EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate H. Sustainability and Quality of Agriculture and Rural Development
H.3. Organic farming

Brussels, 19 September 2013

REPORT ON THE RESULTS OF THE PUBLIC CONSULTATION ON THE REVIEW OF THE EU POLICY ON ORGANIC AGRICULTURE CONDUCTED BY THE DIRECTORATE GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT (15 JANUARY-10 APRIL 2013)

Contents

INTRODUCTION 4

METHODOLOGY 4

DISCLAIMER 4

PARLIAMENTARY QUESTIONS 5

1. ORIGIN OF THE RESPONSES 6

1.1. Country 6

1.2. Capacity and category of stakeholder 8

1.3. Origin of free contributions 11

2. ORGANIC CONSUMPTION 12

2.1. Regularity of consumption of organic products 12

2.2. Rationales behind consumption of organic products 13

2.3. Place of purchase of organic products 15

2.4. Consumers purchasing affordability of organic quality of products 17

3. SMALL FIRMS 19

3.1. Influence of "harmonisation" (alignment) of rules and control requirements at European level on the development of organic production by small firms in the EU 19

4. ORGANIC STANDARD 21

4.1. Strengthening of the organic standard 21

4.2. Pesticide residues 27

4.3. GMOs 33

4.4. Exceptions to the rules 48

4.5. Local origin of feed 55

4.6. Animal welfare 62

4.7. Procedure for authorising substances 66

4.8. Environmental performance 70

5. LABELLING AND LOGO 73

5.1. Recognition of the European organic logo 73

5.2. Ways of recognition of the organic products 75

6. PROMOTION – INFORMATION 80

6.1. Need for information on organic products 80

6.2. Opinion on the European Commission website on organic farming 82

7. CONTROLS 87

7.1. Trust in products certified as "organic" 87

7.2. Frequency of inspections of European organic operators 91

7.3. Improvement of the control system of organic products 99

8. TRADE WITH NON-EU COUNTRIES 116

8.1. Opening of the non-EU markets to organic products produced in the EU countries 116

8.2. Objectives in negotiations of trade agreements for organic products with countries outside the EU 119

9. RESEARCH AND INNOVATION 127

9.1. Research and innovation areas needed in organic food and farming sector 127

9.2. Public budget and research in organic sector 129

10. MISCELLANEOUS ISSUES RAISED IN FREE CONTRIBUTIONS 130

INTRODUCTION

The European Commission conducted a public consultation for the review of the European policy on organic agriculture: Legislation and Action Plan (hereafter – Consultation) from 15 January until 10 April 2013. The public and stakeholders were consulted throughout an on-line questionnaire. The Commission received 44 846 replies to the questionnaire and additional 1 450 free contributions were sent by e-mail from citizens and various stakeholders.

METHODOLOGY

The on-line questionnaire was made available to the public through the Interactive Policy Making (IPM) tool.

As the Commission services anticipated the consultation to draw a large interest from the public, the public consultation was conducted by the use of an anonymous questionnaire with numerous closed questions concerning the following nine subject areas: (1) origin of the responses; (2) organic consumption; (3) harmonisation; (4) organic standard; (5) labelling and logo; (6) promotion – information; (7) controls; (8) trade with non-EU countries and (9) research and innovation. In addition, interested parties had the possibility to submit free contributions by answering to an open question and sending an e-mail sent to a functional mailbox.

The large number of replies received did not allow the use of the IPM tool for data treatment. Therefore, the answers to closed questions were analysed by using of Pivot table – a data summarisation tool in MS Excel.

Free contributions were analysed by a Task Force (group of European Commission staff trained specifically for the exercise). The members of the Task Foce analysed the free contributions using a purpose-developed spreadsheet with matrix for analysis. On the basis of the information contained in the filled-in spreadsheets with matrix for analysis, each member of the Task Force wrote a summary report on a particular topic concerning organic food and the farming sector.

DISCLAIMER

1. The whole sample cannot be considered a statistical sample. Relevant bias in the survey is generated by the willingness to express an opinion: as a consequence, no assumption on distributions can be made. In other words, an answer to the questionnaire is treated as a "message" and not a representative overview of feelings and ideas on the topic.
   Hence, each sophisticated statistical treatment of the sample would be lacking of fundamental bases. Despite this major drawback, some analysis has been carried out.

2. The sample is not geographically balanced. As an example, France is over-represented (around 50%) and citizens are dominant (around 43,000). To check whether some particular sub-classes (by country, capacity, attitude, orientation etc.) could introduce further bias on average results from the sample, analyses based on groups were carried out: by selecting most relevant classes no distortive effect was proved.

At the same time, divergent results are interesting "per se". As an example, nearly everyone is in favour of stricter and tougher controls.

3. The whole archive of answers has been checked to verify that no "multiple attack" was designed. All 44,848 answers were filtered and according to the findings only 341 fields were identical to another one. Among them, the only cluster of identical answers (33 fields, not relevant) was registered in Austria. Hence, no trivial manipulation of the survey (such has the distribution of a "model" to be replicated) was performed.

PARLIAMENTARY QUESTIONS

The Commission has received two Parliamentary questions on the public consultation:

a first question from Bart Staes[1] (Verts/ALE) conveyed that many consumers found the questions too technical, too tendentious or too black and white. It also expressed that a number of questions required a qualified answer, but there was no scope for this inside the questionnaire. It was suggested to improve the questionnaire or even to withdraw it.

a second question, from Agnes Le Brun[2] (PPE), raised security issues. The Commission was asked whether it believed that all precautions had been taken to ensure that the findings of this public consultation were reliable and impartial and provided the legislator with the best possible information. More specifically, it was asked about measures taken to prevent automatic, mass validation of responses.

The Commission replied that a right balance had to be found so that the public was asked on technical issues without excessive simplification. For technical reasons, the Commission could not modify or remove the questionnaire during the course of the consultation.

Because the consultation was anonymous, measures to prevent automatic, mass-validation of responses have been taken, in particular the introduction of a specific security tool ("Captcha"). The usage of such a tool guarantees that no robot or automatic process has answered. Furthermore, the Commission services have checked that there was no specific attack on the website. The limited number of identical answers indicates there were no mass identical interventions and no manipulation of the results.

The comments made by the Members of Parliament have been taken into account in the analysis. In particular, the Commission services are aware that the sample cannot be considered as representative of the EU population.

[1] Question for written answer P-001065/2013 to the Commission

[2] Question for written answer E-003105/2013 to the Commission

1. ORIGIN OF THE RESPONSES

1.1. Country

Question no. 1.1 You are based in the following country (For international or European organisations, please choose "international"):

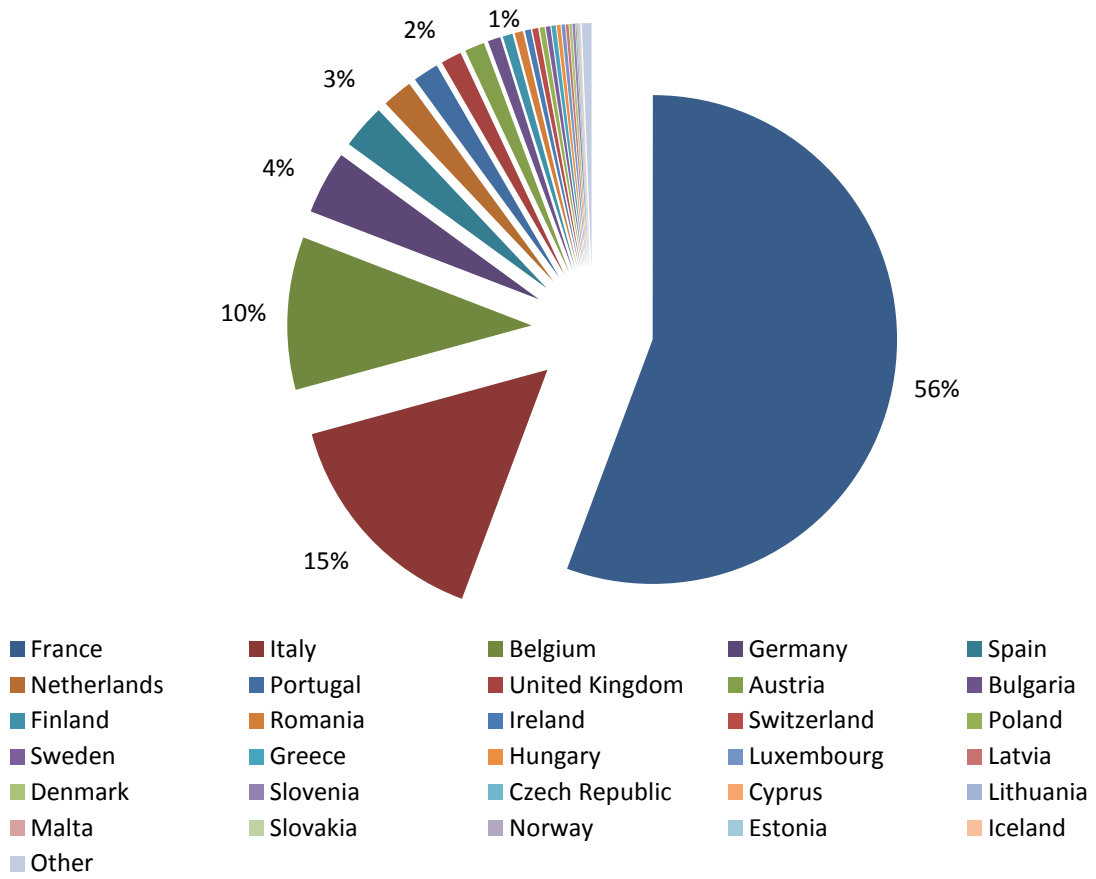


Figure 1 Percentage share of replies to the public consultations' questionnaire by country

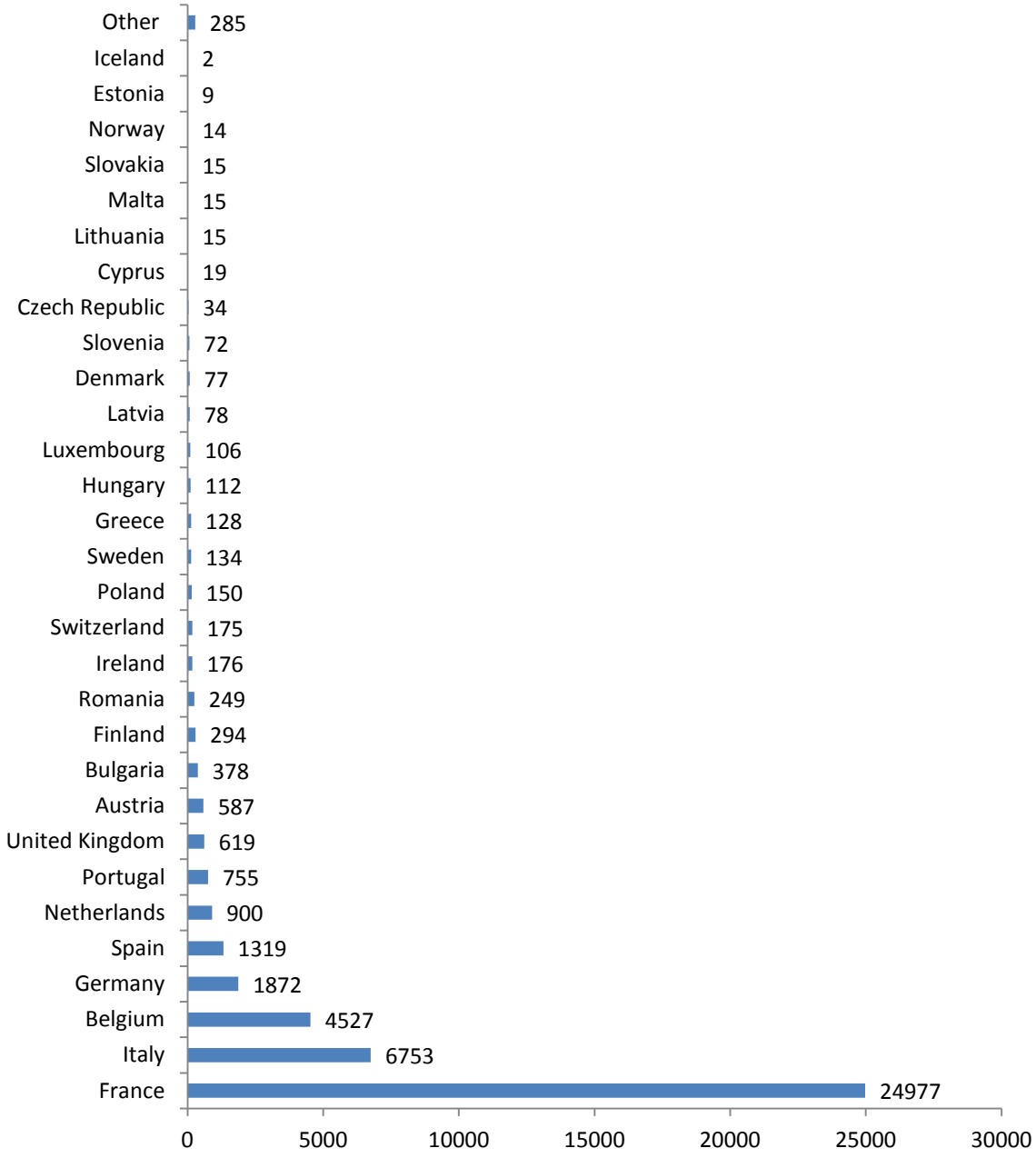


Figure 2 Number of replies to the public consultations' questionnaire by country

The number of replies is not evenly distributed among the countries. In detail, 56% (24977) of the total number of replies were submitted by citizens or companies from France, further 15% (6753) from Italy, 10% (4527) from Belgium, 4% (1872) from Germany, 3% (1319) from Spain and 2% (900) from the Netherlands. The number of responses from each of the other countries did not exceed 2% (see Figure 1 and Figure 2).

1.2. Capacity and category of stakeholder

Question no. 1.2 In what capacity are you completing this questionnaire?

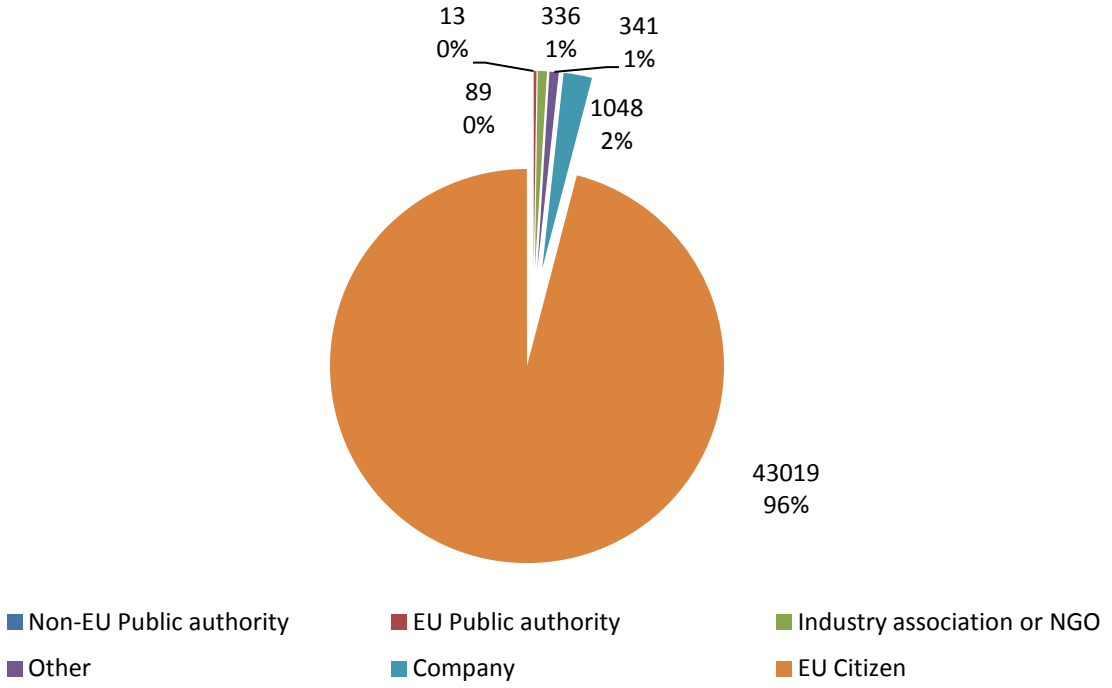


Figure 3 Number and percentage share of replies by capacity

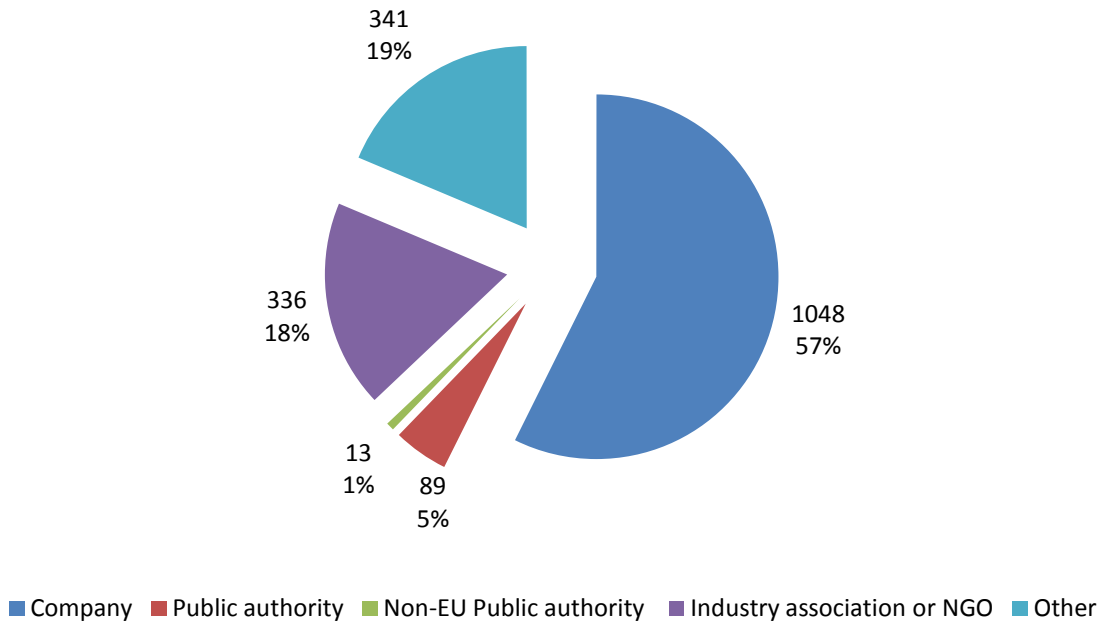


Figure 4 Number and percentage share of stakeholders' replies by capacity

The majority of the replies (96%; 43 019) were submitted by EU citizens. However, the remaining 4% (1827) of the responses were sent by a wide range of stakeholders. Namely, 2% (1048; 57% of stakeholders) of all respondents represented the view of companies, 1% (336; 18% of stakeholders) expressed the opinion of industry associations and NGOs, minimal

fraction 0.2% (5% of stakeholders) and 0.03% (1% of stakeholders) notion of respectively EU and non-EU public authorities. Approximately 1% (341; 19% of stakeholders) of interviewees classified themselves as representatives of other interests than those indicated in the possible answers (see Figure 3 and Figure **4**).

Question no. 1.5 Please specify which interests your organisation represents:

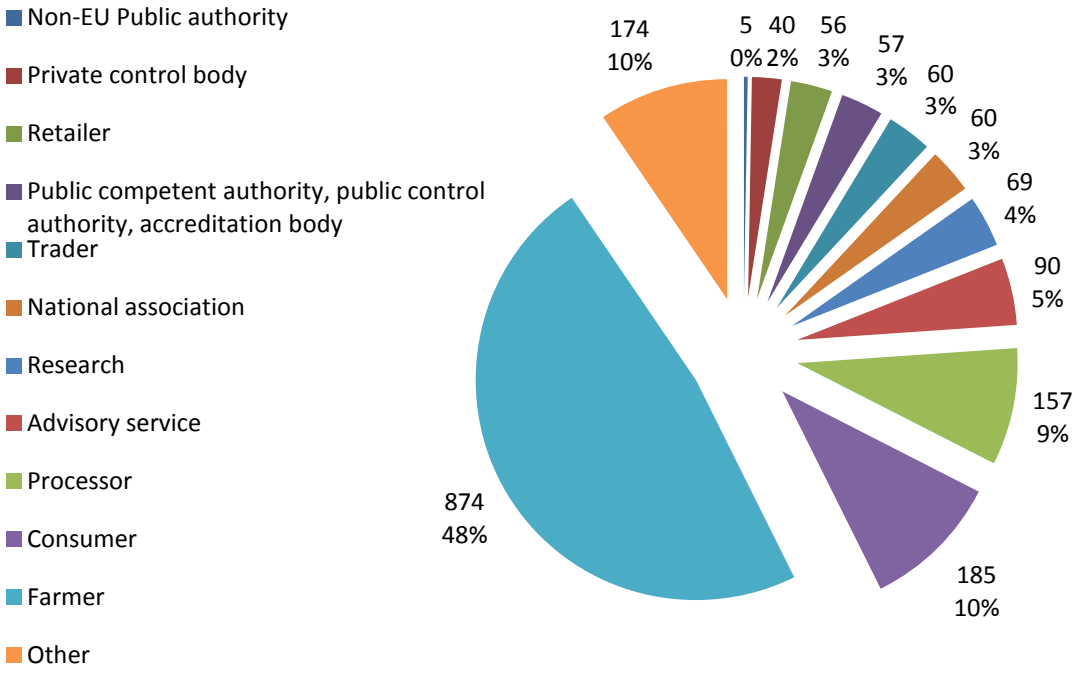


Figure 5 Number and percentage share of replies by represented interest (= category of stakeholders)

Almost half (48%; 874; 2% of all responses) of the respondents, who submitted their replies on behalf of a wide range of stakeholders (forming 4% of all interviewees; 1827), declared that they represent the interest of farmers. 185 (10%; 0.4% of all responses) of stakeholders submitted their view with the consumer's interest. In turn, the processors interest was represented by 157 (9%; 0.37% of all responses) interviewees. The stakeholders represented also the interest of the following groups (each constituting less than 0.2% of all responses): advisory services (5%; 90); researchers (4%; 69); national associations (3%; 60); traders (3%; 60); public competent authorities/public control authorities/accreditation bodies (3%; 57); retailers (3%; 56); private control bodies (2%; 40); public authorities in non-EU countries (0.3%; 5). 174 respondents (10%) declared that as stakeholders they represent the interest of other groups then specified in the possible answers' set (see Figure **5**).

Table 1 presents detailed information on represented interest (= category of stakeholders) by capacity of respondents.

Table 1 Structure of represented interest (= category of stakeholders) by capacity of respondents

Category	Number	% share in total number of category of represented interest	% share in total number of citizens or stakeholders	% share in total number of respondents
Citizens	**43019**	**100%**	**100%**	**95,9%**
Advisory service	**90**	**100%**	**5%**	**0,2%**
Company	38	42%	2%	0,1%
Public authority	7	8%	0%	0,0%
Non-EU Public authority	3	3%	0%	0,0%
Industry association or NGO	17	19%	1%	0,0%
Other	25	28%	1%	0,1%
Consumer	**185**	**100%**	**10%**	**0,4%**
Company	28	15%	2%	0,1%
Public authority	3	2%	0%	0,0%
Non-EU Public authority	3	2%	0%	0,0%
Industry association or NGO	65	35%	4%	0,1%
Other	86	46%	5%	0,2%
Farmer	**874**	**100%**	**48%**	**1,9%**
Company	658	75%	36%	1,5%
Public authority	8	1%	0%	0,0%
Non-EU Public authority	1	0%	0%	0,0%
Industry association or NGO	99	11%	5%	0,2%
Other	108	12%	6%	0,2%
National association	**60**	**100%**	**3%**	**0,1%**
Company	5	8%	0%	0,0%
Public authority	2	3%	0%	0,0%
Industry association or NGO	42	70%	2%	0,1%
Other	11	18%	1%	0,0%
Other	**174**	**100%**	**10%**	**0,4%**
Company	33	19%	2%	0,1%
Public authority	5	3%	0%	0,0%
Non-EU Public authority	2	1%	0%	0,0%
Industry association or NGO	69	40%	4%	0,2%
Other	65	37%	4%	0,1%
Private control body	**40**	**100%**	**2%**	**0,1%**
Company	30	75%	2%	0,1%
Public authority	1	3%	0%	0,0%
Industry association or NGO	4	10%	0%	0,0%
Other	5	13%	0%	0,0%
Processor	**157**	**100%**	**9%**	**0,4%**

Company	138	**88%**	**8%**	0,3%
Industry association or NGO	14	**9%**	**1%**	0,0%
Other	5	**3%**	**0%**	0,0%
Non-EU Public authority	**5**	**100%**	**0%**	**0,0%**
Non-EU Public authority	2	40%	0%	0,0%
Industry association or NGO	2	40%	0%	0,0%
Other	1	20%	0%	0,0%
Public competent authority, public control authority, accreditation body	**57**	**100%**	**3%**	**0,1%**
Public authority	48	84%	3%	0,1%
Industry association or NGO	4	7%	0%	0,0%
Other	5	9%	0%	0,0%
Research	**69**	**100%**	**4%**	**0,2%**
Company	11	16%	1%	0,0%
Public authority	15	22%	1%	0,0%
Non-EU Public authority	1	1%	0%	0,0%
Industry association or NGO	15	22%	1%	0,0%
Other	27	39%	1%	0,1%
Retailer	**56**	**100%**	**3%**	**0,1%**
Company	51	91%	3%	0,1%
Industry association or NGO	2	4%	0%	0,0%
Other	3	5%	0%	0,0%
Trader	**60**	**100%**	**3%**	**0,1%**
Company	56	93%	3%	0,1%
Non-EU Public authority	1	2%	0%	0,0%
Industry association or NGO	3	5%	0%	0,0%
Total	**44846**	**-**	**-**	**100,0%**

1.3. Origin of free contributions

Question no. 10: Comments and suggestions

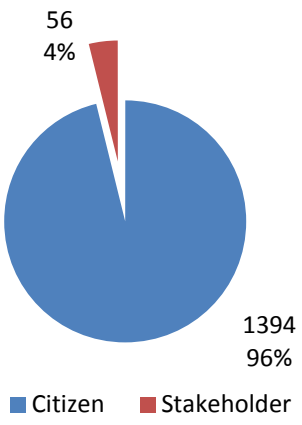


Figure 6 Number and percentage share of free contributions by capacity

In addition to the questionnaire replies, 1 450 e-mails were sent by citizens and various stakeholders with free contributions containing further comments and suggestions on the upcoming revision of the EU organic farming policy. Among them 96% (1394) were from citizens, whereas 4% (56) were sent by various stakeholders (see Figure **6**).

2. ORGANIC CONSUMPTION

The questions in this section were dedicated to private consumers. Therefore, the results are analysed on the basis of the replies only from EU citizens.

2.1. Regularity of consumption of organic products

Question no. 2.1 How 'organic' is your food consumption?

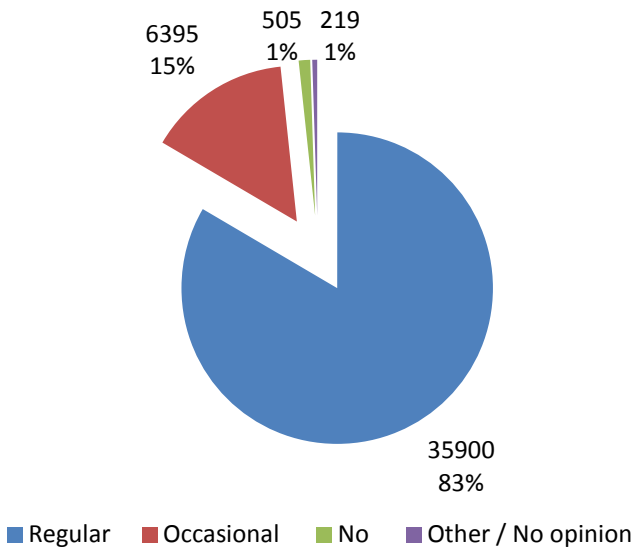


Figure 7 Number and percentage share of EU citizens' replies on regularity of organic foodstuffs consumption

The majority of the respondents i.e. 83% (35 900) stated that they try to buy organic products as much as possible (50%) and consume organic food products on a regular basis (33%). Additional 15% (6395) of interviewees declared to be occasional consumers of organic products. A small minority of the respondents indicated that they either never consume organic products (1%; 505) or have other or no opinion on this issue (1%; 219) (see Figure 7).

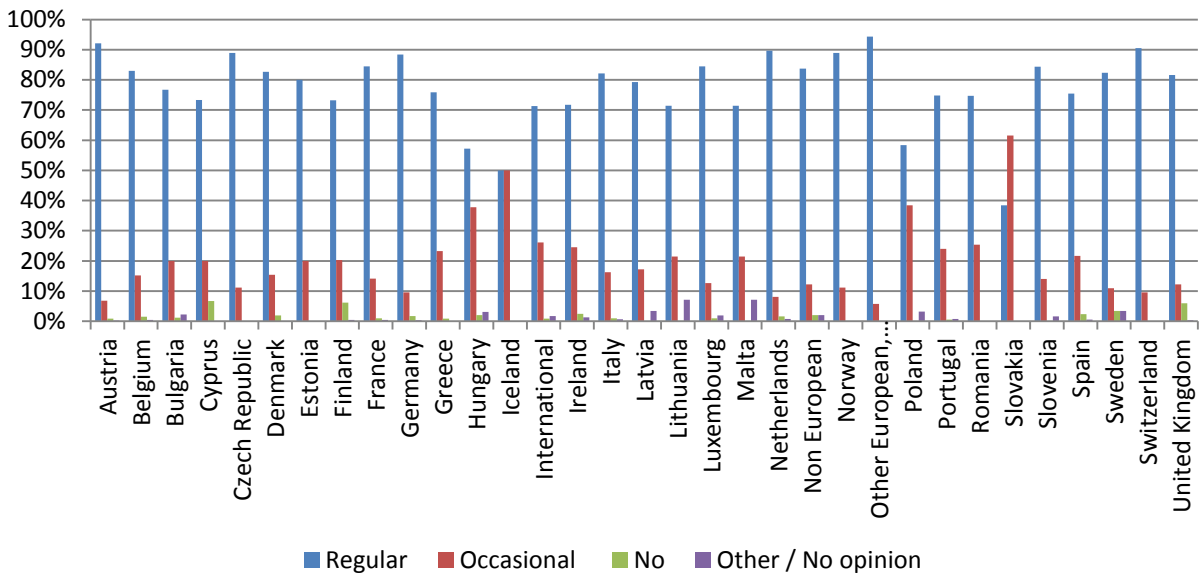


Figure 8 Percentage share of EU citizens' replies on regularity of organic foodstuffs consumption by country

The respondents from the majority of EU countries respond similarly, namely that most of them regularly consume organic products and only a small proportion occasionally. Respondents who never buy organic products represented a small minority in most countries or in some countries did not even answer the questionnaire at all. Slightly contrasting with other respondents were the Slovakian citizens, the majority of whom stated to consume organic products only sporadically (see Figure 8).

2.2. Rationales behind consumption of organic products

Question no. 2.2 I consume organic products because:

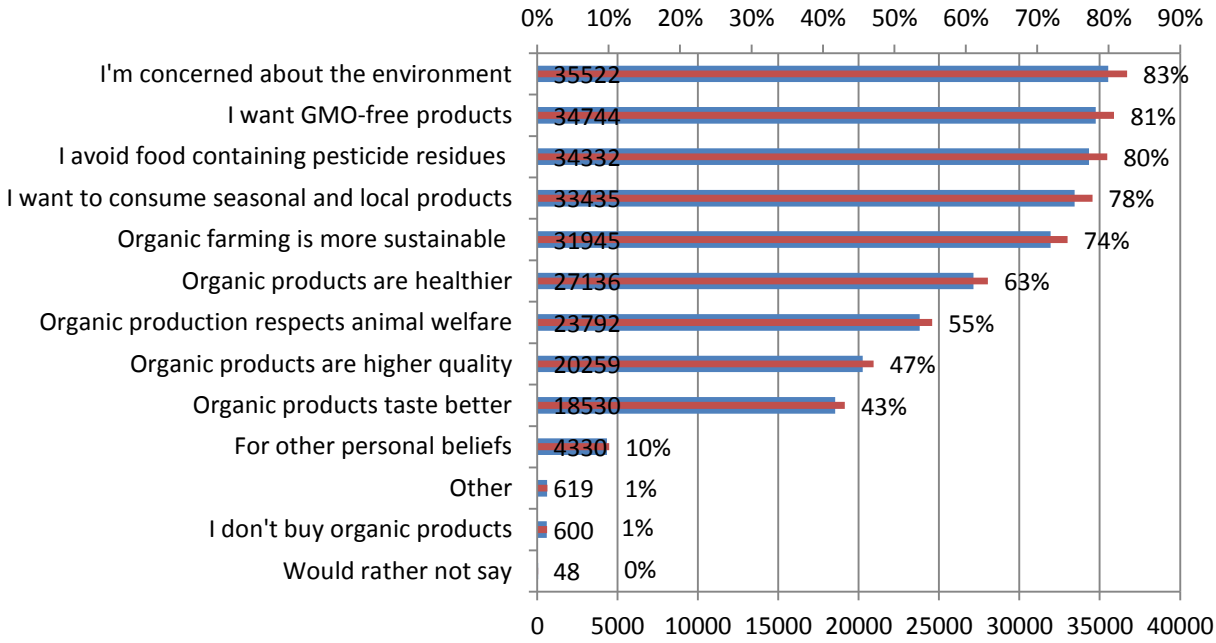


Figure 9 Number and percentage share of EU citizens' replies on rationales behind consumption of organic products

The respondents were asked to indicate drives for purchasing and consuming organic products. Over 80% of all questioned citizens claimed that the most important rationales behind organic products consumption were concerns about the environment (83%) as well as purity of these products with regard to GMOs (81%) and pesticide and other chemical substances residues. A considerable number of citizens' respondents also emphasized that they purchased organic products because of belief in and support for seasonal and local products (78%) as well as strong conviction that organic farming system is more sustainable than conventional (74%). Approximately 63% of interviewed citizens responded that they considered organic foodstuffs as healthier than their conventional counterparts. About half of all interrogated citizens underlined that they are motivated to buy organic products because organic production respect animal welfare. Besides, important reasons that encouraged almost half of the questioned consumers to consume organic products are beliefs that these goods are of higher quality (47%) and better taste (43%). In addition, 10% of private consumers, who responded to the questionnaire, consume organic products for other beliefs than these stated above (see Figure 9).

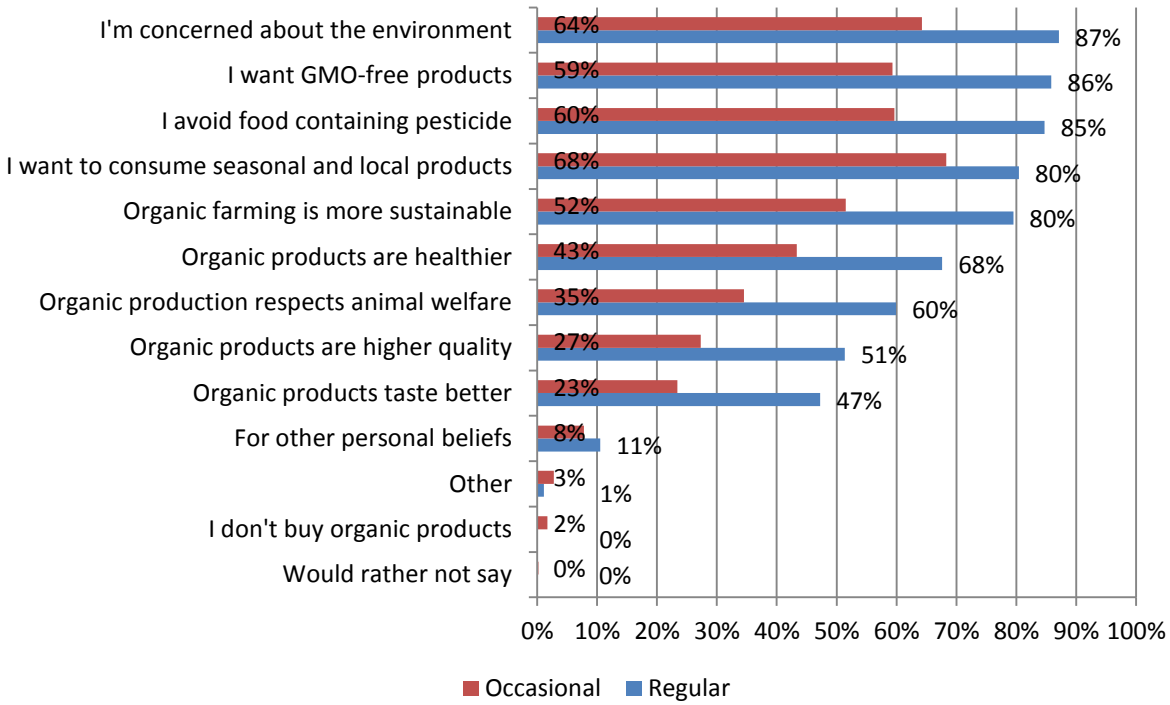


Figure 10 Percentage share of EU citizens' replies on rationales behind consumption of organic products by regularity of consumption of organic products

Similarly to general citizen's replies are distributed responses of consumers who consume organic products on a regular basis (see Figure 9 and Figure 10). But for consumers buying organic products occasionally the structure of replies was slightly different, as the most crucial reasons were as follows: willingness of consumption of seasonal and local products (68%) and concerns about the environment (64%). Apart from the slight difference, all the other reasons were pointed out by the "occasional" organic products' consumers in a similar way to general citizen's population and "regular" consumers (see Figure 10).

2.3. Place of purchase of organic products

Question no. 2.3 Where do you buy organic food?

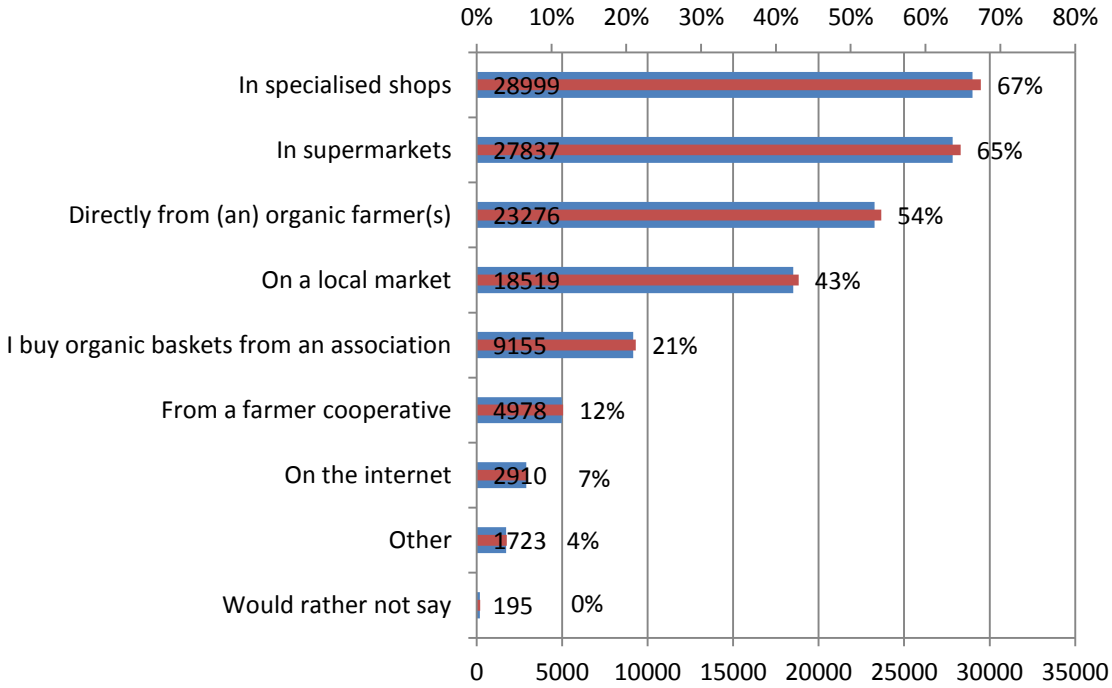


Figure 11 Number and percentage share of EU citizens' replies on place of purchase of organic products

The respondents were also asked to indicate places where they buy their organic products. The vast majority of respondents declared that they find and acquire their organic product mainly in specialised shops (67%) and/or supermarkets (65%). A significant proportion of respondents, namely 54% and 43%, satisfy their demand for organic products throughout respectively direct purchase from (an) organic farmer(s) and/or on a local market. Approximately 21% of interviewees declared that they buy organic baskets from an association that markets local products. In addition, some of the respondents stated also that they purchase their organic products for a farm cooperative (12%), on the Internet (7%) or other places (4%) (see Figure 11).

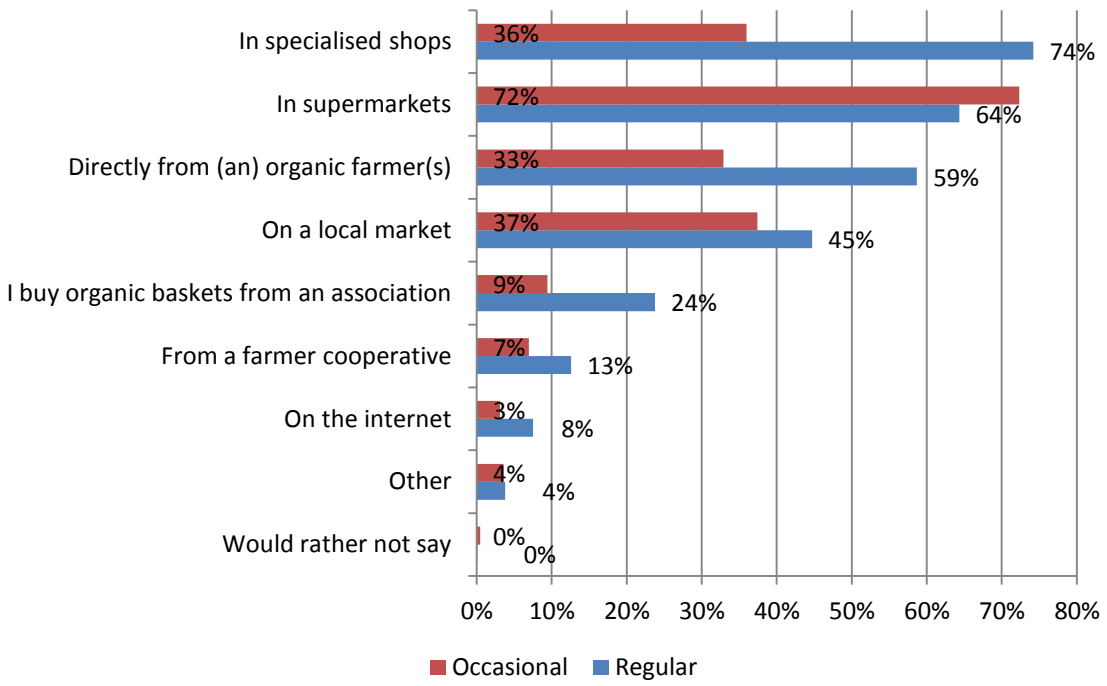


Figure 12 Percentage share of EU citizens' replies on place of purchase of organic products by regularity of consumption of organic products

The place of purchase of organic products varies among the respondents who buy products regularly and occasionally. The population of respondents who buy organic products regularly declared the places of purchase with similar frequency to the general citizens' replies (see Figure 11 and Figure 12). The answers from occasional organic products' consumers are distributed in a different way. For this group organic products are mainly purchased at supermarkets (74%). Approximately one third of respondents from the group of occasional consumers acquire their organic foods on a local market (37%), specialised shops (36%) and/or directly from (an) organic farmer(s) (33%). The minority of the respondents, who consume organic products occasionally, declared that they buy organic baskets from an association that markets local products (9%), from a farmer cooperative (7%), on the Internet (3%) and/or also other sources (4%) (see Figure 12).

2.4. Consumers purchasing affordability of organic quality of products

Questions no. 2.4 As a consumer, are you prepared to pay more for organic food than conventional food? and 2.5 If yes, how much?

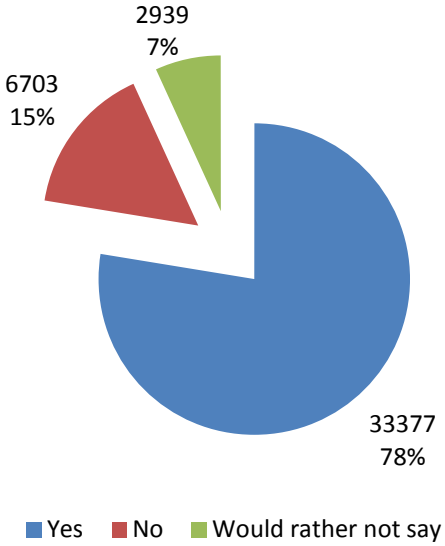


Figure 13 Number and percentage share of EU citizens' replies on affordability of organic products with higher prices than conventional

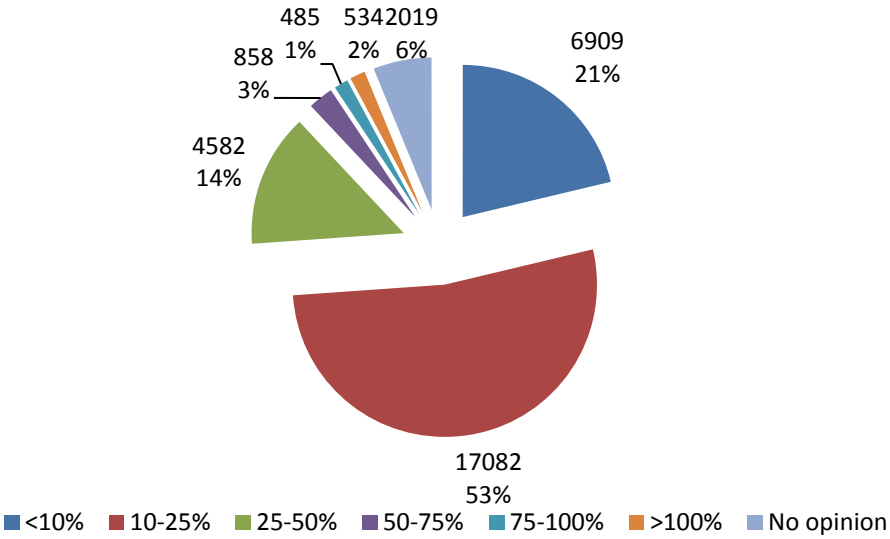


Figure 14 Number and percentage share of EU citizens' replies on acceptable level of higher prices for organic quality of products

The EU citizens' were asked to answer questions on the affordability of organic products that cost more than conventional equivalent products. As many as 78% (33377) of interviewees replied that they are prepared to pay more for organic than conventional foodstuffs. In detail, approximately 74% of the consumers, who responded positively, are prepared to pay more up to 10% (21%) or between 10-25% (53%). About 14% of the repliers, who were prepared to pay more, declared that 25-50% higher prices for organic products in comparison with their conventional equivalents are still acceptable. However, the vast minority of the group of respondents (around 6%) is prepared to pay as much as 50% and more for the organic quality

of foodstuffs. On the contrary, 15% (6703) of respondents claimed that they are not willing to spend more money for organic than on conventional food products. Around 6-7% of consumers were not keen on expressing their view on the affordability of organic products (see Figure **13** and Figure **14**).

