA at the same time.
- (2) DA on the use of in conversion PRM: Their use does not need any derogation neither prior authorization, but some conditions have to be respected. Derogations are needed only for the use of non org PRM. MS will have to establish a positive list of species for non- organic and in-conversion PRM. This act is ready for adoption but have not been sent for EP and council for scrutiny also due to Covid pandemic.
- (3) DA amending Annex III setting rules on the labelling of feed and mixtures of fodder seeds (containing at least 70% of organic and in conversion seeds and the rest 30% of non-organic seeds for which a derogation has been accepted). This act is under ISC with DG SANTE.
- (4) DA supplementing the basic act on rules for PRM/Heterogeneous Materials which is mostly under the responsibility of DG SANTE parallely with the horizontal legislation on seeds, varieties and plant health. This act aims to set rules on the production, labelling, control and packaging of PRM/Heterogeneous material. This act is under ISC.

- (5) DA on certain detailed production rules for certain organic products (sprouted seeds, feeding of bee colonies, aquaculture animals and juvenile. This act has already been published.
- (6) DA on the use of organic cholesterol for shrimps and prawn and parasite treatments. There is a published report of EGTOP on aquaculture. The discussion will start next week to launch the ISC in September.

COM followed with information on IA on production rules and mentioned that only two IA on production rules: One already published Commission Regulation 2020/464 covering: retroactive recognition, additional production rules for livestock and for aquaculture animals and algae, technique authorized in the processing of food and feed products and, collection of data on the availability of organic PRM, animals and aquaculture juveniles.

COM reminded that the other act is still under discussion with the MS covering mainly the annexes. COM confirmed a conservation approach of all current annexes with further work on the revision, except for non-organic agricultural ingredients where the current list will be cleaned up with a transitional period:

- Annex I listing the authorized products and substances in organic production. First discussion with MS will take place next week. The substances authorized in the current Regulation will remain with a potential retrieve of substances based on the last EGTOP report.
- Annex II on fertilizers and Annex III on feed would both need to be reviewed to add some changes to be aligned with the horizontal legislations.
- For the cleaning and disinfection EGTOP has already worked on this point and outlined the criteria under which the product would be used in organic production and not a list of authorized substances.

Aira Sevón (**ECVC**) asked about heterogenous material and organic varieties as regard the latest decisions that have been taken for the application of the organic Regulation. She added that the organic varieties which do not meet the IOPF uniformity standards, cannot be protected by a plant variety certificate. ECVC would like to see them not protected by patent either.

Patrizia Pitton (**COM**) answered that the act is under ISC.

Aira Sevón (**ECVC**) questioned for more information about the study to propose new Regulation on seeds that was supposed to take place during 2020.

Patrizia Pitton (**COM**) informed that DG SANTE is taking the lead on this initiative which is supposed to be launched by end of this year.

Patrizia Pitton (**COM**) informed that the draft act is currently under ISC and the issue related to control will be deepened with the legal frame and the horizontal rules. The draft act aims to provide flexibility to MS to attribute the heterogeneous material control quality.

Luca Capodieci (**FEFANA**) indicated that in the minutes of COP meeting in June, it is written that "Main changes in the Draft Implementing act and Draft Annexes were

presented" and asked for more details on the nature of MS comments/requests especially about technical annexes.

Laurance Bonafos (**COM**) answered that COP members presented a draft to each of the annexes which were sent to MSs for consultations. The feedbacks will be scrutinised during the next COP meeting.

Luca Capodiecì (**FEFANA**) asked if in the light of F2F strategy objectives related to increased sustainability and organic farming yields, more products compatible with the organic farming principles will be permitted in organic feed and if EGTOP will in the future specifically consider the F2F strategy recommendations during their work.

Nicolas Verlet (**COM**) answered that the EGTOP asked to evaluate the compliance of dossiers for the request of the compliance with the EU organic Regulation as a consultative advice. the final decision will be voted on in the committee by the MS.

Emanuele Busacca (**IFOAM OE**) addressed that the issue of veterinary medicine is very important and needs to be properly discussed and asked for the deadline for reaction to the COM interpretation letter on the withdrawal period for veterinary treatments.

Laurance Bonafos (**COM**) answered that the deadline for reactions to the draft interpretation letter is foreseen until 31 July. This point will be finalized with MS in September.

