

EGTOP/2021



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT
Directorate B. Quality, Research & Innovation, Outreach
B.4. Organics

Expert Group for Technical Advice on Organic Production

EGTOP

FACTORY FARMING
(the use of fertilisers from conventional animal husbandry in organic plant and algae production)
Final Report

The EGTOP discussed this technical report at the plenary meeting of May 20/21, 2021.

About the setting up of an independent expert panel for technical advice

With the Communication from the Commission to the Council and to the European Parliament on a European action plan for organic food and farming adopted in June 2004, the Commission intended to assess the situation and to lay down the basis for policy development, thereby providing an overall strategic vision for the contribution of organic farming to the common agricultural policy. In particular, the European action plan for organic food and farming recommends, in action 11, establishing an independent expert panel for technical advice. The Commission may need technical advice to decide on the authorisation of the use of products, substances and techniques in organic farming and processing, to develop or improve organic production rules and, more in general, for any other matter relating to the area of organic production. By Commission Decision 2017/C 287/03 of 30 August 2017, the Commission set up the Expert Group for Technical Advice on Organic Production.

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The Group shall provide technical advice on any matter relating to the area of organic production and in particular it must assist the Commission in evaluating products, substances and techniques which can be used in organic production, improving existing rules and developing new production rules and in bringing about an exchange of experience and good practices in the field of organic production.

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The report of the Expert Group presents the views of the independent experts who are members of the Group. They do not necessarily reflect the views of the European Commission. The reports are published by the European Commission in their original language only.

http://ec.europa.eu/agriculture/organic/home_en

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Members of the EGTOP Group are acknowledged for their valuable contribution to this technical advice.

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EXECUTIVE SUMMARY

EGTOP recommends leaving out the designation factory farming, but instead define a required positive and/or a negative list of elements and techniques to fulfil for allowance of animal products and waste from conventional farming in organic plant production.

EGTOP suggests that the new permanent group assigns experts to conclude on the final list of these inputs that can be used in organic plant production. It is important in this work to assess all the topics linked to the use of manure and waste. The main areas to address are contamination risks of import of manure or animal products from conventional farming, including the techniques that should be used, and the ethical barriers of some conventional livestock systems, to be cut off for import to organic farming.

1. TERMS OF REFERENCE

In light of the most recent technical and scientific information available to the experts, the Group is requested to analyse and advice on the following items:

1. Definitions Member States, codex and EC-Guidance document 1995;
2. Reasons and criteria for the restriction to use fertilisers from certain origins;
3. Objectives and principles of organic production relevant for definition of factory farming;
4. Types of fertilisers/entries in Annex II to Regulation (EC) No 889/2008 to which the restrictions should apply;
5. Feasibility of controls on restrictions proposed;
6. Impact on restrictions on sources of fertilisers in organic production;
7. Organisation of the future work (number of meetings needed, subgroups to be summoned, expertise needed).

2. CONSIDERATIONS AND CONCLUSIONS

About the use of fertilisers from conventional animal husbandry in organic plant and algae production.

2.1. Background

As stated in the general principles of current organic regulation (EC) No 834/2007, as well as in the coming new organic regulation (EU) 2018/848, organic plant production should rely on:

- 1) soil fertility management,
- 2) agronomic measures (such as crop rotation or cover crops),
- 3) manure and animal by-product of organic origin, and
- 4) fertilisers of plant, mineral, microbial, food-waste origin.

In parallel, the concept of recycling organic matter and nutrients is a value acknowledged within the organic farming principles. Therefore, the use of conventional waste products and excreta should be considered in organic plant production to improve soil fertility. This gains a higher relevance in areas/regions where organic animal husbandry is very limited, due to several reasons.

At EU level there is an increasing focus on the issue of avoiding contamination from animal waste products and to achieve the main aims of the Green Deal: to reduce the amount of food loss/waste, the development of new animal-product treatments. The Farm to Fork strategy states that: “Even though the EU’s transition to sustainable food systems has started in many areas, food systems remain one of the key drivers of climate change and environmental degradation. There is an urgent need to reduce dependency on pesticides and antimicrobials, reduce excess fertilisation, increase organic farming, improve animal welfare, and reverse biodiversity loss.”