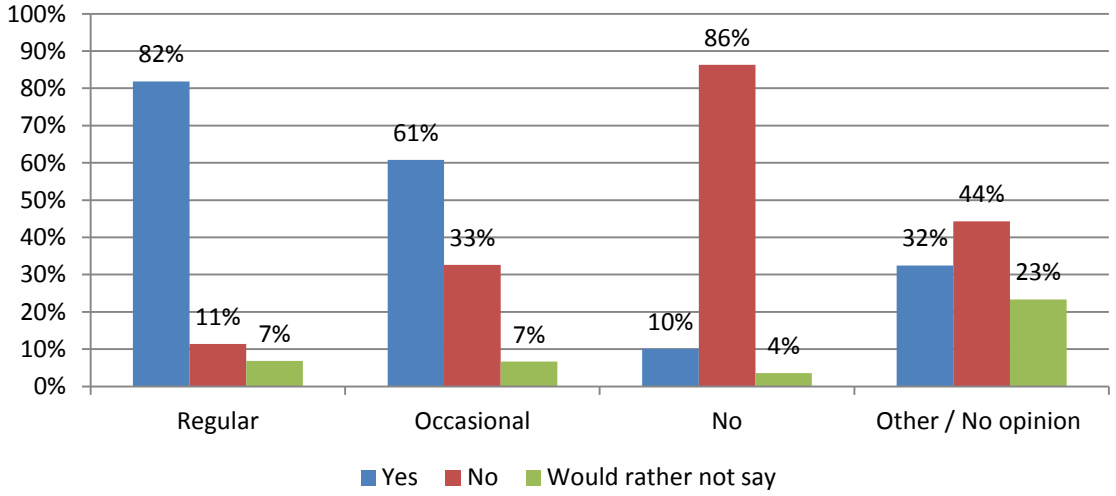


Figure 15 Percentage share of EU citizens' replies on affordability of organic products with higher prices than conventional by regularity of consumption of organic products

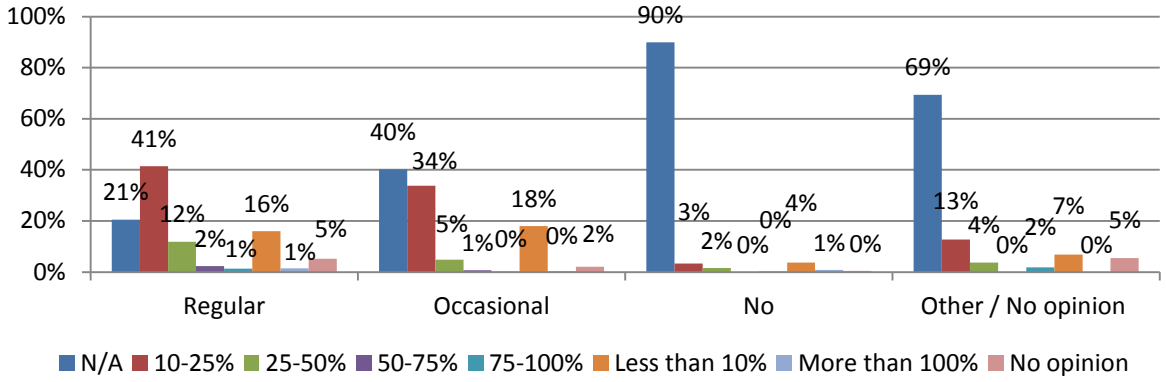


Figure 16 Percentage share of EU citizens' replies on acceptable level of higher prices for organic quality of products by regularity of consumption of organic products

Figure 15 and Figure 16 illustrate the respondents' affordability and acceptance level of higher prices for organic quality of purchases with regard to frequency of such products consumption. It appears that the majority of questioned citizens (82%), who buy organic products on a regular basis, are able to pay more for this added-value. Predominantly, 67% of the group of respondents declared that the price could be higher up to 50%, in detail of less than 10% (16%), between 10-25% (41%) and between 25-50% (12%). Similarly, the preponderance of occasional buyers of organic products, who responded to the questionnaire, namely 61 %, claimed to be prepared to pay more for this particular quality. However, in comparison with the "regular" buyers, principally EU citizens' repliers, who consume organic products from time to time, were capable of higher prices only up to 25%, in detail 18% of them less than 10% and 34% of them between 10-25%. The vast minority of the group (5%) was prepared to spend 25-50% more for organic than for conventional products. It is also important to note, that a significant proportion of one third of respondents, proclaiming

themselves as “occasional buyers”, was not prepared to pay higher prices for organic than for conventional products. Expectedly, the largest part of respondents (86%), who do not consume organic products, was also not willing to pay more for organic quality of foodstuffs. However, 10% of these publics declared that they are prepared to purchase organic products with higher prices than their conventional counterparts. Among interviewees, who stated “other” or had “no opinion” on regularity of organic products’ purchases, the positive and negative answers on affordability of organic products with higher prices than conventional were more or less evenly distributed.

3. SMALL FIRMS

3.1. Influence of “harmonisation” (alignment) of rules and control requirements at European level on the development of organic production by small firms in the EU

Question no. 3.1 Does the "harmonisation" (alignment) of rules and control requirements at European level help the development of organic production by small firms in the EU?

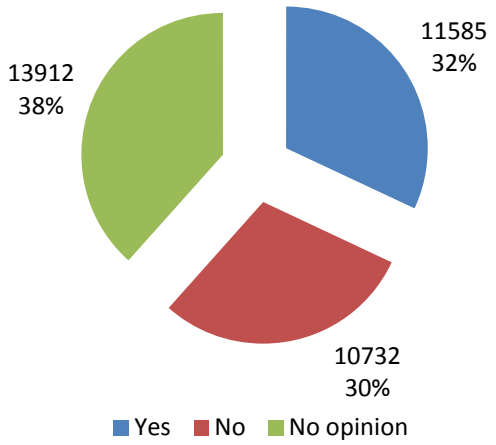


Figure 17 Number and percentage share of replies on the helpfulness of "harmonisation" (alignment) of rules and control requirements at European level for the development of organic production by small firms in the EU: distribution of replies among 36229 records with registered answer

With regard to helpfulness of “harmonisation” (alignment) of rules and control requirements at European level for the development of organic production by small firms in the EU, a large number of respondents either did not answer this question (8617; 19% of the total number of replies) or had no opinion on this matter (13912; 31% of the total number of replies; 38% of records with registered answer). In addition, the share of positive or negative assessments of the effect of “harmonisation” (alignment) of rules and control requirements at European level on the development of organic production by small firms in the EU were almost evenly disseminated. In detail, 32% (11585) respondents noticed helpful influence of the aligned at EU level regulatory framework on the development of organic production by small farms in the EU, in contrast to 30% (10732) interviewees with negative view on that issue (see Figure **17**).

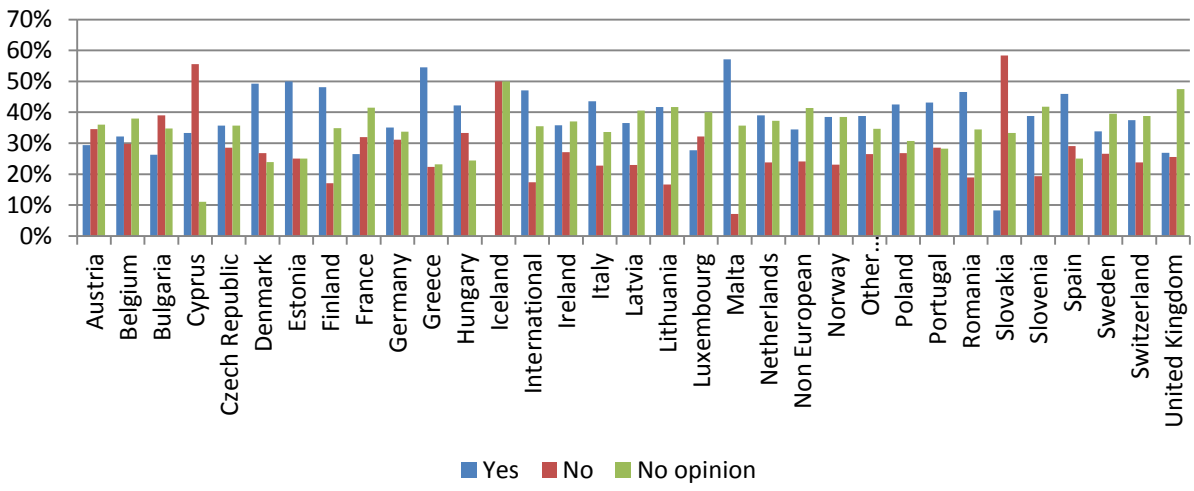


Figure 18 Percentage share of replies on helpfulness of "harmonisation" (alignment) of rules and control requirements at European level for the development of organic production by small firms in the EU by country

In terms of countries, the views on this issue differed a lot. Most of the respondents from Denmark, Estonia, Finland, Greece, Italy, Hungary, Malta, the Netherlands, International, Poland, Portugal and Spain did appreciate the "harmonisation" of rules and control requirements at European level and recognized its positive effect on the development of organic production by small firms in the EU. The majority of respondents from the following countries had the opposite view: Bulgaria, Cyprus, and Slovakia. The feelings of the respondents from the remaining countries about the helpfulness for small firms of the "harmonisation" of requirements at EU level were more or less evenly distributed among the three possibilities, namely positive, negative and no opinion (see Figure 18).

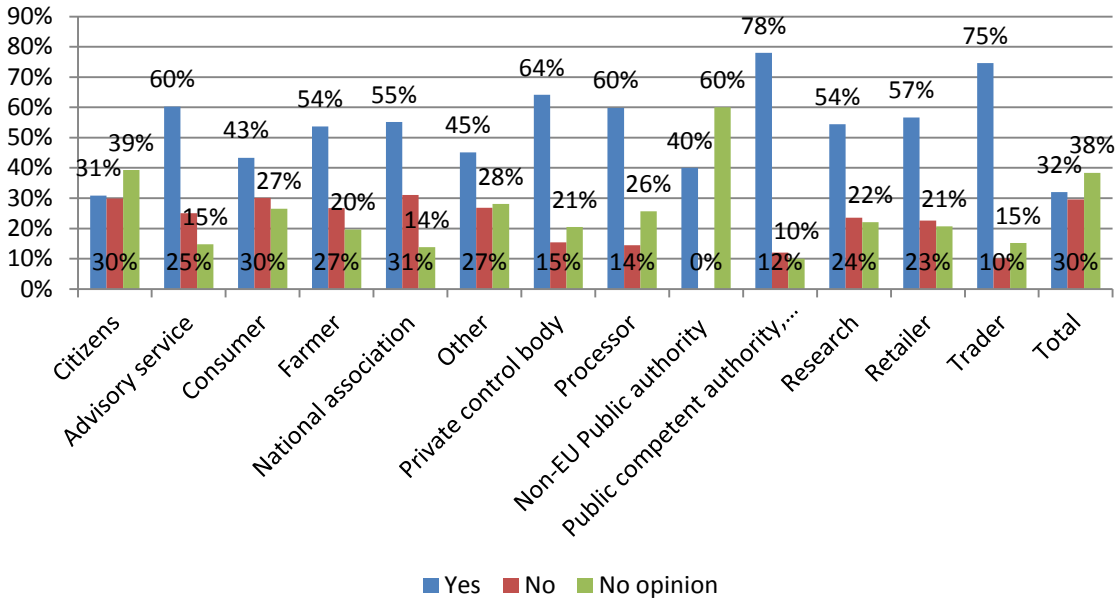


Figure 19 Percentage share of replies on helpfulness of "harmonisation" (alignment) of rules and control requirements at European level for the development of organic production by small firms in the EU by category of stakeholders

Figure 19 presents the attitude of various categories of stakeholders towards the "harmonisation" (alignment) of rules and control requirements at European level and its

effectiveness in terms of development of organic production by small firms in the EU. It appears that the distribution of citizens' replies is analogous to the total group of respondents (see Figure 17 and Figure 19). The repliers representing public authorities from non-EU countries either did not have opinion on this issue (60%) or thought of the uniformity of organic farming by EU legislation as helpful for the development of small organic operators (40%). In turn, the majority of stakeholders representing the following categories in decreasing sequence: public competent authorities (78%), traders (75%), private control bodies (64%), advisory services (60%), processors (60%), retailers (57%), national associations (55%), farmers (54%), researchers (54%), consumers (43%) and others (45%), many of which represent the world of organic food and farming business, considered the "harmonisation" of organic legislation at the EU level as stimulating for the development of organic production by small firms in the EU. Between 10%-30% of respondents representing the above listed categories of stakeholders had the opposite outlook on this issue.

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

- *"Greater harmonisation is needed for MS with highly developed OF markets and for large farms/companies and in situations where unfair competition/behaviours are expected". (DE EC2)*
- *"Explanation is needed on what kind of harmonisation at EU level is meant?" (DE 203, 204)*

4. ORGANIC STANDARD

4.1. Strengthening of the organic standard

Question no. 4.1 Should the current European standard for organic products be strengthened?

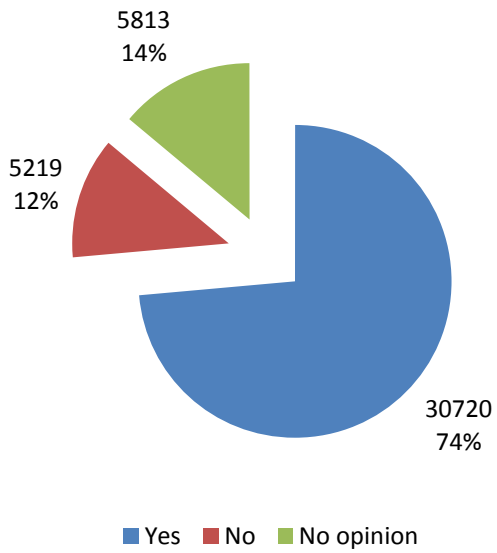


Figure 20 Number and percentage share of replies on necessity for strengthening of the current European standard for organic products: distribution of replies among 41752 records with registered answer

Figure 20 shows the attitude of respondents to public consultations towards the current European standard for organic products. Nearly three quarters of all respondents, i.e. 74% (30720), demanded the European organic standard to be strengthened. No need for strengthening of this standard was expressed by 12% (5219) of questioned citizens. The remaining 14% (5813) of the respondents did not express their opinion at all.

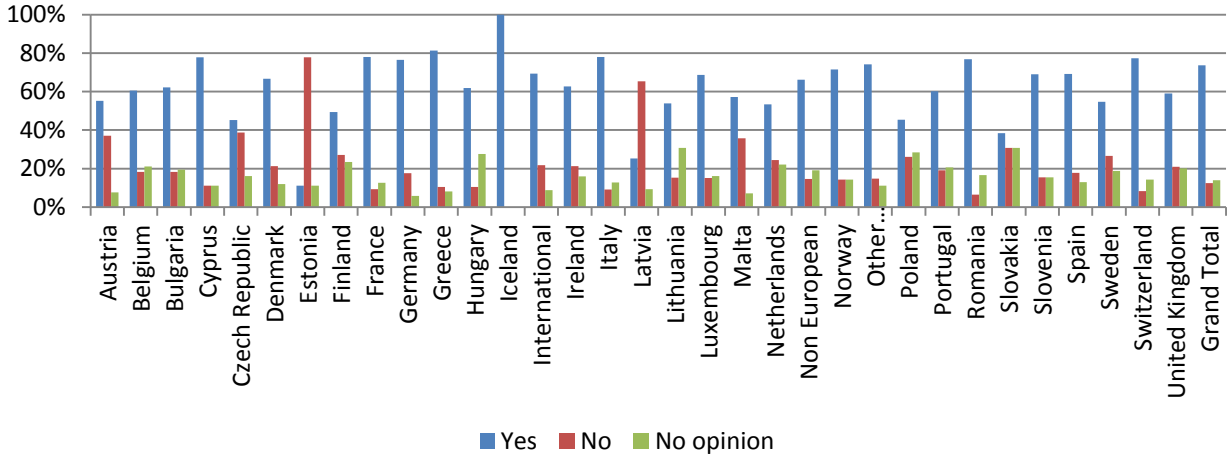


Figure 21 Percentage share of replies on necessity for strengthening of the current European standard for organic products by country

The majority of respondents from most of their countries of origin supported the prospect of strengthening the European standard for organic products. Strongly, against this proposal were citizens from Estonia and Latvia. Balanced distribution of positive and negative answers, meaning no clear position in favour or against the strengthening of the European organic standard appeared among respondents from such countries as: Czech Republic, Slovakia, and to the same extent also Austria, Finland, Malta, Netherlands, Poland and Sweden (see Figure 21).

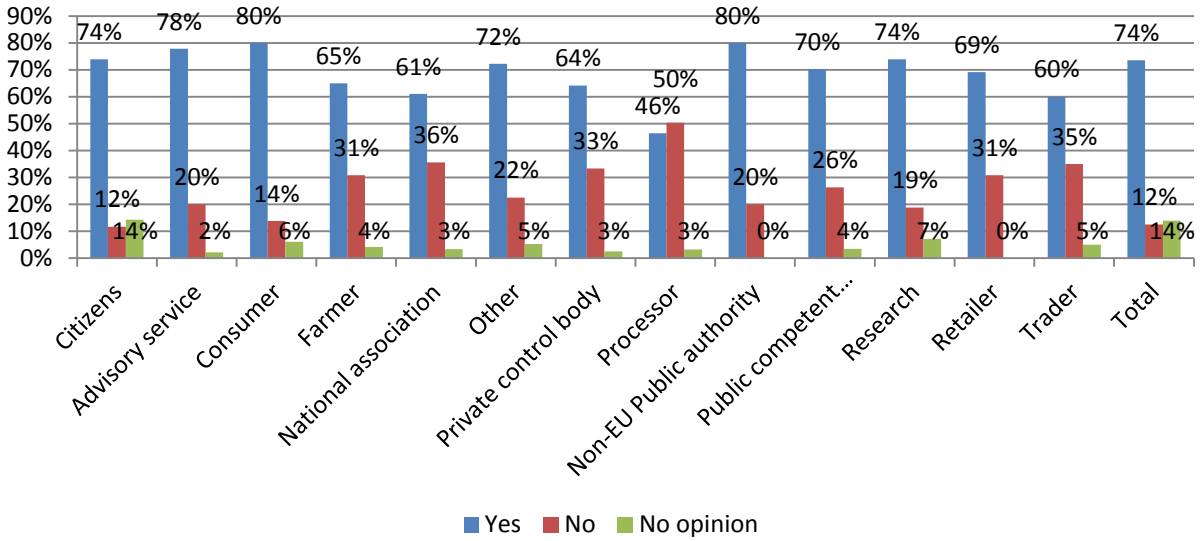


Figure 22 Percentage share of replies on necessity for strengthening of the current European standard for organic products by category of stakeholders

Figure 22 presents the demand for strengthening the European standards for organic products expressed by stakeholders representing various interests. It appeared that the greatest need for

making the EU organic standard stricter was expressed by 80% of respondents representing consumers and non-EU public authorities. Following the strengthening of the EU organic standard was also strongly requested by a vast majority of (in descending order): advisory services (78%), citizens (74%), researchers (74%), public competent authorities, public control authorities and accreditation bodies (70%) as well as others (72%). In some cases even if more respondents were in favour than against the proposal for strengthening the EU organic standard, still quite a significant percentage share of publics surveyed expressed disapproval of the idea, for instance (in descending order) national associations (36%), traders (35%), private control bodies (33%), retailers (31%) and farmers (31%). Moreover, exceptionally, within the processors more respondents were against (50%) strengthening the EU organic standards than in favour of it (46%).

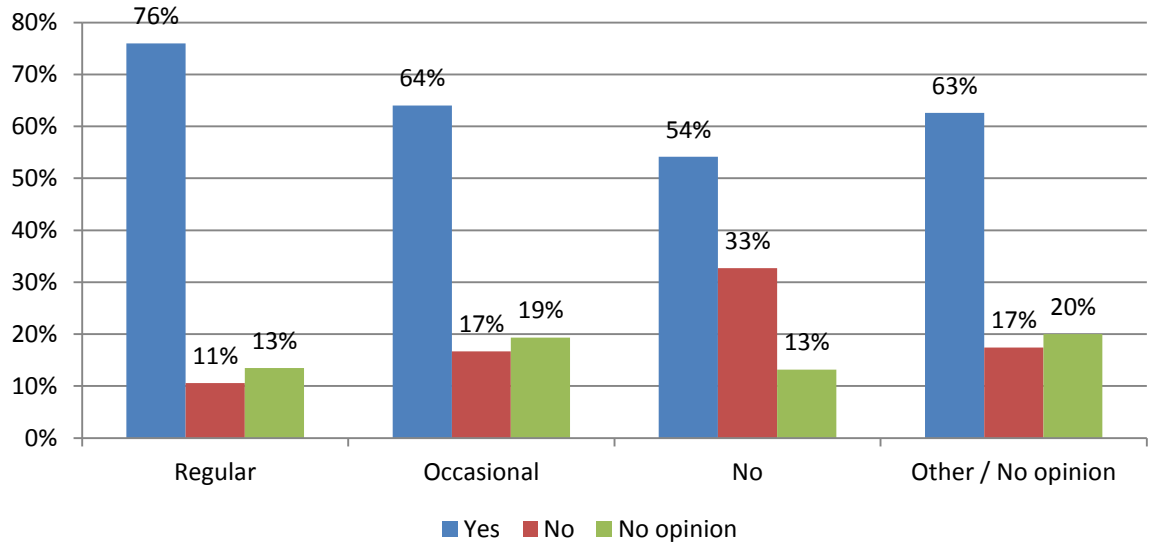


Figure 23 Percentage share of replies on necessity for strengthening of the current European standard for organic products by regularity of consumption of organic products

Generally, the majority of all private consumers (54-76%), regardless of regularity of organic product's consumption, advocated the proposal for strengthening of the current European standard for organic products with the following tendency: the more often the interviewees consume the products, the higher the percentage share of positive replies to this question. In fact, only 11% and 17% of respectively regular and occasional consumers expressed their negative attitude towards making the rules stricter. The majority of consumers (54%), who declared that they do not buy and consume organic product, were also in favour of strengthening the rules. However, one third of them had an opposite opinion. In addition, quite a lot of people each group, i.e. 13-20%, had no opinion on this matter (see Figure 23).

Question no. 4.2 If yes, how?

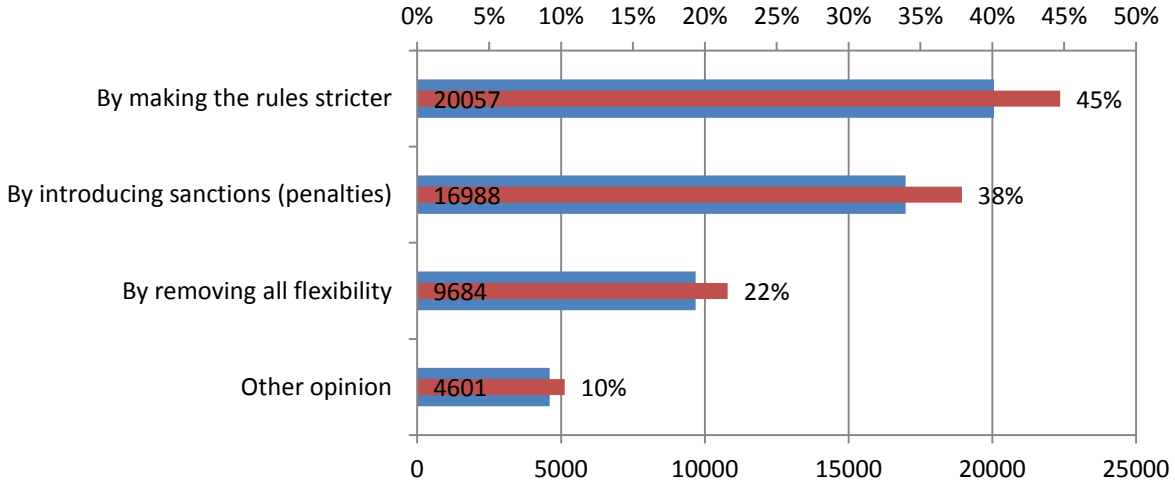


Figure 24 Number and percentage share of replies on means by which the current European standard for organic products should be strengthen

The respondents were asked to indicate the ways in which the current European standard for organic products should be reinforced. Approximately 45% (20057) of respondents stated that strengthening of the current EU organic standard should be realised by making the rules stricter. Following, 38% (16988) of questioned citizens opted for introducing sanctions (penalties) in order to reinforce the present EU organic standard. Almost one quarter (22%, 9684) of interviewees stated that all flexibility should be removed from the current European standard for organic products to make it more robust. Besides, 10% of (4601) respondents indicated that they have other ideas for strengthening of the current EU organic standard (see Figure 24).

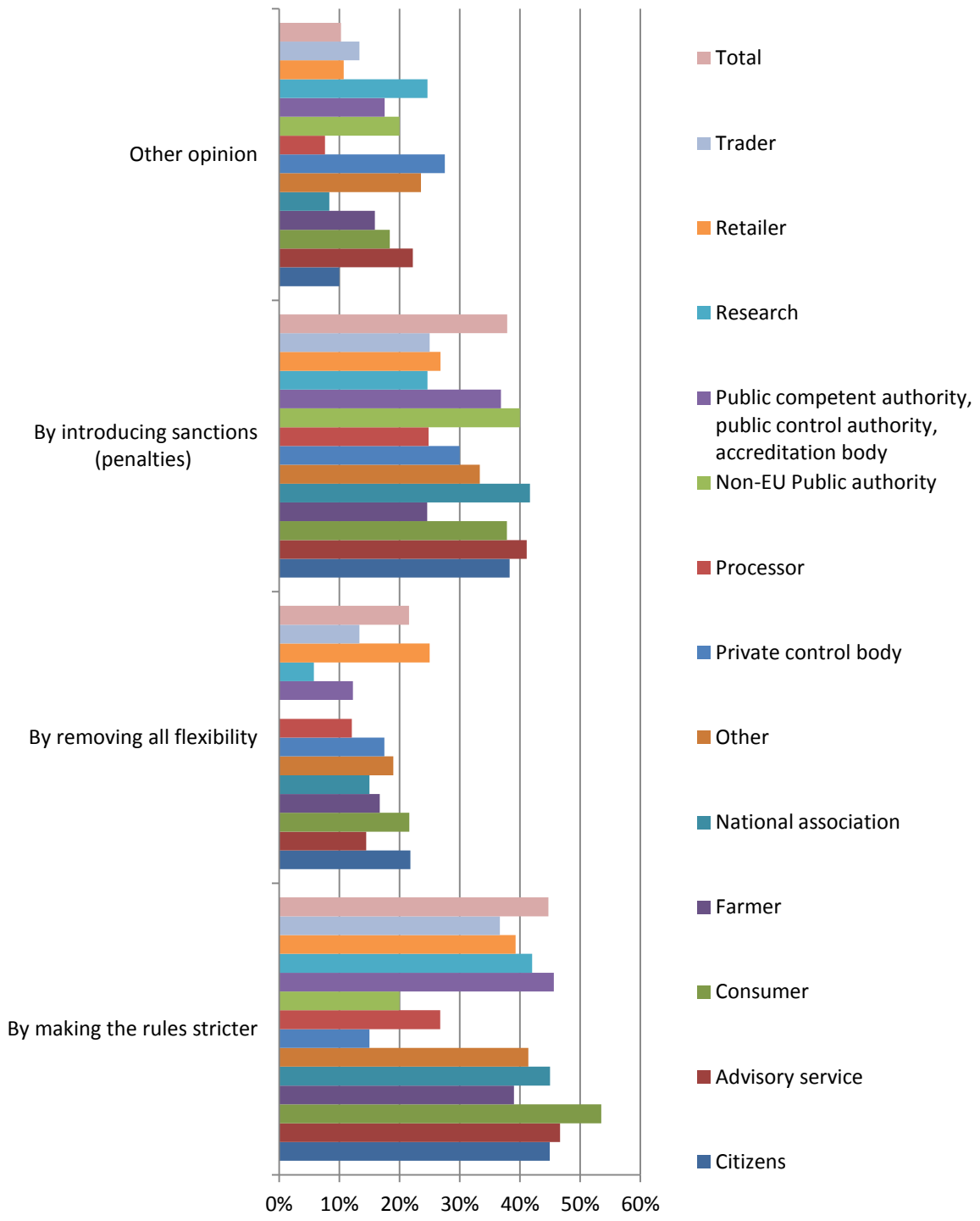


Figure 25 Percentage share of replies on means by which the current European standard for organic products should be strengthen by category of stakeholders

Figure 25 illustrates the needs and ideas of stakeholders for strengthening the current European standard for organic products. It appeared that the prioritization of the means for strengthening the current European standard for organic products was with some small exceptions similar to the ranking obtained from the results of the general questioned population. The first most popular solution, making the rules stricter, was strongly supported by approximately 40% almost all categories of the stakeholders apart from non-EU public authorities, processors and private control bodies, of which only around 15-25% backup the idea. The second – according to the order established by the general respondents-, way, in

which the EU organic standard should be strengthened, namely introduction of sanctions (penalties), gained backup of around 40% from the following categories: public competent authorities, public control authorities, accreditation bodies, non-EU public authorities, national associations, consumers, advisory services, citizens and others. The remaining groups of stakeholders, namely: traders, retailers, researchers, processors, private control bodies, farmers expressed their interest in this measure, but with the percentage share of approximately 25%. The third proposition for strengthening the EU organic standard by removing all flexibility gained much smaller support (around 10-20%) from the different categories of stakeholders than the previous ones. Here, only retailers, consumers and in general citizens exceeded the border of 20%. Significant number of stakeholders representing the following categories: researchers, private control bodies, advisory services and others expressed that they had other solutions.

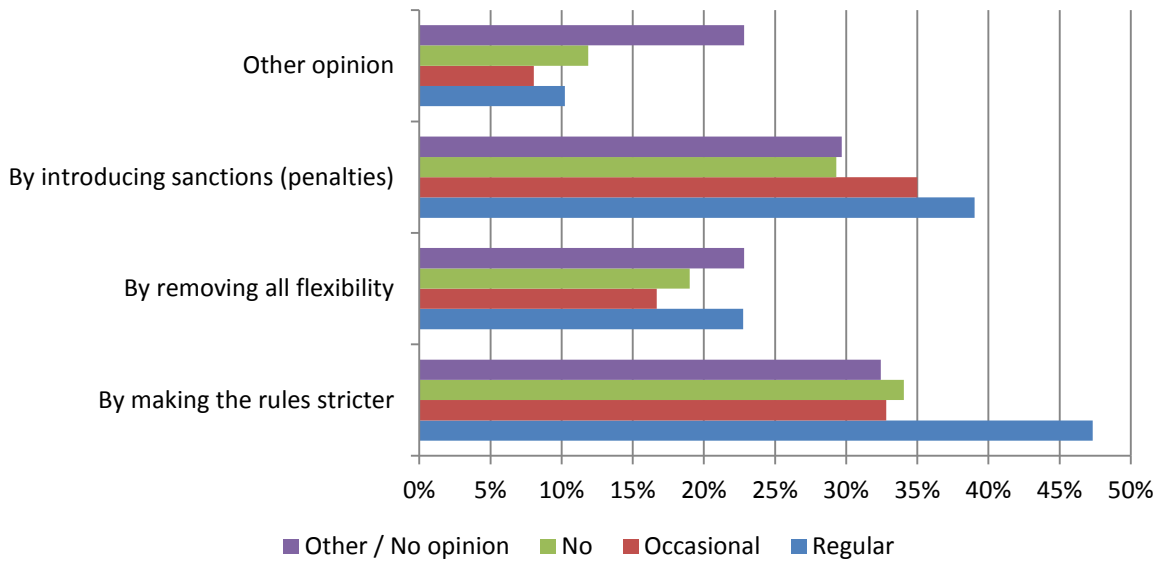


Figure 26 Percentage share of replies on means by which the current European standard for organic products should be strengthen o by regularity of consumption of organic products

The questioned "regular" and "no" organic products' consumers ranked the possible options for strengthening the current European standard for organic products similarly to the general interviewed population. The only difference was that the consumers, who declared that they never buy organic products, gave each option a smaller percentage share of answers than the "regular" consumers. For "occasional" consumers it was slightly more important to introduce sanctions (penalties) than to make stricter rules. The interviewed citizens who had other or no opinion on the regularity of organic product consumption ranked each options similar to the general surveyed population but more evenly within the range of 20-35% (see Figure 26).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

- *"There is no need to change the regulations, as they are really good and on high level. Only small detailed technical changes could be done in terms of greenhouse and poultry production)" (DE 045)*
- *"The regulations should be more strict, demanding. The consumer expects premium "organic" goods and clear division between organic and non-organic farming system." (DE 152)*

- *"The OF regulation should first strengthen and maintain the consumer trust in organic production. Therefore, it is urgent to eliminate existing laps in the regulation." (DE 211)*
- *"The EU organic farming regulations should be improved and strengthened - i.e. a rapid increase of the requirements of the EU organic regulations to the level of German requirements posed by Demeter or other organic farming associations or similar organizations in the EU." (DE EC1)*
- *"Greater harmonisation is needed for MS with highly developed OF markets and for large farms/companies and in situations where unfair competition/behaviours are expected. The regulation is enough strict. However, further development is welcome. Especially, regulations could be strengthening for the requirements for imports, control, poultry production, greenhouse production, environmental services. In some countries the implementation of the regulations should be better organised and supervised. The regulations should not be stricter, but should be further developed and improved. Better implementation of art. 26 of 889 is needed. It is too easy for processing and marketing companies to enter OF market. Therefore here stricter regulations and conversion period is needed. / Within these limits should be adaptations to specific conditions and requirements should be possible. Article 22 of Regulation 834/2007 provides a legal basis for temporary exceptions. Exceptions to help Member States to make the rules more flexible and target them to the different needs and conditions of the Member States. But it is important that this flexibility criteria, controls, transparency and understanding of the reasons is clearly limited, and that any distortions of competition are recognized." (DE EC2)*

4.2. Pesticide residues

Question no. 4.3 Testing all organic products for pesticide residues would increase production costs and so make them dearer for consumers. Should this nevertheless be made compulsory?

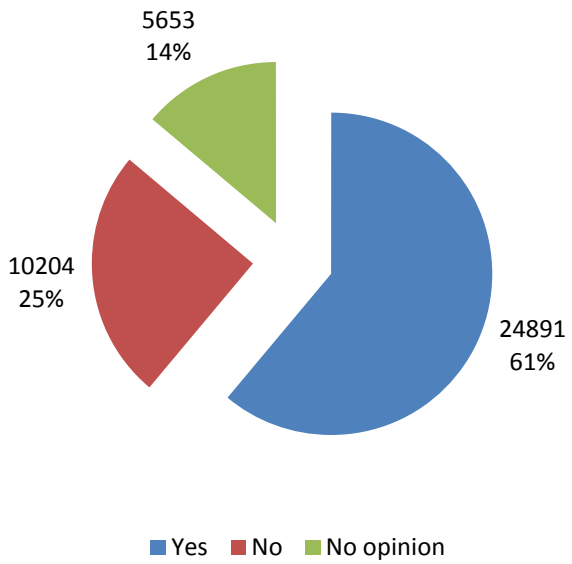


Figure 27 Number and percentage share of replies on necessity for testing all organic products for pesticide residues even if it leads to price rise: distribution of replies among 40748 records with registered answer

Figure 27 presents the respondents' attitude towards the implementation of obligatory tests of all organic products for pesticide residues even if it leads to price growth. Approximately 61%

(24891) of repliers desired that all organic products are tested for pesticide residues. Nevertheless, one quarter of respondents was against this proposal . The remaining 14% refrained from expressing an opinion.

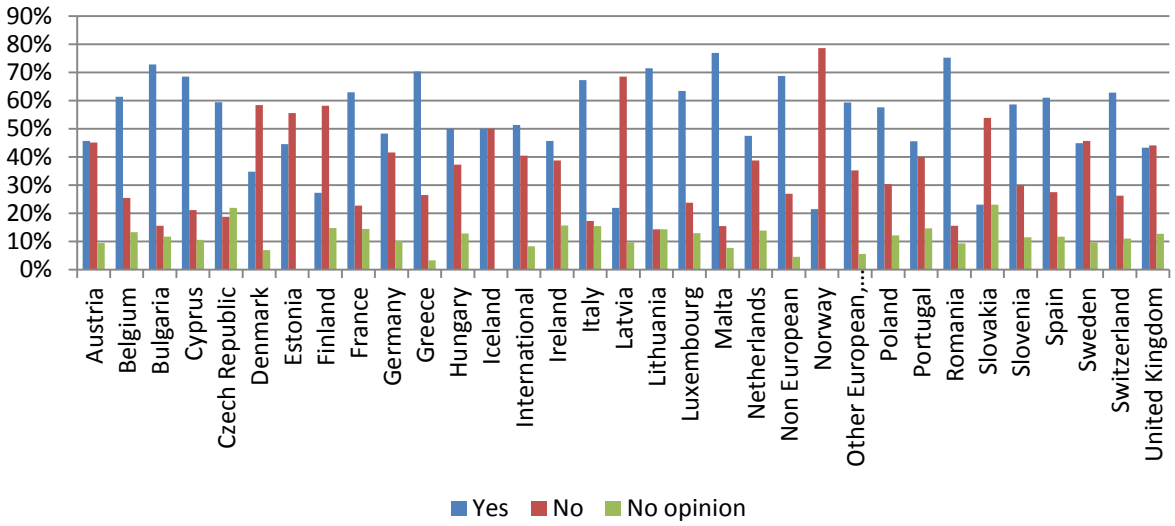


Figure 28 Percentage share of replies on necessity for testing all organic products for pesticide residues even if it leads to price rise by country

Among the countries the opinions were very different. Questioned citizens from Belgium, Bulgaria, Cyprus, Czech Republic, France, Greece, Italy, Lithuania, Luxembourg, Malta, non-European, other European non-EU, Poland, Romania, Slovenia, Spain and Switzerland were definitely in favour of the idea to test all organic products for pesticide residues even it means increase of prices. Undeniably against were respondents from Denmark, Estonia, Finland, Latvia, Norway and Slovakia. The ratio of responses in favour and against was balanced in the remaining countries (see Figure 28).

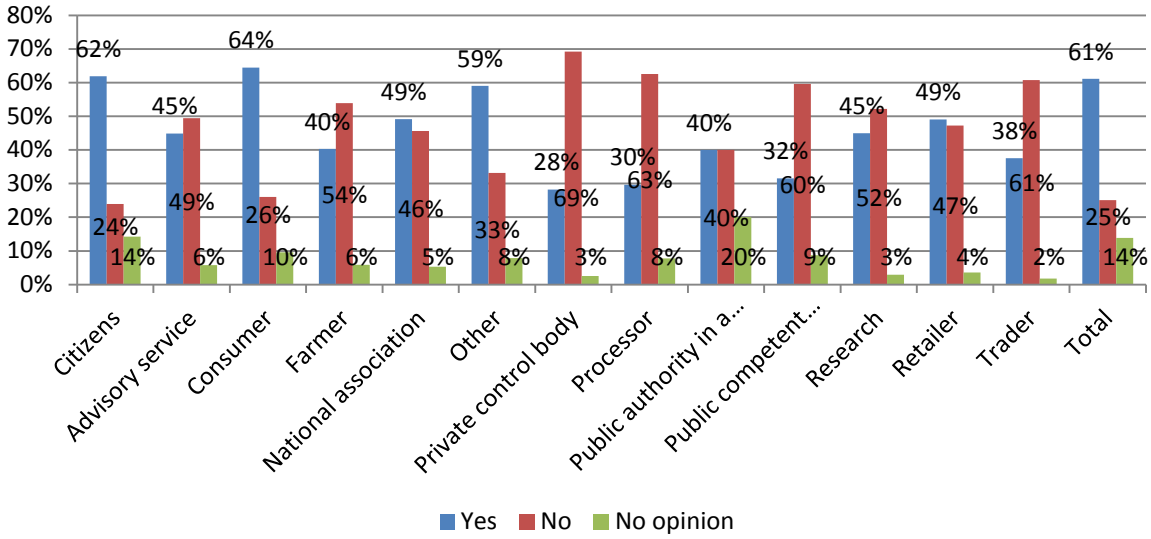


Figure 29 Percentage share of replies on necessity for testing all organic products for pesticide residues even if it leads to price rise by category of stakeholders

According to Figure 29, opinions on this issue among different categories of stakeholders were very divided. In general, most of the citizens (62%) and consumers (64%) as well as others (59%) required performance of tests for pesticide residues on all organic products. On

the other hand, clearly the majority of farmers (54%), private control bodies (69%), processors (63%), traders (61%) and public competent authorities, public control authorities and accreditation bodies (60%) was in contradiction of such a rule. Situation, where almost half respondents in favour and the second half against appeared among representatives of advisory services, non-EU public authorities, researchers and retailers.

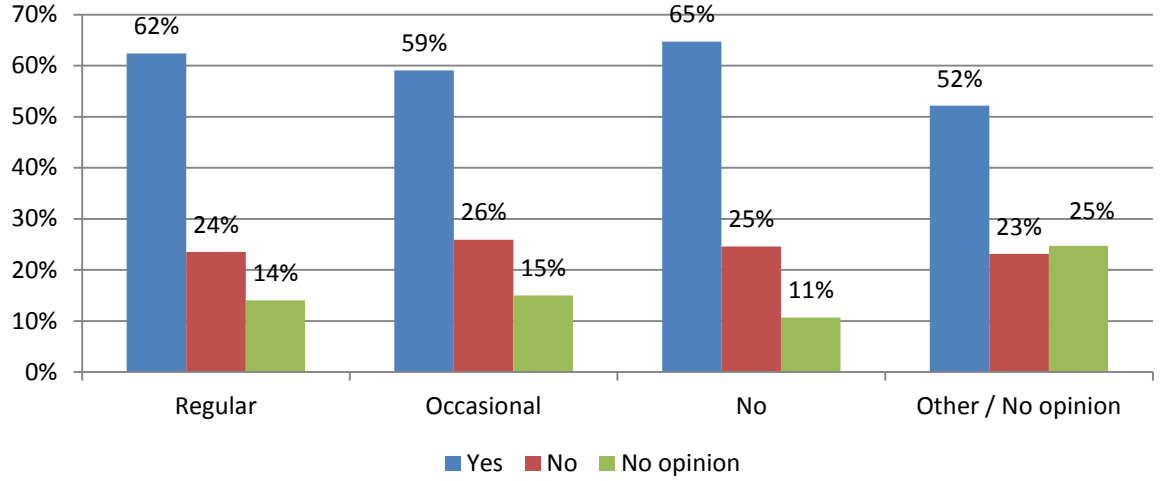


Figure 30 Percentage share of replies on necessity for testing all organic products for pesticide residues even if it leads to price rise by regularity of consumption of organic products

Figure 30 illustrates that the largest part (52-65%) of private consumers no matter their regularity of organic products' consumption had positive approach of consumers towards the necessity for testing for pesticide residues of all organic products. However, approximately one quarter of each group of regularity of consumption of organic products had negative approach to the obligation to test pesticide residues in all organic products.

Question no. 4.4 Should the level of pesticide residues for organic products be set at a lower level than for conventional products?

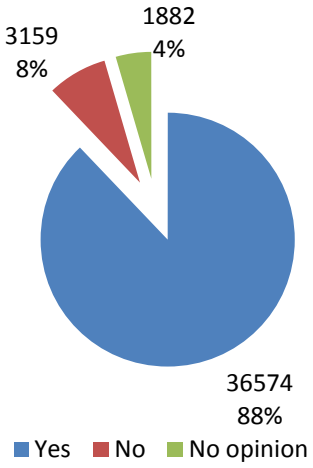


Figure 31 Number and percentage share of replies on necessity for lower level of pesticide residues for organic than conventional products: distribution of replies among 41615 records with registered answer

The overwhelming majority of respondents (88%, 36574), as it is presented on Figure 31, definitely wanted to set a lower level of pesticides residues for organic than for conventional

products. The opposite opinion was expressed only by 8% (3159) of respondents whereas 4% (1882) of repliers did not present their view.

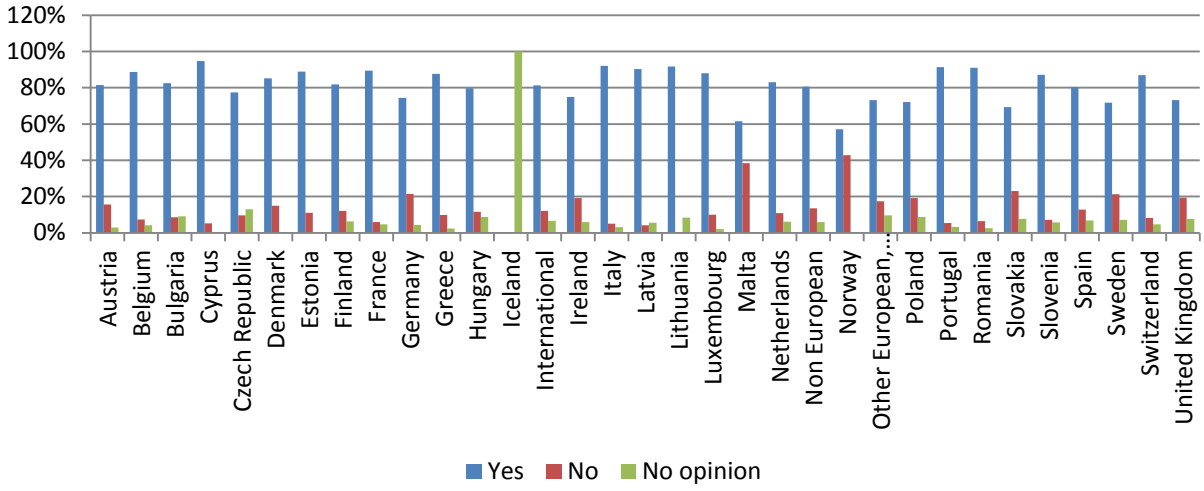


Figure 32 Percentage share of replies on necessity for lower level of pesticide residues for organic than conventional products by country

The vast majority of respondents from almost all countries, except for Malta and Norway (where the superiority was not so clear), supported the proposal for setting lower level of pesticide residues in organic than in conventional products. The respondents from Iceland did not express their opinion on this topic (see Figure 32).