Emanuele Busacca (**IFOAM OE**) asked if the horizontal legislation of fertilizers will limit the use of fertilisers in organic which are not CE marked.

Emanuele Busacca (**IFOAM OE**) asked if COM is planning a definition for 'factory farming'.

Laurance Bonafos (**COM**) answered that the plan is to have a discussion with MS during the following COP meeting to find the best compromise as a lot of MS commented the lack of clarity. She added that French and Belgian associations prepared a document on factory farming and that EGTOP would need to examine the questions.

Nicolas Verlet (**COM**) clarified that the objective is to urgently get the package of the IA and DA adopted by the end of the year. He added that there is a commitment in the basic act that there will be an annual revision of the annexes. He mentioned the idea of securing the needed package to run the organic regulation, then to establish a waiting list where all the new substances that could not been integrated in the annexes but were requested by MS to be dealt with in 2021. Several other fundamental aspects will be scrutinised likewise the issue of factory farming, green houses, copper etc...

Jorge Conesa (**FTAO**) asked about the process for third countries to request the incorporation of substances to annex VI.

Laurance Bonafos (**COM**) stated that the objective of article 45 (2) is to recognise that some allowed inputs (substances, additives, ingredients, products etc...) which are not listed in the annexes of the new organic Regulation are necessary for the organic production in Third Countries (TC). The main concern is the PPP depending on the climatic factors, in order to make them authorized, a request should be publicly available and would need to be sent to EGTOP for examination and the final decision will be taken

by COM. The procedures will be similar to the one with EU MSs. She informed that if an input will be authorized for TC, it will remain for three years.

Antoine Faure (**EOCC**) shared the preference for dossiers on the new substances to be used in TC to be provided by Countries or operators directly.

Michel Reynaud (**IFOAM OE**) agreed with EOCC and said that the dossier linked to annex VI is more an operator issue in the Third country than a CB issue.

Nicolas Verlet (**COM**) answered that this point is still under discussion with COP members. Currently, it is part of the private standards of CBs to submit the dossiers for new substances to be used in organic production. A parallelism with the EU system is needed under the new system of compliance and a minimum technicity in the dossier is needed which excludes all operators. Once a request is accepted from one TC it will be available in all others.

César González (**Euroseeds**) addressed a question about the temporary experiment to have more information about which Member States will participate and which species will be studied.

Patrizia Pitton (**COM**) answered that there is no available written information at this stage.

Wolfram Dienel (**DBV**) stressed the fact that the innovative stable should not only be for pigs but also for fattening cattle, flexible rules needed.

Nicolas Verlet (**COM**) clarified that the discussion is ongoing to also include all kind of buildings. The commitment is to start working on pig innovative buildings in 2021 as it is considered the most urgent file, other species will follow up.

He followed with some other general information on the state of play of DA and IA on the following topics:

3.2.2 On Control:

One IA and two DAs (1 DA supplementing and 1 DA amending) have been put in public consultation which will be launched soon after the results of the Inter Services Consultation (from now on ISC), hopefully, before the end of July. COM welcomed all stakeholders' comments:

- (1) Investigations to be undertaken in case of the presence of non-authorized products and substances
- (2) Templates for the national catalogue of measures
- (3) Mass balances checks
- (4) Model of certificate
- (5) Functioning and control of group of operators

Antoine Faure (**EOCC**) expressed that the control of the characteristics of heterogeneous seeds should be delegated to existing national bodies already in charge of control of seeds for registration in the national catalogue, for example GNIS in France.

Aurélie Quintin (EOCC) acknowledged the importance to discuss the Production rules (within COP Meeting and CDG) and expressed the regret that short time has been allocated to discuss the control rules. She added that the final version currently under ISC is not known from the sector.

3.2.3 International Trade

One DA and one IA will be adopted concerning (A) the rules on the transitional period for CBs and CAs that will continue to be recognised under the equivalence system until 2023. And (B) on the compliance scheme considered as the main change in trade. These acts will cover:

- (1) Content of the certificate of operators
- (2) Provisions on the verification of the certificate of inspection (COI)
- (3) List of CBs and CAs recognised for compliance.

The acts on trade will set additional criteria on procedures for recognition for CBs and the information to be provided for the supervision by the COM. This DA establishes all controls and actions to be carried out by CBs:

- (1) Minimum control requirements,
- (2) Provision to verify the consignment of the COI
- (3) Certain derogation of the basic act.