Recently, the European Commission also adopted the EU Action Plan: "Towards a Zero Pollution for Air, Water and Soil" (and annexes) - a key deliverable of the European Green Deal, namely the contamination of soils, is more in focus.

In the meanwhile, the regulatory framework of European animal husbandry is developed, as well as the practical management of conventional husbandry is evolving. The organic sector has developed as well and continuous future growth is foreseen, to be further supported by policy measurements and rising market demands (as also stated in the European Organic Action Plan). As a consequence, it becomes of utmost importance to clearly define what can be accepted as a basis for fertility management in organic plant production, in order not to hamper the production development but, at the same time, to safeguard fulfilment of the organic farming principles and consumers' acceptance and trust.

2.2. Risk considerations

Due to the risk of contamination of the soil, environment and food products with undesirable substances such as heavy metals, antibiotic-resistant microorganisms, medicine residues linked to the use of many conventional organic fertilisers, the hitherto permitted, even if with restrictions, use must be deeply questioned. The experts’ group considerations pertain to whether and, if so, which conditions can be defined, where the use of conventional fertilisers could be acceptable in organic plant production and, therefore, continue to be permitted.

Up to date, the use of excreta and waste from conventional farming as fertilisers, limited to the type of products listed in Annex I of Reg. (EC) No 889/2008, is restricted to products not

coming from factory farming. The concept of factory farming is not defined in the EU regulation but guidelines for its definition were issued by the Commission in 1995. Based on these guidelines, MSs defined their own factory farming (sometimes differently), adapting the concept to the national needs, availabilities and conditions. The guidelines mention two elements that contribute to the definition of factory farming:

- a) systems where stock is predominantly not allowed to turn freely through 360 or where they are predominantly in the dark or are predominantly kept without bedding and including in particular:
 - poultry and other battery systems;
 - broiler units with stocking rates over 25 kg/m² and
- b) systems where rearing is conducted separately from any other farming activity on a holding. This type of rearing is carried out in structures that have no farmland intended for the cultivation of crops on which effluents can be spread.

Additionally, many private label standards for organic in Europe (such as KRAV, Soil association, etc.) have their own, often stricter, definitions on factory farming.

According to organic farming principles, as defined in Reg. (EU) 2018/848, and in the perception of European citizens, the use of inputs originated from conventional animal husbandry are questionable because:

1. of consistency sake, the reliance on organic farming on conventional farming products (or by-products) is not helping in reaching the goals of organic production;
2. of ethical principles, to rely upon or even justify husbandry systems in several cases not respecting animal physiological and behavioural needs such as foraging, socializing, free movements, etc. is not in tune with the organic concepts;
3. of environmental principles, where conventional farming (CO₂ footprint, feeding on GM soybean from deforested area, use of water, etc.) is often not in tune with the organic concepts;
4. of the quality of the obtained fertilisers, which is questionable in terms of:
 - a) residues and contamination (antibiotics, pesticides, heavy metals, resistant microorganisms, etc.) that impact on soil and humans' health;
 - b) carbon content and quality, due to reduced use of plant based bedding materials;
 - c) high solubility of N, not fitting the purpose of feeding the soil and increasing the leaching risk.

2.3. Dealing with the complexity

Is there a way to solve, at least partially, the points above selecting which type of conventional animal husbandry to accept or which type to forbid? And furthermore, are there techniques or processes that can solve the concerns mentioned in point four above?

The EGTOP group suggest therefore working with a list of negative and positive elements to deal with the complexity of identifying excreta and waste products that can be accepted in organic plant production.

Potential elements of a negative list to be considered:

- animals raised in cages (poultry, rabbits, etc.);
- systems where livestock is not allowed systematically to turn freely through 360 degrees;
- landless systems;
- animals for fur production;

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- density of the animals in the breeding structures (stables) above a certain limit;
- animal welfare conditions (based on several elements such as housing systems, full slatted floor, lighting etc.);
- farms implicating long-distance transportation (e.g. unweaned calves and lambs);
- preventive use of antibiotics;
- use of feed with GMOs.