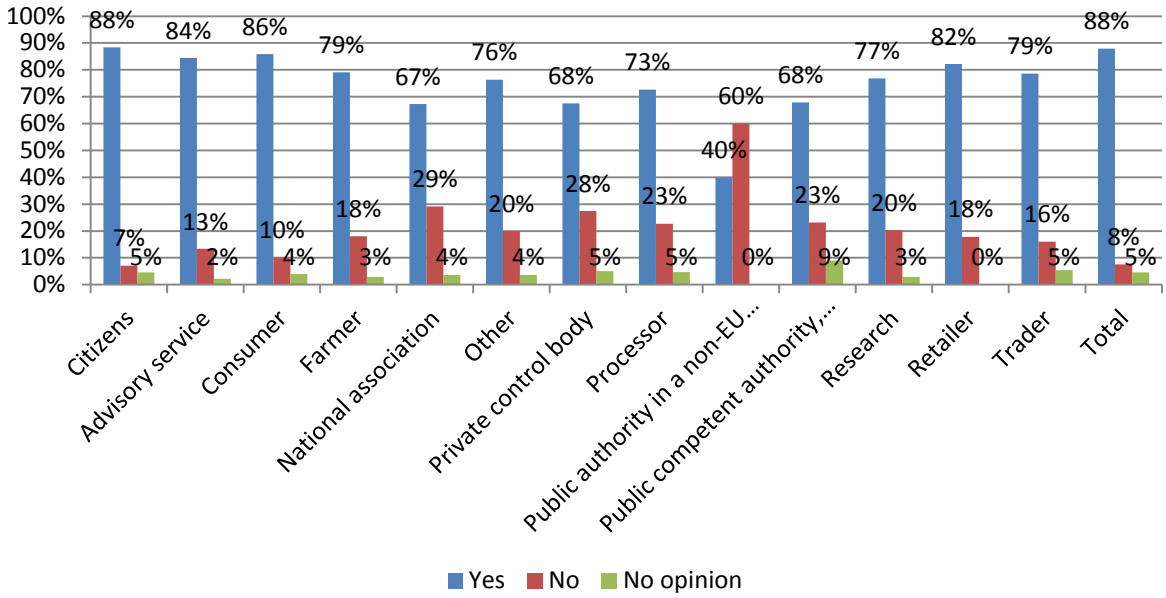


Figure 33 Percentage share of replies on necessity for lower level of pesticide residues for organic than conventional products by category of stakeholders

Figure 33 illustrates the attitude of the various groups of stakeholders towards the allowed level of pesticide residues. The only category of stakeholders, in which more respondents were against (60%) than in favour of (40%) setting lower level of pesticide residues for organic than conventional products, was the one representing non-EU public authorities. From 67% to even 88% of respondents in the other categories were in favour of lowering the level of pesticide residues in organic products compared to their conventional counterparts. In six

categories, namely (in descending order) national associations, private control bodies, processors, public competent authority, public control authority, accreditation body and researchers, despite the advantage of positive responses, the percentage share of negative opinion on this question exceeded 20%.

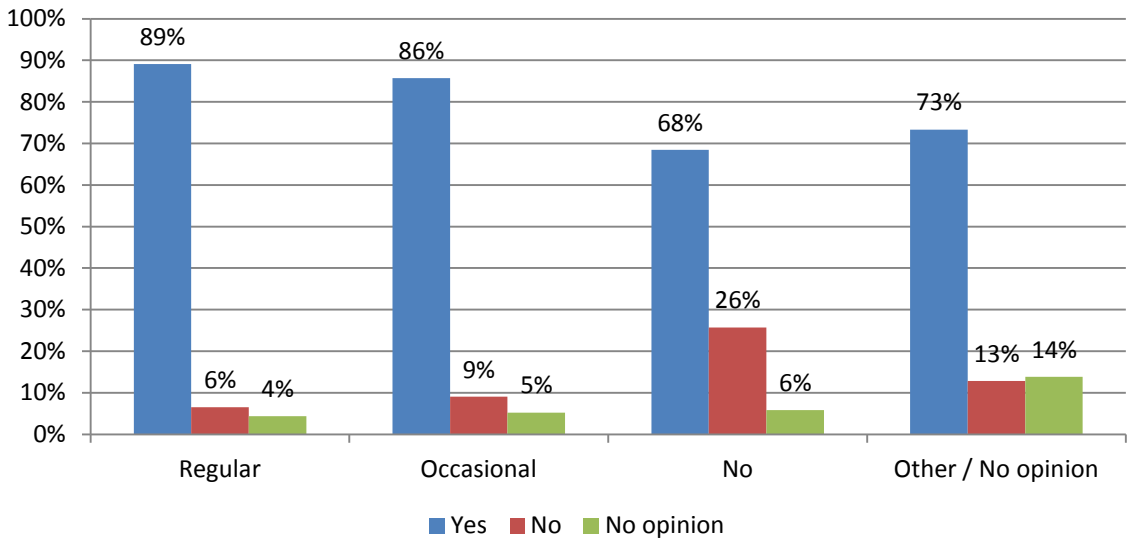


Figure 34 Percentage share of replies on necessity for lower level of pesticide residues for organic than conventional products by regularity of consumption of organic products

Similar dominance of approbating replies over the discrediting ones occurred even among respondents divided into groups of different regularity of organic products' consumption. Particularly clear ascendancy of positive answer appeared among the "regular" (89%) and "occasional" (86%) organic products' consumers. Nevertheless, questioned publics, who did not consumer organic products, also were in favour of lowering the threshold of pesticide residues in organic products compared with conventional ones (see Figure 34).

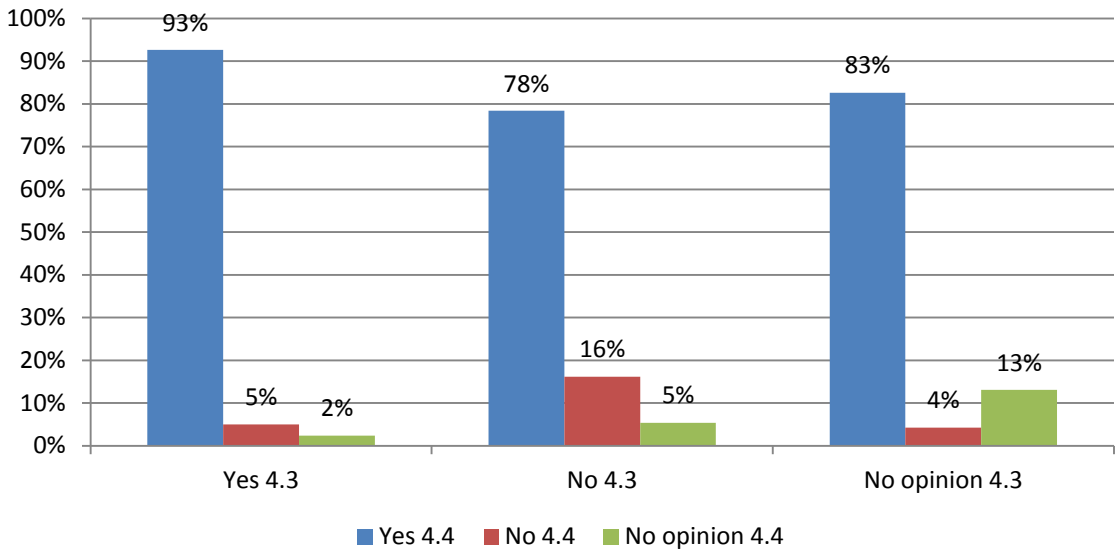


Figure 35 Intersection of replies for question 4.3 with replies for question 4.4

Figure 35 presents the attitude of respondents towards setting lower threshold of pesticide residues in organic products compared with conventional ones with division into groups with different approaches towards implementation of obligation for testing all organic products for

pesticide residues. However, although the respondents agreed for testing all organic products for pesticide residues or not, most of them demanded lowering the level of pesticide residues for organic compared to conventional products.

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

- *"Testing for residues - tool for verifying compliance and in doubts. Additional investigative instruments should be applied in accordance to the problem e.g. cross-checking, traceability tests, deep bookkeeping check, unannounced visits, etc. Choice of the product to be tested based on risk analysis." (EN 102)*
- *"There should be absolutely no pesticide residues in organic ad conventional farming products. The EU should support small, pesticide-free farms only." (DE 029)*
- *"Stricter threshold should be implemented for conventional products, this would help reducing contamination of organic." (DE 200, 201)*
- *"Apart from residue analysis, there shall be other methods applied such as cross-checks, traceability checks, in-depth accounting audit, unannounced checks etc. The choice should be based on situation. he decision, which is investigative monitoring instrument appropriate and whether products analyses are conducted, should be the result of a risk-based analysis, and in particular on products aimed at high risk. Besides, the market players, inspection bodies and authorities should verify compliance with environmental rules." (DE EC2)*
- *"The ban on use of herbicides and insecticides has to be kept, as it is helping the environment protection, especially in terms of biodiversity." (DE 210)*
- *"The pesticide residues level should be as low as possible even in conventional products. The control for pesticide residues should be constructed as follows: random and unannounced inspections by an independent (national) authority to carry out on a sufficient number of samples, which in conjunction with sanctions have the desired effect namely no pesticides use. Checking all the products without exception makes no sense." (DE 203, 204)*
- *"Testing for pesticide residues should not be paid by anyone. / If the threshold would be lower than for conventional, there would be needed two control systems would be needed." (DE 184, 185, 186)*
- *"If a food may be classified as organic or not (in case of pesticide content) has to be decided on a case by case basis by control authorities and control bodies. For these decisions requires clear procedures and a clear legal framework that should be further developed." (DE EC2)*

4.3. GMOs

Question no. 4.5 Genetically-modified organisms (GMOs) and products produced from or by them are considered incompatible with the concept of organic production. They cannot be used in organic farming or in the processing of organic products. ***Is the fact that 'organic', by definition, means 'GMO-free' an important reason why you buy organic?***

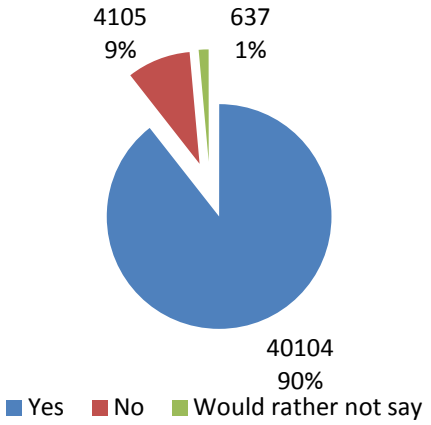


Figure 36 Number and percentage share of replies on importance of the fact that 'organic', by definition, means 'GMO-free' for decision on buying organic products

The public consultation's questionnaire allowed the respondents to express their opinion on the GMOs with reflection to organic products. In general the contributors were not in favour of genetically-modified organisms (GMOs) and products produced from them, especially with reference to organic farming objectives, criteria and principles. In fact, 90% (40104) of the interviewees stated that 'organic', by definition, means 'GMO-free' and, thus, is an critical reason for purchasing these products. On the contrary, 9% (4105) of all respondents claimed that the prohibition of using GMOs in organic farming does not influence their decision concerning buying organic products. The remaining 1% (637) of contributors did not express their view on that issue (see Figure **36**).

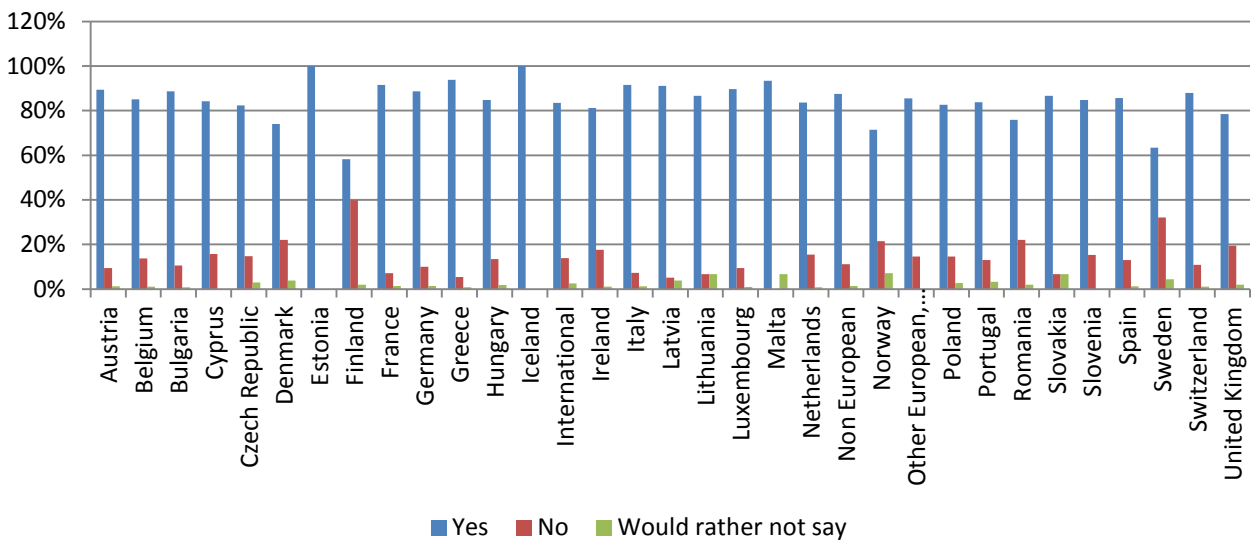


Figure 37 Percentage share of replies on importance of the fact that 'organic', by definition, means 'GMO-free' for decision on buying organic products by country

With regard to distributions of responses in terms of country of origin, the majority of questioned citizens from almost all Member States tended to answer in a similar way (see Figure **36** and Figure 37). However, in two countries, namely Finland and Sweden, as many as approximately 30-40% of respondents seemed not to treat 'GMO-free' as an organic product asset and critical for decision on purchase (see Figure 37).

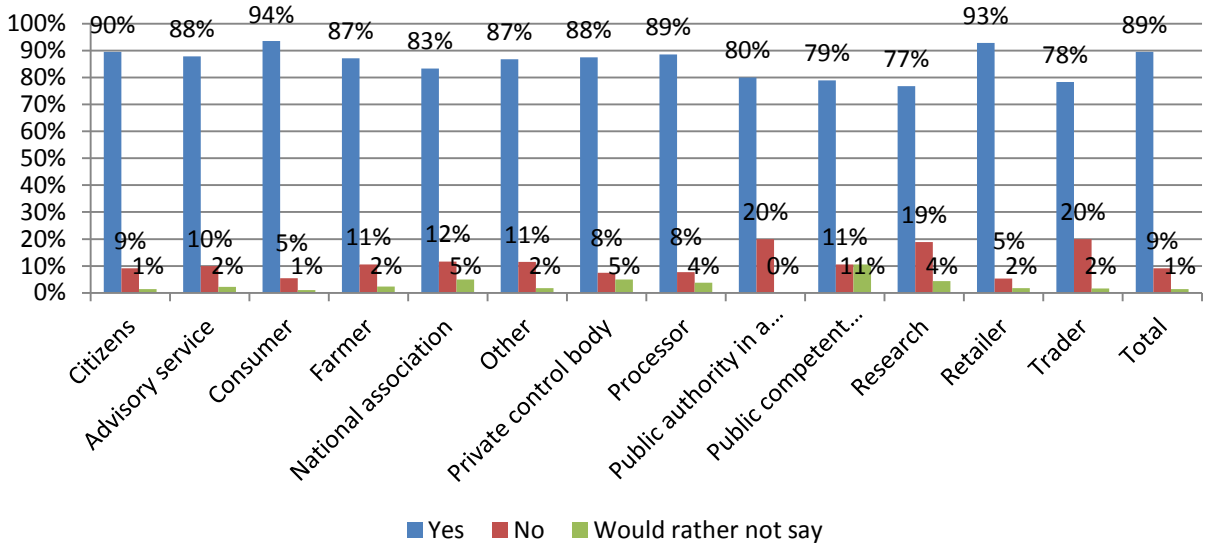


Figure 38 Percentage share of replies on importance of the fact that 'organic', by definition, means 'GMO-free' for decision on buying organic products by category of stakeholders

Responses among all groups of respondents from various categories of stakeholders (see Figure **36** and Figure 38) were comparable to those of the general public.. However, approximately 20% of respondents representing non-EU public authorities, researchers as well as traders claimed that the statement 'GMO-free' is not a reason for buying organic products (Figure 3).

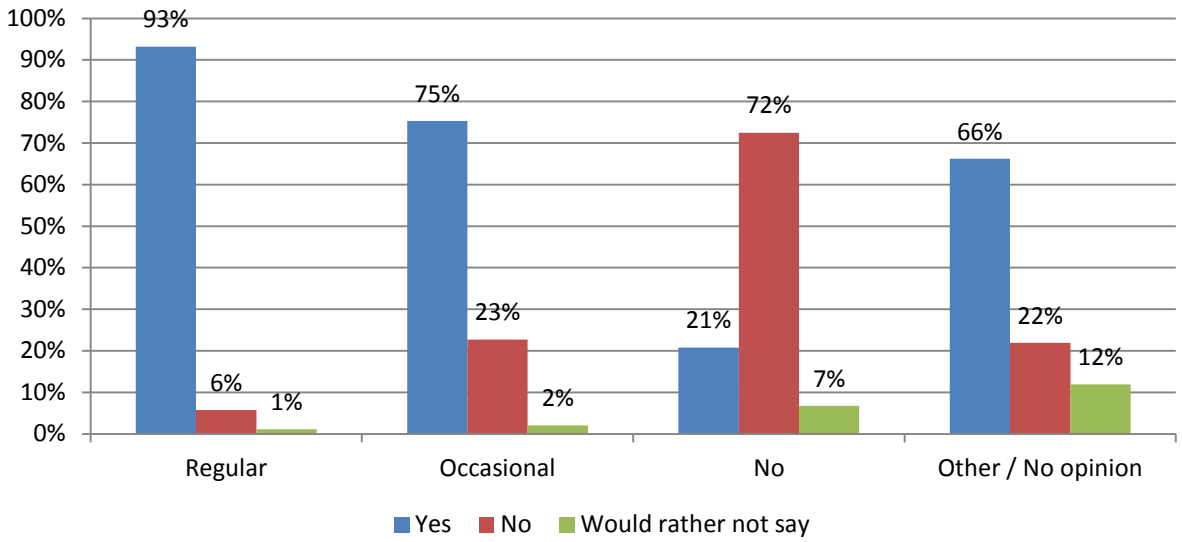


Figure 39 Percentage share of replies on importance of the fact that 'organic', by definition, means 'GMO-free' for decision on buying organic products by regularity of consumption of organic products

Slightly less than "regular" consumers, but still the majority of "occasional" ones, namely 75%, were attracted to organic products because of the 'GMO-free' attribute. A similar

percentage shares of responses to the "occasional" group could be noticed among the respondents who did not declare their regularity of organic products consumption. The reverse proportion is among the group of interviewees that were not used to buying organic products and, thus, for the majority of them the 'GMO-free' attribute did not have any influence on their consumer choice (see Figure 39).

Question no. 4.6 Because organic systems are not isolated from the general production chain (cultivation, harvest, transport, storage, processing), the accidental presence of GM crops in organic farming systems can't be completely ruled out. Under the current laws, there is no need to mention the possible presence of GMOs on the label of any food product where the GMO is likely to account for less than 0.9% of the product content. However, lower/stricter labelling requirements are likely to increase costs for consumers. ***Were you aware of this GMO labelling limit?***

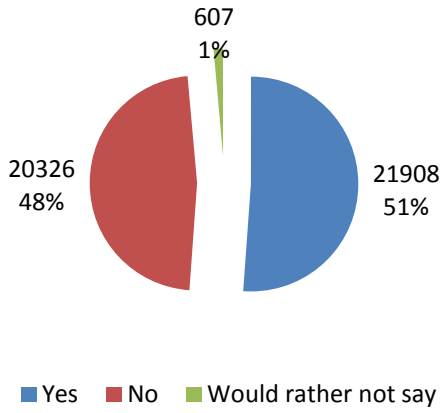


Figure 40 Number and percentage share of replies on awareness of existing GMO labelling limit: distribution of replies among 42841 records with registered answer

The questionnaire aimed also at measuring the respondent's awareness of the existing GMO labelling limit. Here, only 51% (21908) of the respondents replied they were aware of the provisions regarding GMO labelling limit. In addition, as many as 20326 (48%) questioned people did not know about this rule and 1% (607) refused to express their opinion (see Figure 40).

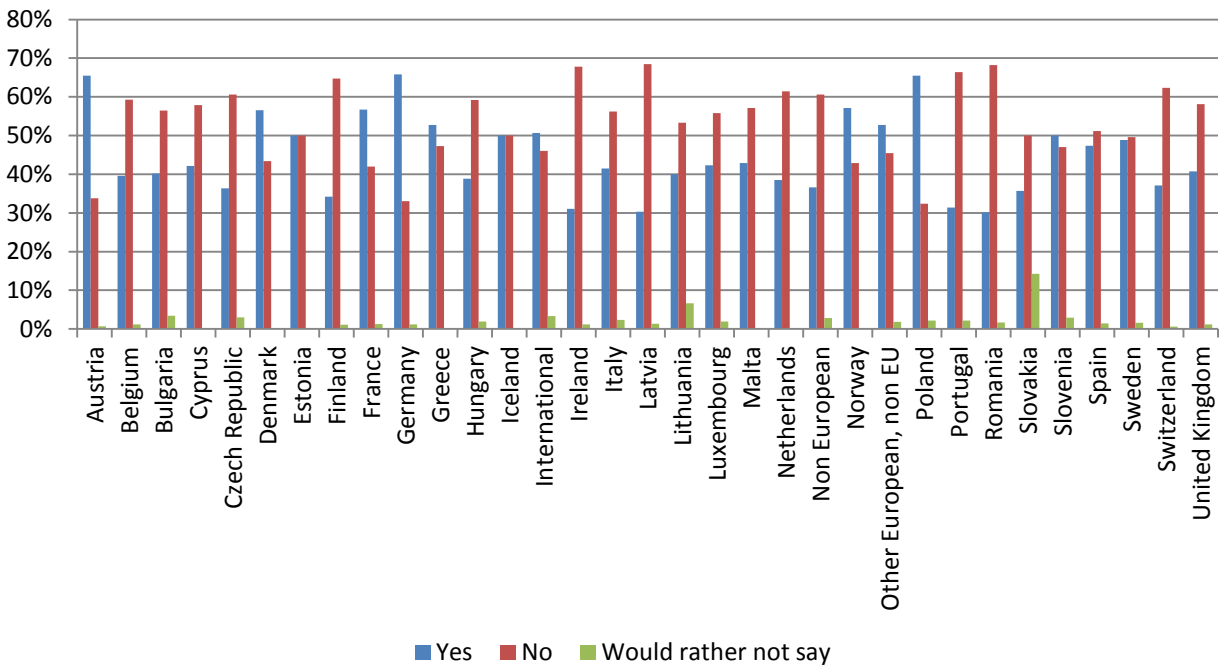


Figure 41 Percentage share of replies on awareness of existing GMO labelling limit by country

Figure 41 demonstrates that more than half of the respondents did not know about the rule on GMO labelling limit. The most aware of this matter were respondents from Austria, Denmark, France, Germany and Norway.

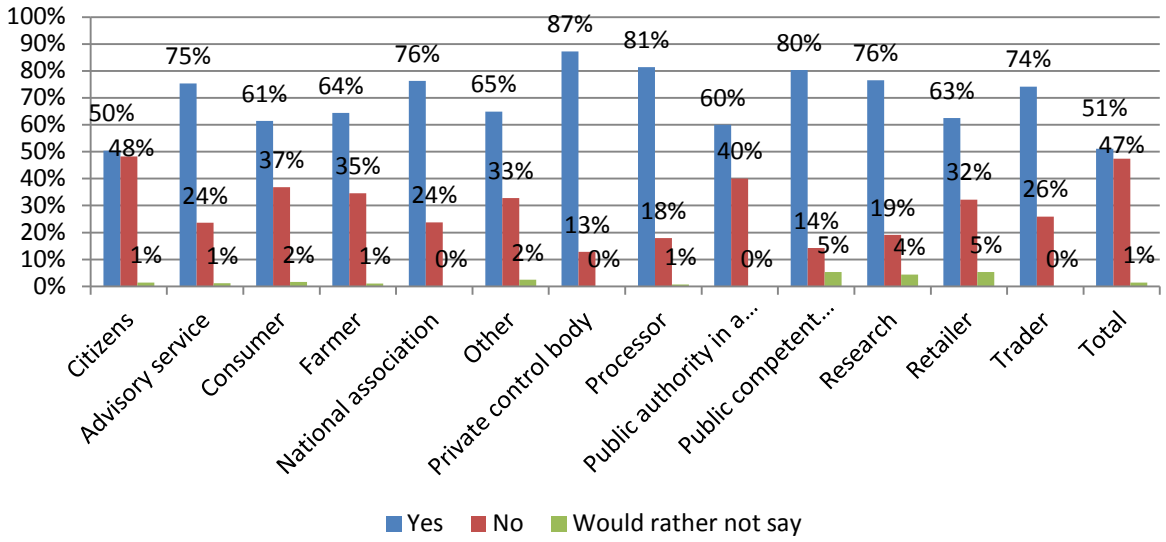


Figure 42 Percentage share of replies on awareness of existing GMO labelling limit by category of stakeholders

In all categories of stakeholders more than half of respondents knew about the rule concerning the GMO labelling limit. In detail, more than 80% of repliers representing private control bodies, processors and public competent authorities, public control authorities and accreditation bodies declared possession of knowledge about the GMO labelling limit. In the remaining groups (except citizens) the percentage was also high: around 60-75% of respondents responded positively to that question. However, almost half of the citizens (48%) did not know about the GMO labelling limit. Equally, there was significant lack of awareness of about 40% also among representatives of stakeholders such as consumers (37%), farmers

(35%), and public authorities in non-EU countries (40%). And last but not least, high percentage share of the under-informed were also questioned individuals from groups that in principle should have had such knowledge, namely *inter alia* retailers (32%) and traders (26%), advisory services (24%), national associations (24%), researchers (19%), processors (18%), private control bodies (13%), public competent authorities (14%) (see Figure 42).

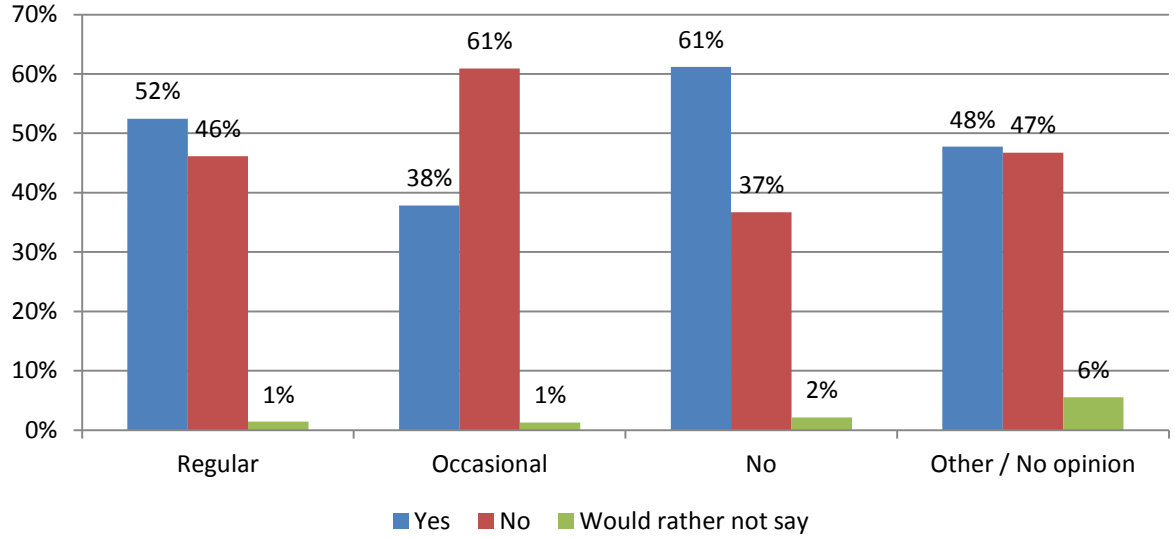


Figure 43 Percentage share of replies on awareness of existing GMO labelling limit by regularity of consumption of organic products

The citizens who replied were not particularly well-informed about the GMO labelling limit. The least informed group of respondents in terms of GMO labelling limit appeared to be "occasional" organic consumers. In addition, as many as 46% and 47% of respectively "regular" and "other/no opinion" purchasers of organic products were not acquainted with the provision. The most conversant with this provision were consumers claiming that they only consume non-organic products (see Figure 43).

Question no. 4.7 Should organic products be subject to the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO?

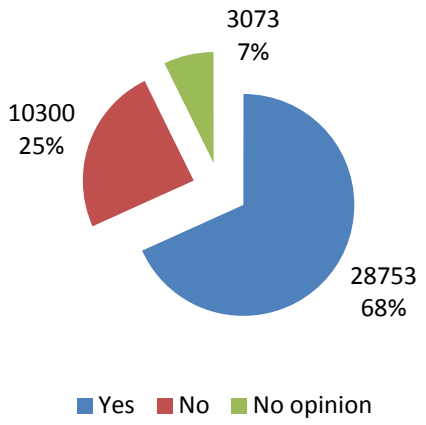


Figure 44 Number and percentage share of replies on necessity for the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO: distribution of replies among 42126 records with registered answer

The questioned publics were asked to state their opinion on the labelling rules of organic products as regards the accidental or unavoidable presence of GMO. As many as 68% (28753) of respondents were in support of subjecting organic products to the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMOs. At the same time against it or with no opinion on it were, respectively, around 25% (10300) and 7% (3073) of all public consultations' contributors (see Figure **44**).

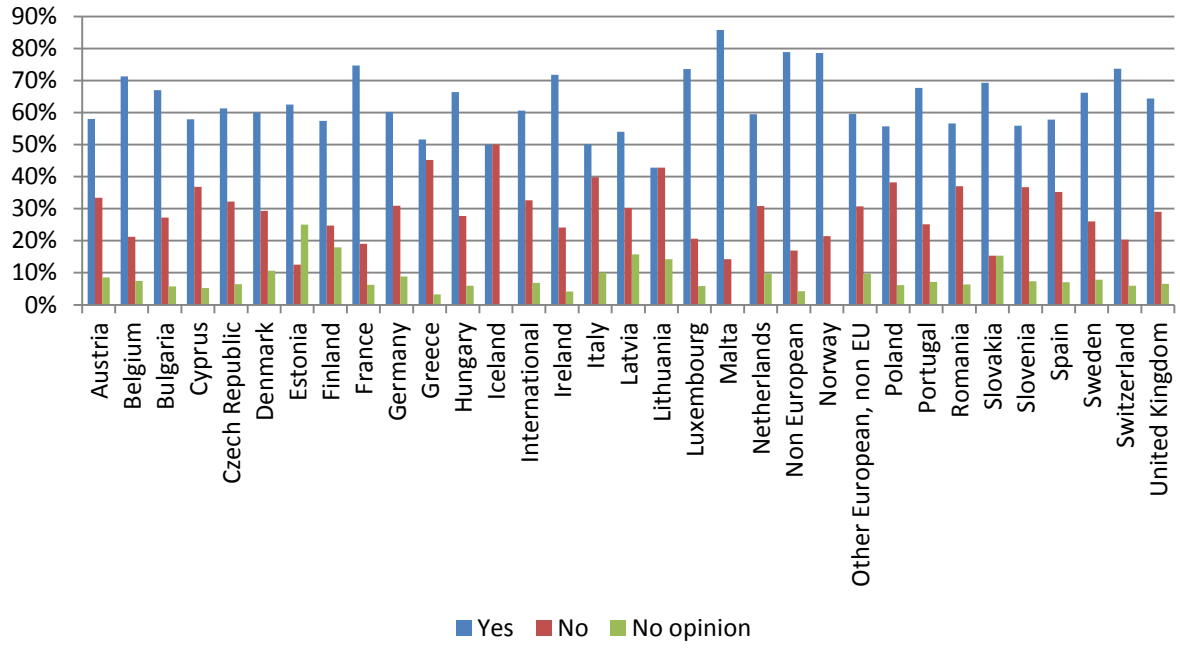


Figure 45 Percentage share of replies on necessity for the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO by country

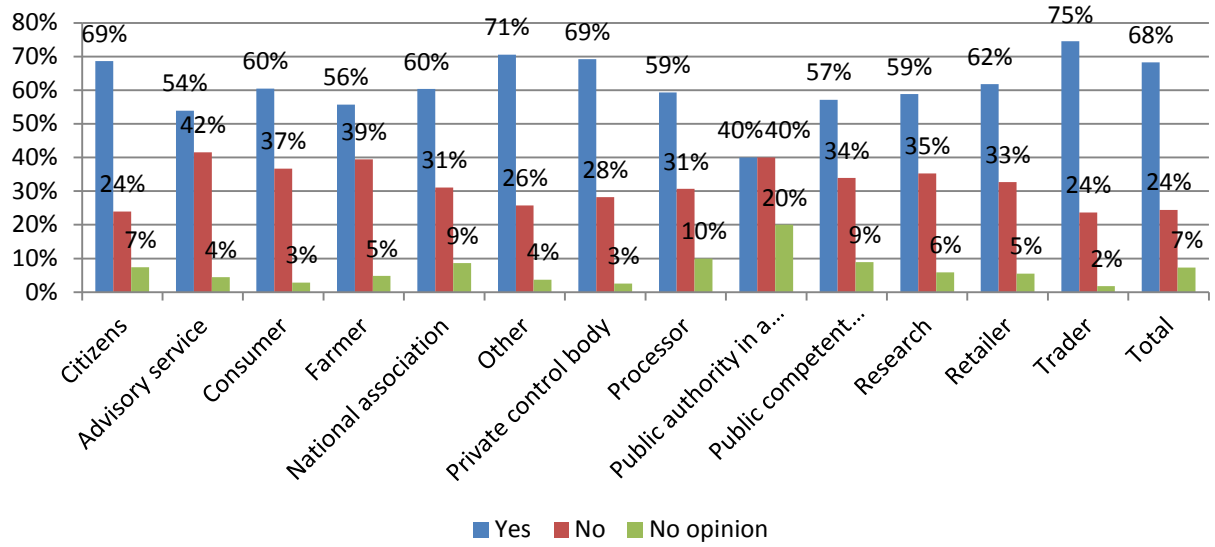


Figure 46 Percentage share of replies on necessity for the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO by category of stakeholders

The majority of the groups of stakeholders showed similar trend in the responses to the question as the total group. Besides citizens (69%), the biggest supporters of the necessity for

same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO were interviewed representatives of traders (75%), private control bodies (69%) as well as others (71%). Nevertheless, it should be emphasised that many respondents, i.e. 30-40%, from the following groups – consumers, farmers, national associations, non-EU public authorities, advisory services, retailers, researchers, processors and public competent authorities – were against the use of the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO (see Figure 46).

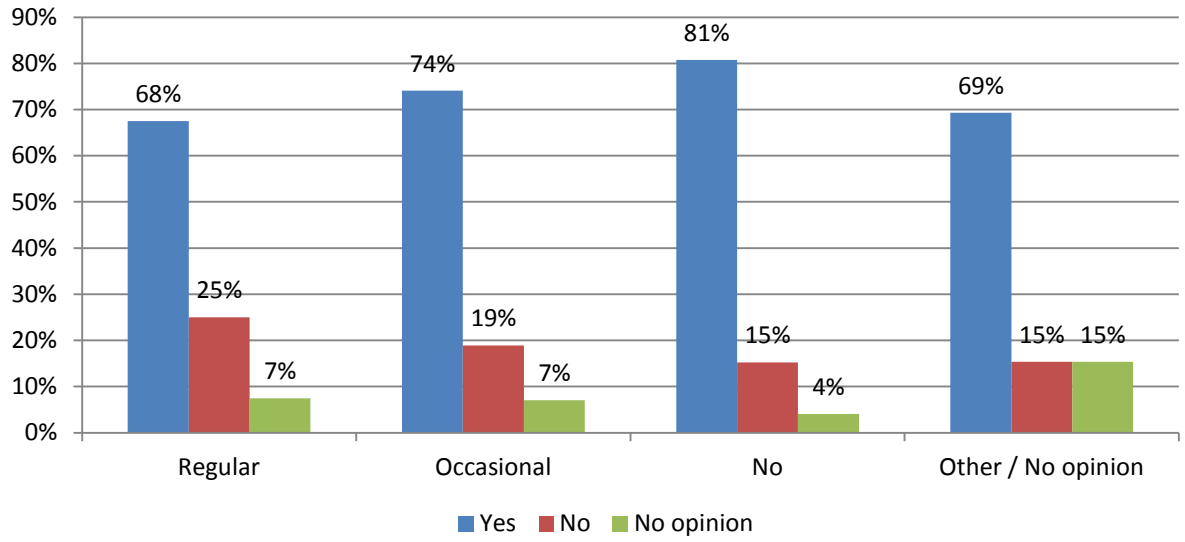


Figure 47 Percentage share of replies on necessity for the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO by regularity of consumption of organic products

The majority (i.e. 70-80%) in all groups of questioned private consumers, irrespective of the regularity of organic product's consumption, supported the idea that organic products should be subject to the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO. The strongest supporters were the consumers of non-organic foodstuffs (81%). On the other hand, the highest percentage share of respondents against the above mentioned labelling provision was of about 25% among the consumers, who purchase organic products regularly. Among the remaining groups 15-20% of respondents were against the same labelling rules for organic as for conventional products with regard to the accidental or unavoidable presence of GMO (see Figure 47).

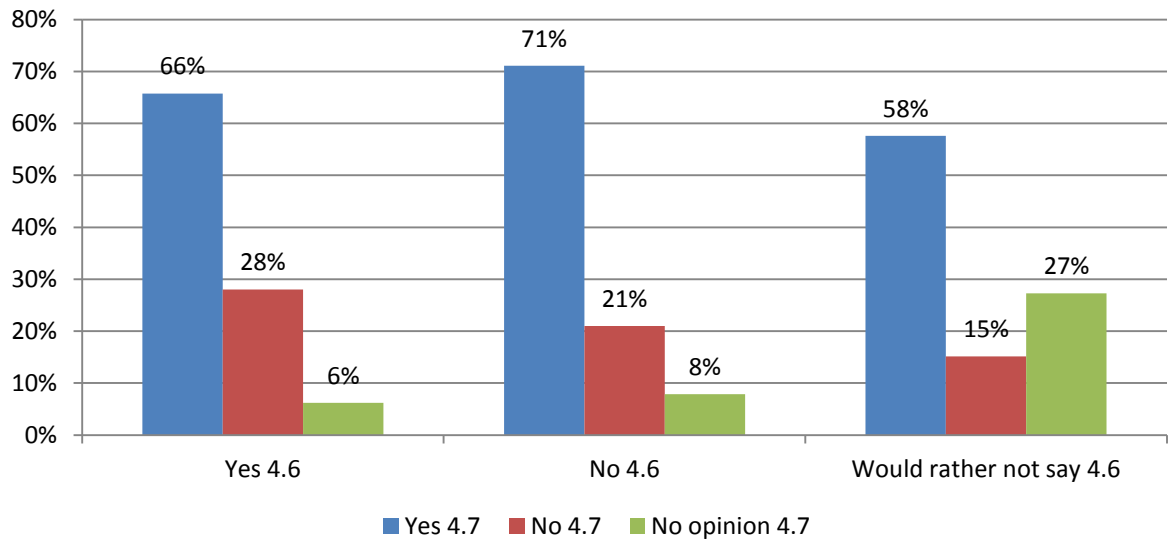


Figure 48 Intersection of replies for question 4.6 with replies for question 4.7

Figure 48 presents the view of respondents on the necessity of the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO with division into groups of citizens who did or did not know about the existence of the GMO labelling limit or did not want to express their opinion in this matter. It results that independently from the fact that citizens were aware or not of the GMO labelling limit, the majority, i.e. from 58 to even 71%, of them in each group was in favour of the concept that organic products should be subject to the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO. However, more than one quarter (28%) of the interviewees, who were aware of the labelling and more than one fifth (21%) of the respondents, who did not know about the labelling limit were against the same labelling rules for organic and conventional products with reference to accidental or unavoidable presence of GMO.

Question no. 4.8 If no, should the amount (labelling threshold for accidental presence) of GMOs that must be mentioned on the label of organic products be lower than for conventional products?

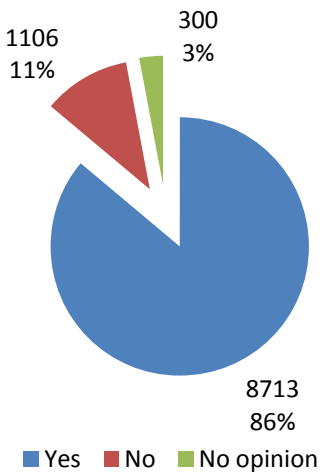


Figure 49 Number and percentage share of replies on necessity for lower labelling threshold for accidental presence of GMOs that must be mentioned on the label for organic than conventional products: distribution of replies among 10119 records with registered answer and "no" in 4.7

What is more, the majority of respondents (86%, 8713), who were against the notion that organic products should be subject to the same labelling rules as conventional products, as regards the accidental or unavoidable presence of GMO, expressed their approval for setting a lower labelling threshold for accidental presence of GMOs that must be mentioned on the label for organic than conventional products. In contradiction of setting up a lower labelling limit of GMO presence for organic then conventional products were only 11% (1106) of these interviewees. The remaining 3% (300) did not have opinion on this matter (see Figure **49**).

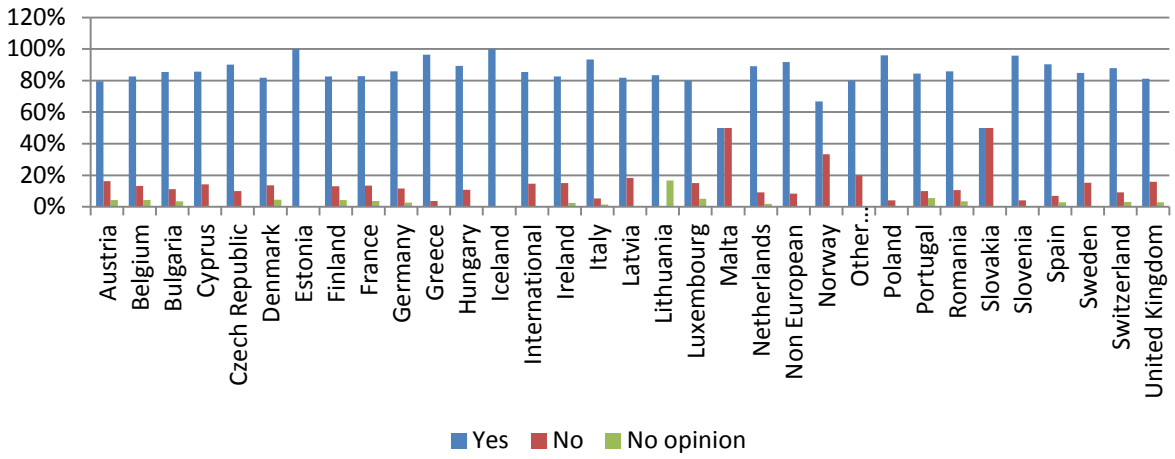


Figure 50 Percentage share of replies on necessity for lower labelling threshold for accidental presence of GMOs that must be mentioned on the label for organic than conventional products by country: distribution of replies among 10119 records with registered answer and "no" in 4.7

The ratio of positive and negative attitude towards lowering the GMO labelling limit for organic products was similar in most of the countries with the exception of Malta and Slovakia. However, half of the questioned Maltese and Slovakian citizens were pro and half of them against the concept of lowering the labelling threshold for accidental presence of GMOs that must be mentioned on the label for organic than conventional products (see Figure 50).

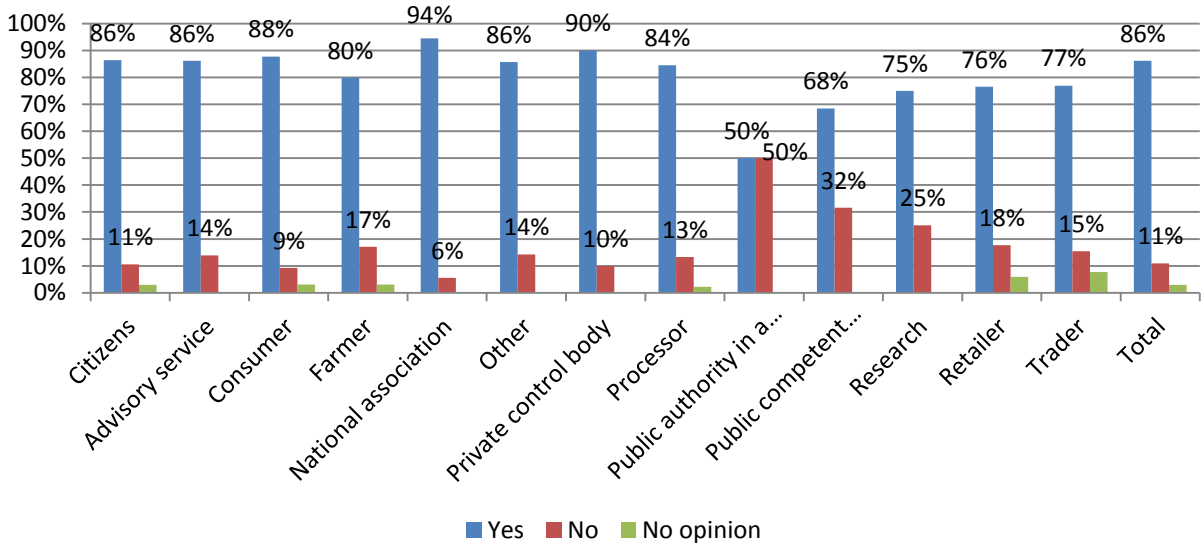


Figure 51 Percentage share of replies on necessity for lower labelling threshold for accidental presence of GMOs that must be mentioned on the label for organic than conventional products by category of stakeholders: distribution of replies among 10119 records with registered answer and "no" in 4.7

Most of the respondents from various categories of stakeholders (70-95%) supported the idea that the amount of GMOs which must be mentioned on the label should be lower for organic than for conventional products. Nonetheless, half of the respondents representing public authorities in non-EU countries disagreed with the stated proposal. In addition, more than one quarter of interviewees answering on behalf of public competent authorities, public control authorities, accreditation bodies (32%) as well as researchers (25%) were also against the concept mentioned in this question (see Figure 51).

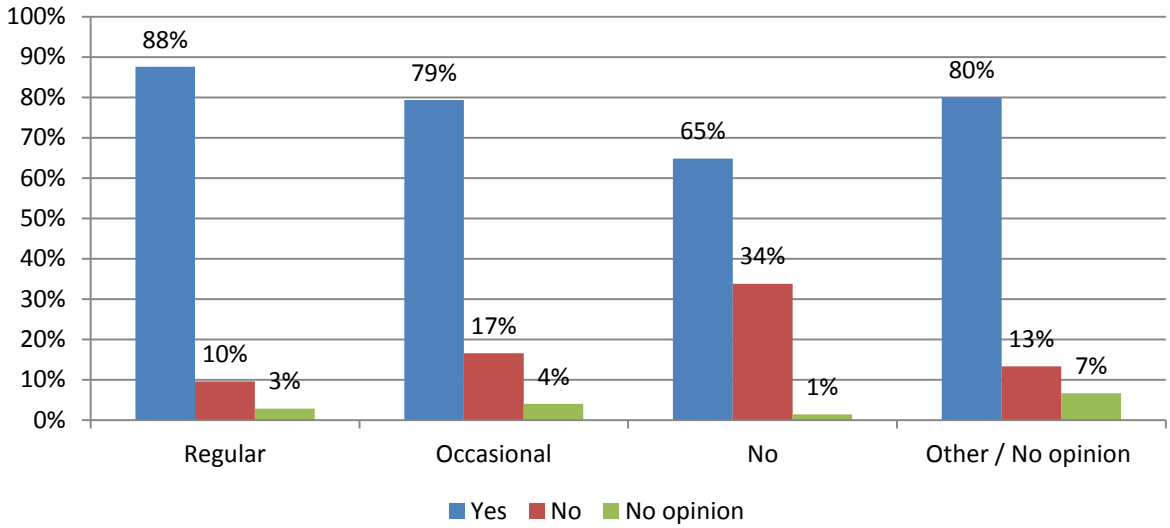


Figure 52 Percentage share of replies on necessity for lower labelling threshold for accidental presence of GMOs that must be mentioned on the label for organic than conventional products by regularity of consumption of organic products: distribution of replies among 10119 records with registered answer and "no" in 4.7

A very similar proportion of responses as in the above described on Figure **49**, Figure 50, Figure 51 occurs among respondents divided into groups based on the regularity of consumption of organic products (see Figure 52). Approximately 80-90% of the consumers that occasionally, regularly or "with other regularity/no opinion" consume organic products were in favour of lowering the labelling threshold for accidental presence of GMOs that must

be mentioned on the label for organic than conventional products. Additionally, 65% of respondents, who did not consume organic products, were of the same opinion. Comparing to others within the last described group there was the highest percentage share of respondents (i.e. 34%) against the concept presented in this question.