COM notified that many comments were received and informed that the mentioned points will be further discussed in the COP/GREX meetings of July and mid of September. Nicolas Verlet stressed that the acts on trade will be ready by September and that their feedback mechanism will be probably done by October.

Luca Capodiecì (FEFANA) asked whether the COM could alert CDG members when the 4-weeks feedback mechanism will be launched to not miss the deadline. **COM** agreed to share the information via email and circa.

3.4 Possible postponement of one year

Nicolas Verlet (COM) informed that several requests to postpone the implementation of the new organic were received from a wide range of stakeholders. But there is nothing to add at this stage.

Aurélie Quintin (EOCC) informed that the certification program of CA and CB would need to be modified after publication of the full EU-legislation and also staff would need to be trained. She added that the extension of accreditation is required for all CBs within the EU which requires time (EOCC thinks half a year for the entire process). There will be no accredited CB with the scope 2018/848 on 1/1/2021. She also highlighted that the national legislations complementing the EU organic Regulation will not be modified on 1/1/2021. These regulations determine, as an example, approval of CB, approval of staff and inspectors, registration process of operators, dealing with residues and sanctioning. If the postponement is not foreseen, the system might be difunctional at 1/1/2021.

Aira Sevón (ECVC) supported EOCC.

4. State of play of the activities of EGTOP and on the revision of technical annexes

Bas Drukker (COM) informed that the first step is to review the criteria for evaluation of substances. Pending opinion of Acryleat, sucrose ester, however, additional information will be evaluated.

He followed with ion exchange saying that EGTOP gave negative advice for its use, because of the request of MS to review the rationale behind it, on the other hand, EGTOP gave a positive advice for its use in baby food.

He notified that subgroup on salt for its production methods will follow up but the report is not ready yet and no planning for the date.

Wolfram Dienel (DBV) asked if it is enabled to have as much protein feed from oil plant and potatoe left overs as possible.

Patrizia Pitton (COM) addressed the question on temporary experiment on organic varieties saying that first working group on temporary experiment represent 19 MS who took part but not yet sure who will finally be in the active group. As regard to the species: Wheat, Rye, Maize, Soybean, Potato, Carrot, Kohlrabi, Tomato, Onion and maybe alfalfa.

Wolfram Dienel (DBV) proposed to put a negative list of cleaning detergents and disinfectants.

Bas Drukker (COM) confirmed that the legislators are obliged to present a positive list.

The chairperson invited the EC to update the EC webpage with the calendar of EGTOP exchanges and meeting minutes as to increase transparency on ongoing activities. The EC committed to update also the publicly available information on the specific EGTOP webpage in the register of Commission expert groups.

5. COVID 19 Outbreak: impact on controls and on market and COI

COM informed that the Implementing Regulation provides derogations from Regulation (EC) No 889/2008 and (EC) No 1235/2008 as regards controls on the production of organic products due to COVID-19 pandemic. The derogations concern annual visits and control on the spot for low risk operators which are substituted by documentary checks and any other available means of distance communication.

COM specified that for other type of operators, the same means apply but physical inspections need to occur right after the end of the social distancing at national level.

COM followed that number of samples to be taken and analysed shall correspond to 2% instead of 5%, the same for the percentage of random visits which are lowered for 10 to 5%.

As regard MS activities in the annual inspection, COM informed that annual supervision audits carried out by any available means of distance communication will substitute the “annual inspection” until the end of the social distancing in the MS.

COM stated that the implementing Regulation will apply in TC and EU from March 2020 except for China where it is applied from the first of January of this year.

Aurélie Quintin (**EOCC**) welcomed the new implementing Regulation but mentioned the lack of explicit mentioning of TC. She added that CBs will make their best to achieve all addressed percentages which are quite challenging in the current pandemic situation.

COM answered that further clarification and interpretation will be provided to provide explanation regarding the unannounced visits where rectifications are provided.

Luigi Tozzi (**Copa**) insisted on the fact that the pandemic is still ongoing in some important countries from where the majority of protein feed is imported (e.g. Brazil) and asked if COM is planning to authorise the use of a percentage of non-organic feed for monogastric in the coming months.

Aira Sevón (**ECVC**) reacted that non-organic feed was inquired earlier this spring and that among organic farmers there seem to be really no extra need. She added that such derogation would be a great threat to the reputation of the organic, it would be better to think about the innovations that exist for organic protein feed.