Potential elements of a positive list to be considered:

- free-range (being aware that the manure to gather is limited);
- fulfilment of quality schemes (i.e. compassion in world farming; label rouge; local slow-growth breeds, local breed scheme, National quality schemes, the future EU Animal Welfare Scheme), farm-direct selling and territorial certification scheme (geographical indication, protected denomination origin);
- restricted use of antibiotic / antibiotic stewardship e.g. similar to the organic standard or other schemes restricting antibiotic (this solve only the quality of SM¹ issue but not the welfare issues);
- presence of bedding materials of plant origin (to increase SOM²);
- density of the animals in the breeding structures (stables) below a certain limit e.g. similar to the organic standard or other schemes;
- compliance to EU laws on animal welfare;
- locally sourced raw materials (it only solves part of environmental problems).

2.4. Techniques or processes to improve animal waste quality

Are there techniques that can contribute to solve “quality problems” of conventional wastes?

Potential elements for a positive list to be considered:

- composting for at least xx months and reaching a temperature of xx °C;
- presence of at least x% of plant-based material, that can be mixed with animal excrements if not present as bedding material;
- anaerobic digestion (with no use of not allowed inputs);
- fermentation (defining minimum requirements);
- to set a maximum amount that can be used per ha/year, for example 40 kg of N;
- distribution techniques and limitation (i.e. only on green manure or on plant residues, not on edible plants.);
- analysis of the product obtained and limits in contents of heavy metals, antibiotics.

2.5. From definition to list of use

The definition of factory farming is not concise, a switch to the use of a list of elements, mentioning which kind of conventional animal husbandry produces excreta and waste in organic plant production that are acceptable and which not, is suggested. The definition of “acceptable conventional animal wastes” can be obtained by a combination of positive and negative elements from the above lists, possibly supplemented by a compulsory treatment. For example, pork slurry, mixed with wood chips and composted for at least 6 months, or,

¹ Soil material

² Soil organic matter

conventional poultry manure from animals grown on plant material bedding and undergone biogas production.

2.6. Inspectability/implementability of the rules

Conventional farms (where the manure or the waste comes from) are not inspected by the CBs within the controls of the organic regulation. Who should inspect them and who should pay related costs? Even for industry-produced fertilisers or for biogas plants, usually the traceability and origin is based on self-declarations of suppliers, but rarely inspected.

For manure and excreta in general, it is difficult, but still possible, to check the requisites of the breeding systems. For slaughterhouse residues' it is more complex as, usually, the batches are very large and not separate per origin. In biogas plants, depending on the size, it is difficult to trace the origin of materials but possible.

2.7. Conclusion

EGTOP recommends leaving out the designation factory farming, but instead define a required positive and/or a negative list of elements and techniques to fulfil for authorizing animal products and waste from conventional farming in organic plant production.

EGTOP suggests that the new permanent group assigns experts to conclude on the final list of these inputs that can be used in organic plant production. It is important in this work to assess all the topics linked to the use of manure and waste. The main areas to address are contamination risks of import of manure or animal products from conventional farming, including the techniques that should be used, and the ethical barriers of some conventional livestock systems, to be cut off for import to organic farming.

2.8. References

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3. ANNEX 1

Type of fertilisers, listed in Annex I of Reg. (EC) No 889/2008 influenced by restrictions in Factory farming origin

product	status
Farmyard manure	Already restricted
Dried farmyard manure and dehydrated poultry manure	Already restricted
Composted animal excrements, including poultry manure and composted farmyard manure included	Already restricted
Liquid animal excrements	Already restricted
Mushroom culture wastes	indirectly restricted
Biogas digestate containing animal by-products co-digested with material of plant or animal origin as listed in this Annex	indirectly restricted
Meals (blood, horn, hoofs, bone, fish, meat, feather, wool, hair, dairy, hydrolyzed proteins..)	Not restricted but to be considered for future restriction