Question no. 4.9 As a consumer, are you prepared to pay higher prices for organic products if this were the result of a lower GMO labelling limit?

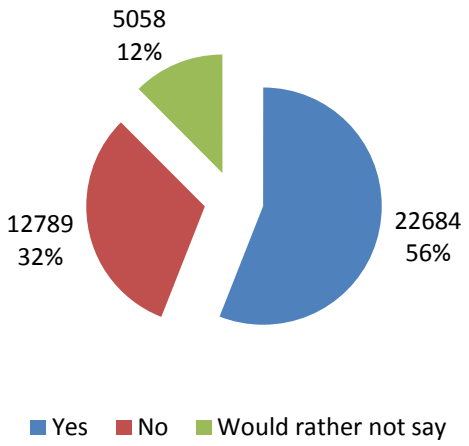


Figure 53 Number and percentage share of replies on affordability of organic products with higher prices because of a lower GMO labelling limit: distribution of replies among 40531 records with registered answer

Pertaining to the prices of organic products and GMOs content, more than half (56%, 22684) of respondents replied that they are prepared to pay more for organic products with a lower GMOs labelling limit. On the contrary, as many as 12789 (32%) individuals did not want to pay more for that. Besides, a moderate but significant number of respondents, 5058 (12%), did not provide their opinion on this matter at all (see Figure **53**).

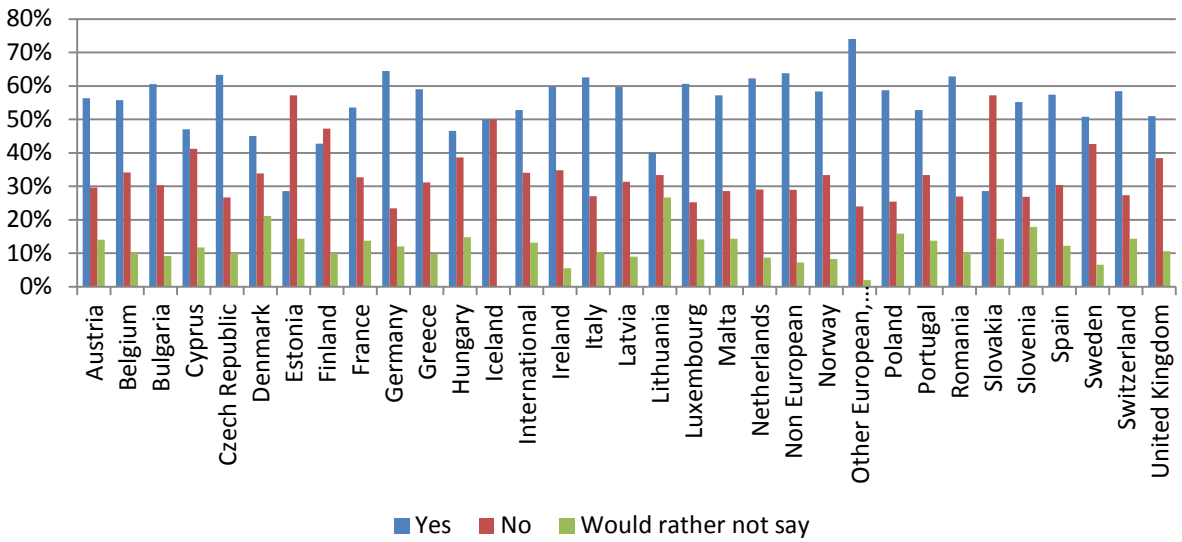


Figure 54 Percentage share of replies on affordability of organic products with higher prices because of a lower GMO labelling limit by country

Acceptance of higher prices for a lower limit for GMO labelling differed from country to country. Most of the respondents from different countries indicated that they are prepared to

pay higher prices for organic products if this was the result of a lower GMO labelling limit. However, the majority of interviewees from countries such as Estonia and Slovakia were against the rise in prices of organic products as a result of setting a lower GMO labelling limit. Nevertheless, the ratio between negative and positive responses to the question on affordability of organic products with higher prices because of a lower GMO labelling limit in the following countries: Cyprus, Denmark, Finland, Hungary, Iceland, Lithuania, Sweden, United Kingdom, was relatively balanced (see Figure 54).

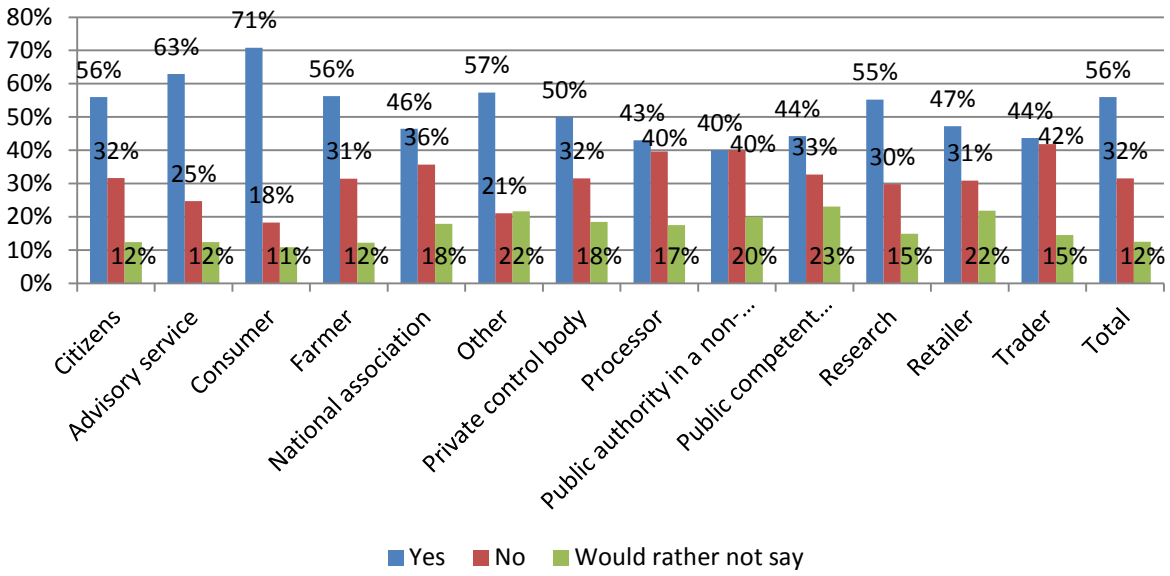


Figure 55 Percentage share of replies on affordability of organic products with higher prices because of a lower GMO labelling limit by category of stakeholders

The percentage share of answers in favour and against higher prices for products with lower GMO labelling limit differed significantly also among various categories of stakeholders. Half or more of the respondents from the following categories of stakeholders: citizens (56%), advisor services (63%), consumers (71%), farmers (56%), researchers (55%), private control bodies (50%) and others (57%) agreed to pay higher prices for organic products with this particular added-value feature. On the contrary, in other groups (as processors, public authorities in non-EU countries, public competent authorities, retailers and traders) the difference of percentage share of respondents who are prepared to pay higher prices for lower GMO labelling on organic products compared to those who could not afford is not so distinct (see Figure 55).

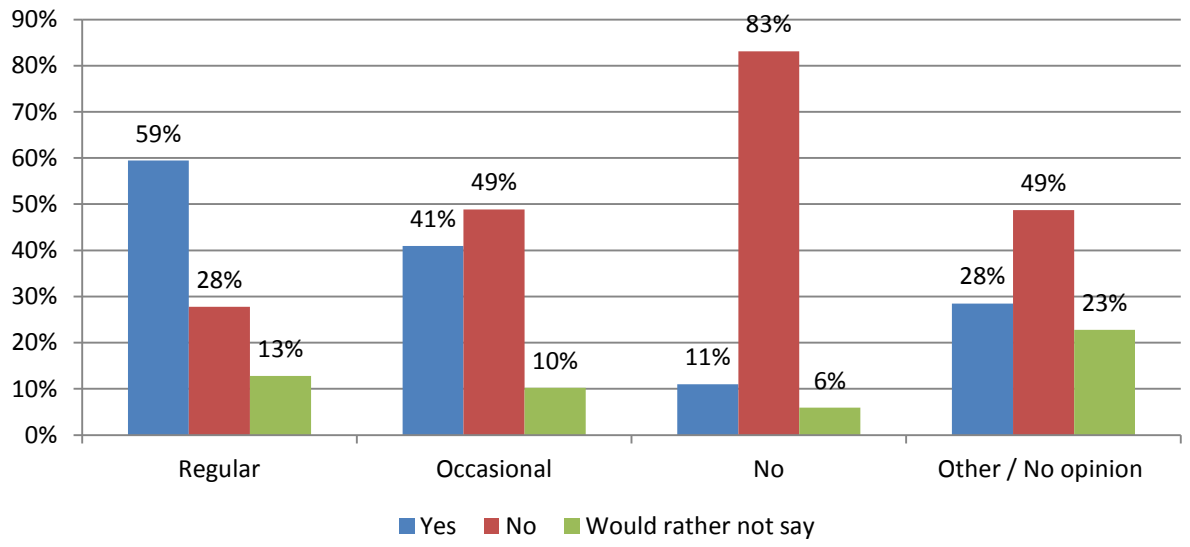


Figure 56 Percentage share of replies on affordability of organic products with higher prices because of a lower GMO labelling limit by regularity of consumption of organic products

The majority of questioned private consumers (59%), who described themselves as regular organic products' buyers, did not see any obstacle in paying more for organic products with a lower GMO labelling limit. Quite the opposite trend was noticed among consumers that never buy organic products, of whom 83% strongly disagreed with the concept of lowering the GMO labelling limit if it leads to price growth of organic products. In case of respondents, who consume organic products only on occasional basis, the opinions were split more or less evenly into those who strongly disagreed (49%) and those who agreed (41%) to pay more for organic products with lower GMO labelling limit (see Figure 56).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

Citizens in great majority were against GMOs in the European Union and demanded complete prohibition of GMOs. In detail, many contributions from citizens claimed that GMOs should be banned in the European Union and emphasised that GMOs are absolutely incompatible with its principles, criteria and objectives of organic farming. There also appeared opinions that import and use of GMO feedstuffs to European Union should be completely prohibited. The authors of the contributions supported their strong disapproval for GMOs in the European Union by providing the following chosen arguments: (I) research on GMOs confirms its detrimental effects; (II) GMOs negatively influence environmental and human health and life; (III) GMOs contaminate the soil (Mexican case) and destroy insects; (IV) GMOs do not tackle the problem of malnutrition and food security; (V) GMOs are pushed only by big corporations and their allowance will destroy small plant breeding companies; (VI) we have to secure at least one variety that is without GMOs; etc.
Examples:

- *"(…) purely and simply delete the GMO is not proposed but that would remove completely the question of controls and additional costs (…)". (FR 224)*
- *"(…) Secondly, current researches on GMOs are alarming...The bio cannot use of GMOs! (I'd prefer better allow pesticides) (…)". (FR 237)*
- *"EU legislator needs to stop approving GM crops on European land or at least set up binding rules to protect GM-free farming". (EN 102)*

- *“There are research results confirming that GMOs are not helpful for food security. Strict organic farming rules should not allow any kind of situations for accidental or unavoidable presence of GMO. The consumer is prepared to pay more for good quality foodstuff. GMOs are killers not foodstuffs”. (DE 029)*
- *"GMO technology uses a huge quantity of resources and is on a global point of view more expensive than the biological agriculture. The environmental costs are never taken into account in the GMO food costs, for example the soil destruction (sth irreversible) or the pollution of the water resources". (EN 062)*
- DE 203 and 204 gave an in-depth insight into the rationales behind the must of GMOs prohibition in the European Union agro-food sector.

Moreover, authors of several contributions submitted by citizens demanded not only GMOs prohibition but also all sorts of genetic engineering techniques, including hybrids, especially in organic farming sector.
Some examples can be found below:
- *"All gen techniques should be banned in EU organic farming". (DE 171)*
- *"Prohibition of genetic engineering is absolutely indispensable in organic farming". (DE EC 1)*
- *"The supply of animal for herd/flock and seeds should not only be of organic origin, but breeding methods should also be in line with organic principles". (DE 184, 185, 186)*

There were also several contributions that supported GMOs in the European Union and demanded their permission. These contributors usually also stated that GMOs are the future of organic farming. The authors listed the following chosen arguments to corroborate their views: (I) GMOs labelling are detrimental for agricultural sector and development of modern technologies; (II) GMOs reduce the usage of pesticides; (III) GMOs avoidance does not make the products safer; (IV) insect resistant GMO crops require less insecticide spraying; etc.
Some examples:
- *"GM labelling is a kind of marketing strategy which is detriment for other sectors and modern technologies". (EN 101)*
- *"GM should be allowed in organic farming". (EN 101)*
- *"Organic industry should find a balance between claim that is not misleading ad realistic standards that reflect the realities of modern agriculture and food production. It is highly contradictive to apply the same labelling standards for organic as for conventional products are applied, which may legally contain up to 100% of GMO varieties authorised in the EU. This appears to contradict the GM free claim that is regrettably legally linked to the organic". (EN 101)*
- *"‘Incompatibility’ of GM and organic is unfounded", and additional arguments. (EN 128)*

As far as coexistence of GMOs and organic farming is concerned, some authors of the contributions completely discarded such possibility and strongly stressed its absolute incompatibility.
- Some examples:
- *"Buffer zones are ineffective because of enormous distances of pollen and insect flight". (EN112)*
- *"Rules for protecting organic crops from GMO contamination". (DE EC2)*
- *"The coexistence of conventional and organic production farmers is not possible basically, especially in terms of GMOs coexistence". (DE 190, 191)*

Some of the respondents took the idea of GMOs coexistence for granted and as inevitable in today's world situation. Thus, this part of contributors conditionally agreed and provided several examples of measures that should be used in such case to minimise the risk of cross-contamination. The citizens also expressed in their contributions that the EU procedure to authorised GMOs should be strengthened. Additionally, in case of contamination many authors argued that the only fair solution is the application of the "polluter payer" principle, in which the operators responsible for contamination are going to be responsible for the damage and will have to compensate it.
Some examples:

- *"The growers of GMO products field must assume full responsibility for contamination with GMOs and thus prevention costs such as for isolation distances, separation along the food chain, sampling and analysis". (DE EC2)*
- *"All these measures must be based on the "polluter pays" principle". (EN 102)*

With regard to adventitious presence of EU-authorised GMOs in organic products and labelling threshold, similarly, there were two different attitudes. Authors of the first group of contributions strongly supported the view that in organic products there should be absolute zero tolerance for GMOs and the minimum threshold of residues should be at the level of 0.000%. Accordingly, they demanded both strengthening the controls and that the products containing even slight amount of GMOs should be completely discredited as organic. Furthermore, the costs of controls should be put on corporations that produce GMOs or by taxation of conventional products. Some respondents also stressed that even if some substances such as vitamins, enzymes and amino-acids are regularly reported as available only produced by GMOs and cannot be used in organic production. Here, also the permission for use GMOs within veterinary treatment in organic farming should be banned.
Some examples:

- *"GMOs should not be allowed in any type of products. Even the GMO veterinary treatments should be banned". (DE 184, 185, 186)*
- *"EU should protect the agriculture from GMOs. In accordance to question no. 4.9 - there should be zero tolerance for GMO - the products should be completely GMO-free". (DE 202)*
- *"The GMO residue should be 0,0000% - no deliberate use of GMO and no residue allowance". (DE 184, 185, 186)*

The second group of respondents agreed that in case of accidental/unavoidable contamination the product should still be sold as organic. However, often the group of contributors proposed measures that should be applied to protect the consumers and producers interest.
Some examples:

- *"If a food may be classified as organic or not upon the occurrence of GMOs, the control bodies and control authorities have to decide case by case, whether a violation or the effort has not been respected". (DE EC2)*
- *"(…) Would not it be rather interesting and egalitarian publishing or certifying ingredients of conventional agriculture? CERTIFIED with GMOs, Pesticides, Fertilizers, etc... (…)". (FR 232)*
- *"Setting up a scheme for an early warning system for GMO residues". (IT 016)*

Authors of several contributions suggested that more research on GMOs is urgently needed and should be carried out by objective organizations with no conflict of interests.

4.4. Exceptions to the rules

Question no. 4.10 Do you think European organic farmers and other operators ought to be bound by identical rules in all EU countries?

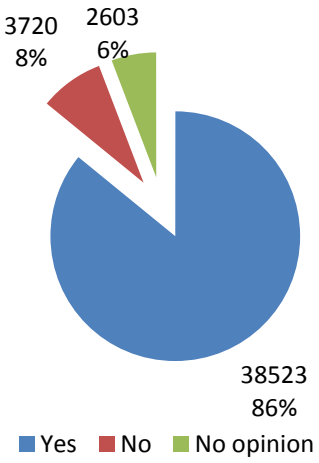


Figure 57 Number and percentage share of replies on feasibility of identical rules for European organic farmers and other operators in all EU countries

The overwhelming majority of respondents (86%, 38523), wanted uniformity of rules in all EU Member States for European farmers and other operators. The opposite opinion was expressed only by 8% (3720) of respondents. (see Figure **57**).

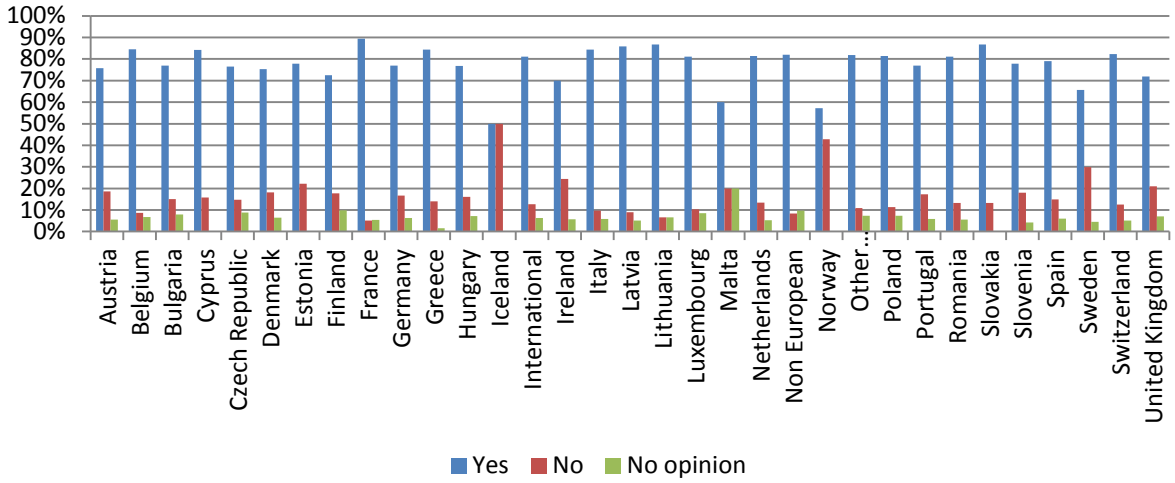


Figure 58 Percentage share of replies on feasibility of identical rules for European organic farmers and other operators in all EU countries by country

According to the results presented on Figure 58, the majority of the respondents from most of the countries answered that European organic farmers and other operators ought to be bound by identical rules in all EU countries. Such a distinctive dominance was not observed in case of Iceland and Norway, where the number of answers in favour of uniformity of organic rules for all countries and against this idea was quite similar.

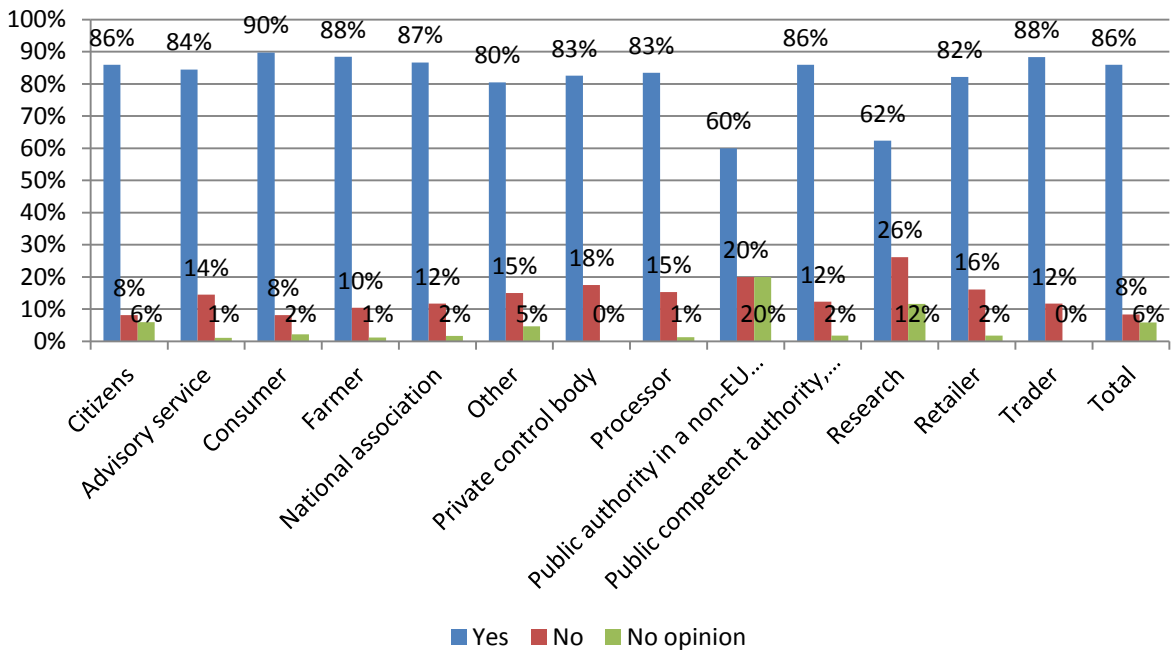


Figure 59 Percentage share of replies on feasibility of identical rules for European organic farmers and other operators in all EU countries by category of stakeholders

Within the different categories of stakeholders, the majority of respondents (60-90%) stated that the European organic farmers and other operators should oblige identical rules in all EU countries. However, 26% of researchers and 20% of non-EU public authorities were antagonistic towards the idea of homogeneity of organic rules for farmers and other processors in all EU countries and only respectively 62% and 60% of them were pro it (see Figure 59).

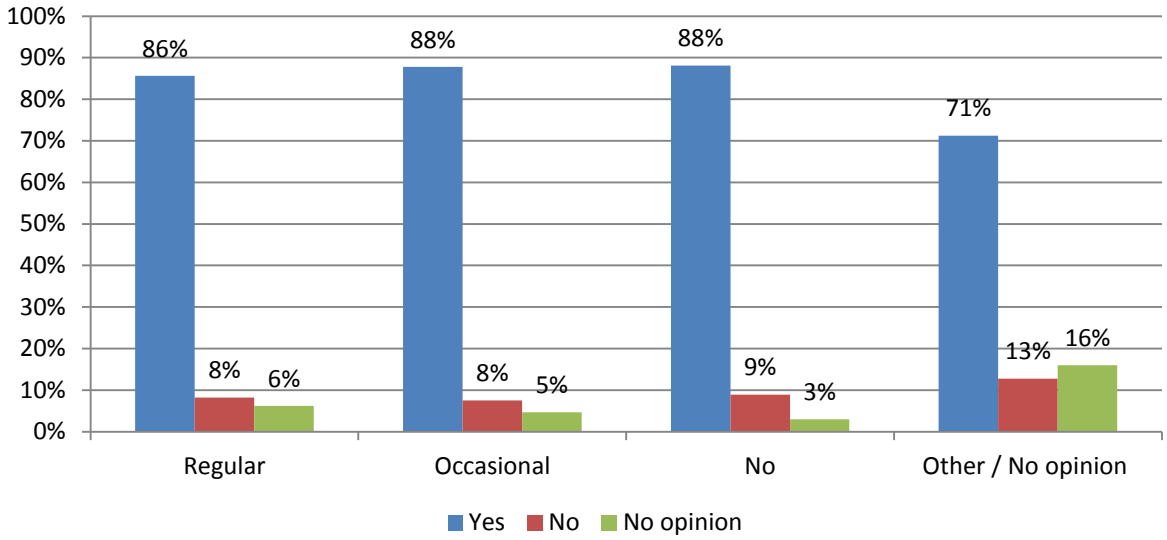


Figure 60 Percentage share of replies on feasibility of identical rules for European organic farmers and other operators in all EU countries by regularity of consumption of organic products

In each group of the questioned private consumers the majority of repliers (71-88%) supported the equality of regulations for all organic farmers and other operators. Merely 8-13% expressed negative opinion on this proposal (see Figure 60).

Question no. 4.11 Today organic farmers and other operators can – in specific circumstances, listed in the European legislation – be exempted from production rules and still have their produce certified organic. For instance, when organic seeds are not available on the market, farmers are allowed to use conventional, non-treated seeds. Other exemptions allow them to use non-organic animals. ***Do you think these exemptions should continue?***

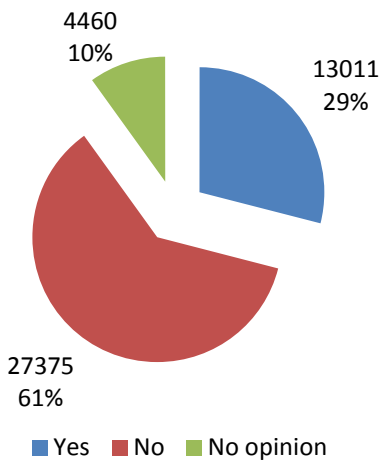


Figure 61 Number and percentage share of replies on necessity for continuation of exemptions from production rules in specific conditions while maintaining a permission to certify products as organic

Most of the respondents (61%, 27375), definitely discredited the continuity of exemptions from production rules in specific conditions with simultaneous maintenance of permission to certify such products as organic. The opposite desire was expressed only by 29% (13011) of respondents. In turn, 10% (4460) of repliers did not express their view (see Figure **61**).

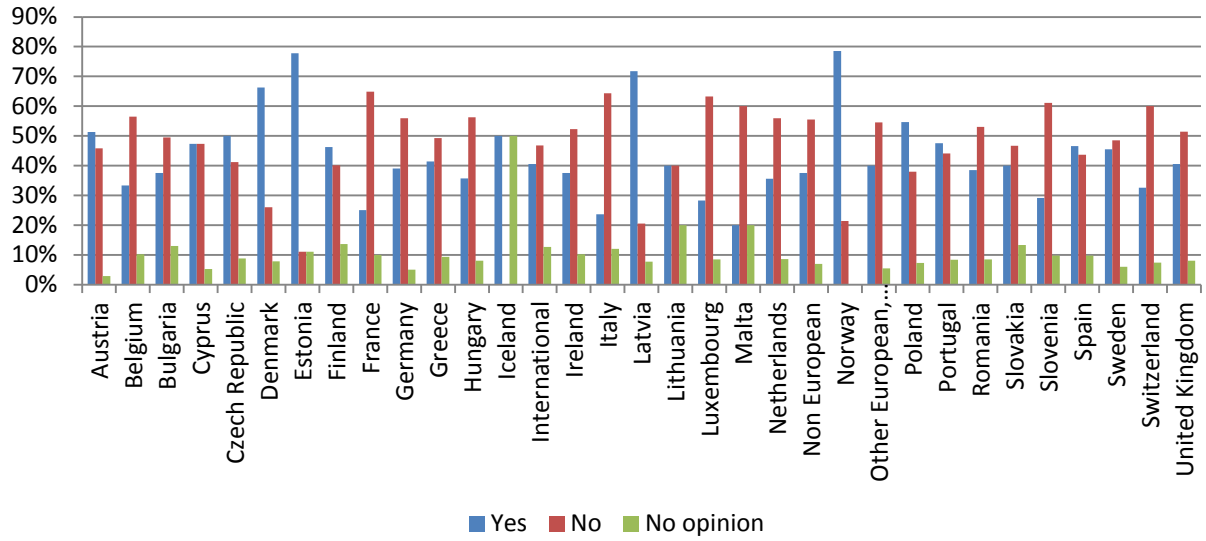


Figure 62 Percentage share of replies on necessity for continuation of exemptions from production rules in specific conditions while maintaining a permission to certify products as organic by country

According to the results presented on Figure 62, the distribution of answers differed a lot according to the country of origin of the respondent. Most of the respondents from Belgium, Bulgaria, France, Germany, Hungary, Ireland, Italy, Luxembourg, Malta, Netherlands, Non-European, other European non-EU, Romania, Slovenia, Switzerland and United Kingdom

were against the continuation of exemptions from organic farming rules. The majority of interviewees from Denmark, Estonia, Latvia, Norway and Poland declared that the derogations should still exist in organic farming regulations. In the remaining countries the percentage share of respondents in favour of prolongation of exceptions from the organic rules was comparable to those against it (see Figure 62).

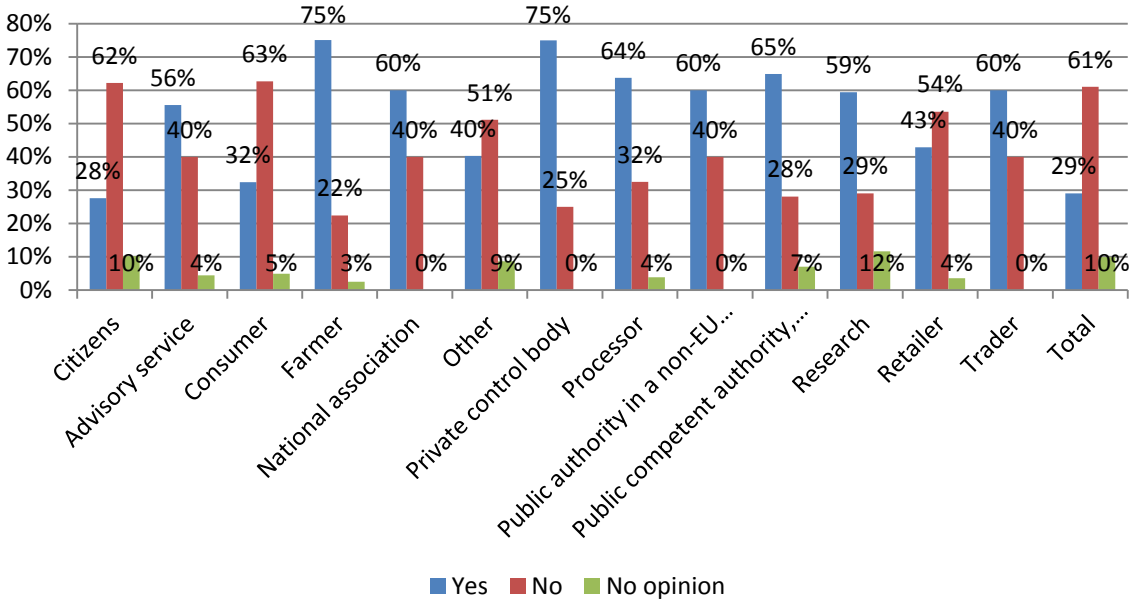


Figure 63 Percentage share of replies on necessity for continuation of exemptions from production rules in specific conditions while maintaining a permission to certify products as organic by category of stakeholders

Various categories of stakeholders had very different views on the necessity for continuation of exemptions from production rules in specific conditions while maintaining a permission to certify products as organic. The majority of questioned citizens (62%) and stakeholders representing consumers (63%) and retailers (54%) did not approve the possibility for farmers and other operators to be exempted from production rules and still have their produce certified organic under specific circumstances, listed in the European legislation. The interviewees representing the view of farmers (75%), private control bodies (75%), public competent authorities, public control authorities, accreditation bodies (65%), processors (64%), traders (60%), public competent authorities in non-EU countries (60%), national associations (60%), researchers (59%) and advisory services (56%) were mostly in favour of the allowing derogations from production rules in special circumstances with the possibility to label products as organic. However, it should be noted, that in case of advisory services, national associations, non-EU public authorities, retailers, traders and others the difference in percentage share between the negative and positive approach towards the issue of exemptions was not unequivocal (see Figure 63).

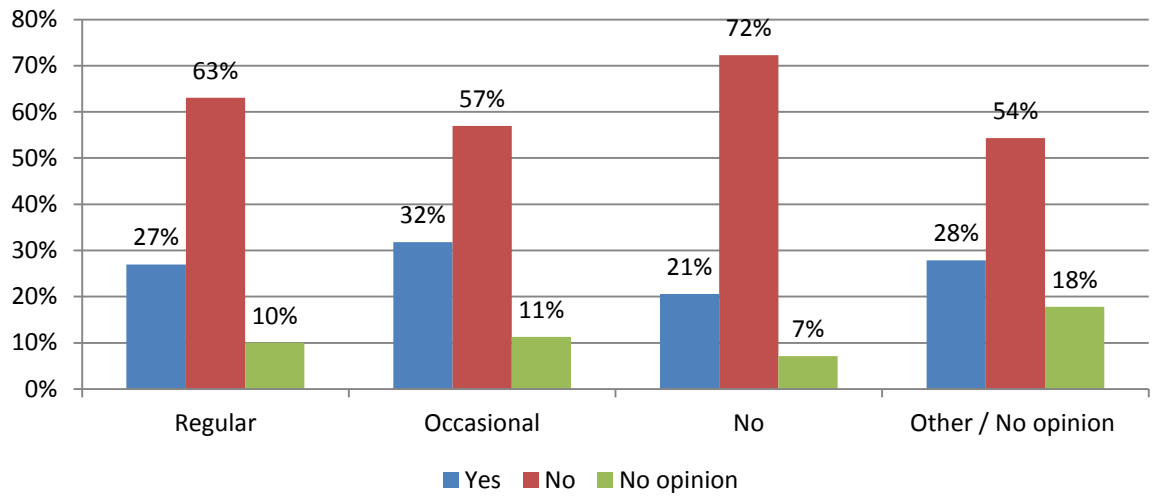


Figure 64 Percentage share of replies on necessity for continuation of exemptions from production rules in specific conditions while maintaining a permission to certify products as organic by regularity of consumption of organic products

Figure 64 illustrates that the questioned private consumers are basically against the possibility for organic farmers and other operators to be exempted from production rules and still have their produce certified organic in specific circumstances, listed in the European legislation. In detail, as many as 63% and 57% of respectively regular and occasional buyers of organic products wanted to discontinue the provision that allows exemptions from production rules in specific conditions. In the same groups 27% and 32% of the respondents were of the opposite opinion. Within the group of consumers, which did not buy organic products, 72% were against the continuation of derogations and 21% in favour of it.

Question no. 4.12 Should these exemptions from production rules granted to farmers and other operators always be limited in time?

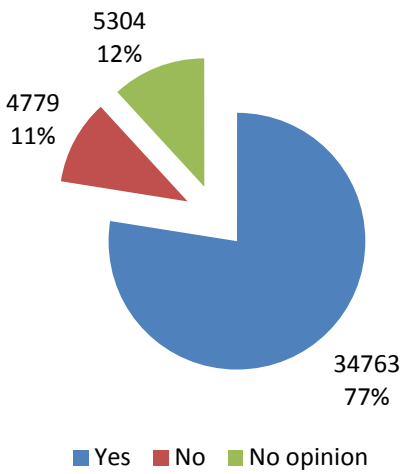


Figure 65 Number and percentage share of replies on necessity for limitation in time the individual exemptions from production rules granted to farmers and other operators

The largest part of respondents, i.e. 77% (34763), agreed that exemptions from production rules granted to farmers and other operators should always be limited in time. Of the opposite opinion were approximately 11% (4779) respondents. Roughly 12% (5304) of repliers did not have any attitude towards this issue (see Figure **65**).

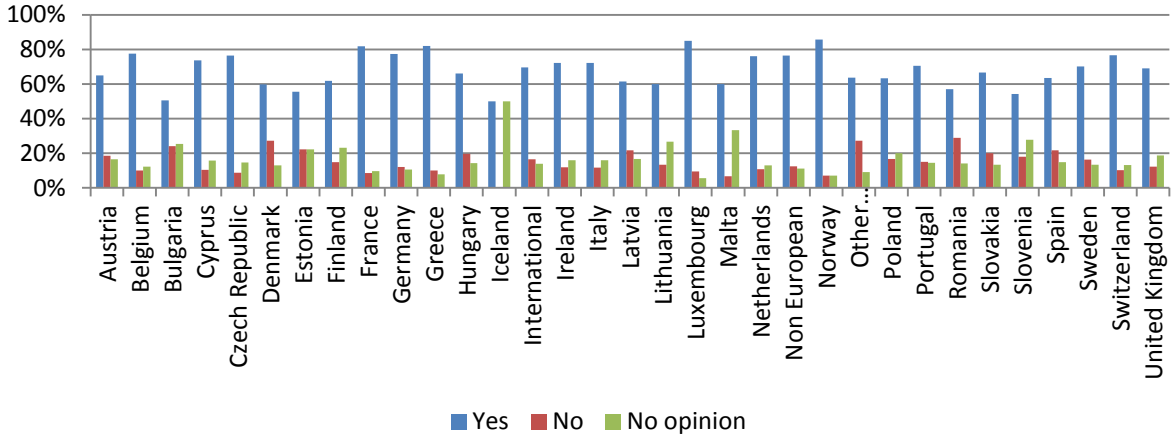


Figure 66 Percentage share of replies on necessity for limitation in time the individual exemptions from production rules granted to farmers and other operators by country

In all countries most of the respondents agreed that the exemptions from production rules granted to farmers and other operators should be limited in time. Of the opposite view were only about 10-25% of respondents from each of the countries (see Figure 66).

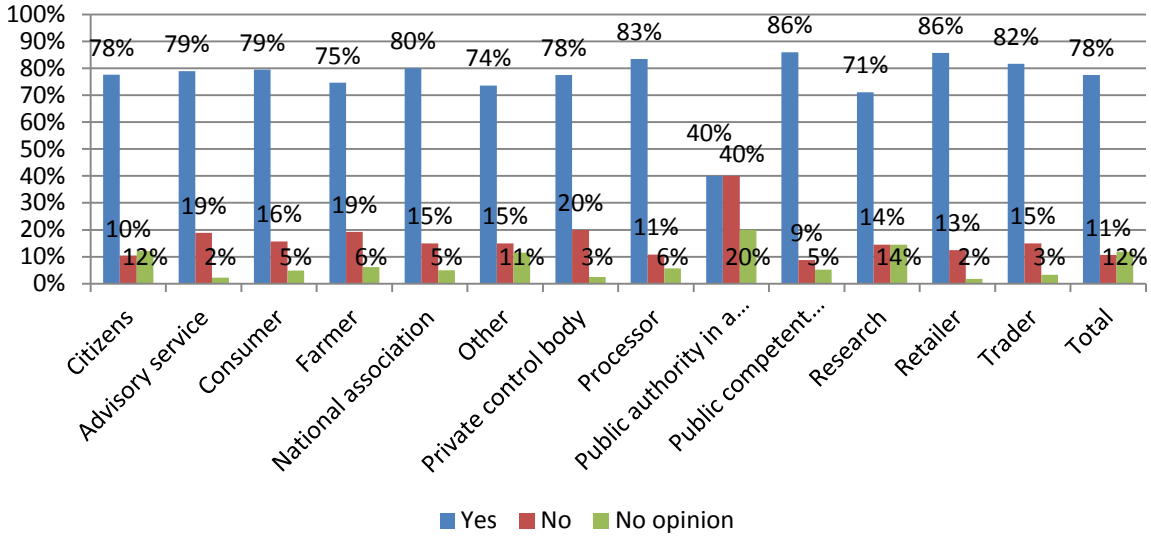


Figure 67 Percentage share of replies on necessity for limitation in time the individual exemptions from production rules granted to farmers and other operators by category of stakeholders

Figure 67 demonstrates that the vast preponderance of respondents (74-86%) representing almost all categories of stakeholders, except for non-EU public authorities (40%), approved the idea to limit the granted exemptions in time. On the contrary, the minority of interviewees (9-20%) in each group representing different stakeholders, with the exception of non-EU public authorities (40%), declared that the individual exemptions from production rules granted to farmers and other operators should not be limited in time.

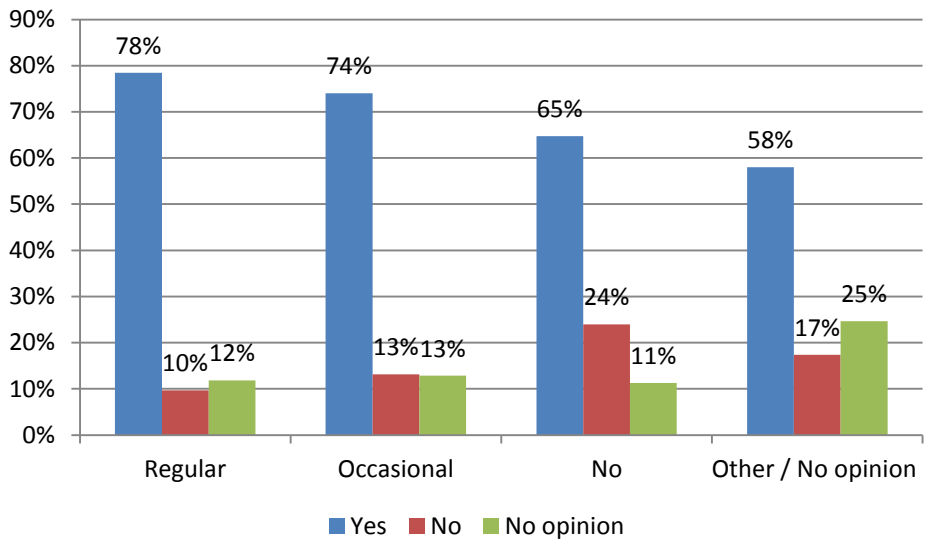


Figure 68 Percentage share of replies on necessity for limitation in time the individual exemptions from production rules granted to farmers and other operators by regularity of consumption of organic products

Most of private consumers (58-78%), irrespective of the regularity of their consumption of organic products, claimed that the derogations from production rules given to organic farmers and other operators should definitely be limited in time. This idea received the strongest support from the regular (78%) and occasional (74%) purchasers of organic products. On the other hand, it should be noted that almost one quarter of the interviewed "non-organic" consumers declared that there is no need for a limitation in time of exemptions from production rules (see Figure **68**).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

With regard to exceptional rules, in most of the free contributions the European citizens expressed their disapproval to the existence of a large number of exceptions in the EU Organic Regulation, except for some specific cases. For instance, derogations should be allowed in order to help the economic development of the small farms or to give time for the organic market to develop.
Some examples:

- *"Each derogation should be put on public consultation and consultations with industries." (EN 100)*
- *"Derogations should stay for seed and animal, until there will be abundance on the market. Derogations should be limited in time and should also be regularly reviewed in order to decide whether they are still needed or not." (DE)*
- *"In organic farming any compromise is allowed, as otherwise the certification would lose sense. The proposition is to develop additional rules to describe/label products that do not comply with OF rules in 100% as "almost organic" and allow the consumers to choose if they want the product or not. This would help the small farms that could have many additional advantages e.g. local production with local human resources, etc." (DE 031)*
- *"Derogations and exceptions only for small farmers and small enterprises." (DE)*
- *"The regulations should take into account the size of the farm." (EN 104)*

4.5. Local origin of feed

Question no. 4.13 Under organic livestock production rules, animals should be fed with organic feed primarily obtained from the farm where the animals are kept or from other organic farms in the same region. For herbivores like cows, sheep and goats, at least 60% of the feed must come from the same farm (or, if not possible, the same region). For pigs and poultry, this minimum is 20%. ***Do you think organic livestock should be fed with:***

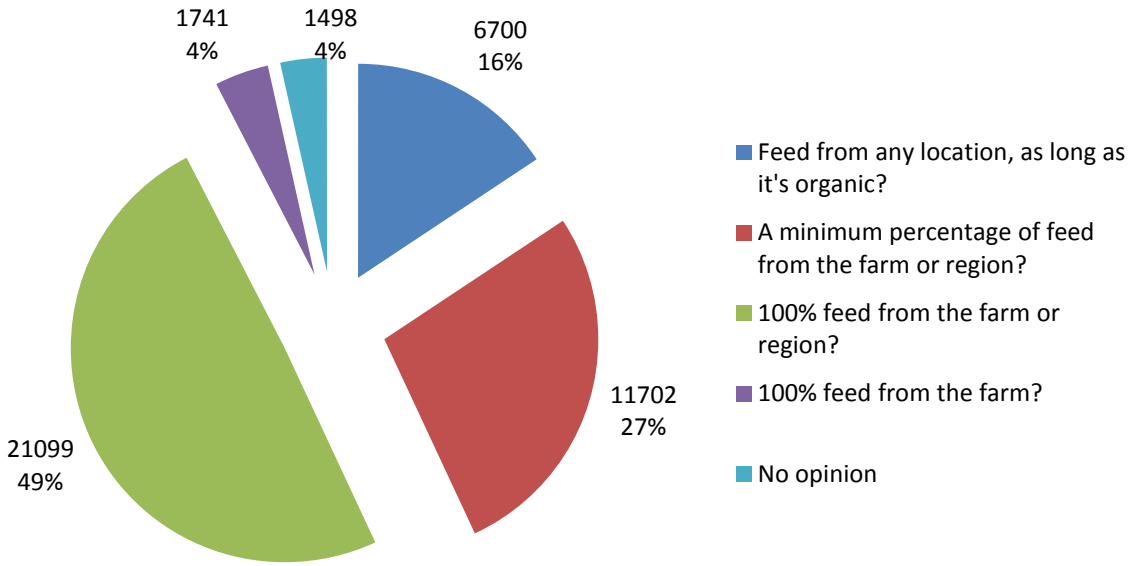


Figure 69 Number and percentage share of replies on preferred origin and quality of feed used in organic livestock production: distribution of replies among 42740 records with registered answer

Nearly half (and simultaneously the majority) of the respondents, i.e. 49% (21099), clearly stated that organic livestock should be fed with 100% feed from the farm or region. More than one quarter of respondents (27% , 11702), opted for setting a minimum percentage of feed for organic livestock that should be from the farm or region. Moreover, 16% (6700) of respondents claimed that as long as feed is of organic quality, it could come from any location. Only 4% (1741) of the respondents demanded 100% of feed to be from the farm (see Figure 69).