Roberto Pinton (**IFOAM OE**) informed that the survey results among the EU organic organization revealed that a large majority agreed that there is no need to authorize more conventional protein feed as the present stock of protein feed is considered enough until the next EU harvest.

Wolfram Dienel (**DBV**) shared that DBV are against extra derogation for conventional feed.

Ivira Forsström (**COGECA**) informed that the situation of organic protein feed supply is still very strained in Sweden which is considered a threat for farmers and producers.

Elena Panichi (**COM**) answered that COM is ready to listen to any point that will be raised in the future months.

Luigi Tozzi (**Copa**) declared that many physical checks were blocked during the pandemic in the EU and that some products in the field were not checked. He said that performing physical checks at this stage does not make sense any longer. He asked if COM is able to clarify whether a non-physical check would be sufficient for these types of companies this year.

Elena Panichi (**COM**) replied that the implementing regulation gives more time to the CBs as it gives the possibility to use distance tools.

6. EOCC/ IFOAM OE Presentation on Phosphonic Acid

Juan Carlos Perez gave a presentation about IFOAM OE and EOCC study on Phosphonic acid. The most updated study showed that:

(1) Few EU MSs have national residue law (BE, IT, IR) which shows different approach among MS on dealing with the presence of non-authorized substances,

(2) Only few MSs apply the decertification limit for Phosphonic acid and fosetyl (BE, IT and IR), other apply a case by case approach (DK, NL NO, UK) in SP the decertification depends on the competent authority, and

(3) As regard the limit above which the investigation starts in the EU, the evaluation of substances is not approved in the implementing Regulation (EC) 889/2008. The

investigation is on case by case in the majority of MSs. However, in Italy and Switzerland, investigation starts from the presence of 0,01 ppm of phosphonic acid in fruits and vegetables.

He informed that first version of EOCC factsheet on phosphonic acid is available [online](#) from 2018, some improvements will be done in the near future (before autumn 2020) to include how the investigations need to be done in all cases to be in line with EOCC-COM meeting of November 2019.

COM informed that due to the presence of residues, several products were blocked during the trade.

Roberto Pinton (**IFOAM OE**) informed that the Italian decree such a limitation is not written, but the ministry's research institute has ascertained that the residues of phosphonic acid derive from inputs declared to be compliant (copper salts and some fertilizers included in the official list of allowed inputs). Moreover, he reported that until 31 December 2022, the MRL is 1mg/kg, such a threshold that does not cause concern according to organic operators.

Luigi Tozzi (**COP**) notified that the Italian study has also shown that contamination can be persistent in plants even after 4 or 5 years, especially in tree plants. This means that even if fosetyl has not been used in the last three years of conversion, his presence might be detected, and the product can be decertified

Marian Blom (**IFOAM EU**) asked if the rock phosphate that contains phosphonic acid will be banned from the use in organic system.

Nicolas Verlet (**COM**) informed that the first steps are to check the likelihood of the presence of the non-authorized product then to investigate the source of the problem in a simple manner before concluding.

Roberto Pinton (**IFOAM OE**) questioned if the de-certified operators have to go to court against their ministry in the case of countries where fertilizers are included in the official list of allowed inputs.

Nicolas Verlet (**COM**) informed that it is a case by case approach.

7. International Trade: COI, update on trade agreements, guidelines on official controls, Brexit

COM presented the state of play of Brexit saying that the agreement has already entered into force which consist of the withdrawal of the UK from the union with a transitional period until 31 December 2020. She added that the UK, did not ask for an extension of the transitional period. Until that time, the EU law will apply in the UK which will remain in the single EU market and will be considered formally as a TC right after the transitional period. She informed that COM is working to ensure an effective approach of the withdrawal agreement.

She mentioned that significant changes will occur which would affect businesses, citizens and stakeholders (etc...). A trade agreement will enter into force right after the end of the transitional period. The commission published series of notes including the

organic readiness communication¹, for organic farming which intends that for the next years, CBs are legally able to certify under the EU law and would need to adapt their distribution channel consequently.

As regard the state of play of negotiation between EU and UK, COM indicated that all officially started on the 2nd of March on topics covered by political declaration, On the 19th of March, a draft text for an agreement with the UK (ambitious) based on negotiation directives has followed. The EU has offered the most ambitious trade deal which includes zero tariff on all goods and partnerships in terms of scope. However, the UK has taken a different approach.