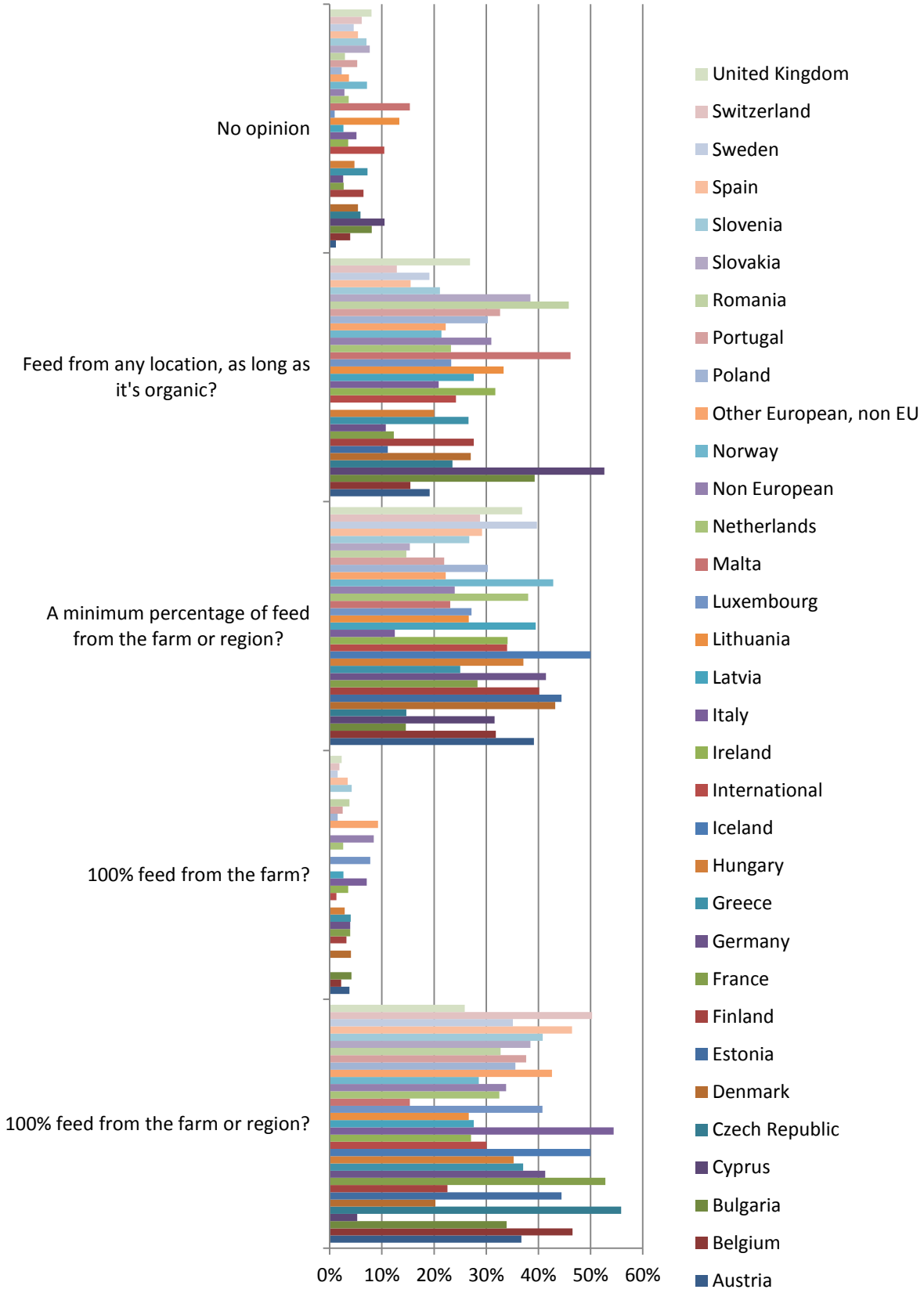


Figure 70 Percentage share of replies on preferred origin and quality of feed used in organic livestock production by country

As presented on Figure 70, with some exceptions, the respondents from different countries tend to reply similarly. Feeding systems in organic livestock production consisting of 100%

feed from farm or region was requested by as many as around 40-60% of respondents from Switzerland, Spain, Slovenia, Slovakia, Portugal, other European non-EU, Luxembourg, Italy, Iceland, Greece, Germany, France, Estonia, Czech Republic and Belgium. Only a small part of responses from Cyprus, Malta, Finland and Denmark was in favour of the proposal for organic feeding systems based on 100% feed from farm or region. In the remaining countries approximately 25-35% of the repliers opted for this possible answer. Stronger than the general population support (of around 40% and more) from Sweden, Norway, Latvia, Iceland, Germany, Finland, Estonia, Denmark and Austria was given to the proposal to feed animals in organic systems with a required minimum percentage of feed from the farm or region. Particular emphasis on the organic quality of feed irrespective of the place of origin was requested especially by questioned citizens from Slovakia, Romania, Portugal, Poland, non-European, Malta, Lithuania, Ireland, Cyprus and Bulgaria. Practically without significant exceptions citizens from all countries vary rarely preferred to feed the organic livestock with 100% feed from the farm or had no opinion on this matter.

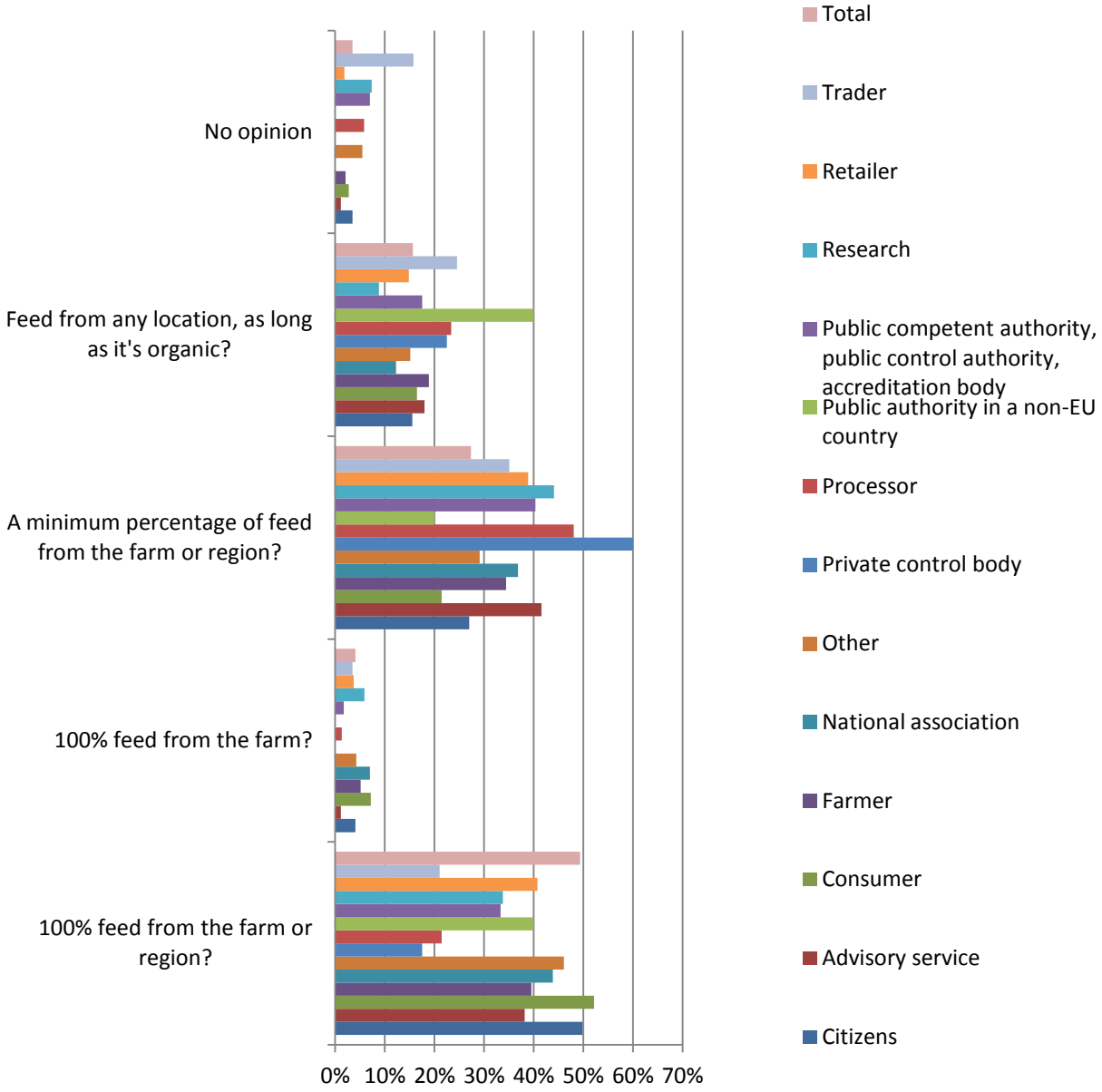


Figure 71 Percentage share of replies on preferred origin and quality of feed used in organic livestock production by category of stakeholders

Among the preferred responses, were: '100% feed from the farm or region' and 'a minimum percentage of feed from the farm or region',. For approximately 50% of respondents representing consumers and citizens it was important that 100 % of feed would be sourced from the farm or region. On the other hand, traders, processors and private control bodies were not particularly interested in such a provision. The situation was different with regard to the proposal of setting a minimum percentage of feed to be sourced from the farm or region. Here, more than 30% of respondents representing almost all categories of stakeholders, except for public authorities in a non-EU country, consumers and citizens, were in favour of the idea to pose such a rule of minimum percentage of feed from the farm or region. With a similar frequency of around 10-20% of questioned stakeholders, exclusive of traders (25%) and public authorities in non-EU country (40%), chose the answer that feed could be from any location, as long as it's organic (see Figure 71).

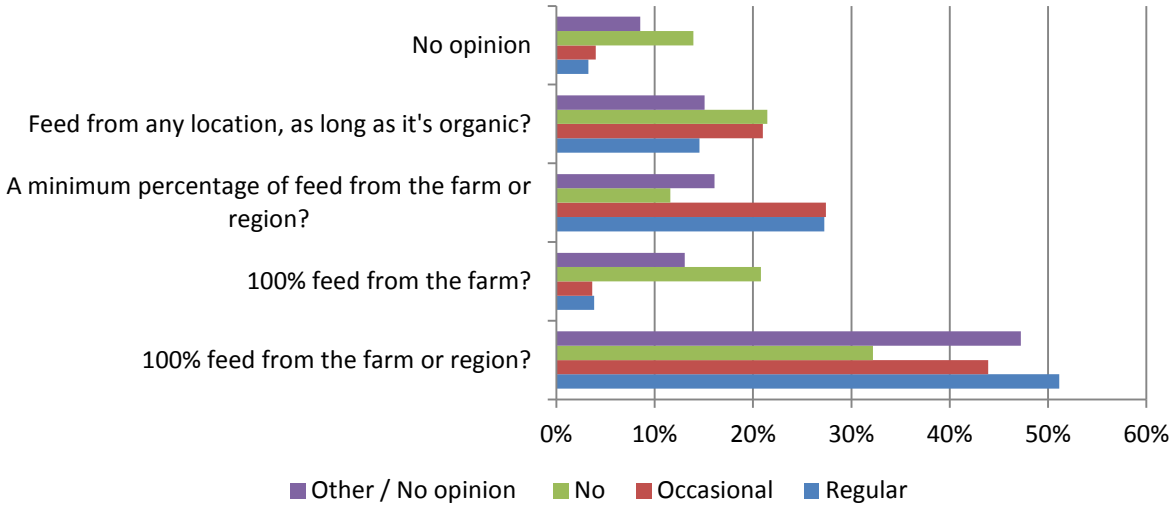


Figure 72 Percentage share of replies on preferred origin and quality of feed used in organic livestock production by regularity of consumption of organic products

Figure 72 presents preferences of consumers divided into groups based on their regularity of organic products consumption with regard to origin and quality of feed used in organic livestock production. It appeared that 40-50% of occasional as well as regular organic products buyers wanted to force the farmers to source 100% of feed from the farm or region. However, more than 30% of so-called "non-organic" consumers also strongly opted for this option. Furthermore, around 25% of consumers, who claimed to buy organic products on occasional as well as on regular basis, preferred the feed to be sourced in an obligatory minimum percentage from the farm or region. On the contrary to very low percentage of regular, occasional consumers, a bit more than 20% of respondents, who declared themselves as "non-organic" buyers, chose the option that the feed should be 100% from the farm. In addition, similar percentage of repliers, who purchase organic products occasionally or not at all, did not pay attention to the origin, but to the organic quality of the utilized feed.

Question 4.14 To ensure a healthy, balanced and complete diet for farm animals, their feed ration must include sufficient quantities of proteins. As Europe does not produce enough organic protein-feed supplies, it has to import organic soya or other organic protein-rich feed. ***Do you think that:***

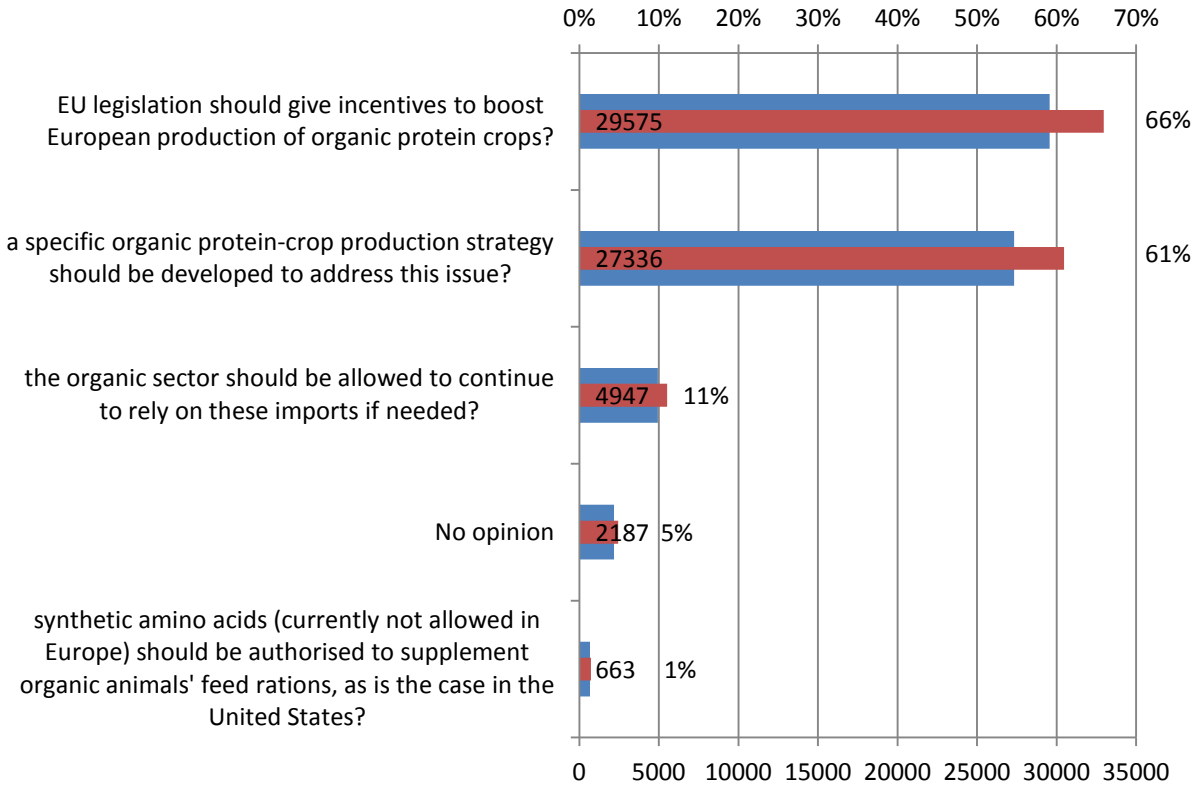


Figure 73 Number and percentage share of replies on solutions for completion of organic protein-rich feed supplies shortages in Europe

The majority of the respondents (66%; 29575) stated that the effective solution for reduction of insufficiency in terms of organic protein-rich feed in Europe was to introduce in the EU legislation initiatives to boost European production of organic protein crops. Furthermore, as many as 27336 (61%) of citizens found that in order to address this issue a specific organic protein-crop production strategy should be developed. Only 11% (4947) claimed that the organic sector should be allowed to continue to rely on these imports if needed. A marginal percentage of respondents, namely 5% (2187) and 1% (663) did not have opinion on this issue or supported the idea that synthetic amino acids (currently not allowed in Europe) should be authorised to supplement organic animal's feed rations, as is the case in the United States (see Figure 73).

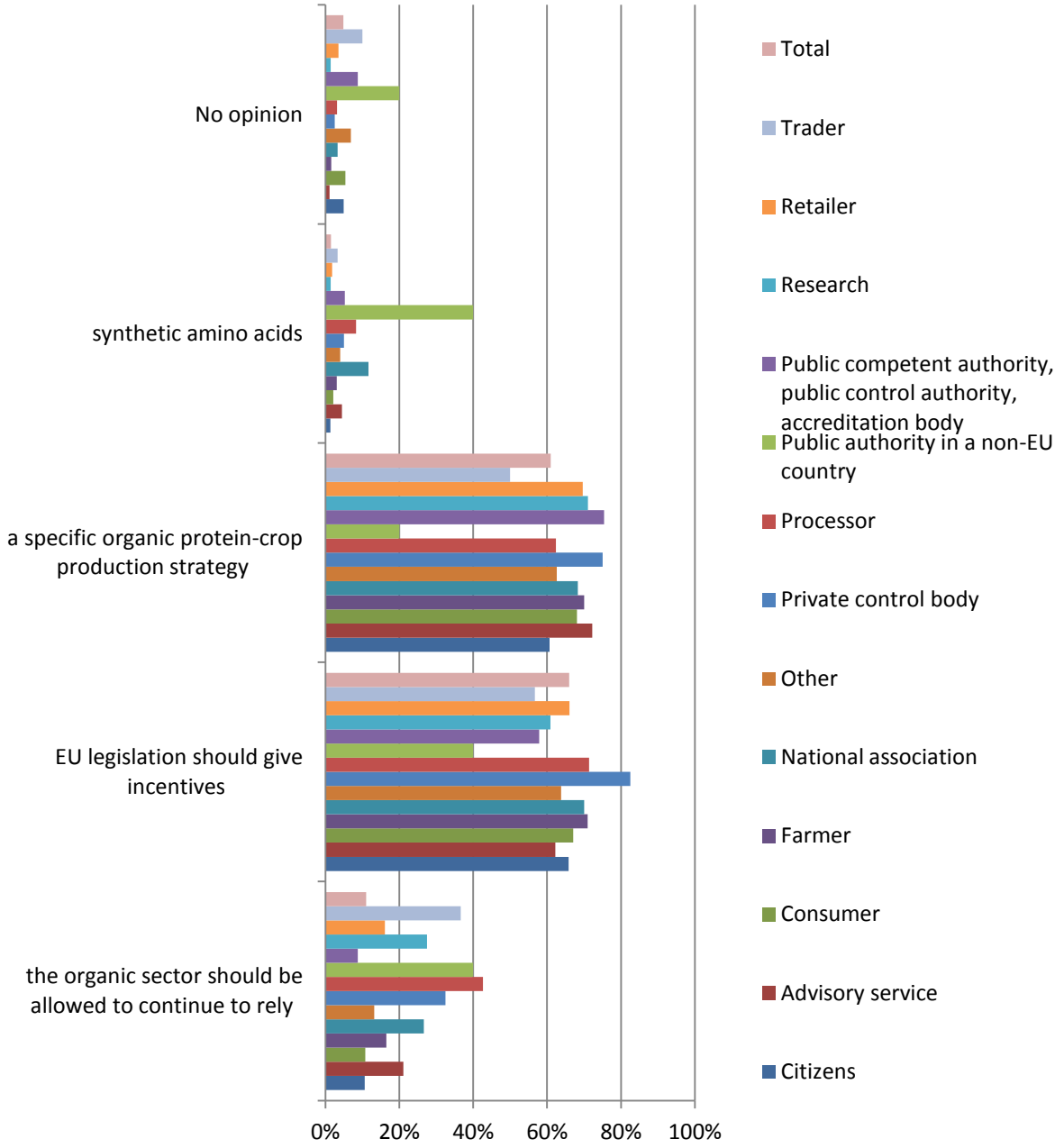


Figure 74 Percentage share of replies on solutions for completion of organic protein-rich feed supplies shortages in Europe by category of stakeholders

Figure 74 presents the opinion on the solutions for completion of organic protein-rich feed supplies shortages in Europe expressed by different categories of stakeholders. It appeared that the majority of respondents from all categories of stakeholders proposed to solve the problem either by introducing appropriate initiatives in the EU legislation or by a specific organic protein-crop strategy. Quite a significant number of respondents representing traders, researchers, public authority in a non-EU country, processors as well as private control bodies and national associations declared that a solution for insufficient organic protein-rich feed would be to allow the organic sector to rely on imports. The remaining groups of stakeholders also opted for the option but to a significantly lesser extent.

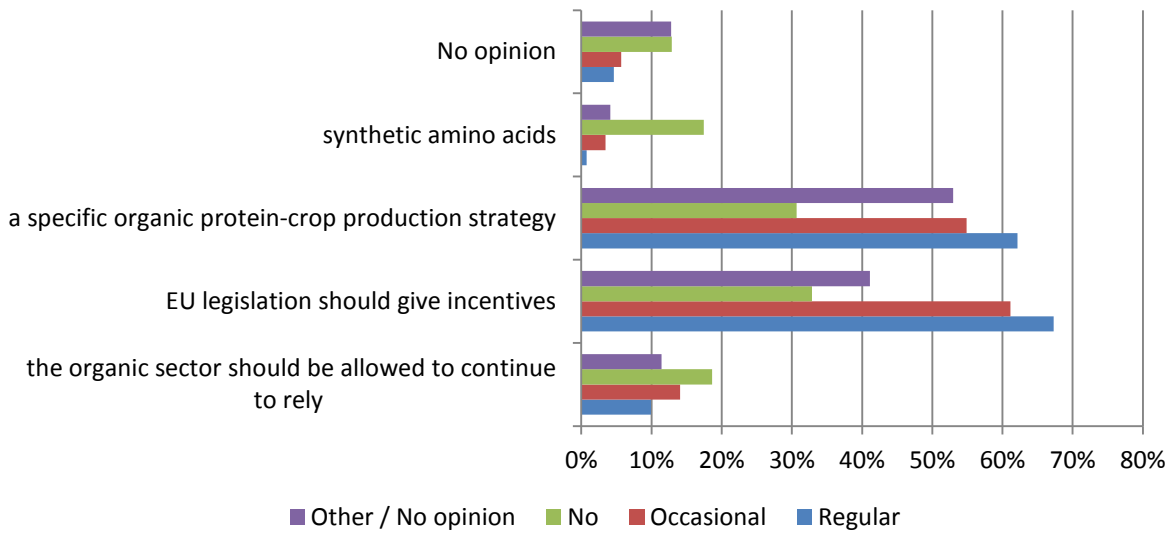


Figure 75 Percentage share of replies on solutions for completion of organic protein-rich feed supplies shortages in Europe by regularity of consumption of organic products

The majority of respondents from groups of regular, occasional and "other/no opinion" organic products consumers and to a lesser extent , from category of non-organic buyers, claimed that the two most effective would be either initiatives throughout EU legislation and/or specific strategy for organic protein-crop production. The option to allow the sector to rely on imports of protein-rich feed got marginal support, mostly by non-organic consumers. The same tendency appeared in terms of the proposed solution of permission to use synthetic amino acids (see Figure 75).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

- *"60 % of animal feedstuff (for cows, cattle, goat and sheep) should come from the farm. For pigs and poultry should come a minimum feed stuff percentage of 20% from the farm; Setting up a scheme for an early warning system for GMO residues. Conventional farming must respect the environment and have to include the same environmental aspects as organic farming." (IT 016)*
- *"Livestock should not be fed by vegetal proteins produced on the other side of the world. Reasons are in particular : carbon footprint should be taken into account, there is not enough control on quality and traceability of overseas productions, and for ages Europe has fed her livestock with local cereals, why shouldn't be possible nowadays. The trend seems to lower the consumption of meat, better than importing cereals to grow up the livestock." (FR)*
- *"Feed mainly for the same farm or at least form the region; protein-rich feed from Europe." (DE 152)*
- *"A clearly defined percentage of feed from the same establishment or from the same region is a good compromise between labour and environmental principles. However, it is not possible to obtain 100% of the feed by one farm or in one particular region. / Synthetic amino acids are unacceptable." (DE EC2)*
- *"The organisation find it controversial that why in the U.S. synthetic amino acids are allowed to be used, while in Europe they are forbidden, as supplements in animal feed. Leading experts of organic animal feeding almost all German organic farming*

associations think this should be possible as an emergency regulation to ensure appropriate nutrition of monogastric." (DE205)

4.6. Animal welfare

Question no. 4.15 Which of the following statements do you agree with?

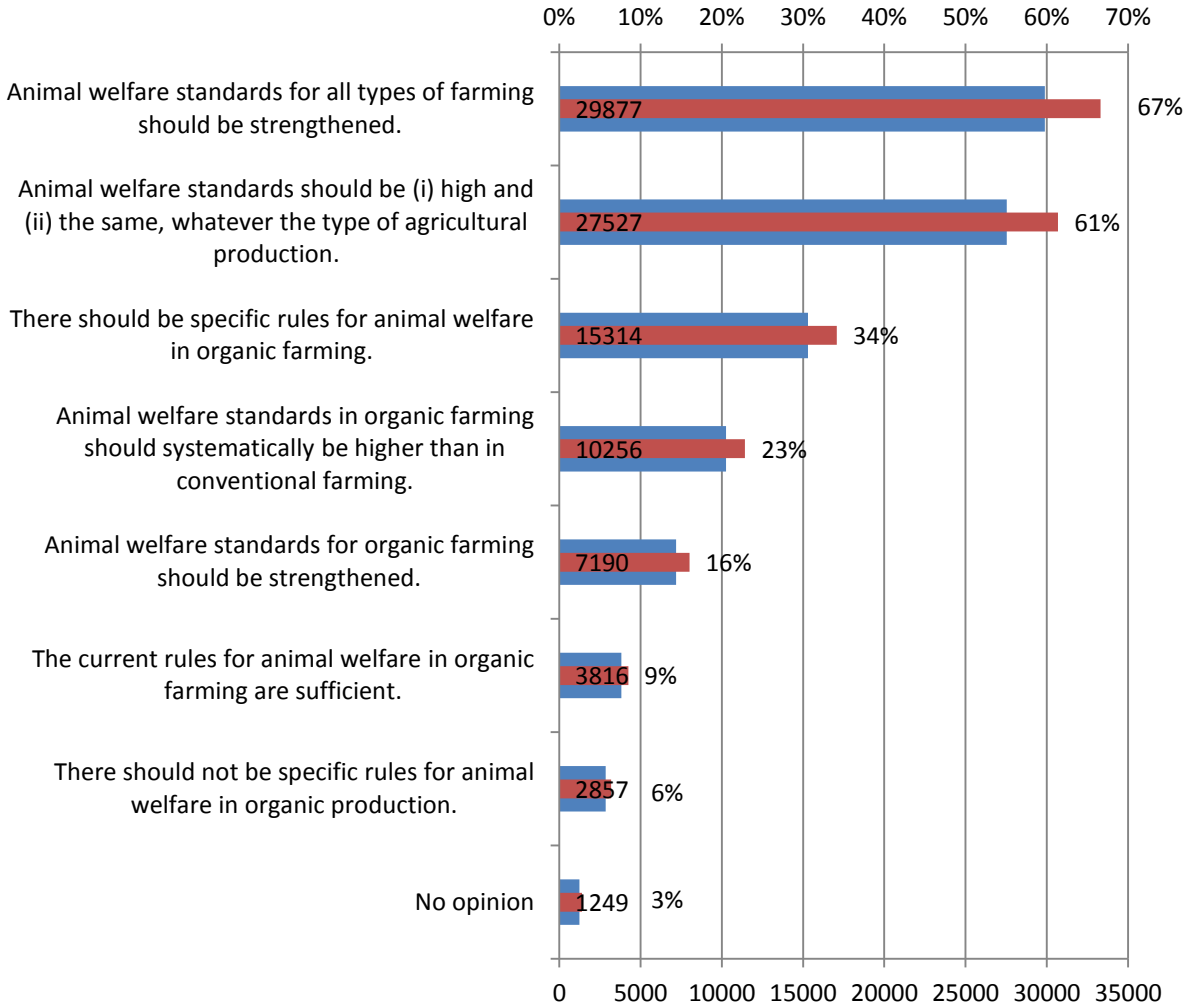


Figure 76 Number and percentage share of replies on animal welfare standards

Figure 76 presents the opinion on animal welfare in relation to EU organic production standards. It appeared that the majority of respondents i.e. 67% (29877) and 61% (27527) strongly insisted on respectively strengthening animal welfare standards for all types of agricultural production systems. More than one third of respondents (34%; 15413) underlined that organic farming producers should be obliged to comply with specific rules for animal welfare. Only 6% (2857) of respondents were of the opposite opinion, namely 'no need for specific animal welfare standard for organic farming'. Strengthening of the animal welfare rules with regard to specifically organic farming was requested only by 16% (7190) of the respondents. In addition, around one quarter (23%; 10256) of respondents opted for the proposal that animal welfare standards in organic farming should systematically be higher than in conventional farming. On the contrary, 9% (3816) of interviewees declared that current rules for animal welfare in organic farming are sufficient. 3% of repliers did not express their opinion on this issue.

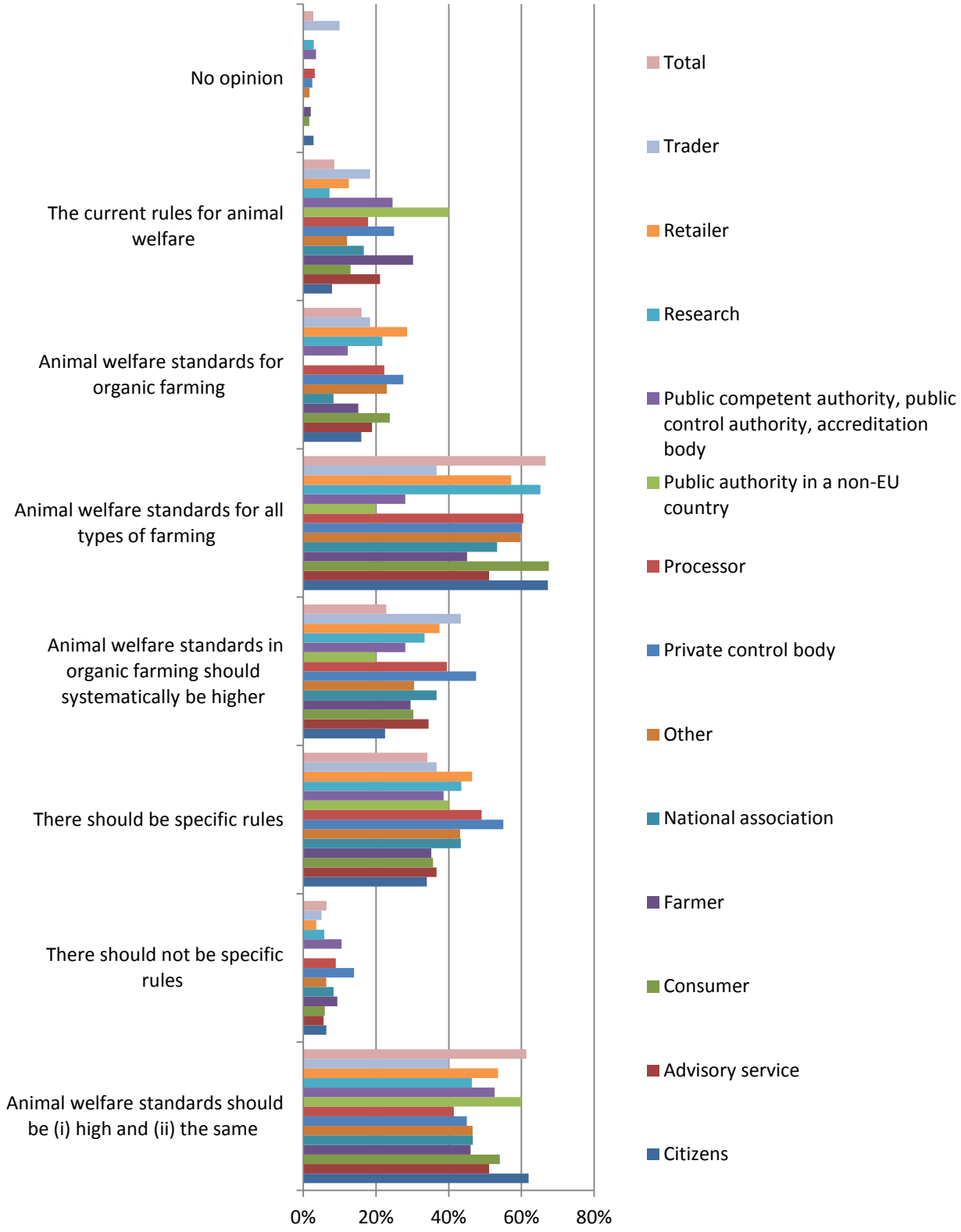


Figure 77 Percentage share of replies on animal welfare standards by category of stakeholders

The different categories of stakeholders relatively evenly and in line with the general tendency opted for the particular options with regard to animal welfare standards and organic livestock production. Without exceptions, they wanted mainly the animal welfare standards to be high and the same for all farming systems. Furthermore, the majority of respondents from almost all groups, except for researchers, public competent authorities as well as non-EU

public authorities, strongly demanded animal welfare standards for all types of farming. Furthermore, all categories of stakeholders similarly high ranked the proposals for specific rules of animal welfare only for organic farming and systematic augmentation of animal welfare standard in organic farming. The remaining options gained from most of the interviewed publics significantly less attention than the one discussed (see Figure 77).

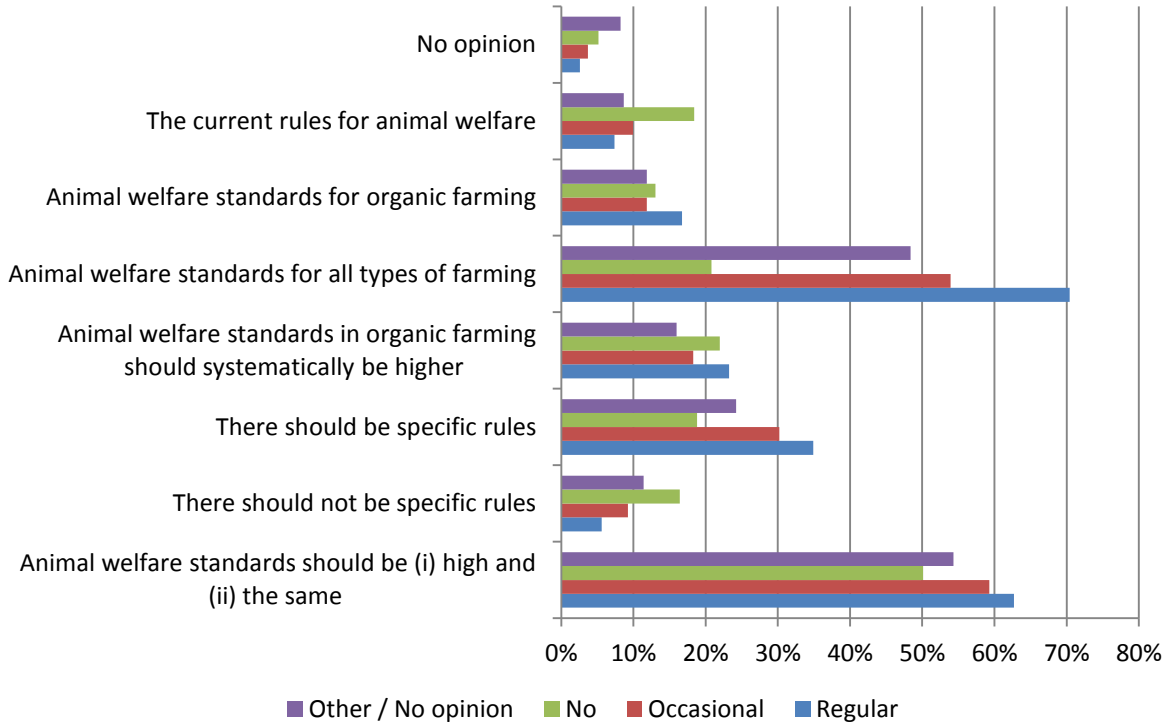


Figure 78 Percentage share of replies on animal welfare standards by regularity of consumption of organic products

As far as consumers' attitude towards animal welfare is concerned, it appeared that predominantly most of respondents irrespective of the group declared that the standards should be high and the same throughout all agriculture production systems. At a similar level by almost all groups of questioned private consumers, except for non-organic consumers, the idea that animal welfare rules should be the same for all types of farming was strongly supported. Significant part of the regular and occasional consumers demanded also specific rules for animal welfare in organic farming. The remaining options were chosen by all the categories of interviewed private consumers (see Figure 78).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

There is a need highlighted by the citizens to review the organic poultry rules:

- *"Especially, regulations could be strengthening for the requirements for imports, control, poultry production, greenhouse production, environmental services."*
- *"There is no need to change the regulations, as they are really good and on high level. Only small detailed technical changes could be done in terms of greenhouse and poultry production." (DE045)*

There are several remarks concerning the use of allopathic and chemically synthesized in the regulation:

- *"The word ""allopathic"" and ""chemically synthesised"" used in 834/2007 in veterinary treatment section- are not purely technical expressions and inappropriately used in this text of the Regulation; technical documents should read as technical documents, using valid scientific terminology; the expressions undermine the idea of organic farming." (EN113)*
- *"The term "allopathic" has no scientific meaning and no place in an official document. It was invented by Samuel Hahnemann, inventor of homeopathy, to characterise and demonise all approaches other than homeopathy. Every approach other than homeopathy is allopathic, that is tending to counter the disease rather than use the principle of "like cures like". The reason that only homeopathy uses "like cures like", and all other approaches are by definition "allopathic", is that like does not cure like, so nobody else uses this approach. It is, quite simply, wrong."*

Globally there is a demand from the citizens to strengthen the animal welfare:
- *"Extension of organic origin for parents and grandparents animals." (DE EC1)*
- *"Welfare standards for all farming should be strengthened and systems with limited potential should be avoided or clearly identified and labelled."*
- *"Stricter rules for slaughter houses regarding animals from organic farming."*
- *"Strengthen the regulation of livestock farming in organic and conventional farming (more species-appropriate)."*

4.7. Procedure for authorising substances

Question no. 4.16 Please rate the following categories of substance according to how much authorisation you think should be required for their use in organic farming and production – from 1 (very strict – no substances allowed) to 4 (all substances possible are allowed):

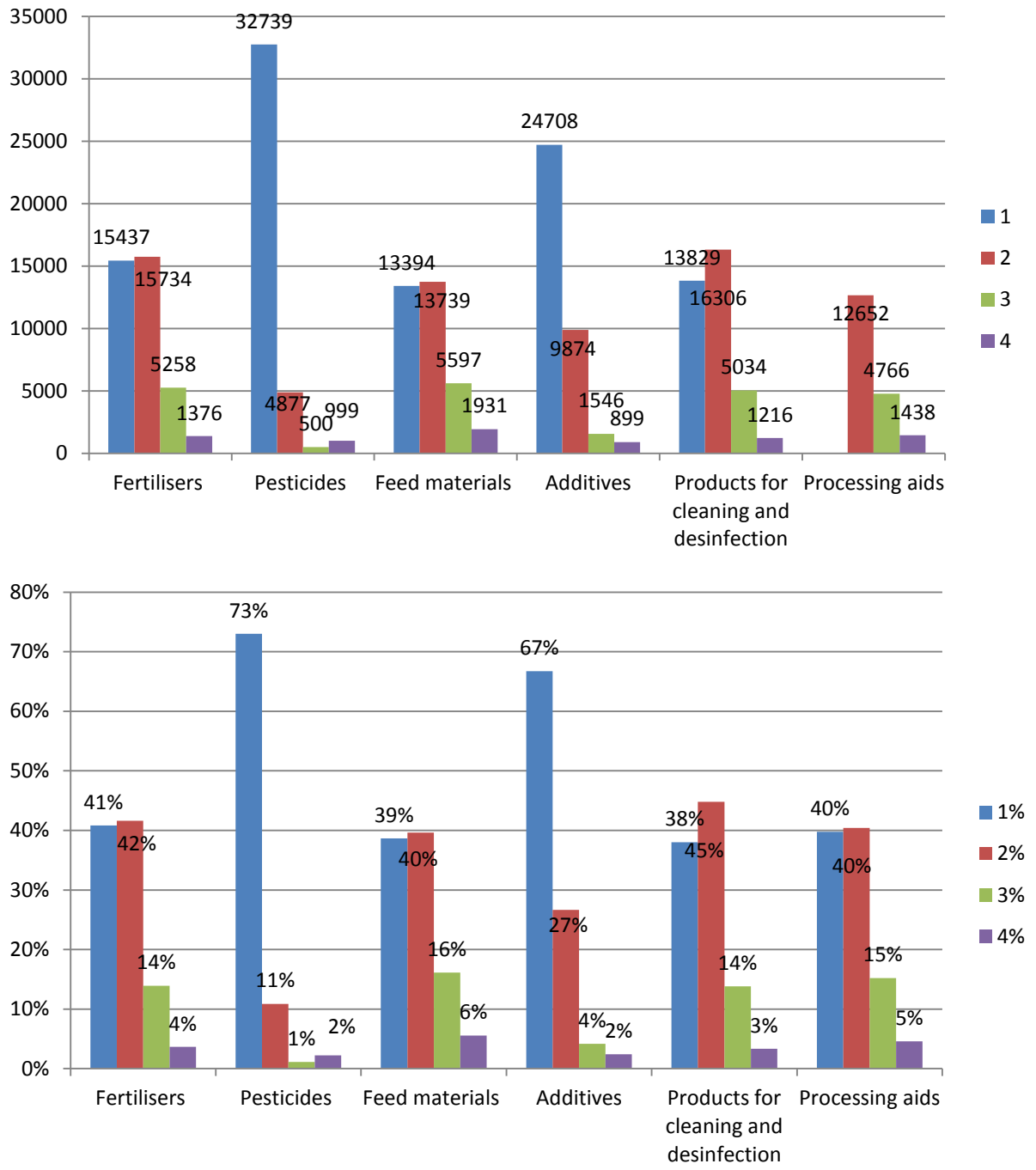
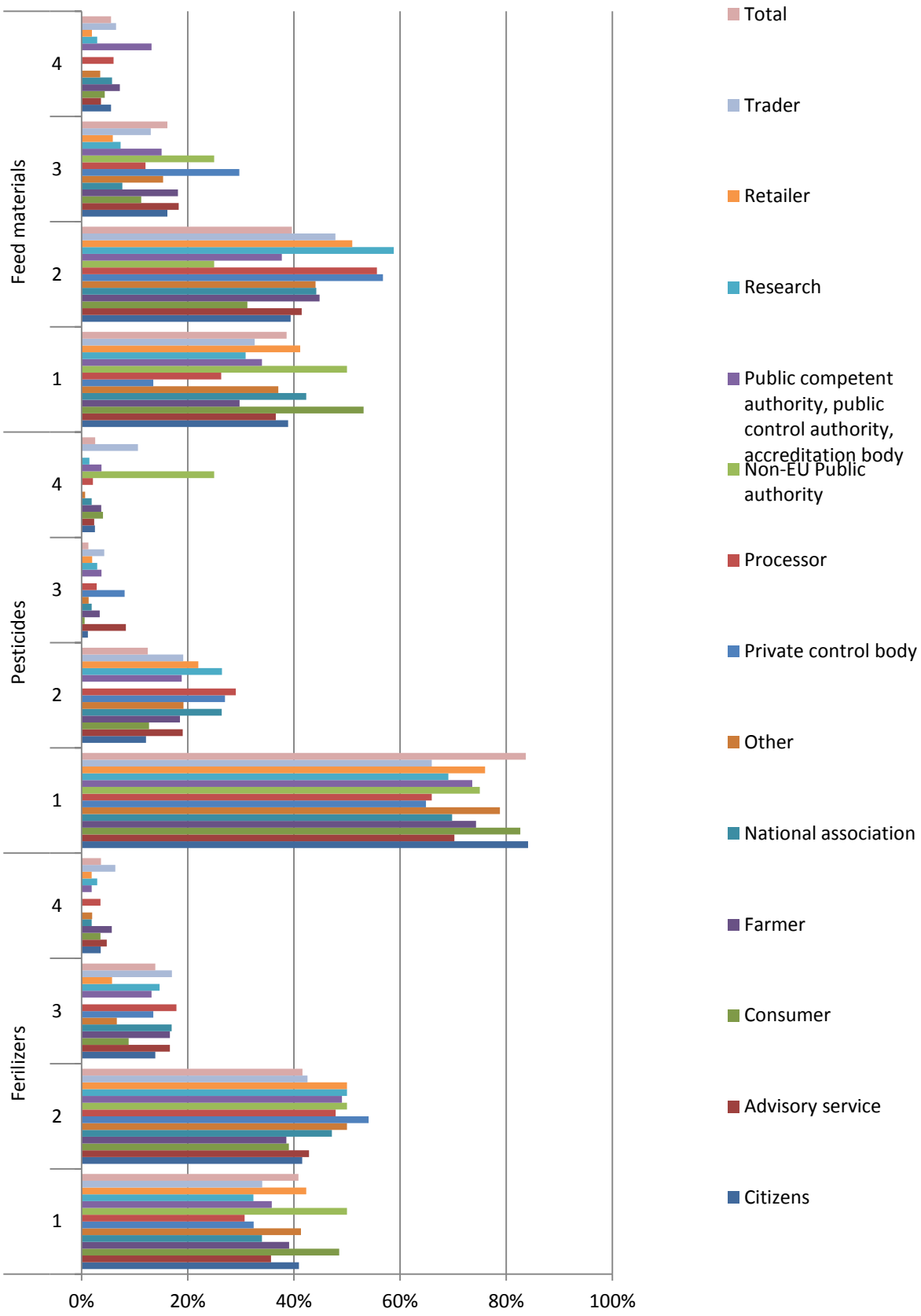


Figure 79 Number and percentage share of replies on the level of necessary strictness for authorisation of different categories of substances: distribution of replies among the following number of records in respective categories: fertilizers – 37805, pesticides – 39115, feed materials – 34661, additives – 37027, products for cleaning and disinfection – 3638, processing aids – 31312 and no opinion – 3230 with registered answer

In the view of questioned citizens the strictest rules in terms of authorisation of substances should apply to pesticides and additives. Almost three quarters (73%; 32739) and 67%;

(24708) of respondents demanded that respectively pesticides and additives should not be allowed at all in organic farming production. Additionally, 11% and 27% of interviewees indicated that the authorisation of pesticides and additives respectively should be possible, but the procedure should be very strict. Only a vast minority of respondents (1-4%) in both cases opted for more liberal authorisation rules. With regards to fertilizers, feed materials, processing aids and products for cleaning and disinfection, the public demanded also strict rules, but to a slightly lesser extent than in case of pesticides and additives. Namely, approximately 40% of questioned citizens requested either the complete ban or very strict provisions in terms of authorisation of fertilisers, feed materials processing aids and products for cleaning and disinfection. Furthermore 15% or 5% of interviewees had a more tolerant attitude towards the authorisation procedure of fertilisers, feed materials, processing aids and products for cleaning and disinfection and wanted respectively much more flexible rules or permission for unlimited use of the substances (see Figure 79).


Feed materials
Pesticides
Ferilizers
4
3
2
1
0%
20%
40%
60%
80%
100%
Total
Trader
Retailer
Research
Public competent authority, public control authority, accreditation body
Non-EU Public authority
Processor
Private control body
Other
National association
Farmer
Consumer
Advisory service
Citizens

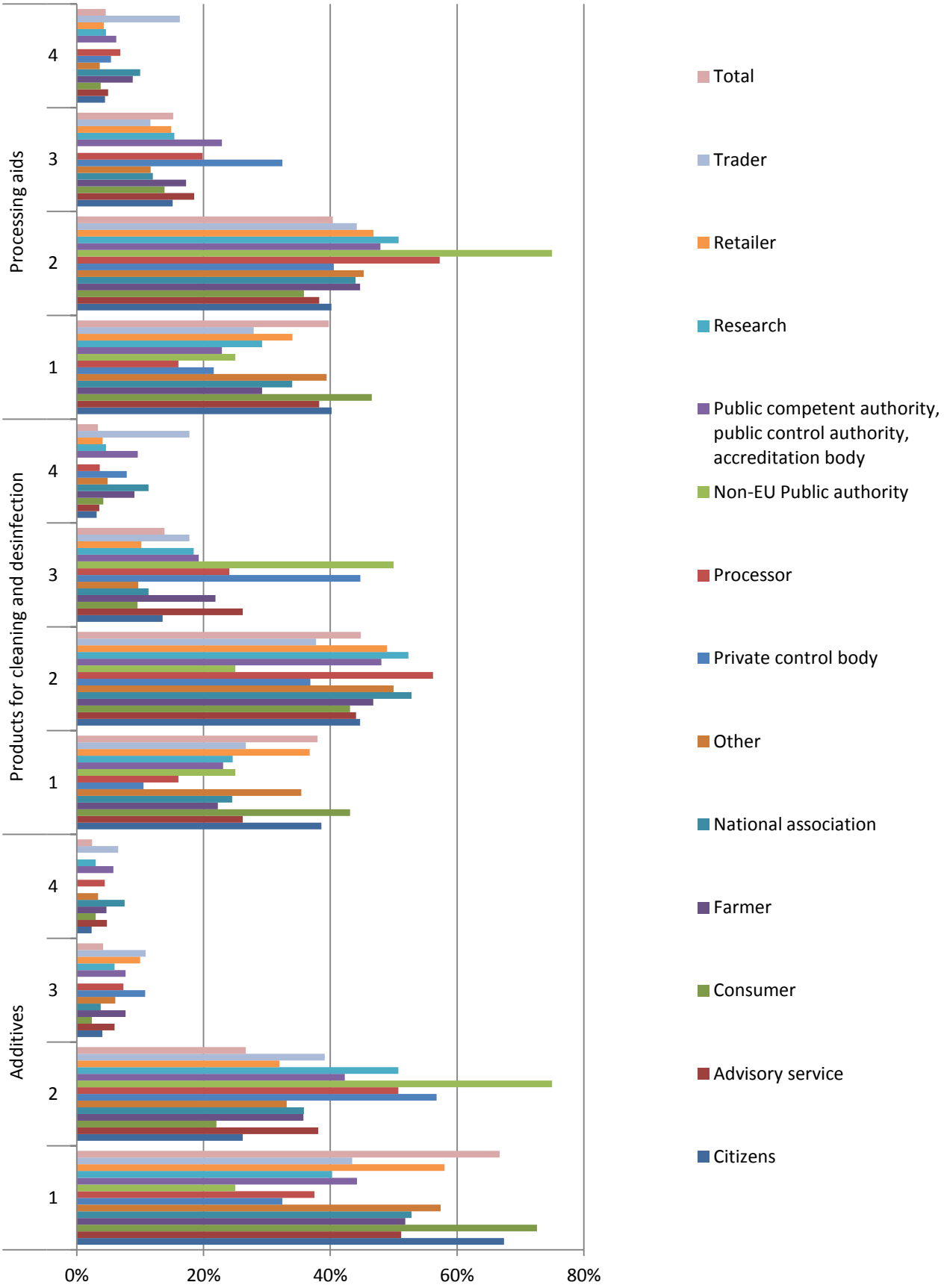


Figure 80 Percentage share of replies on the level of necessary strictness for authorisation of different categories of substances by category of stakeholders

Figure 80 presents the views of representatives of different categories of stakeholders on the required strictness of procedures aiming at authorisation of substances to be used in organic farming production. The results showed that although percentage share of replies differ among various stakeholders, the distribution of answers from almost each group is relatively similar to the tendency in the general results. With regard to pesticides the respondents representing each category of stakeholders support mainly a complete ban on the use of these substances or extremely stringent rules of authorisation. In relation to additives more than half (sometimes even nearly three quarters) of repliers representing mainly consumers and citizens, but also retailers and other categories strongly opted for the prohibition of use of additives in organic production. Of the same view were also the remaining groups of stakeholders, but with a slightly lower percentage share. Predominantly non-EU public authorities as well as researchers, processor and private control bodies wanted the additives to undergo very firm authorisation process before being allowed to organic production. In reference to fertilisers the different categories of stakeholders alike preferred either full ban on their use or very strict authorisation rules. As far as processing aids, products for cleaning and disinfection as well as feed materials are concerned, the predominance of one option over the other is not so clear. However, the majority of replies were in favour of imposing very strict authorisation rules. Above all, it should be noted that principally consumers opted for the ban of use of such groups of substances.

4.8. Environmental performance

Question no. 4.17 European legislation requires organic producers and traders to respect nature's systems and cycles; ensure the health of soil, water, plants and animals; contribute to a high level of biodiversity and make responsible use of energy and natural resources, such as water, soil, organic matter and air. ***Do you think that, in addition to these requirements, producers and traders should be required to implement an environmental management system to measure and evaluate their environmental performance and impacts?***

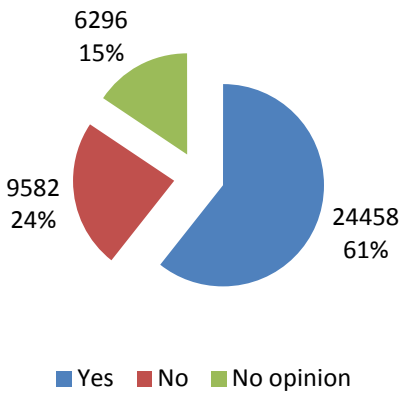


Figure 81 Number and percentage share of replies on necessity for enforcement of an additional requirement for producers and traders to implement an environmental management system to measure and evaluate their environmental performance and impacts: distribution of replies among 40336 records with registered answer

With regard to environmental performance, a large number of respondents, namely 24458 (61%) demanded that producers and traders should be required to implement an environmental management system to measure and evaluate their environmental performance and impacts in addition to other European requirements. 24% (9582) of questioned citizens were opposed to this idea whereas 15% (6296) of repliers did not express their opinion (see Figure **81**).

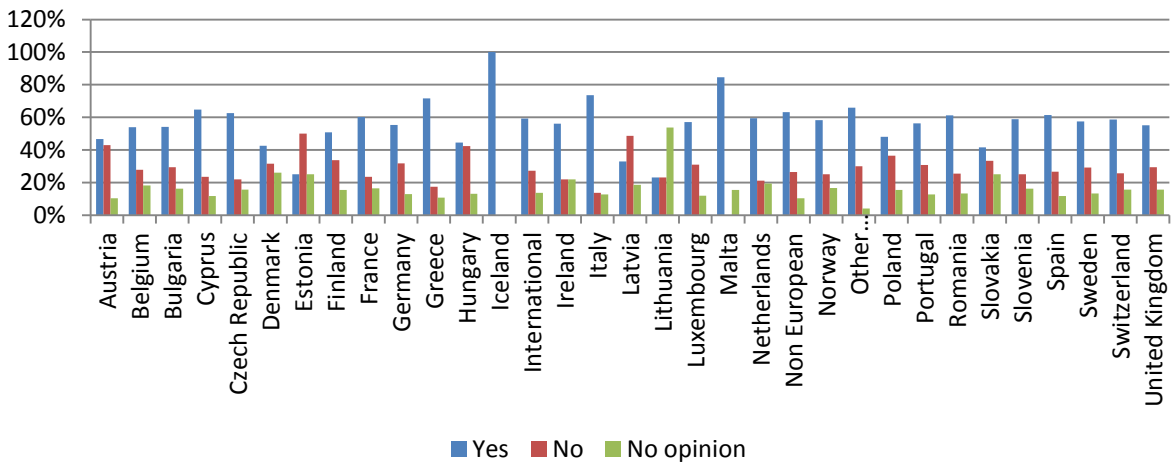


Figure 82 Percentage share of replies on necessity for enforcement of an additional requirement for producers and traders to implement an environmental management system to measure and evaluate their environmental performance and impacts by country

As presented on Figure 82, most of the respondents from the majority of the countries were in favour of the proposal to require from organic producers and traders implementation of an environmental management system to measure and evaluate their environmental performance and impacts. The only two countries, from which respondents had mostly negative attitude towards the implementation of an environmental management system by organic producers and traders, were Latvia and Estonia. On the contrary, in the following countries: Austria, Hungary, Lithuania, Poland and Slovakia, almost equal number of respondents were in favour and against the mentioned proposal.

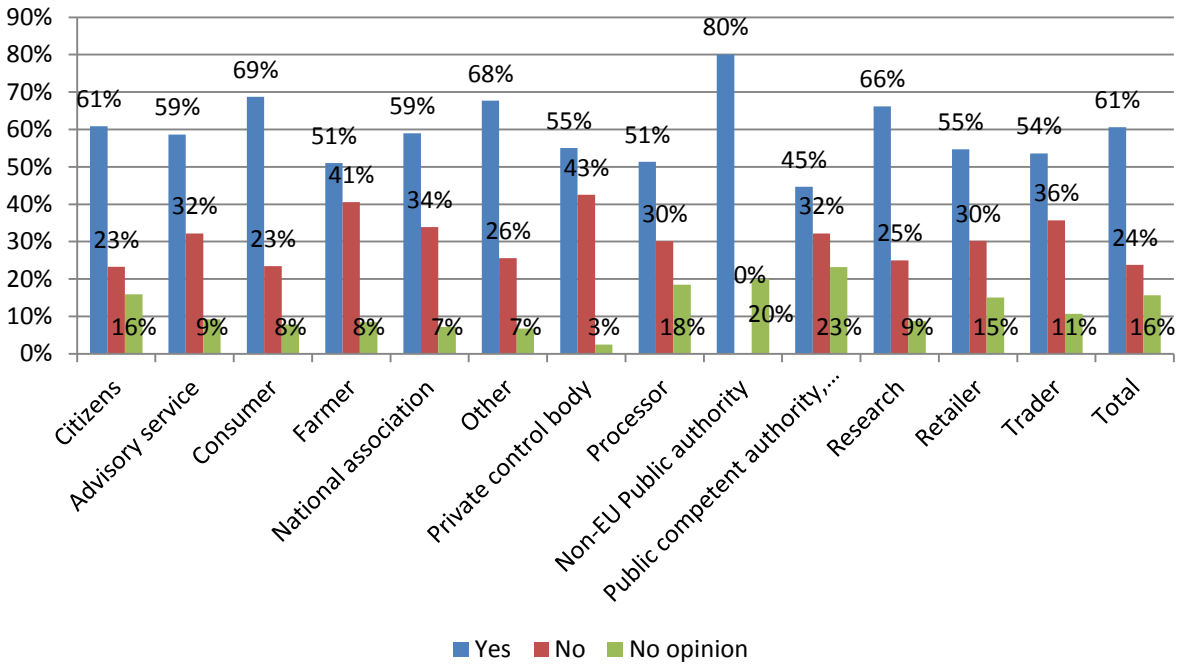


Figure 83 Percentage share of replies on necessity for enforcement of an additional requirement for producers and traders to implement an environmental management system to measure and evaluate their environmental performance and impacts by category of stakeholders

Most of the questioned representatives of citizens and the following categories of stakeholders (in descending order): non-EU public authorities (80%), consumers (69%), researchers (66%),

advisory services (59%), national associations (59%) and others (68%) were in favour of the enforcement of an additional requirement for producers and traders to implement an environmental management system to measure and evaluate their environmental performance and impacts. The remaining categories of stakeholders the percentage share of replies pro and against the proposed requirement were more balanced, but with a slight predominance of positive answers to the question (see Figure 83).

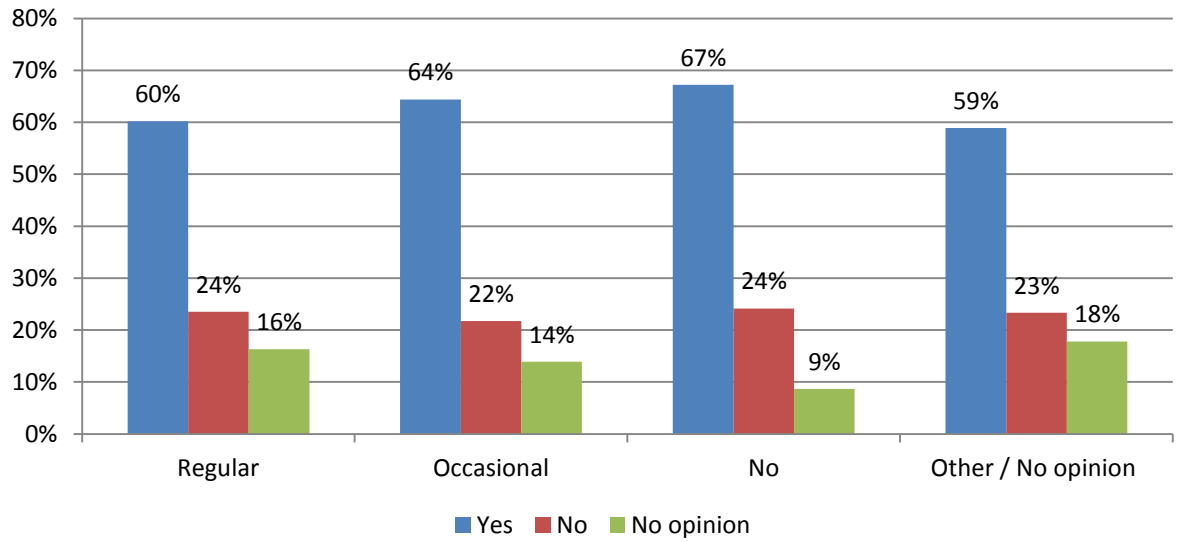


Figure 84 Percentage share of replies on necessity for enforcement of an additional requirement for producers and traders to implement an environmental management system to measure and evaluate their environmental performance and impacts by regularity of consumption of organic products

Figure 84 presents the distribution of attitude towards the implementation of a special environmental management system to measure the performance among different groups of consumers based on their regularity of organic products consumption. Generally, with no significant differences, the questioned publics in each group replied in a similar manner. Namely, the majority of interviewees (59-67%) requested an additional requirement for producers and traders to implement an environmental management system to measure and evaluate their environmental performance and impacts. Of the opposite view was around one quarter (22-24%) of respondents in each group of consumers. ***Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions***

Most of the citizens agreed on the fact that organic products should take into account environmental management system. Their main environmental concern is the greenhouse impact of organic products. That is why environmental issues are also treated in the trade regime part.

- *"The retail products « organic farming » should integrated a carbon and/or energy balance of the final product, following the example of the bulbs or appliance." (FR058)*
- *"The « packaging » and « transport » aspect should be taken into account for the organic farming products, even if the creation of a new logo, more respectful for the environment and more local, is necessary." (FR095)*
- *"Adoption of ecological principles into organic farming means adaption to local environmental conditions."*
- *"New requirements to evaluate the environmental performance and impacts are needed."*
- *"Eliminate the need of packaging materials for organic farming, it is not sustainable and thereby an incongruence."*

- *"The organic farming has good influence on environment and climate change (examples were given for that)." (DE 2010)*
- *"Environmental performance monitoring and measurement on top of this will not improve performance, but will add unnecessary costs. This is not recommended." (EN 100)*
- *"In principle operators should implement an environmental management system when it concerns the level of processing and trade companies, but the farm level and possibly small operators should be excluded. / Proposition for EMAS structure. / It would be necessary also to avoid that Eco-Label regulation extents its scope to the food and drink sector." (EN 102)*
- *"The European EMAS environmental management system should be strengthened." (DE 037)*
- *"The environmental impact should not be implemented among organic farmers." (DE 203, 204)*

The quality of the soil is also a real concern for the citizens:

- *"Organic legislation should contemplate keeping the soil organic in high rates and retaining nutrients that have been fed to people."*

5. LABELLING AND LOGO

5.1. Recognition of the European organic logo

Question no. 5.1 Do you know the European organic logo?

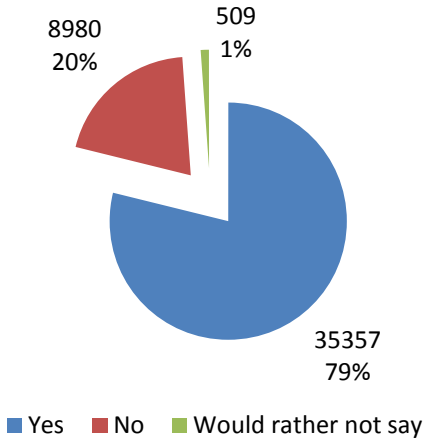


Figure 85 Number and percentage share of replies on familiarity with the European organic logo

The European organic logo appeared to be well-known by the public that took part in the public consultation. The vast majority of respondents, namely 35357 (79%), declared that they recognise the European organic logo. Nevertheless, 20% of the respondents were not familiar with the European organic logo. The remaining 1% of the respondents did not give a clear answer to this question (see Figure **85**).

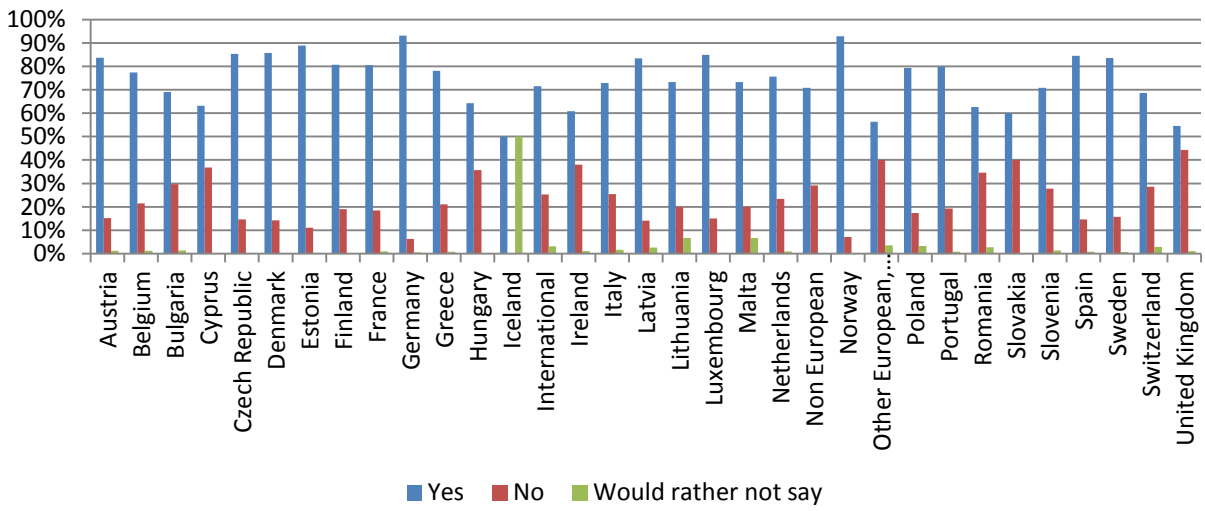


Figure 86 Percentage share of replies on familiarity with the European organic logo by country

Respondents from most of the Member States were acquainted with the European organic logo. Although most of the respondents from different countries declared recognition of the European organic logo, although the rate of non recognition was fairly high amongst the respondents from the United Kingdom (45%), Slovakia (40%), Cyprus, Hungary, Ireland and Romania (35%), and Slovenia (25%).,. In addition, half of the respondents from Iceland denied clearly presenting their knowledge on the European organic logo (see Figure 86).

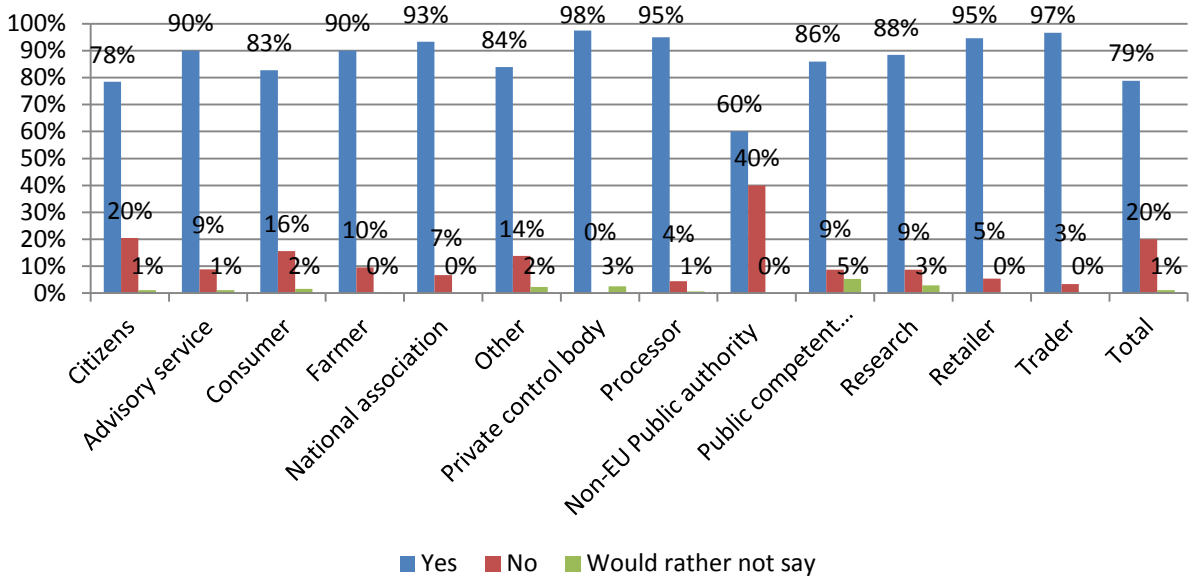


Figure 87 Percentage share of replies on familiarity with the European organic logo by category of stakeholders

As far as knowledge about the European organic logo among stakeholders is concerned, the majority of them stated that they easily identify the symbol. Slightly higher percentage shares indicating unfamiliarity with the European organic logo appeared among the repliers representing the interest of non-EU public authorities (40%), citizens (20%), consumers (16%), farmers (10%) and group entitled others (14%) (see Figure 87).

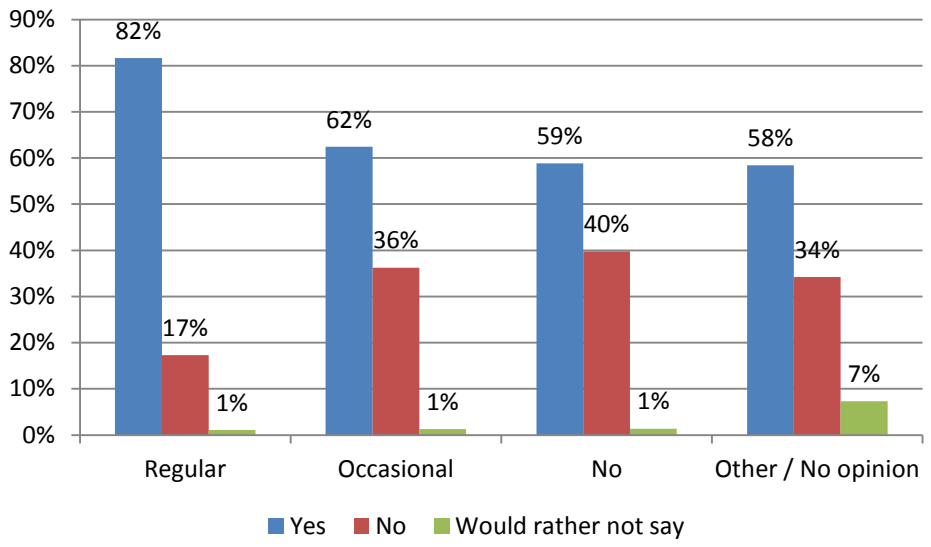


Figure 88 Percentage share of replies on familiarity with the European organic logo by regularity of consumption of organic products

The tendency in the graph above confirms that the more often the respondents consume organic products, the better they recognise the European organic logo (seeFigure **88**).

5.2. Ways of recognition of the organic products

Question no. 5.2 How do you recognise organic products?

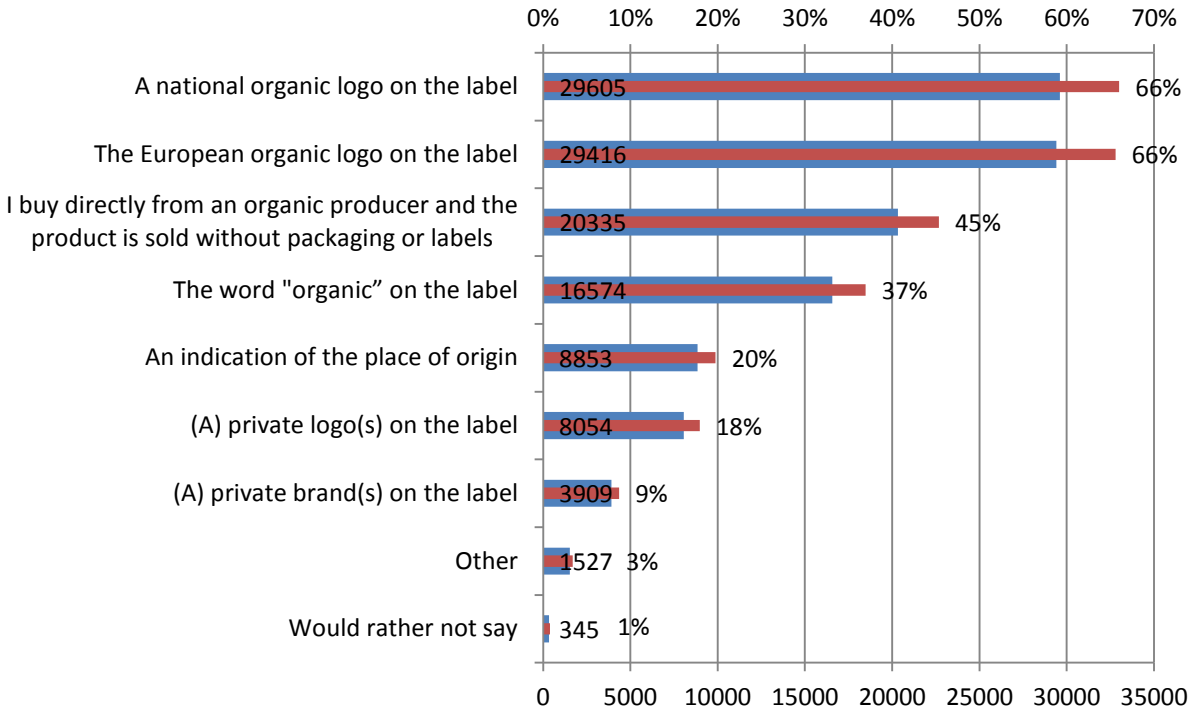


Figure 89 Number and percentage share of replies on the way in which organic products are recognised

Respondents were asked to specify the way in which they recognise organic products. The results presented in Figure 89 show that national logos (66%; 29605) and the European (66%; 29416) logo are the most common and trusted indications of distinguishing organic among

conventional products. Almost half of the respondents (45%; 20335) indicated that they purchase organic products directly from an organic producer without any kind of packaging or labels. Quite a significant number of respondents, namely 37% (16574) stated that the word "organic" itself on the label is a mean of differentiating between organic and conventional products. Approximately one fifth of the interviewees indicated also that organic quality of products is recognised by them throughout an indication of the place of origin (20%, 8853) and/or (a) private logo(s) on the label (18%; 8054). For 9% (3909) of the questioned publics (a) private brand(s) on the label is an important indicator for organic products' recognition. Besides, 3% (1627) and 1% (345) of respondents indicated respectively that they had other ways of distinguishing organic products or did not want to express their view on that question.

As illustrated by Figure 89 and Figure 90 to a greater or lesser extent the proportions of indicated ways of organic products' recognition with division into particular countries was similar to the general pool of respondents. The results indicate also that national organic logos on the label are popular trademarks of organic quality to respondents from almost all member states and non-EU countries, but in particular for Germany, France, Finland, Denmark, Austria, Luxembourg, Switzerland, Sweden and Norway. The European organic logo was recognised by more than 60% of the respondents from almost all countries, apart from the following Member States: Cyprus, Ireland, Hungary, the United Kingdom as well as from Switzerland, Norway, Iceland and these described as non-European and other European but non-EU. Exceptional results could be noted in the case of Iceland, but the results are not representative because of the low number of respondents. According to a significant number of respondents from some countries such as Germany, Luxembourg, Norway, Slovakia (a) private logo(s) on the label also play a significant role.

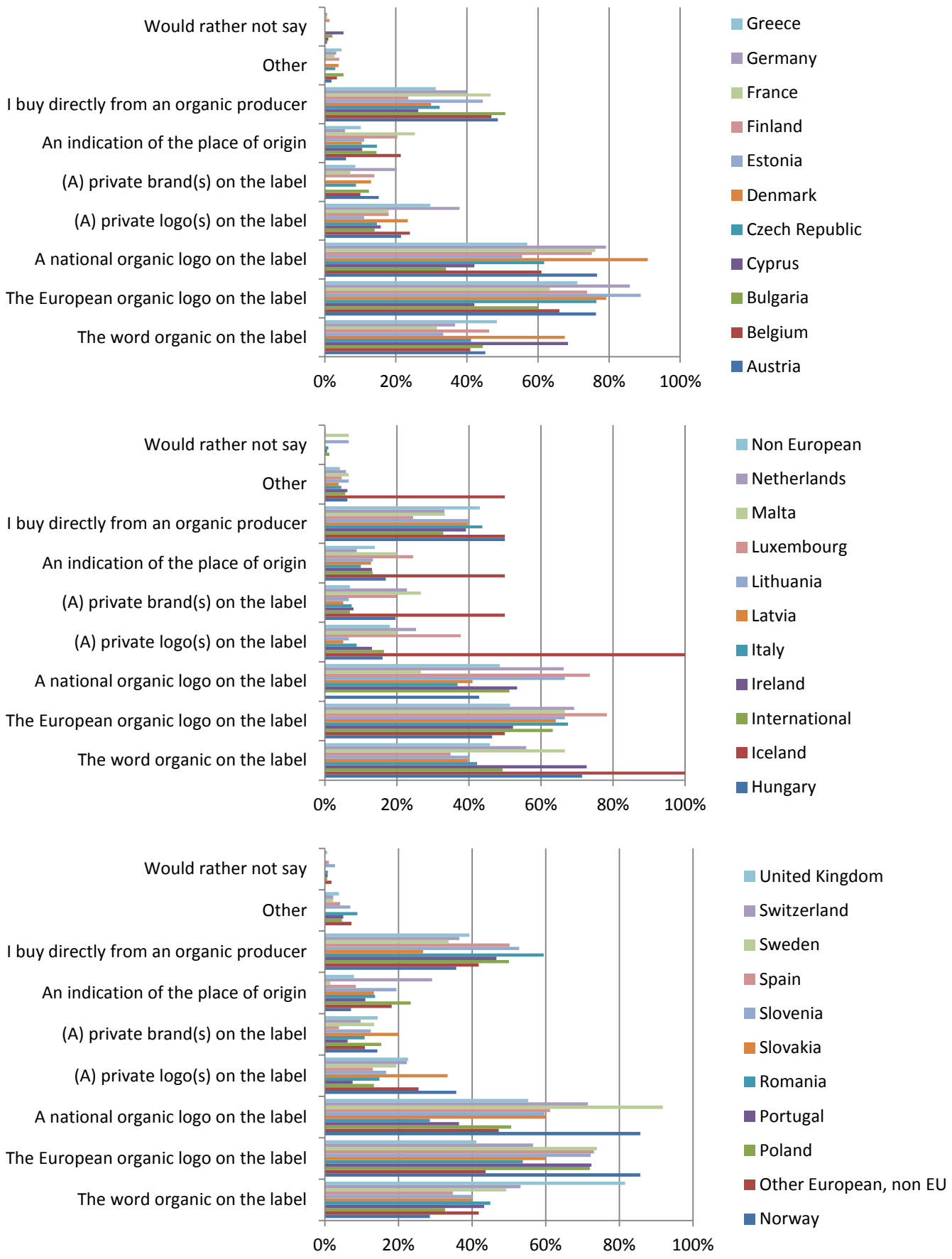


Figure 90 Percentage share of replies on the way in which organic products are recognised by country

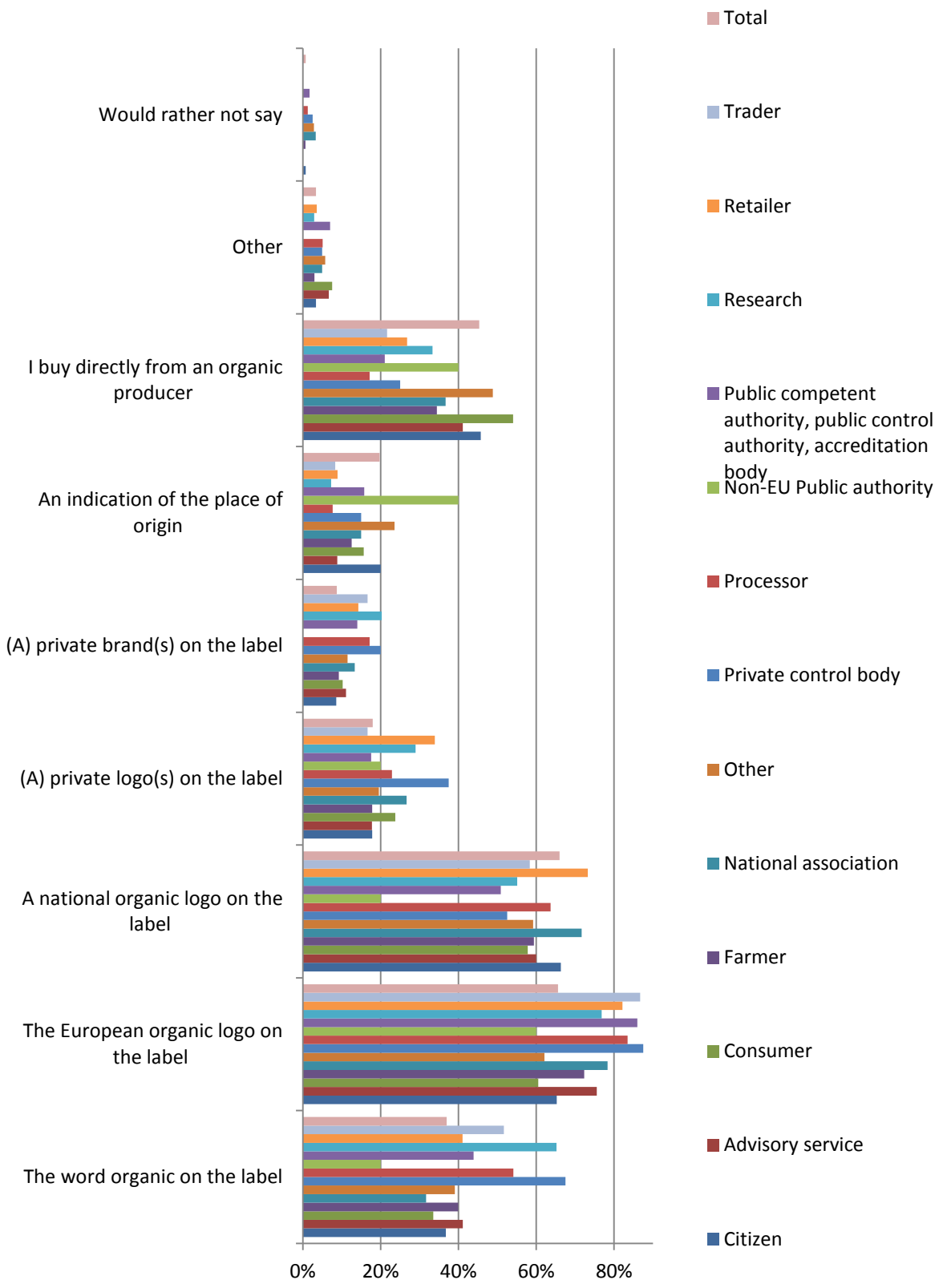


Figure 91 Percentage share of replies on the way in which organic products are recognised by category of stakeholders

The replies from various categories of stakeholders were comparable with the average of total answers with some exceptions. Namely, significantly more often than the average of the total respondents belonging to certain categories of groups such as traders, retailers, researchers, public competent authority, public control authority, accreditation body, processors, private control bodies national association, farmers and advisory services, recognise organic products by the European organic logo. The national organic logo on the label was indicated by majority of all the different categories of stakeholders (with exception to non-EU public authority). However, the national logo on the label was of great importance for the recognition of organic products in particular for citizens, processors, retailers and national associations. Retailers, researchers, private control bodies and national associations indicated more than the general public the significance of the private logos on the label. Non-EU public authority representatives emphasised also the relevance of indication of the place of origin. Moreover, more than the total average of stakeholders, the ones that represent consumers and so called others indicated that the recognition of the organic products is linked with direct purchase from an organic producer (see Figure 91).

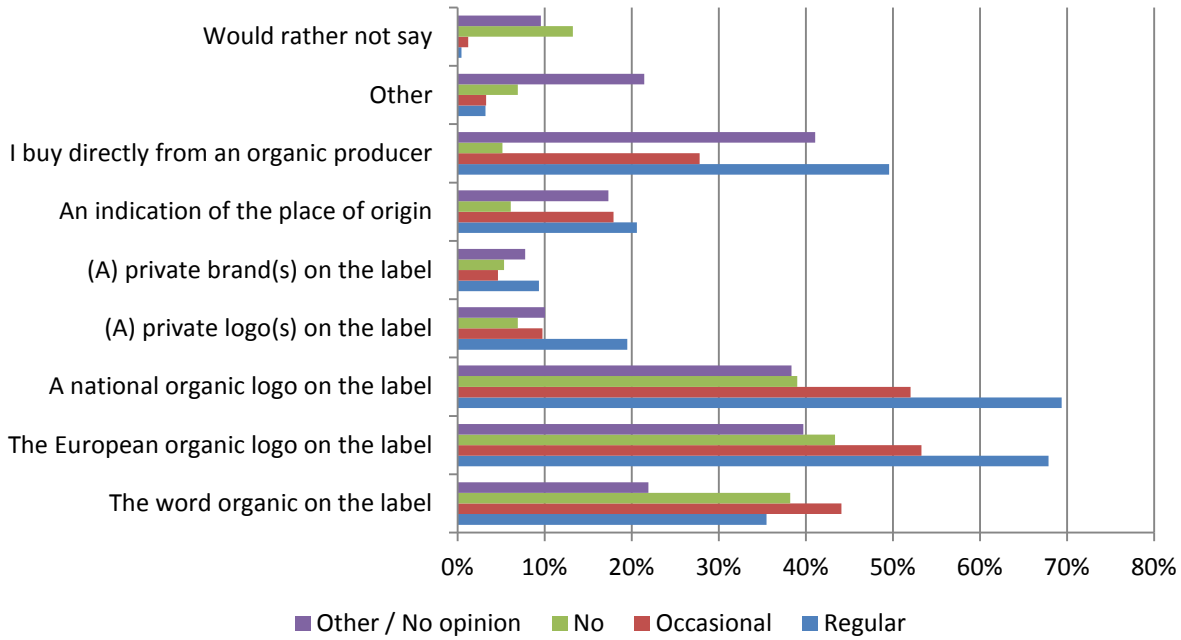


Figure 92 Percentage share of replies on the way in which organic products are recognised by regularity of consumption of organic products

The majority of all respondents regardless of the regularity of organic product's consumption indicated the three main ways of recognition of the organic products: national organic logo, European organic logo as well as the word organic on the label. The two first mentioned identification methods of organic product coupled with the direct purchase from an organic producer are especially popular among the regular consumer of organic foodstuffs. The consumers, who buy organic products occasionally, besides the above mentioned ways of recognition, indicated also the direct purchase from organic producers. The least popular, also indicated by consumers from each of the groups of regularity of organic product's consumption, were the following: indication of the place of origin, private brand and private logo on the label (see Figure 92).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

Contributions pointed to the need for promotion of the EU logo .

6. PROMOTION – INFORMATION

6.1. Need for information on organic products

Question no. 6.1 Do you think consumers need more information on organic products?

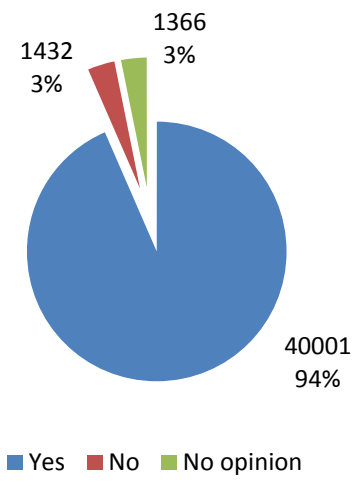


Figure 93 Number and percentage share of replies on necessity for more information on organic products: distribution of replies among 42799 records with registered answer

A vast majority of respondents (94%; 40001) demanded that more information on organic products. Only 3% (1432) of the questioned publics considered that the amount of information on organic products is sufficient and expressed no need for more. Others (3%; 1366) abstained from answering this particular question (see Figure **93**).Figure **93**

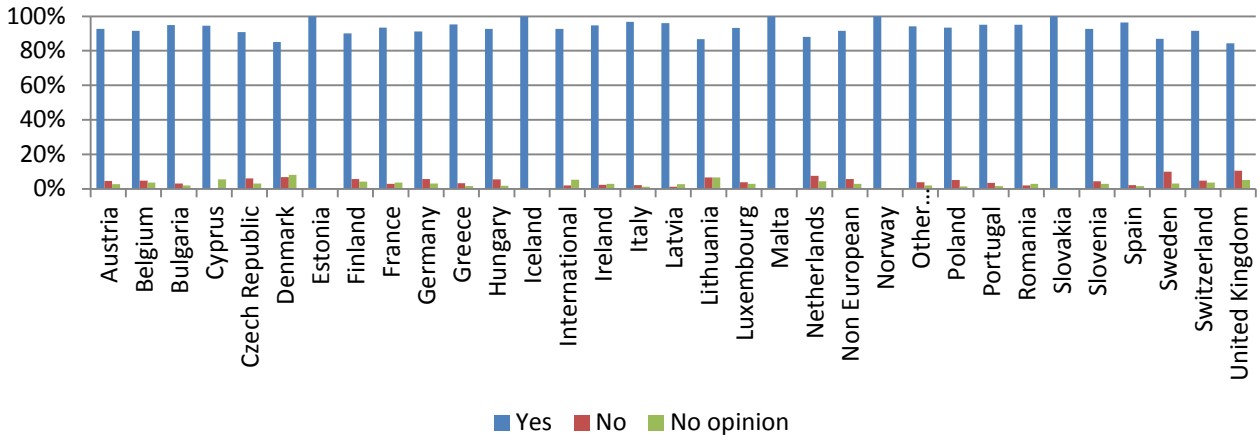


Figure 94 Percentage share of replies on necessity for more information on organic products by country

Necessity for more information on organic products was expressed by more than 80% or even in some cases by all (i.e. from Estonia, Iceland, Norway, Malta, Slovakia) respondents from every single country. It clearly shows that further education is needed in the EU irrespective of the country (see Figure 94).

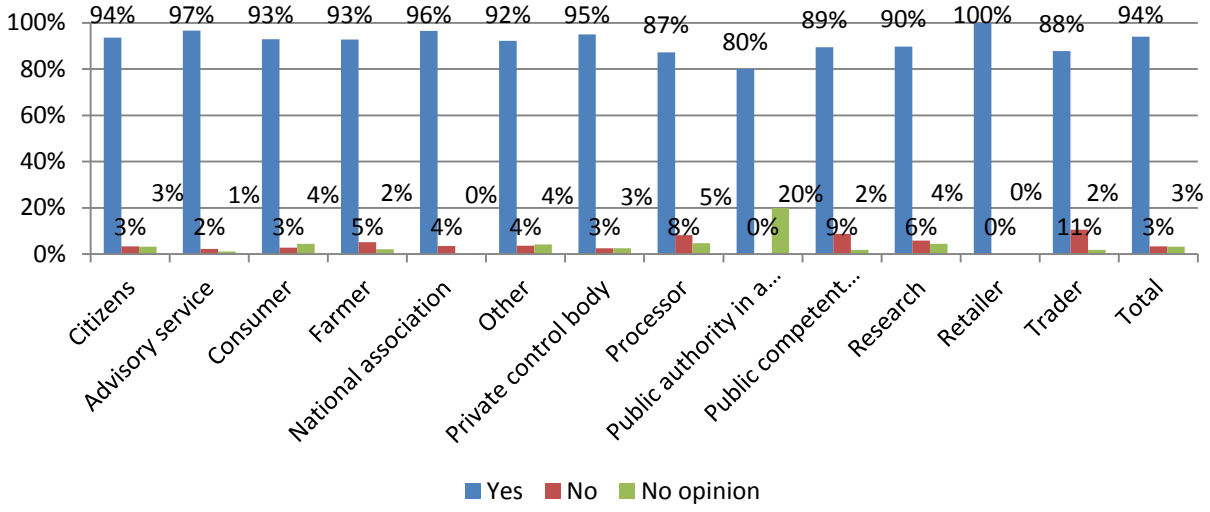


Figure 95 Percentage share of replies on necessity for more information on organic products by category of stakeholders

The breakdown of the results into categories of stakeholders presents almost identical replies to the previous question. Almost all respondents from all categories of stakeholders expressed the request for more information about organic product. Only around 8-10% of processors, public competent authorities and traders stated that they do not require more information (see Figure 95).

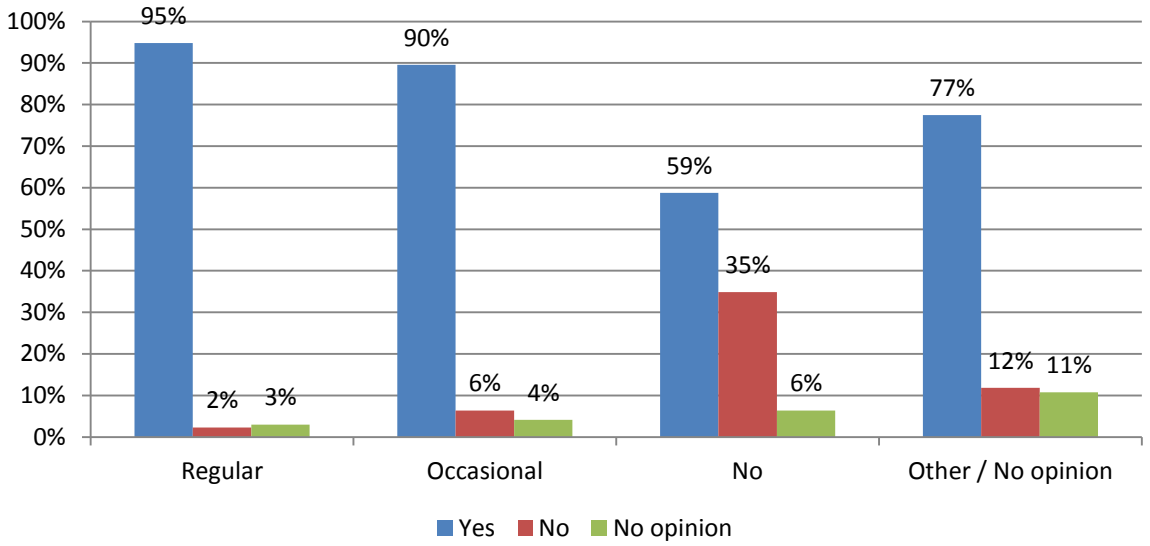


Figure 96 Percentage share of replies on necessity for more information on organic products by regularity of consumption of organic products

The majority of both regular (95%) and occasional (90%) consumers were still expressing lack of information on organic products. Also, surprisingly and promisingly for the sector, more than half (59%) of the respondents, who declared that they do not buy organic products,

required more knowledge transfer on organic production. However, as much as 35% of them did not find it necessary to gain better understanding about organic products (see Figure 96).