For the organic equivalence agreement, COM informed that trade with the UK will be aligned with the same terms as the rest of TC, additionally, food and feed registered as organic in the UK will be considered organic in the EU as well.

Antoine Faure (**EOCC**) asked if CBs have to be recognised and listed in the annex IV of 1235/2008 by the end of the year.

Nicolas Verlet (**COM**) informed that the list of CBs recognised to certify organic products in the UK will be published before the end of the year.

Cecilie Boje (**COM**) gave a presentation on temporary suspension of the guidelines on additional controls until 30 June 2020 due to the Covid-19 crises. She informed that additional controls concern some products from some TC: Russia Federation, Moldova, Ukraine, Kazakhstan, China. She reported that as outcomes of the last COP meeting of June MSs wanted to reinstate the guidelines on additional controls, but TC are not able to apply such guideline.

Nicolas Verlet (**COM**) informed that the situation depends strongly on the Covid-19 situation. He added that the dates were setup for end of September. However, he confirmed that the situation will be monitored to re-install the entire guidelines.

COM announced the official starting of the use of the e-seal in Traces. She added that half of the COIs in Traces are E-signed, 4 CBs signed more than 1000 COIs in 10 days and 4 MS using E-seal signing more than 300 COIs in 10 days. However, still not all EU MS are enrolled and are using E-seal.

Nicolas Verlet (**COM**) simplified that the entire process would need minimum 6 months of adaptation before not accepting paper works anymore.

Antoine Faure (**EOCC**) asked COM about the situation with equivalent TC CBs and if it is still possible to work with the current system.

Nicolas Verlet (**COM**) answered that this point is still under discussion in TC where two situations are possible: To provide enrolment for competent authorities to be delegated CBs in TC. Or to deal directly with CBs recognised in Annex III.

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https://ec.europa.eu/info/sites/info/files/brexit_files/info_site/com_2020_324_2_communication_from_commission_to_inst_en_0.pdf

Emanuele Busacca (**IFOAM OE**) informed about the possible on-going discussions on potential establishment of specific “Organic“ Border Control Points and asked if changes are foreseen on this regard.

Nicolas Verlet (**COM**) clarified the obligation to review the structure in TC to better endorse the COI which needs some flexibility for MS. He indicated that organic unit has no empowerment on this point and lawyers and DG SANTE are working on this topic to find further flexibility.

Gema Vila Cambra (COM) gave an update on international agreement. She summarized the steps to move from unilateral equivalency agreement to the international agreement in the trade of organic goods. She informed that COM would need the authorization of the EU Council in order to obtain the negotiation mandate mainly with countries with a current unilateral equivalent recognition in place.

She mentioned that some preliminary talks with current equivalent third countries took place, namely, Canada, Japan, India, US. The objective of such talks was to share the most important change in the new regulation. There are scheduled meetings with some other equivalent countries (Tunisia, Korea and Israel) which are postponed due to Covid pandemic or might be organised via other distancing tools.

Nicolas Verlet (**COM**) added that COM would need to deal with the current 11 existing unilateral agreements to make them aligned with the new rules. He mentioned that the discussion will officially start in September with priority to countries to which the EU exports the most.

Michel Reynaud (**IFOAM OE**) referred to the 2 years of transitional period for Taiwan as it ended in June. He stressed that two Taiwanese CBs accredited to certify according to the Taiwanese Regulation are not in the position to carry out controls due to Covid pandemic and asked if COM could ask Taiwan to extend the transitional period.

Nicolas Verlet (**COM**) informed that there is no negotiate directive with Taiwan for the moment and that Taiwan has a political goal to reach the maximum of international agreements. However, COM will try to contact them.

Antoine Faure (**EOCC**) asked about the maintenance of the current scope of the agreement in switching from equivalence agreement to trade agreement.

Nicolas Verlet (**COM**) clarified that the shift is not linked to the scope but to the change into the international agreement. He highlighted that such a change is needed for the near future to secure the organic market as it is growing exponentially. He added that the revision will include either (1) a copy past of the current scope or (2) to enlarge the scope. Several points will be deeply discussed as the use of antibiotics or the hydroponic production in the US. COM believes that the negotiations will not be very complicated.

Michel Reynaud (**IFOAM OE**) notified that the aquaculture products are not part of the equivalency agreement which means that from 1 January all aquaculture products exported to Canada need to be certified according to the Canadian Organic Standard. He reported that the same issues exist with livestock products from Japan and asked if a perspective for agreements is foreseen.