6.2. Opinion on the European Commission website on organic farming

Question no. 6.2 What's your opinion of the European Commission website on organic farming? Do you find the information you need?

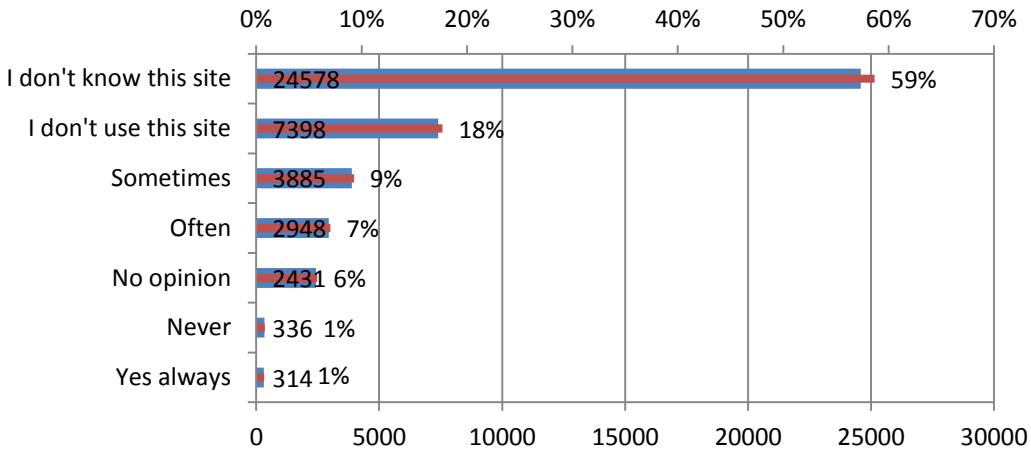


Figure 97 Number and percentage share of replies on usefulness and comprehensiveness of the European Commission website on organic farming: distribution of replies among 41890 records with registered answer

Respondents were asked to express their opinion about the European Commission's website on organic farming and whether they find all the needed and useful information therein. An overwhelming number of respondents, i.e. 24578 (59%) stated that they did not know that such a web-site existed. Additionally 7398 (18%) and 336 (1%) of questioned citizens claimed respectively that they did not use the web-site or they never found the content needed and useful. Very low percentage shares of the surveyed population actually uses the web-site and finds relevant information, namely 1% (314) – always, 7% (2948) – often and 9% (3885) – sometimes (see Figure **97**).

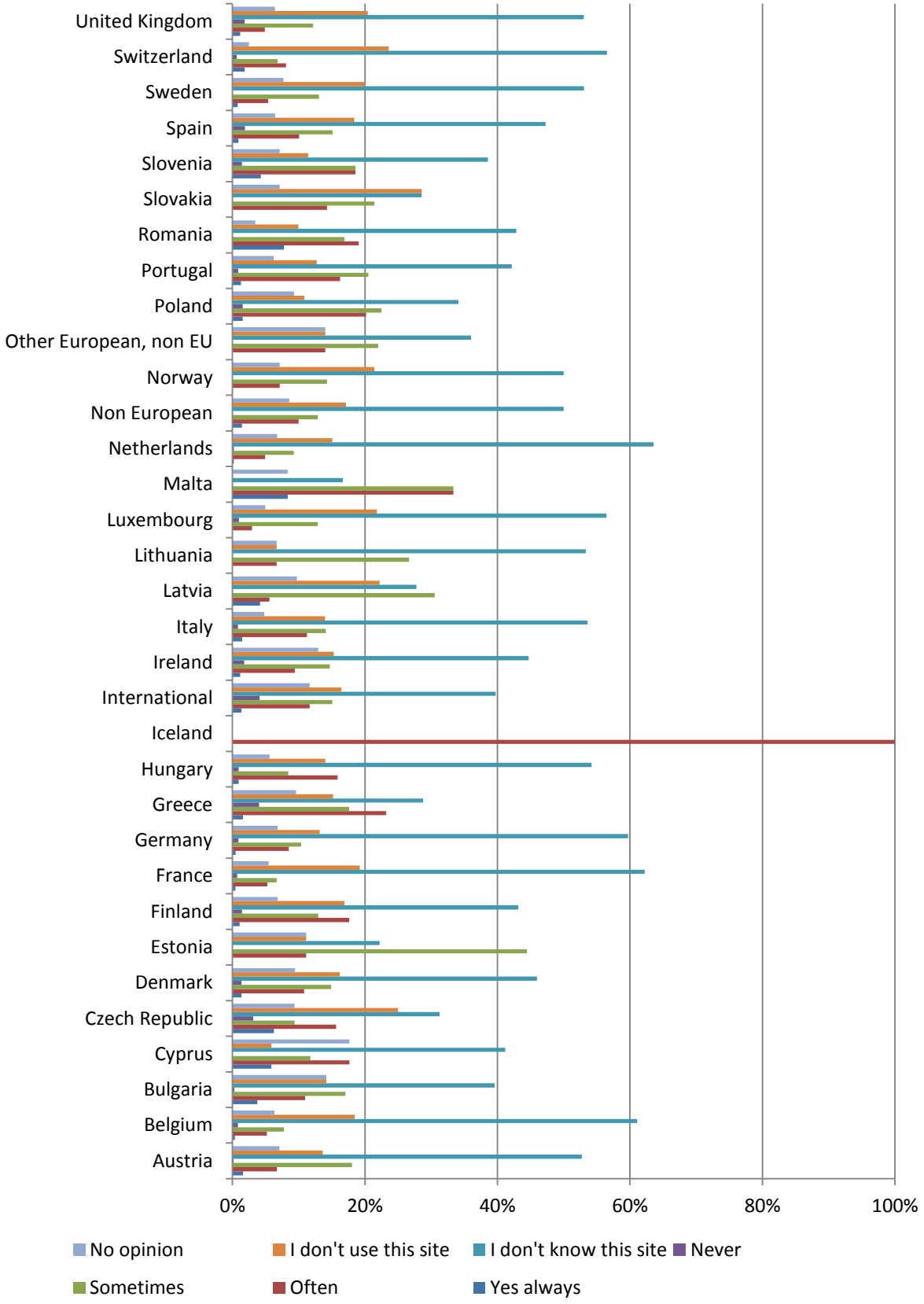


Figure 98 Percentage share of replies on usefulness and comprehensiveness of the European Commission website on organic farming by country

Figure 98 illustrates that the majority respondents from most of the countries did not know or use the European Commission website on organic farming. The highest, however percentage share of answers indicating that the people know the web-site and sometime/often/always use was noted for Slovenian, Slovakian, Romanian, Portuguese, Polish, Other European non-EU, Maltese, Lithuanian, Latvian, Greek and Estonian respondents. However, the percentage share of respondents from other countries that declared the use of the web-site was low.

Figure 99 clearly shows that all individual stakeholders' categories were better acquainted with the European Commission web-site than the citizens and total average of all respondents. However, still around 40% of interviewed retailers, national associations, farmers, consumers and others did not know about existence of the European Commission web-site on organic farming. Besides, around one fifth of respondents associating themselves with public competent authorities, public control authorities, accreditation bodies, advisory services and others as well as approximately 10% of all the other categories of stakeholders (except non-EU public authority) claimed that they did not use this web-site. Nevertheless, more than the total average, stakeholders of all categories, but in particular traders, researchers, public competent authorities, public control authorities, accreditation bodies, private control bodies, processors, advisory services and others declared that they sometimes or often used the page and found needed information. The minority of each category of stakeholders chose the extreme responses that they either never or always found the relevant information on the website. Notwithstanding, a high percentage (50%) of questioned representatives of the public authorities in a non-EU country considered that information provided on web-site was always useful and comprehensive (see Figure 99).

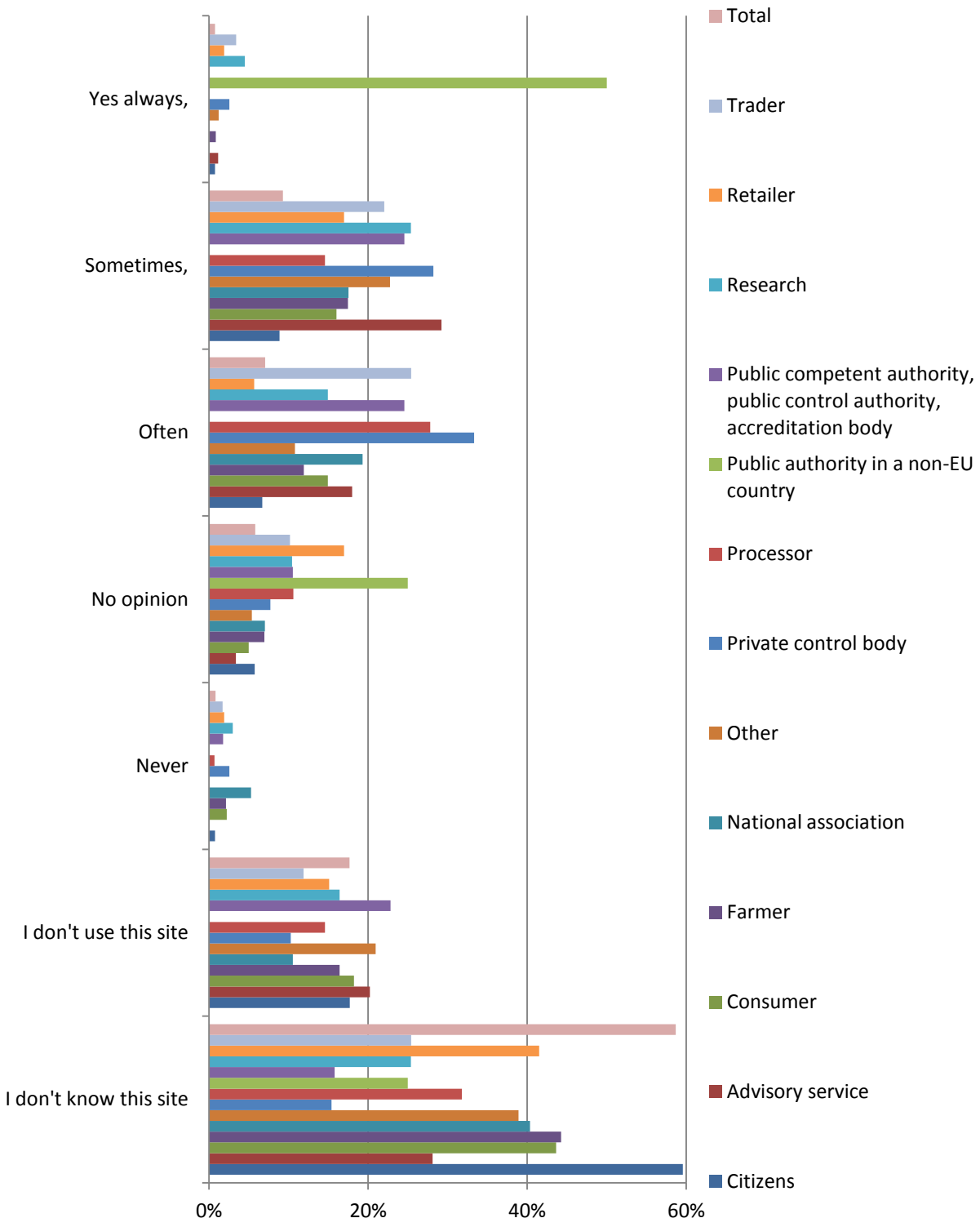


Figure 99 Percentage share of replies on usefulness and comprehensiveness of the European Commission website on organic farming by category of stakeholders

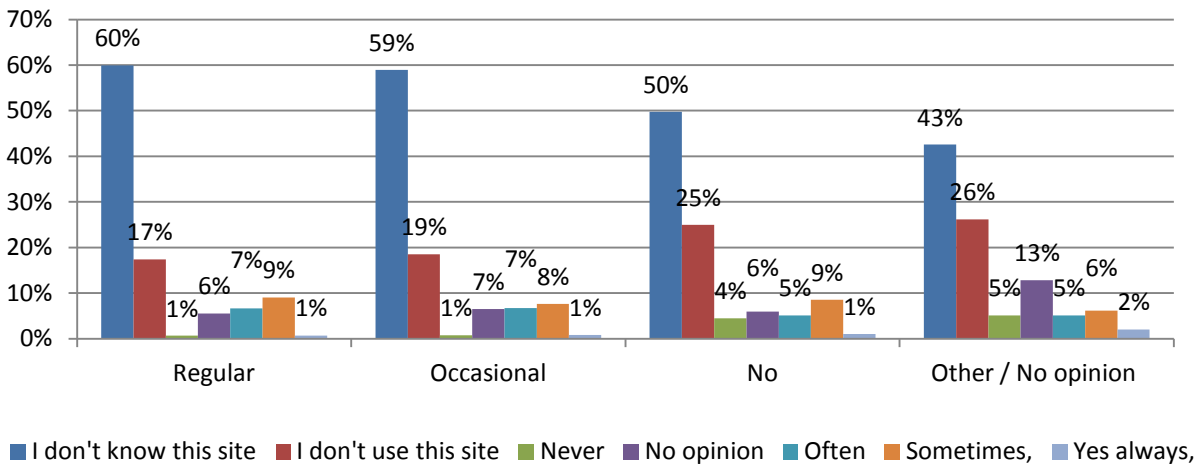


Figure 100 Percentage share of replies on usefulness and comprehensiveness of the European Commission website on organic farming by regularity of consumption of organic products

Figure 100 presents the usefulness of the European Commission web-site on organic farming for different groups of consumers. Among the "regular" and "occasional" consumers, around 60% of respondents did not know and roughly 20% did not use this web-site. Similarly, the questioned consumers, who never buy organic products or who have other/no opinion on the regularity of organic product's consumption, stated that they were not familiar with the European Commission web-site (around 50%) or did not utilise it so far (about 25%). 5-10% the respondents of each group replied that they either sometimes or often found the needed information on the website. Only a tiny percentage (1%) of respondents in each group of consumers declared that that they always found sought knowledge on the web-site. In addition, approximately 5% of consumers, who never consume organic products or fall into the group of "other/no opinion" declared that the content of the web-site was never useful for them.

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

The EU citizens in free contributions expressed that communication and promotion of organic farming among all consumers should be increased the, especially through school curricula, consultations with the public and institutions, reporting in media, etc. Public gardens, parks, roads, botanical gardens, pleasure grounds, playground, school gardens and kitchen gardens should practice and provide the support for organic farming.

Promote seasonal food and educate citizens about nutrition and local products, can also be the way to stimulate organic and local production.

- *"There should be mechanisms that would increase the market supply and not the area of organic production." (PL 001)*
- *"Les opérateurs industriels affichent leur intérêt pour l'AB, mais dans la réalité, très peu acceptent de prendre des risques en signer des contrats avec des producteurs" (FR 087)*
- *"The promotion of EU products should be based on raising consumers' awareness. Promotion should not be understood as advertisement, but as an essential component in the education system. Education on ecological relationships, both globally and in one's diet should be provided for (EU) citizens from a young age." (DE 031)*
- *"More promotion in TV is needed. Organic organisations/farmers should appear more often in the TV. Strengthen the education of children. More control, reduction and*

regulation on advertisements. / Promotion of organic farming within the whole Europe instead of group certification." (DE 190, 191)

7. CONTROLS

7.1. Trust in products certified as "organic"

Question no. 7.1 European organic legislation requires EU governments to set up a system of controls, run by one or more national authorities. These authorities may delegate monitoring tasks to private control bodies, under specific conditions. This possibility is widely used in Europe. ***Do you trust products certified as "organic"?***

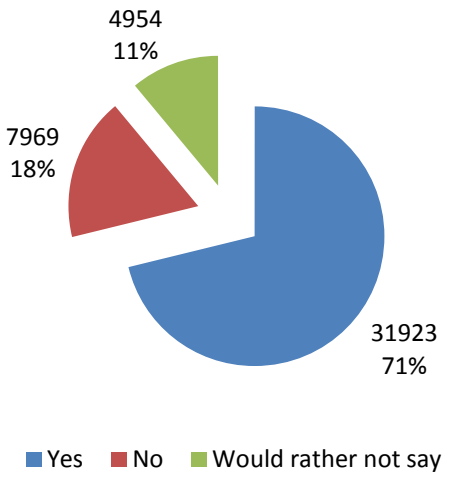


Figure 101 Number and percentage share of replies on trust in products certified as "organic"

Figure 101 demonstrates the level of questioned consumers' confidence in products certified as "organic". Nearly three quarters of all respondents, i.e. 71% (31923), acknowledged that they have full confidence in organic products. Nonetheless, almost one out of five of the interviewees, i.e. 18% (7969) did not believe in organic quality of products. In addition, 11% of respondents abstained from answering to this question.

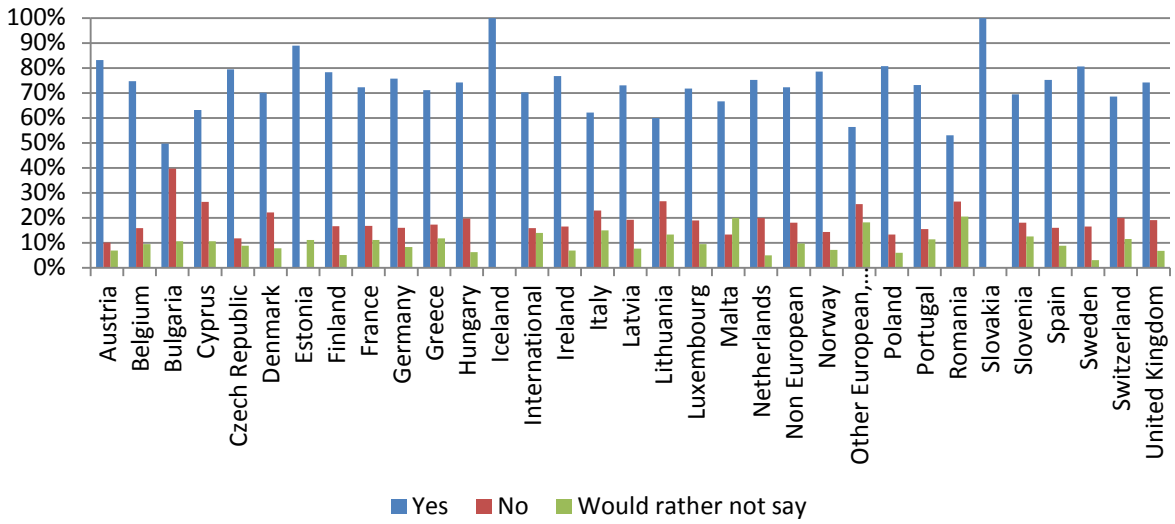


Figure 102 Percentage share of replies on trust in products certified as "organic" by country

Taking into consideration the respondents' country of origin, it seems that the majority of questioned publics from most of the represented by them countries trust organic products. Highest percentage of people who had confidence in organic products in comparison to those who did not trust them was found among the following countries: Austria, Estonia, Iceland, Slovakia (80% and more of positive answers) as well as Belgium, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, International, Ireland, Latvia, Luxembourg, Netherlands, Non-European, Norway, Poland, Portugal, Slovakia, Spain, Sweden and United Kingdom (70-80%). In the remaining countries around 20-30% of questioned citizens replied negatively to this question. What is more, quite a large proportion of distrustful citizens with regard to products certified as "organic" compared to those who fully believe the particular quality of products occurred among the Bulgarian respondents (see Figure 102).

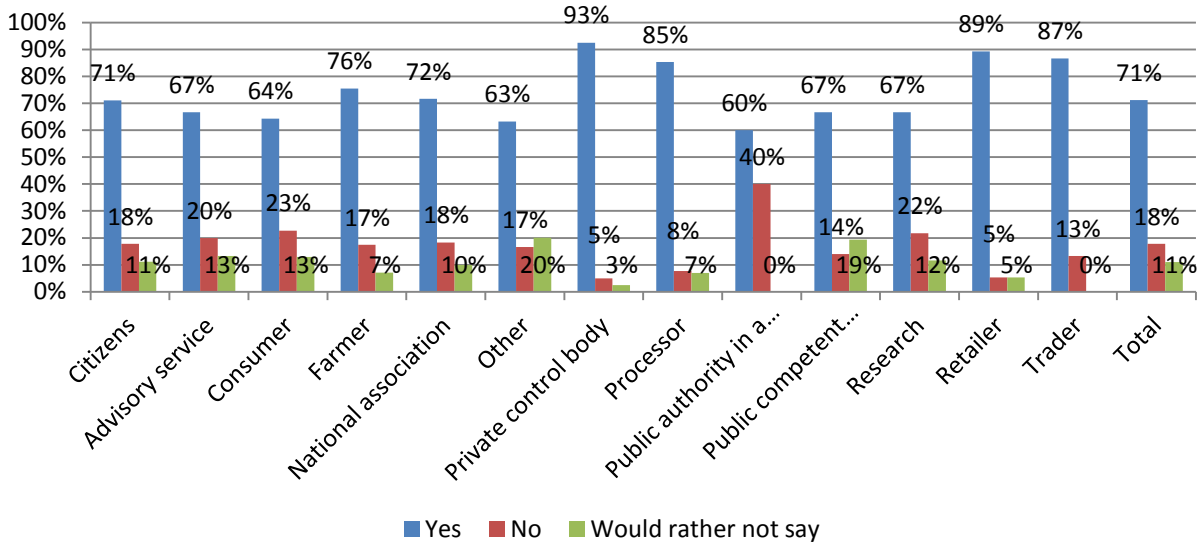


Figure 103 Percentage share of replies on trust in products certified as "organic" by category of stakeholders

The majority of respondents (i.e. 60-93%) representing almost all categories of stakeholders expressed trust in organic products. The highest percentage share of stakeholders with trustful attitude towards the organic product occurred among the following categories in descending order: private control bodies (93%), retailers (89%), traders (87%) and processors (85%). In turn, the lowest percentage share of respondents trusting organic products was mainly expressed by the categories listed below in ascending order: non-EU public authorities (60%), "others" (63%), consumers (64%), advisory services (67%), researchers (67%) and also public competent authorities, public control authorities, accreditation bodies (67%). It is important to emphasise that a substantial percentage of respondents representing the following categories: non-EU public authorities (40%), consumers (23%), researchers (22%) and advisory services (20%), did not trust the organic quality of products at all (see Figure 103).

It is interesting to compare the results above with the detailed distribution of replies on trust in products certified as "organic" by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system in Table 2 below.

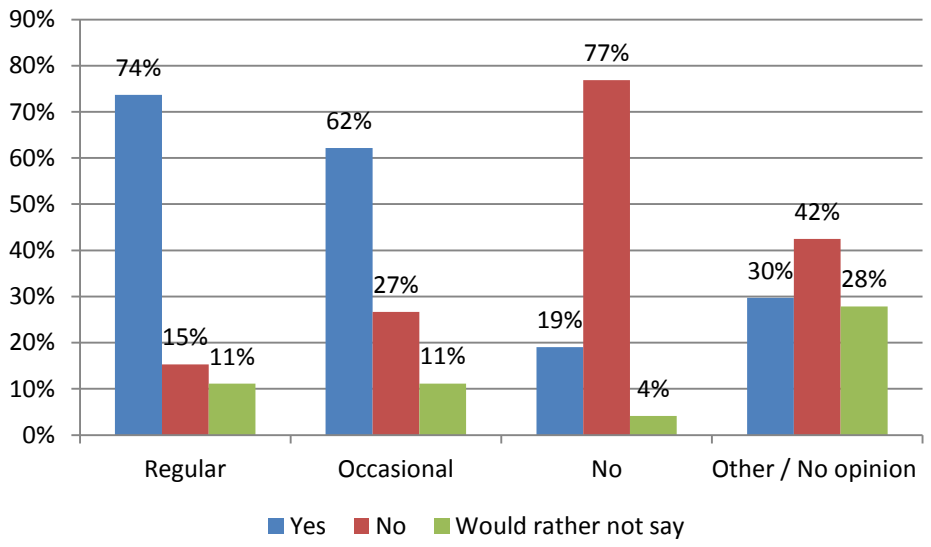


Figure 104 Percentage share of replies on trust in products certified as "organic" by regularity of consumption of organic products

The majority of questioned private consumers, who buy organic products regularly (74%) and occasionally (62%), claimed full trust in organic products. However, inconsistent and incomprehensible is the fact that as many as 15% and 11% of the interviewees, who declared themselves as regular consumers of organic products, stated that respectively either they did not trust the organic quality of products or did not want to express their opinion on this issue. Even more than the "regular" ones, 27% and 11% of the surveyed "occasional" organic products' consumers also respectively either did not have confidence in the particular added-value feature or refused stating opinion. The situation was completely reversed among the questioned citizens, who considered themselves as non-organic consumers. A vast majority among them (77%) expressed absolute no trust in organic products. However, nearly one out of five in this group (19%) stated that he/she believes in the organic quality of products. Within the group described as "other/no opinion" the view on this matter was more or less balanced between each answer possibility with slight predominance of the negative approach towards organic products (42%) (see Figure **104**).

Table 2 Number of replies on trust in products certified as "organic" by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system

Answer	Yes					No					Would rather not say				
Category of stakeholders	**Other MS**	**DK**	**FI**	**NL**	**Total**	**Other MS**	**DK**	**FI**	**NL**	**Total**	**Other MS**	**DK**	**FI**	**NL**	**Total**
Citizens	29694	32	202	644	**30572**	7434	15	46	172	**7667**	4721	5	13	42	**4781**
Advisory service	57			3	**60**	18				**18**	12				**12**
Consumer	112		3	4	**119**	41			1	**42**	24				**24**
Farmer	615	16	16	13	**660**	144	2	2	4	**152**	58	1	1	2	**62**
National association	42		1		**43**	11				**11**	6				**6**
Other	103	3	2	2	**110**	28			1	**29**	34		1		**35**
Private control body	37				**37**	2				**2**	1				**1**
Processor	127	2	3	2	**134**	10		1	1	**12**	11				**11**
Public authority in a non-EU country	3				**3**	2				**2**					
Public competent authority, public control authority, accreditation body	38				**38**	8				**8**	11				**11**
Research	41	1	2	2	**46**	15				**15**	8				**8**
Retailer	47			3	**50**	3				**3**	3				**3**
Trader	47		1	4	**52**	8				**8**					
Total	**30963**	**54**	**230**	**677**	**31924**	**7724**	**17**	**49**	**179**	**7969**	**4889**	**6**	**15**	**44**	**4954**

7.2. Frequency of inspections of European organic operators

Question no. 7.2 Did you know that all European organic operators are inspected at least once a year?

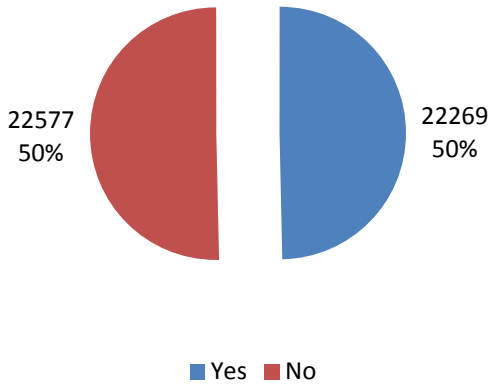


Figure 105 Number and percentage share of replies on awareness of the obligation of annual inspections of all European organic operators

Figure **105** presents the respondents awareness about the provision that each European organic operator has to be inspected at least once a year. It appeared that half (22269) of the respondents did know about it and the second half (22577) were ignorant of this rule.

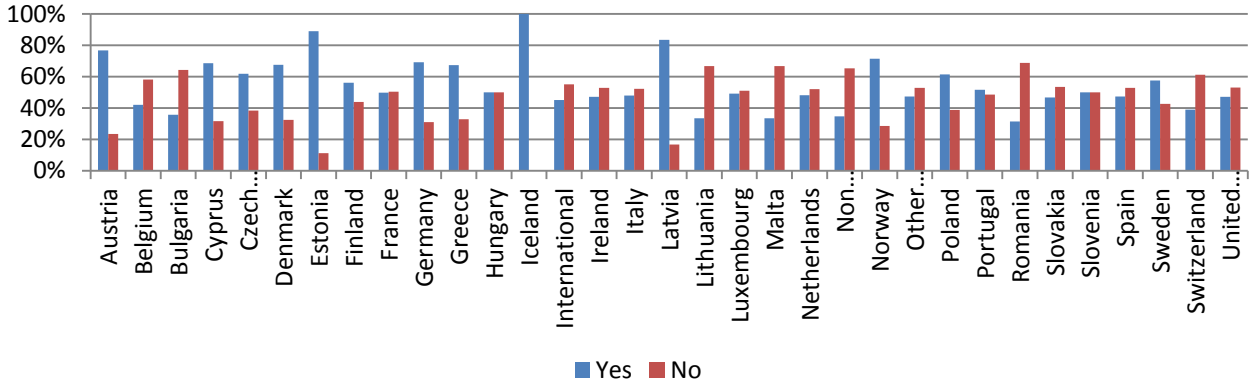


Figure 106 Percentage share of replies on awareness of the obligation of annual inspections of all European organic operators by country

Among the respondents it appears that citizens who were more aware of the obligation of annual inspections came from Austria, Cyprus, Czech Republic, Denmark, Estonia, Finland, Germany, Iceland, Latvia, Norway, Poland, Portugal and Sweden. The proportions were balanced in France, Hungary and Slovenia and reversed in the remaining countries (see Figure 106).

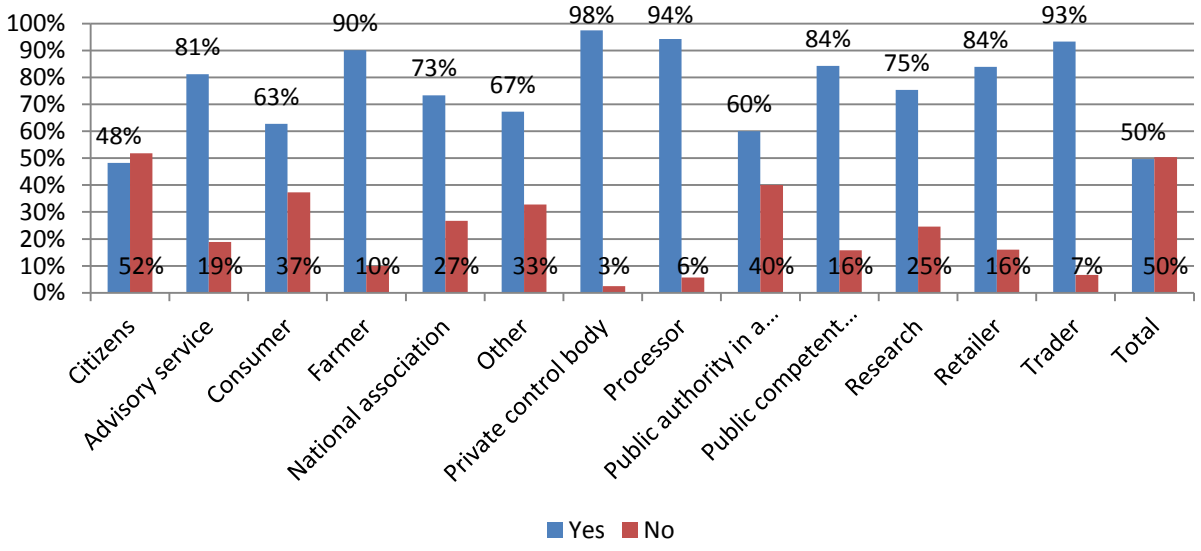


Figure 107 Percentage share of replies on awareness of the obligation of annual inspections of all European organic operators by category of stakeholders

Figure 107 presents the stakeholders familiarity with the provision on obligatory annual inspections of all European organic operators. 'Citizens' was the only category in which the percentage of those who were aware (48%) and not aware (52%) of the obligation was so close. Besides, in all categories of stakeholders, regardless of represented interest, the majority of questioned individuals (from 60 to even 98%) declared to be acquainted with the provision. However, quite a significant percentage share of respondents representing the interest of the listed below stakeholders in descending order were not aware of the mandatory annual inspection of all European organic operators, non-EU public authorities (40%), consumers (37%), others (33%), national associations (27%), researchers (25%) as well as advisory services (19%).

In Table 3 below you can see a detailed distribution of replies on the awareness of the obligation of annual inspections of all European organic operators by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system.

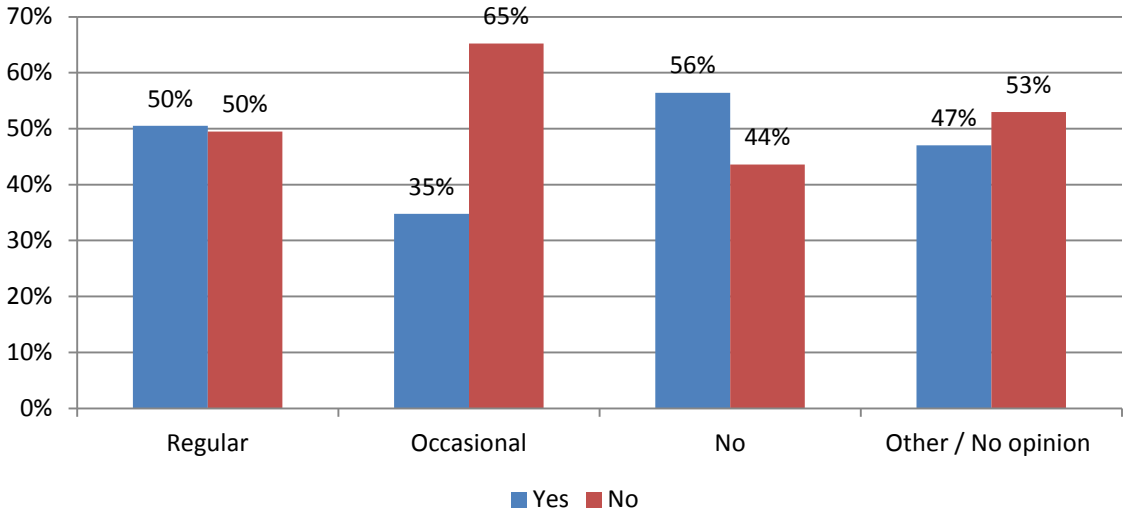


Figure 108 Percentage share of replies on awareness of the obligation of annual inspections of all European organic operators by regularity of consumption of organic products

Surprisingly, it appeared that those who are most aware of the provision of obligatory annual inspections of all European organic operators were the consumers, who declared themselves as non-organic purchasers (i.e. 56% positive in comparison with 44% of negative answers). The knowledge about the rule among regular consumers was balanced, it means that half (50%) of them knew and half (50%) were not informed about it. In addition, most of the questioned publics (65%), who consume organic products sporadically, were not familiar with the obligation for at least one inspection of all European operators per year (see Figure 108).

Table 3 Number of replies on awareness of the obligation of annual inspections of all European organic operators by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system

Answer	Yes					No				
Category of stakeholders	**Other MS**	**DK**	**FI**	**NL**	**Total**	**Other MS**	**DK**	**FI**	**NL**	**Total**
Citizens	20183	29	135	392	**20739**	21666	23	126	466	**22281**
Advisory service	70			3	**73**	17				**17**
Consumer	110		2	4	**116**	67		1	1	**69**
Farmer	733	18	17	19	**787**	84	1	2		**87**
National association	43		1		**44**	16				**16**
Other	110	2	3	2	**117**	55	1		1	**57**
Private control body	39				**39**	1				**1**
Processor	139	2	4	3	**148**	9				**9**
Public authority in a non-EU country	3				**3**	2				**2**
Public competent authority, public control authority, accreditation body	48				**48**	9				**9**
Research	47	1	2	2	**52**	17				**17**
Retailer	44			3	**47**	9				**9**
Trader	51		1	4	**56**	4				**4**
Total	**21620**	**52**	**165**	**432**	**22269**	**21956**	**25**	**129**	**468**	**22578**

Question no. 7.3 Would you agree that organic operators with a proven track record of abiding by the rules could be inspected less often, for instance every 2 or 3 years?

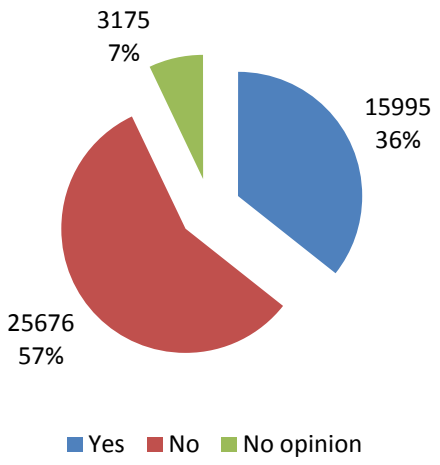


Figure 109 Number and percentage share of replies on acceptance of risk-based frequency of organic operators' inspections

Generally, opinions on this issue were divided. However, the majority of respondents (57%, 25676) disapproved the idea of lowering the number of inspections for organic operators with a proven track record of abiding to the rules. On the contrary, significant percentage of approximately 36% (15995) of the respondents was in favour of the risk-based regularity of organic operators' inspections. Only 7% of the questioned publics refused to express their opinion on this matter (see Figure **109**).

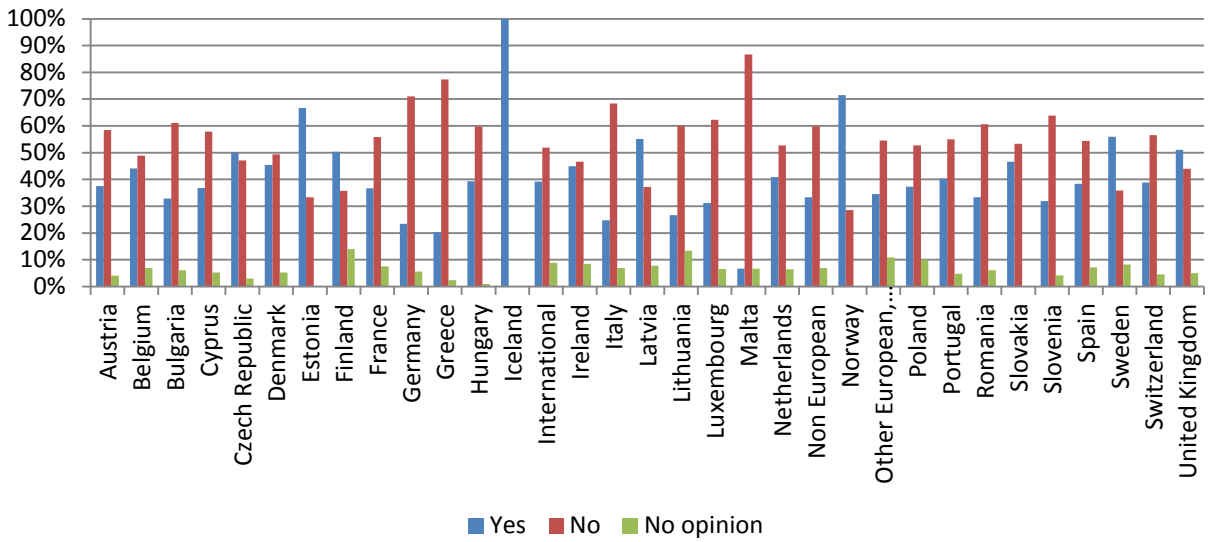


Figure 110 Percentage share of replies on acceptance of risk-based frequency of organic operators' inspections by country

Replies differ among the countries. However, the largest part of respondents from most of the countries (i.e. Austria, Bulgaria, Cyprus, France, Germany, Greece, Hungary, International, Italy, Lithuania, Luxembourg, Malta, Netherlands, Non-European, other European non-EU, Poland, Portugal, Romania, Slovenia, Spain, Switzerland) opposed to the idea on the dependence of regularity of inspections on the organic operator's proven track record of abiding to the rules. Only predominance of questioned citizens from Estonia, Finland, Iceland,

Latvia, Norway and Sweden agreed for the proposal of risk-based frequency of organic operators' inspections. In addition the distribution of "yes" and "no" answers was very balanced within the representatives of the following countries: Belgium, Denmark, Ireland, Slovakia, United Kingdom (see Figure 110).

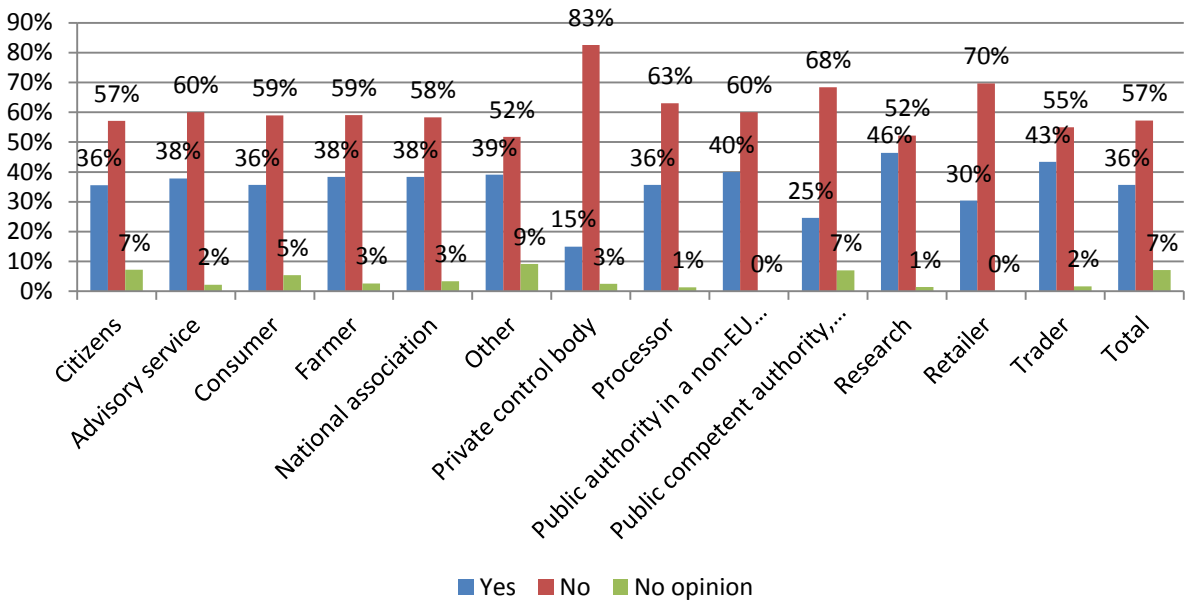


Figure 111 Percentage share of replies on acceptance of risk-based frequency of organic operators' inspections by category of stakeholders

Figure 111 illustrates the attitude of different categories of stakeholders to the proposal of lowering the number of inspections of organic operators with a proven track record of abiding to the rules. The majority of respondents (between 52-83%) representing all categories of stakeholders without exceptions are strongly against the risk-based frequency of inspections of organic operators. The strongest opponents of the idea to lower the number of inspection for trusted organic operators are repliers representing the following categories of stakeholders in descending order: private control bodies (83%), retailers (70%), public competent authorities, public control authorities, accreditation bodies (68%), processors (63%) as well as advisory services (60%) and non-EU public authorities (60%). Besides, within the range of 15 to even 46% of respondents in various categories of stakeholders were in favour of this prospect to regulate the number of organic operators' inspections based on the track record of respecting the organic farming rules. More than 40% of respondents, who expressed their approval for such inspection system, were among the researchers (46%), traders (43%) as well as non-EU public authorities (40%).

In addition, Table 4 below presents a detailed distribution of replies on acceptance of risk-based frequency of organic operators' inspections by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control systems.

Figure 112 Percentage share of replies on acceptance of risk-based frequency of organic operators' inspections by regularity of consumption of organic products

Similar distribution of respondents in favour of and against the decrease of the number of inspections for organic operators who have proven track record of abiding to the rules was in groups divided on the basis of their regularity of organic products consumption. In detail, it appeared that around 57% and 55% of respectively regular and occasional consumers of

organic products were against the change of setting the regularity of organic operators' inspections. However, the highest percentage share (76%) of respondents against the risk-based frequency of organic operators' inspections was among the respondents who never consume organic products. In turn, 38%, 35% and 18% of the questioned in sequence organic occasional, regular and non-organic consumers approved the possibility to normalise the amount of inspections for organic operators based on their track record (see Figure **112**).

Table 4 Number of replies on acceptance of risk-based frequency of organic operators' inspections by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system

Answer	Yes					No					No opinion				
Category of stakeholders	**Other MS**	**DK**	**FI**	**NL**	**Total**	**Other MS**	**DK**	**FI**	**NL**	**Total**	**Other MS**	**DK**	**FI**	**NL**	**Total**
Citizens	14833	19	121	343	**15316**	24003	29	101	458	**24591**	3013	4	39	57	**3113**
Advisory service	32			2	**34**	53			1	**54**	2				**2**
Consumer	59		2	5	**66**	108		1		**109**	10				**10**
Farmer	294	14	18	9	**335**	501	5	1	9	**516**	22			1	**23**
National association	22		1		**23**	35				**35**	2				**2**
Other	65	1		2	**68**	86	2	1	1	**90**	14		2		**16**
Private control body	6				**6**	33				**33**	1				**1**
Processor	53		3		**56**	93	2	1	3	**99**	2				**2**
Public authority in a non-EU country	2				**2**	3				**3**					
Public competent authority, public control authority, accreditation body	14				**14**	39				**39**	4				**4**
Research	27	1	2	2	**32**	36				**36**	1				**1**
Retailer	15			2	**17**	38			1	**39**					
Trader	22		1	3	**26**	32			1	**33**	1				**1**
Total	**15444**	**35**	**148**	**368**	**15995**	**25060**	**38**	**105**	**474**	**25677**	**3072**	**4**	**41**	**58**	**3175**

7.3. Improvement of the control system of organic products

Question no. 7.4 Even if the cost of organic food were to go up as a result, do you think the control system of organic products sold in Europe should be improved?

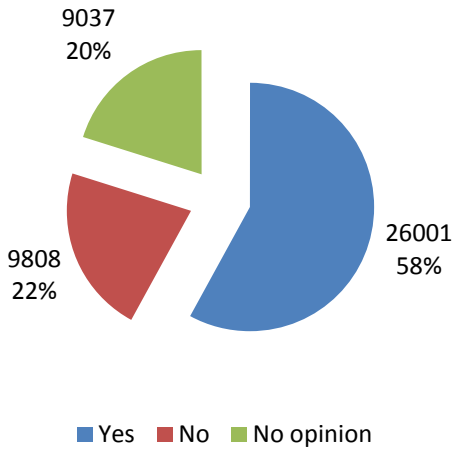


Figure 113 Number and percentage share of replies on necessity for improvement of control system for organic production even if the cost of organic food were to go up as a result

Figure **113** illustrates the opinion of respondents on the necessity for improvement of the control system for organic products sold in Europe even if the cost of organic food were to go up as a result. More than half (58%, 26001) of the questioned citizens required improvement of the European control system for organic products even if this entails an increase in prices.. 22% (9808) repliers to the questionnaire stated that improvements are not needed, especially if these lead to a rise of organic products' prices. 20% of the respondents did not express any opinion on this issue.