Nicolas Verlet (**COM**) informed that COM is working on these issues and is looking to bridge the existing gap which is not so easy.

COM gave a presentation on Organic Farming Information System (OFIS) that contains three modules: (1) non-conformities detected in the EU, (2) non-conformities in third countries and (3) alerts from MS to inform of certain non-conformities detected on their territories.

COM informed that irregularities are reported in OFIS where all cases are public to MSs and that cases are replied within 30 days before initiating the procedures. According to the study, 18% of all organic residue cases were reported to be above MRL for 2019/2020.

Luigi Tozzi (**Copa**) suggested to report more detail about the type of non-compliances detected, e.g. contamination by pesticides, fertilisers, non-compliant labels etc. He asked if OFIS reports can officially include in the risk analysis elements to be carried out by CBs on operators to determine the risk class. He also referred to the ratio of exported volumes as it would give a better understanding of the number of OFIS notification in relation to the exported volumes.

Michel Reynaud (**IFOAM OE**) supported the importance of having the information linked to the ratio between the number of COI and number of alerts.

COM clarified that each notification is linked to at least one COI.

Aurélie Quintin (**EOCC**) supported the work of COM on OFIS and asked if the form of OFIS notification will change.

COM is currently working on listing the possible needed changes which will be more tackled in the future.

4. Next meeting

Nicolas Verlet (**COM**) informed that the next CDG meeting on organic farming would take place in the middle of the public consultation on AOP which is foreseen for a minimum of 8 weeks.

5. List of participants - Annex

Guidance

DGs should ensure that all participants in a given group are informed that the Commission would be processing their personal data. They should do this via the Privacy Statement that is not only published online, but is also provided individually to each participant (e.g. as part of the email where the DG first contacts the individual concerned).

The name of Type A² and B³ members and observers should always be included in the list of participants pursuant to Article 23 of Commission Decision C(2016)3301.

(e.g. given in a consent form that they sign for that purpose at each meeting), in compliance with Article 3(15) and Article 7 of Regulation 2018/1725.

DGs have to be able to demonstrate that consent was obtained subject to conditions of Regulation 2018/1725 (i.e. keep a record that shows how the consent was obtained and whether it was valid).

Disclaimer

"The opinions expressed in this report represent the point of view of the meeting participants from agriculturally related NGOs at community level. These opinions cannot, under any circumstances, be attributed to the European Commission. Neither the European Commission nor any person acting on behalf of the Commission is responsible for the use which might be made of the here above information."

² Individuals appointed in a personal capacity (C(2016) 3301, art. 7.2 (a)).

³ Individuals appointed to represent a common interest shared by stakeholders (C(2016) 3301, art. 7.2 (b)).

List of participants– Minutes

Civil Dialogue Group Organic Farming

10 July 2020

MEMBER ORGANISATION	NUMBER OF PERSONS
European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT)	2
Association des régions européennes des produits d'origine (AREPO)	2
European farmers (COPA)	4
European Council of Young farmers (CEJA)	4
European Liaison Committee for Agriculture and agri-food trade (CELCAA)	4
European agri-cooperatives (COGECA)	4
FoodDrinkEurope (FoodDrinkEurope)	4
European Organic Certifiers Council (EOCC)	3
European Rural Poultry Association (ERPA)	1
European Agroforestry Federation (EURAF)	2
Euro Coop - European Community of Consumer Co-operatives (EUROCOOP)	1
EuroCommerce	1
Eurogroup for Animals	1
European Coordination Via Campesina (ECVC)	2
European Environmental Bureau (EEB)	2
FoodDrinkEurope (FoodDrinkEurope)	3
Fair Trade Advocacy Office (FTAO)	1
EU Association of Specialty Feed Ingredients and their Mixtures (FEFANA)	1
Secrétariat des Associations du Commerce Agricole Réunies / Joint Secretariat of Agricultural Trade Associations (SACAR)	3
International Federation of Organic Agriculture Movements_ Organics Europe (IFOAM OE)	5
Pesticide Action Network Europe (PAN Europe)	1
European Landowners' Organization asbl (ELO)	2

WWF European Policy Programme (WWF EPO)	1
Juan Carlos Perez Montero ad-hoc expert	1
Total: 55	