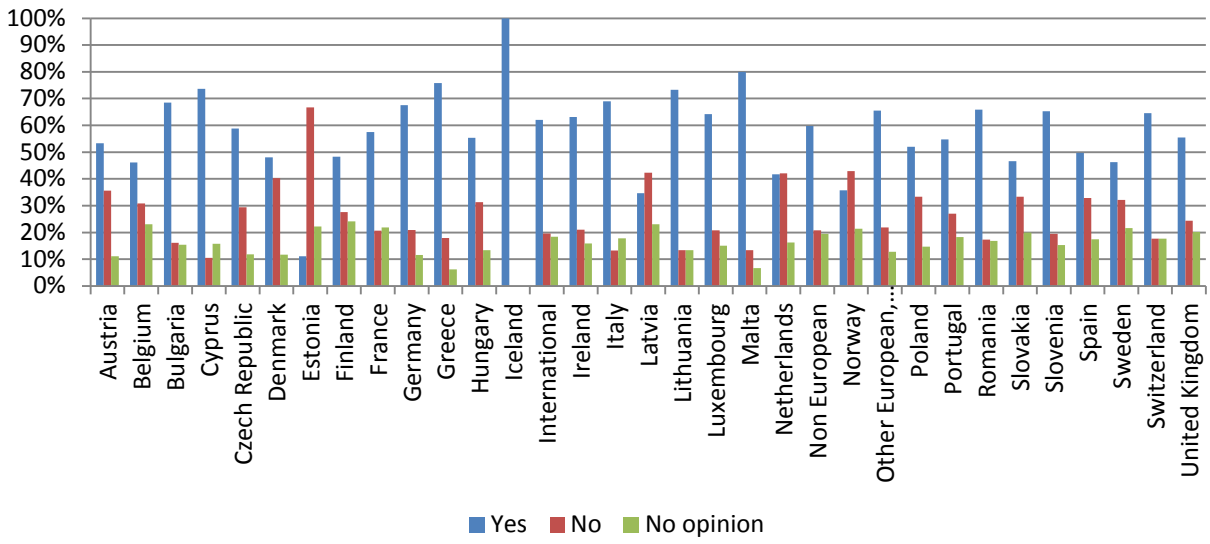


Figure 114 Percentage share of replies by country on the necessity for improvement of control system for organic production even if the cost of organic food were to go up as a result

The majority of respondents in almost all countries expressed the necessity for improvement of the control system for organic production even if the cost of organic food were to go up. Only more respondents from Estonia, Latvia, Netherlands and Norway were against than in favour of organic control system improvements in the face of price growth (see Figure 114).

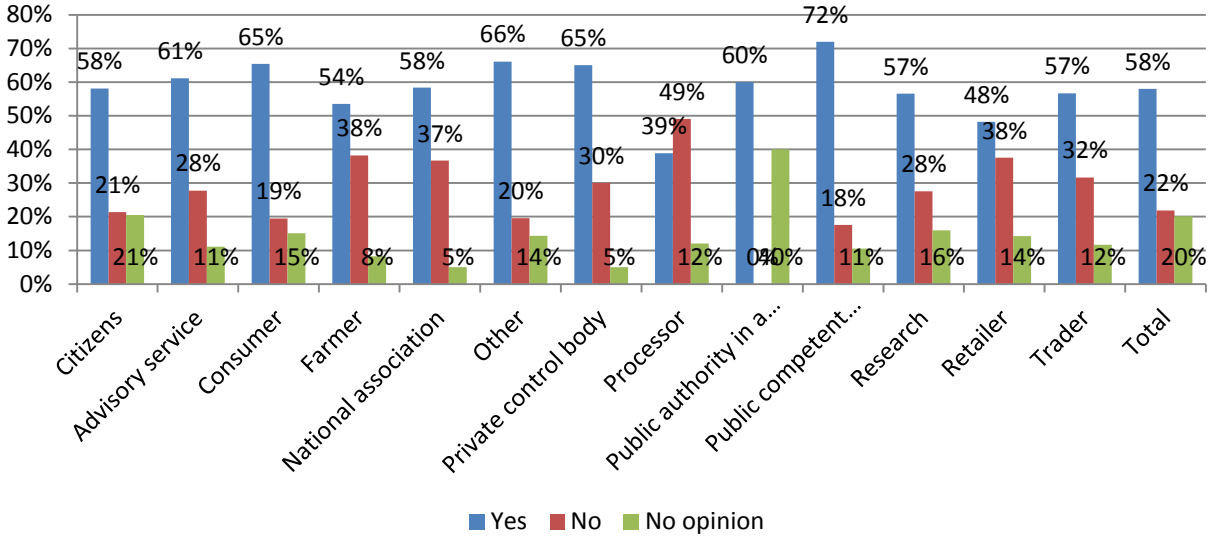


Figure 115 Percentage share of replies on necessity for improvement of control system for organic production even if the cost of organic food were to go up as a result by category of stakeholders

Figure 115 demonstrates the approach of different categories of stakeholders towards the necessity for control system improvements. It appeared that around half and more (percentage share oscillating between 48% and 72%) of respondents in each category, except for processors, were in favour of improvements of control systems of European organic operators even if it means price's growth. As mentioned, only distribution of answer given by the interviewees representing the processors was reverse. It means that 49% of the "processors" were in contradiction of the improvements of control systems in comparison with 39% of respondents representing the same interest, who were in favour of this idea.

In Table 5 below you can see a detailed distribution of replies on the necessity for improvement of control system for organic production even if the cost of organic food were to go up as a result by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system..

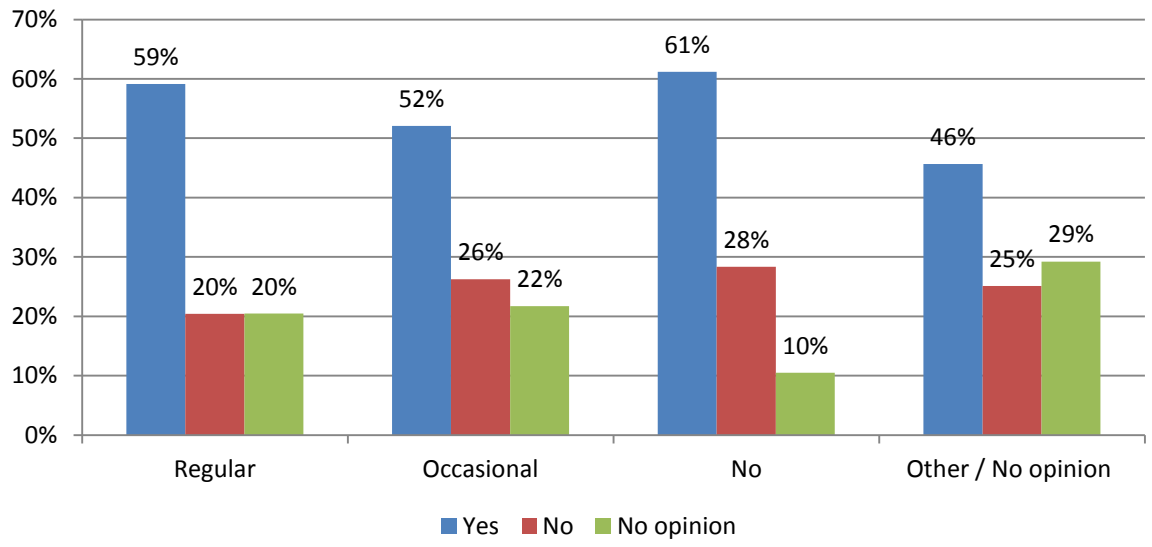


Figure 116 Percentage share of replies on necessity for improvement of control system for organic production even if the cost of organic food were to go up as a result by regularity of consumption of organic products

With regard to the division into groups by regularity of consumption of organic products, the results are very balanced among the various sets of respondents. In detail, approximately 50-60% of replies in each group expressed the necessity for improvement of control system for organic production even if the cost of organic food were to go up as a result. Approximately 20-30% of answers in every single class of consumers were not in favour of any kind of control systems' improvements if it leads to price growth of organic products. Quite a lot of respondents, i.e. 10-30% in each group did not express their opinion on that question (see Figure 116).

Table 5 Number of replies on necessity for improvement of control system for organic production even if the cost of organic food were to go up as a result by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system

Answer	Yes					No					No opinion				
Category of stakeholders	**Other MS**	**DK**	**FI**	**NL**	**Total**	**Other MS**	**DK**	**FI**	**NL**	**Total**	**Other MS**	**DK**	**FI**	**NL**	**Total**
Citizens	24467	29	128	352	**24976**	8753	16	68	363	**9200**	8629	7	65	143	**8844**
Advisory service	53			2	**55**	24			1	**25**	10				**10**
Consumer	117		1	3	**121**	35			1	**36**	25		2	1	**28**
Farmer	444	4	9	11	**468**	305	13	9	7	**334**	68	2	1	1	**72**
National association	34		1		**35**	22				**22**	3				**3**
Other	109	2	1	3	**115**	32	1	1		**34**	24		1		**25**
Private control body	26				**26**	12				**12**	2				**2**
Processor	58	1	1	1	**61**	71	1	3	2	**77**	19				**19**
Public authority in a non-EU country	3				**3**						2				**2**
Public competent authority, public control authority, accreditation body	41				**41**	10				**10**	6				**6**
Research	36	1	1	1	**39**	19				**19**	9		1	1	**11**
Retailer	27				**27**	18			3	**21**	8				**8**
Trader	32			2	**34**	17			2	**19**	6		1		**7**
Total	**25447**	**37**	**142**	**375**	**26001**	**9318**	**31**	**81**	**379**	**9809**	**8811**	**9**	**71**	**146**	**9037**

Question no. 7.5 If yes, how could this be done?

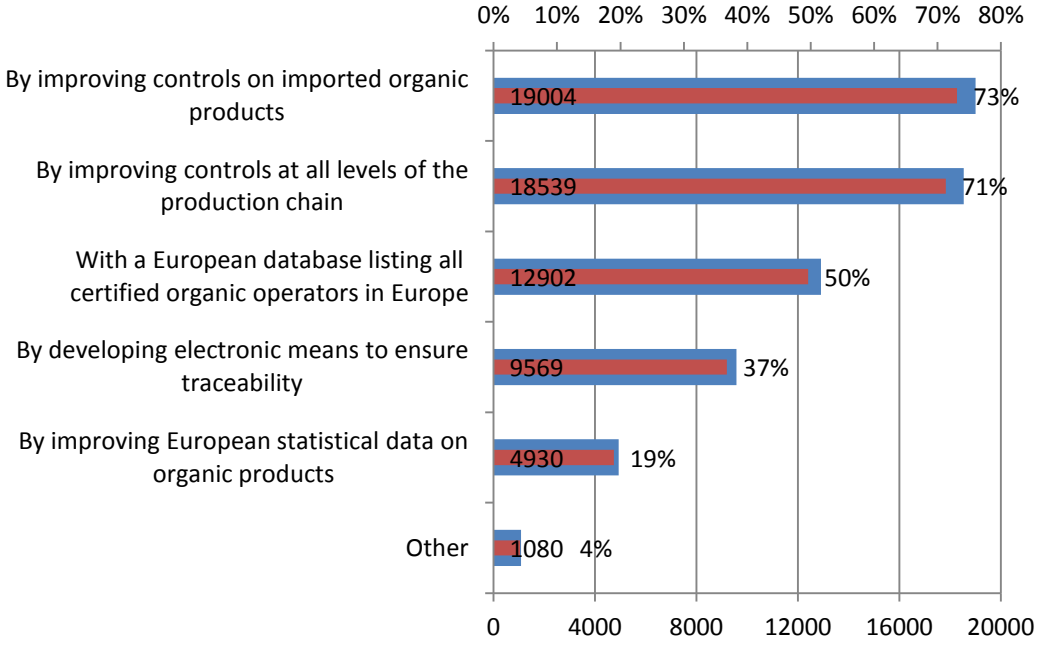


Figure 117 Number and percentage share of replies on solutions for improvement of control system for organic production: distribution of replies among 26001 records with registered answer

Figure **117** presents the opinion of respondents on the way in which control systems for organic food and farming sector should be improved. The vast majority of respondents 73% (19004) and 71% (18539) opted for two improvement possibilities: respectively better controls on imported organic products and at all levels of the production chain. Moreover, 50% (12902) of the respondents wanted creation of a European database listing all certified organic operators in Europe. More than one third (i.e. 37%, 9569) of the respondents voted for the development of electronic means to ensure traceability. Additionally 19% (4930) required improvement in terms of European statistical data on organic products.

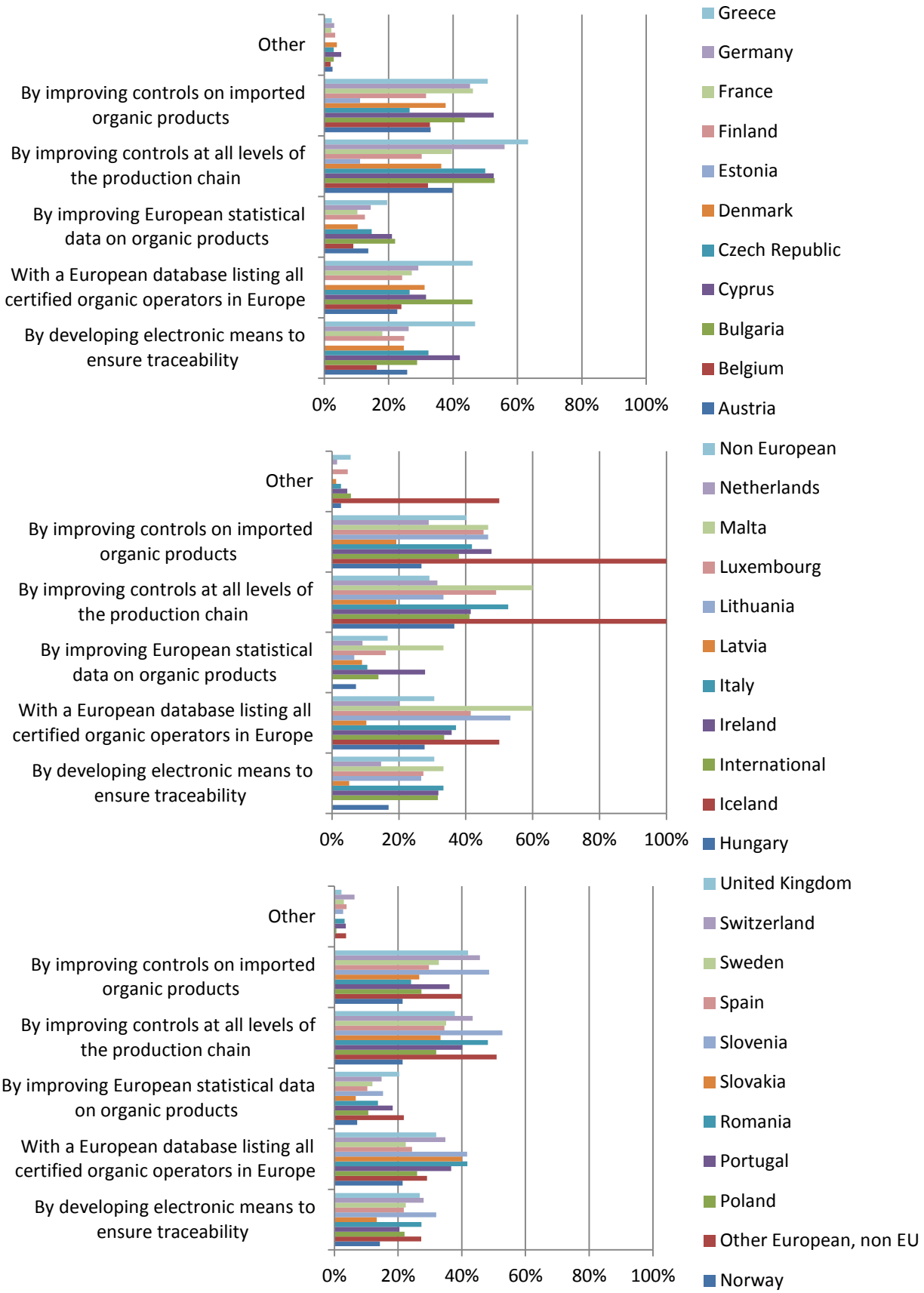


Figure 118 Percentage share of replies on solutions for improvement of control system for organic production by country

Figure 118 presents the ranking of solutions with regard to country of origin of respondents. The preferences of respondents from different countries differ among each other. The first solution in the general ranking, namely improvement of controls on imported organic products was chosen by more than 40% of questioned citizens from Greece, Germany, France, Cyprus, Bulgaria, Malta, Luxembourg, Lithuania, Italy, Ireland, Iceland, United Kingdom, Switzerland and Slovenia. In the remaining countries this option received less than 40% of preferences, wherein in Estonia and Latvia even less than 20%. The second option, viz. improvement of controls at all levels of the production chain was preferred by more than 40% of surveyed publics from the following countries: Greece, Germany, France, Czech Republic, Cyprus, Bulgaria, Malta, Luxembourg, Italy, Ireland, International, Iceland, Slovenia, Romania, other European non-EU. In the other countries this option was chosen by less than 40% of respondents, particularly less popular to this option were Estonians and Latvians. The third solution, i.e. creation an European database listing all certified organic operators in Europe, was preferred by more than 40% of respondents from Greece, Bulgaria, Malta, Luxembourg, Lithuania, Iceland, Slovenia, Slovakia and Romania. Around 20-40% of the questioned citizens from the remaining countries, except for Estonia and Latvia, opted for this option. The fourth improvement possibility, namely development of electronic means to ensure traceability was most frequently (i.e. more than 40%) chosen by interviewees from Greece, Bulgaria, Slovenia, Slovakia and Romania. On the contrary, the option received less than 20% of votes from Slovakia, Norway, Netherlands, Latvia, Iceland, Hungary, Estonia, France and Belgium. The last option, the improvement of European statistical data on organic products, was less frequently chosen by all countries. However more than 20% of respondents expressed need for this solution from the following countries: Greece, Cyprus, Bulgaria, Malta, Ireland, United Kingdom and other European non-EU. The minority of respondent from each country stated that there are other improvement possibilities.

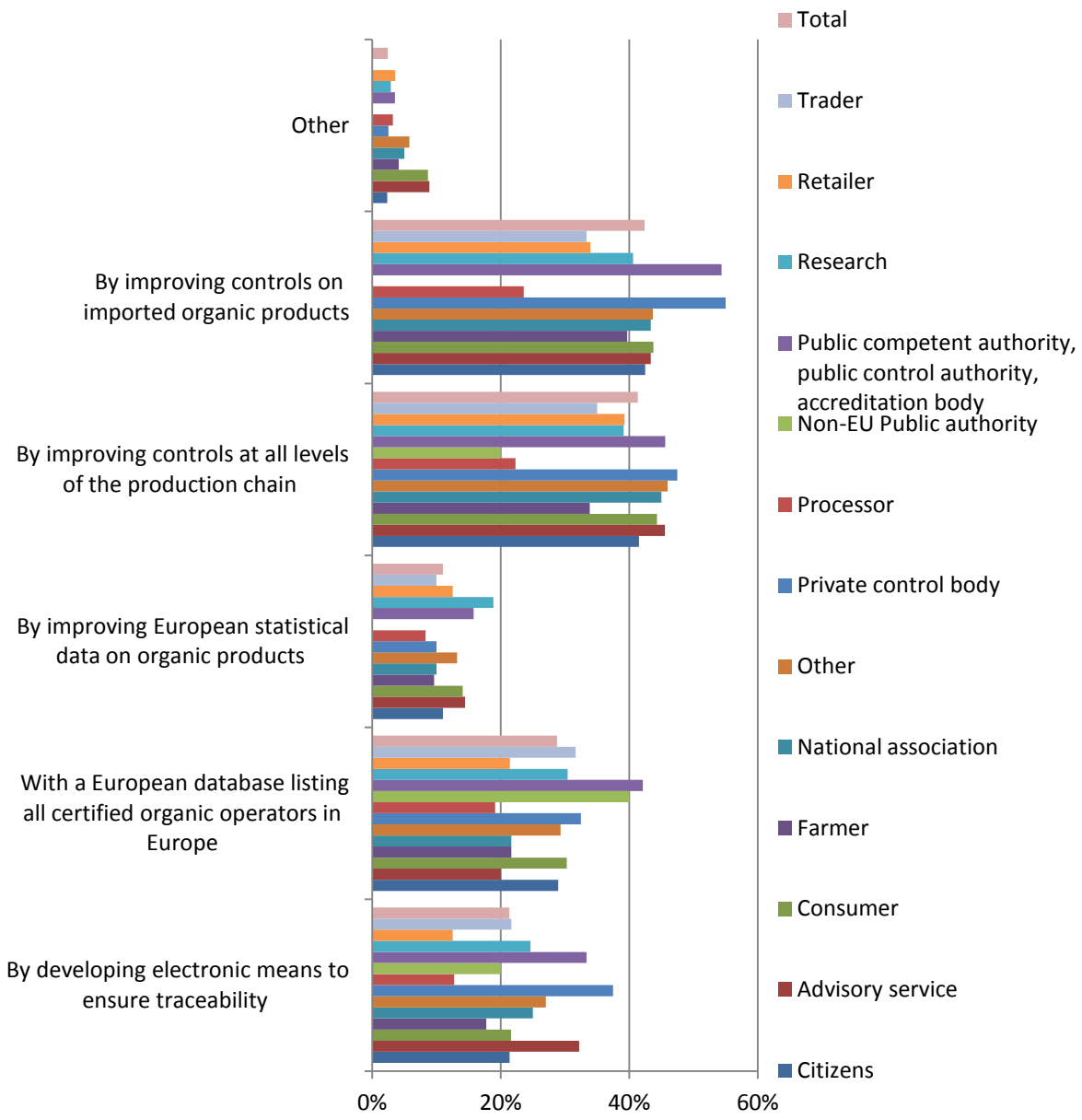


Figure 119 Percentage share of replies on solutions for improvement of control system for organic production by category of stakeholders

More than 40% of respondents representing almost all groups of stakeholders, except for traders, retailers, non-EU public authorities as well as processors (20-40%), opted for the option to improve controls on imported organic products. The second solution, namely improvement of controls at all levels of the production chain was most frequently indicated again by almost all categories of stakeholders, but in particular (more than 40% of respondents) by public competent authorities, public control authorities, accreditation bodies, private control bodies, national associations, consumer, advisory services and citizens. The possibility of developing a European database listing all certified organic operators in Europe attracted between 20% and 40% of replies from the majority of the categories of stakeholders.. The strongest supporters of this idea were the public authorities, public control authorities, accreditation bodies as well as non-EU public authorities. The support for the solution to develop electronic means to ensure traceability was quite unbalanced among all categories of stakeholders. The following categories were strongly in favour of the option: public authorities, public control authorities, accreditation bodies, private control bodies as

well as advisory services. Retailers, processors and farmers opted for this option, but to a lesser extent. The improvement possibility concentrating on improving European statistical data on organic products was chosen by less than 20% of respondents from each category. The minority of respondents from each category of stakeholders stated that there are other improvement possibilities. (see Figure 119).

Table 6 below presents a detailed distribution of replies on solutions for improvement of control system for organic production by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system .

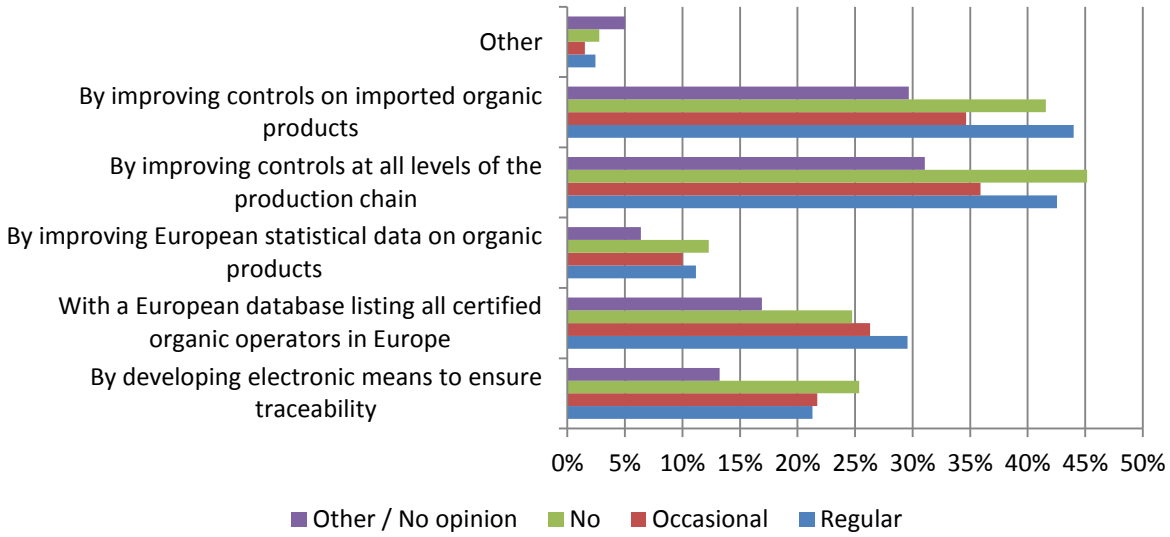


Figure 120 Percentage share of replies on solutions for improvement of control system for organic production by regularity of consumption of organic products

It appeared that the different classes of consumers – regular, occasional and non-organic – had a similar ranking system to the proposed solutions for improvement of control system for organic food and farming sector. The majority of respondents almost evenly highly evaluated the necessity for improvement of the controls on imported organic products and at all levels of the production chain. The solutions to create a European listing of all certified organic operators in Europe and to develop electronic means to ensure traceability were also important for the respondents of all groups. . The least preferred option was the one referring to ‘improving European statistical data on organic products and others’ (see Figure 120).

Table 6 Number of replies on solutions for improvement of control system for organic production by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system

Answer	By developing electronic means to ensure traceability					With a European database listing all certified organic operators in Europe					By improving European statistical data on organic products				
Category of stakeholders	Other MS	DK	FI	NL	Total	Other MS	DK	FI	NL	Total	Other MS	DK	FI	NL	Total
Citizens	8988	17	63	123	**9191**	12202	19	62	171	**12454**	4609	5	33	79	4726
Advisory service	27			2	**29**	18			0	**18**	13			0	13
Consumer	39		1	0	**40**	53		0	3	**56**	25		1	0	26
Farmer	142	1	6	6	**155**	177	2	6	4	**189**	78	2	2	2	84
National association	14		1		**15**	12		1		**13**	5		1		6
Other	44	1	1	1	**47**	47	1	1	2	**51**	22	0	0	1	23
Private control body	15				**15**	13				**13**	4				4
Processor	19	0	1	0	**20**	29	1	0	0	**30**	13	0	0	0	13
Public authority in a non-EU country	1				**1**	2				**2**	0				0
Public competent authority, public control authority, accreditation body	19				**19**	24				**24**	9				9
Research	17	0	0	0	**17**	19	1	1	0	**21**	12	1	0	0	13
Retailer	7			0	**7**	12			0	**12**	7			0	7
Trader	13		0	0	**13**	19		0	0	**19**	6		0	0	6
Total	9345	19	73	132	**9569**	12627	24	71	180	**12902**	4803	8	37	82	4930
Citizens	17490	22	83	267	**17862**	17929	22	83	244	**18278**	969	2	10	14	995
Advisory service	41			0	**41**	39			0	**39**	8			0	8
Consumer	80		0	2	**82**	77		1	3	**81**	16		0	0	16
Farmer	284	2	2	8	**296**	329	3	7	8	**347**	35	1	0	0	36
National association	26		1		**27**	25		1		**26**	3		0		3

Other	74	2	1	3	**80**	71	2	0	3	**76**	10	0	0	0	10
Private control body	19				**19**	22				**22**	1				1
Processor	32	1	1	1	**35**	36	1	0	0	**37**	5	0	0	0	5
Public authority in a non-EU country	1				**1**	0				**0**	0				0
Public competent authority, public control authority, accreditation body	26				**26**	31				**31**	2				2
Research	24	1	1	1	**27**	25	1	1	1	**28**	2	0	0	0	2
Retailer	22			0	**22**	19			0	**19**	2			0	2
Trader	19		0	2	**21**	19		0	1	**20**	0		0	0	0
Total	**18138**	**28**	**89**	**284**	**18539**	**18622**	**29**	**93**	**260**	**19004**	**1053**	**3**	**10**	**14**	1080

7.4. Opinion on group certification

Question no. 7.6 In several European countries, there are small farmers who apply the principles and rules of organic farming but can't sell their products as organic for various reasons, e.g.: they don't have access to certification, which proves to be costly, given their small organic production volumes they are not able to manage the documentation and records required by the European control system. One way of enabling such farmers to access certification and sell their products as organic could be on a joint basis, through farmer groups. These groups would have their own internal control systems, and therefore it would be sufficient to control a sample of farmers and not all farmers. ***Do you think that group certification – which is allowed for organic farmers in some non-EU countries, should be allowed in the EU?***

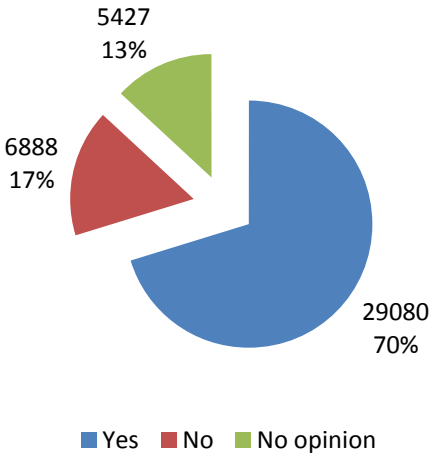


Figure 121 Number and percentage share of replies on acceptance for allowance of group certification in the EU: distribution of replies among 41395 records with registered answer

As presented on Figure **121** approximately 70% (29080) of the respondents favour the idea of allowance of group certification in the EU, which is allowed for organic farmers in some non-EU countries. Against group certification were only 17% (6888) repliers.

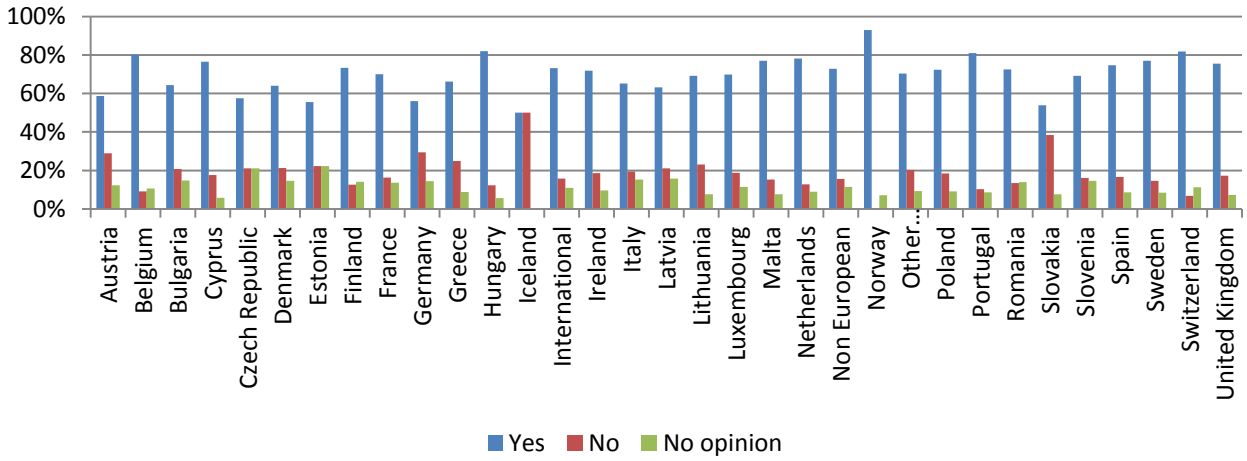


Figure 122 Percentage share of replies on acceptance for allowance of group certification in the EU by country

In almost all countries, except for Iceland, the majority of respondents were in favour of the creation of group certification system in the EU. Significant percentage proportion of negative

replies in relation to positive replies occurred in five countries: Austria, Germany, Greece, Iceland and Slovakia (see Figure 122).

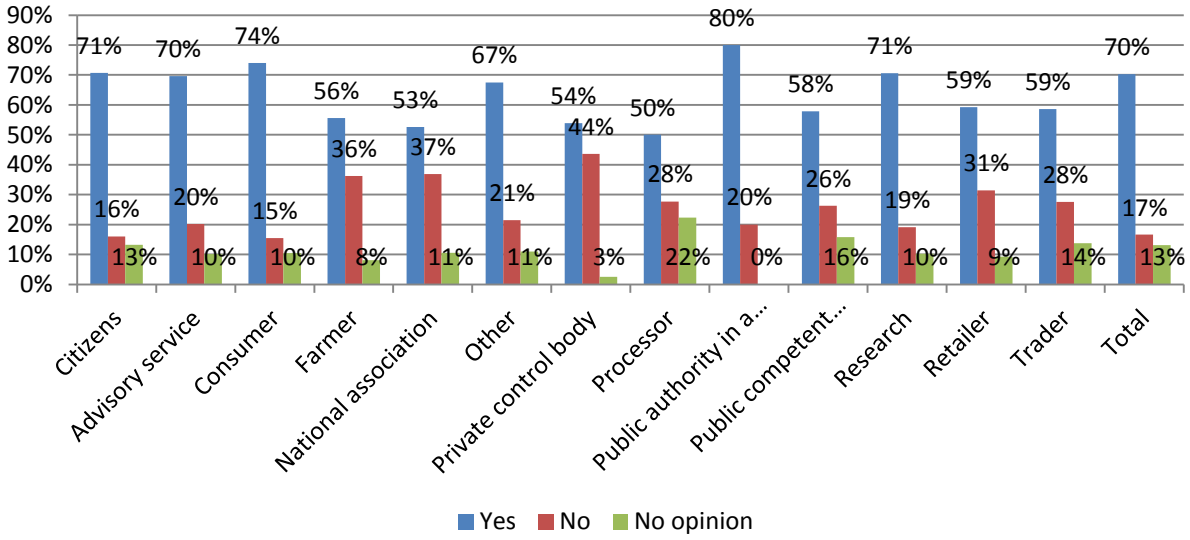


Figure 123 Percentage share of replies on acceptance for allowance of group certification in the EU by category of stakeholders

Among the different categories of stakeholders, as presented on Figure 123, most of the respondents (50-80%) supported the concept of group certification. The strongest supporters were among the following groups of stakeholders in descending order: non-EU public authorities (80%), consumers (74%), researchers (71%), citizens (71%), advisory services (70%) and others (67%). Even if the majority of respondents were in favour of the group certification, still in some groups occurred relevant percentage share of surveyed publics, who opposed to the model of group certification in the EU. This was namely noted, among private control bodies (44%), national associations (37%), and farmers (36%) as well as to a lesser extent but still – retailers (31%).

Table 7 below presents a detailed distribution of replies on acceptance for allowance of group certification in the EU by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system.

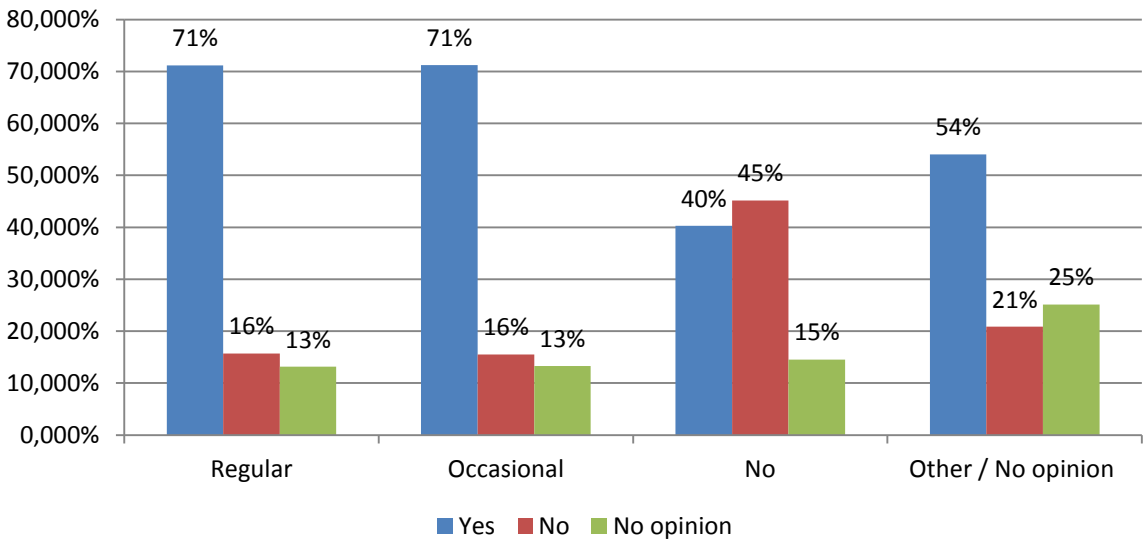


Figure 124 Percentage share of replies on acceptance for allowance of group certification in the EU by regularity of consumption of organic products

The attitude of questioned private consumers who consume and do not consume organic products was quite contradictory. Approximately 71% of the regular and the occasional buyers of organic products agreeably stated that group certification in the EU could be allowed. The opposite view was approximately 16% of these two groups of respondents. Further 13% of replies from each of the "regular" and "occasional" organic foodstuffs consumers groups did not have opinion on this matter. 45% of consumers, who declared that they never buy organic products, were against the group certification whereas 40% of them who were in favour of this idea. Besides, the group of "other/no opinion" was generally in favour of the group certification system for organic operators (see Figure 124).

Table 7 Number of replies on acceptance for allowance of group certification in the EU by category of stakeholders with division into countries with private (Other MS) and public (DK, FI, NL) control system

Answer	Yes					No					No opinion				
Category of stakeholders	Other MS	DK	FI	NL	Total	Other MS	DK	FI	NL	Total	Other MS	DK	FI	NL	Total
Citizens	27153	35	181	656	**28025**	6225	8	28	96	**6357**	5123	7	36	77	**5243**
Advisory service	59			3	**62**	18				**18**	9				**9**
Consumer	127		2	5	**134**	28				**28**	18		1		**19**
Farmer	444	8	14	8	**474**	286	8	4	11	**309**	65	3	1		**69**
National association	29		1		**30**	21				**21**	6				**6**
Other	104	3	2	1	**110**	33			2	**35**	18				**18**
Private control body	21				**21**	17				**17**	1				**1**
Processor	73	1			**74**	36		3	2	**41**	30	1	1	1	**33**
Public authority in a non-EU country	4				**4**	1				**1**					
Public competent authority, public control authority, accreditation body	33				**33**	15				**15**	9				**9**
Research	43	1	2	2	**48**	13				**13**	7				**7**
Retailer	29			3	**32**	17				**17**	5				**5**
Trader	30		1	3	**34**	15			1	**16**	8				**8**
Total	**28149**	**48**	**203**	**681**	**29081**	**6725**	**16**	**35**	**112**	**6888**	**5299**	**11**	**39**	**78**	**5427**

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

It is worth stating at this point the fact that some respondents contemplate the idea of collective certifications as a possible solution to the problem just exposed, the following quotations embody this idea:

- *"Le principe de la certification de groupement semble noble : permettre aux petits producteurs d'obtenir la labélisation en se regroupant. Car en effet, il est déjà injustifiable que ce soit à ceux qui cherchent à polluer le moins possible et à offrir un aliment sain aux consommateurs de devoir se justifier et payer leur certification." (FR)*
- *" Group certification only for very small and small farms (e.g. <25 dairy cows)" (DE029)*

The great majority of the consulted citizens are of the opinion that controls on this matter should be strengthened. When talking about strengthening controls, the contributors do not mean that they should be stricter but that they should be better as the sentence quoted below indicates:

- *"Strengthen controls by ensuring that the Competent Authorities do their job competently and consistently."*

The contributors also point out the idea that these controls should be carried out during the whole cycle of the organic process, including the imports in the scope of these examinations. Moreover, some of them suggest the following:

- *"In the growing season, controls must be displayed at least monthly"*
- *"Stricter controls on animals and feedstuff"(IT 041)*
- *"Controls on organic farming should be strengthened. Especially for imported food"*
- *"Strengthen the existing system but reducing the administrative burden."*

This subcategory seeks to gather the different opinions of the contributors on who are the agents that have to bear the costs of the certification (labelling testing, etc.). After an exhaustive examination of the contributions regarding this matter, we can state that most of them consider that the certification should fall over conventional farmers rather than organic ones as provided in the following sentences:

- *"Increase controls and certification costs to conventional farming to promote organic farming for economic reasons."*
- *"Controls should be lightened for organic farmers and strengthened for conventional farmers."*
- *"The burden of certification should be on conventional farmers."*
- *"Costs of testing should be borne by the producers of pesticides and GMO's themselves neither by the organic farmers nor the organic certification authorities."*
- *"The chemical-dependent producers who need greater levels of monitoring and more transparent labelling on their products. They are the ones who need controlling."*

In the same line of action, some of the contributors highlighted the idea that costs should be borne by the big companies, retailers and consumers as we can appreciate hereafter:

- *"More controls for bigger than for smaller producers – as higher potential risk and impact and lower cost are in big companies." (EN110)*
- *"The certification costs should be covered by consumers/retailers; controls have to be more often in the growing season; eliminate connection between farms and CB." (EN103)*
- *"Labelling costs should be borne by the corporations who are trying to sell hazardous products; the commission should keep these corporations under close watch."*

Others have another view:

- *"Controls should be implemented for all agricultural businesses"*

- *"The costs for the controls have to be financed from the government or EU and should not be taken account into the price of the products neither be paid by farmers"*
- *"The costs for the controls have to be financed from the government or EU and should not be taken account into the price of the products neither be paid by farmers" (FR 472)*
-

In the light of the contributions we can also take into consideration the fact that a lot of the contributors maintain that the costs of certification should be lowered as they are too high.
The contributions give suggestions towards changing the existing control system. Some consider that the best way to tackle this issue is to create an independent control body that might audit on an annual basis whether the conditions are being followed or not. Despite this last remark, some of the contributors deem it necessary to do controls more than once a year so to ensure a better control. However we find that others are more of the idea that controls should be carried out by the national authorities not by a private certification body. There are also those who support the idea of establishing more than one certification authority as to lower fees through competition. Some of them also highlight the importance of having a control over the private inspection bodies carried out by the public authorities. We can find an extract of some of these comments in the sentences provided below:

- *"Introduction of a self-certification for reducing the costs of bureaucratese" (IT 003)*
- *"Independent control body without notification and should be applied once a year on all products"*
- *"Organic control costs are high; why not use a non-profit organization to control them?"*
- *"National controls instead of controls by a certification body." (IT 017)*
- *"More than one certification authority to lower fees through competition."*
- *"Continue with the annual inspections but determine its intensity and comprehension."*
- *"It is important for the competent authorities to oversee the private inspection bodies."*
- *"A yearly audit is not sufficient to assure compliance with the standard and prevent fraud."*

Most of the contributors consider that the correct course of action would be to increase the number of controls, making them more often. There are even those who suggest that:

- *"Controls should be examined unannounced and more often" (DE019)*
- *"More controls on residues should be carried out, in both organic and conventional farming"*

In spite of the suggestions above placed there are some contributors who consider that the number of inspections is something which should be determined by the control bodies themselves as established in the next sentence:

- *"The number of controls/inspections should be determined by the control body/inspector itself." (DE029)*

Other remarks and suggestions with regard to controls:

- *"Control of the blanket use of Round-up on cereal land as it turns vast track of agricultural land to a lifeless colour killing the greenery upon which the natural life of soils depend as well as wildlife."*
- *"Soil Association labelling is trustworthy but the other sorts of certification not that much."*
- *"Enforce a fairer pricing system for organic certification in the UK as the actual drives out the small producers who are the mainstay of the organic movement (if not in 2 or 3 years they will have to abandon organic farming)"*
- *"Controls can be done with the application of the magnetic resonance"(IT 032)*
- *"New label on "ecological products" when produced next to the consumer."*

- *"Shape controls promoting an agricultural sector that is sustainable, that preserves biodiversity and the rural tissue, that is ethical. See Nature et Progrès http://www.natureetprogres.org/"*
- *"No trust in the organic label due to previous fraud at European level (Higher sanctions)"*
- *"Transparency about controlling pesticide residues"*
- *"More control about abusing the term bio"*

8. TRADE WITH NON-EU COUNTRIES

8.1. Opening of the non-EU markets to organic products produced in the EU countries

Question no. 8.1 The EU is a major importer of organic products and one of the two largest markets for organic products. The EU has developed specific agreements or arrangements with countries where organic standards and control systems are recognised as equivalent. This means their standards are capable of meeting the objectives and principles of European organic farming and ensure the same level of product conformity. The EU has also recognised directly some private inspection bodies which apply equivalent standards in non-EU countries. In addition, during a transition period, EU countries can grant import authorisation for organic products. ***The EU market is open to imports of organic products from non-EU countries. Do you agree that non-EU countries exporting to the EU should open their market to organic products produced in EU countries?***

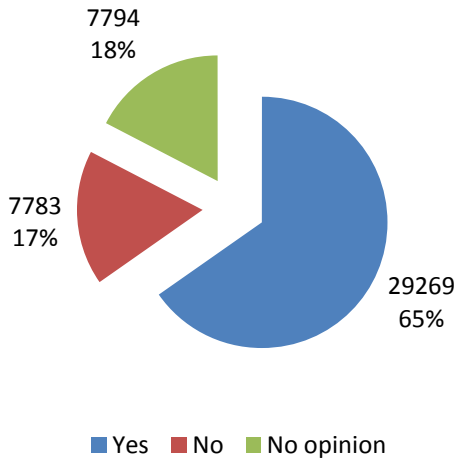


Figure 125 Number and percentage share of replies on necessity for opening of the non-EU markets to organic products produced in the EU countries

The questioned publics were asked to express their opinion on whether the non-EU markets should be opened for organic products produced in the EU countries. The majority of respondents (65%, 29269) demanded opening of the non-EU markets to EU organic products. However, as many as 7783 interviewees (17%) made an objection to the opening of non-EU markets to EU organic products. Almost one fifth of respondents (18%, 7794) abstained from answering to this particular question (see Figure 125).

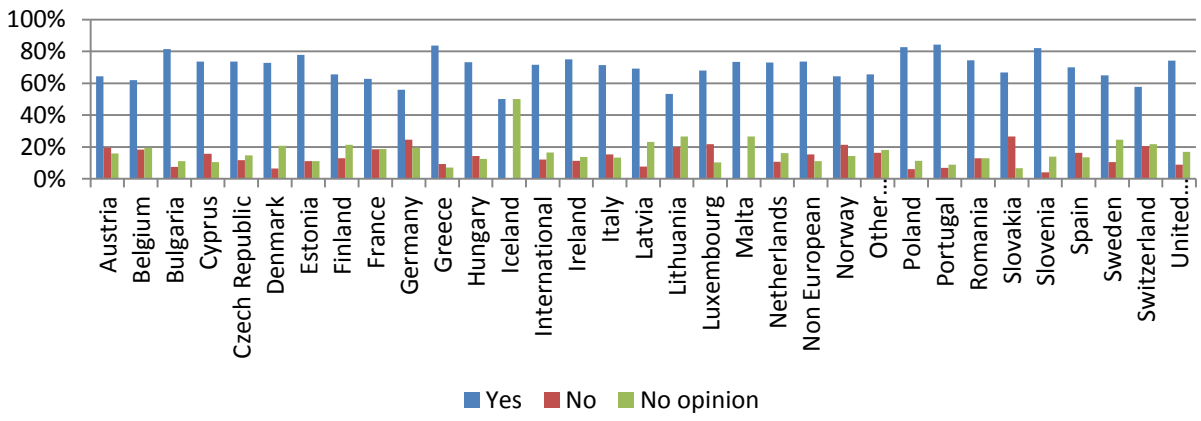


Figure 126 Percentage share of replies on necessity for opening of the non-EU markets to organic products produced in the EU countries by country

Figure 126 presents the attitude of respondents from different countries towards the necessity for opening of the non-EU markets to organic products produced in the EU. The vast preponderance of respondents from each of the countries favours the proposal for opening of the non-EU markets to organic products produced in the EU. Only the minority of 5-20% of interviewed citizens disapproved the export of EU organic products to non-EU markets.

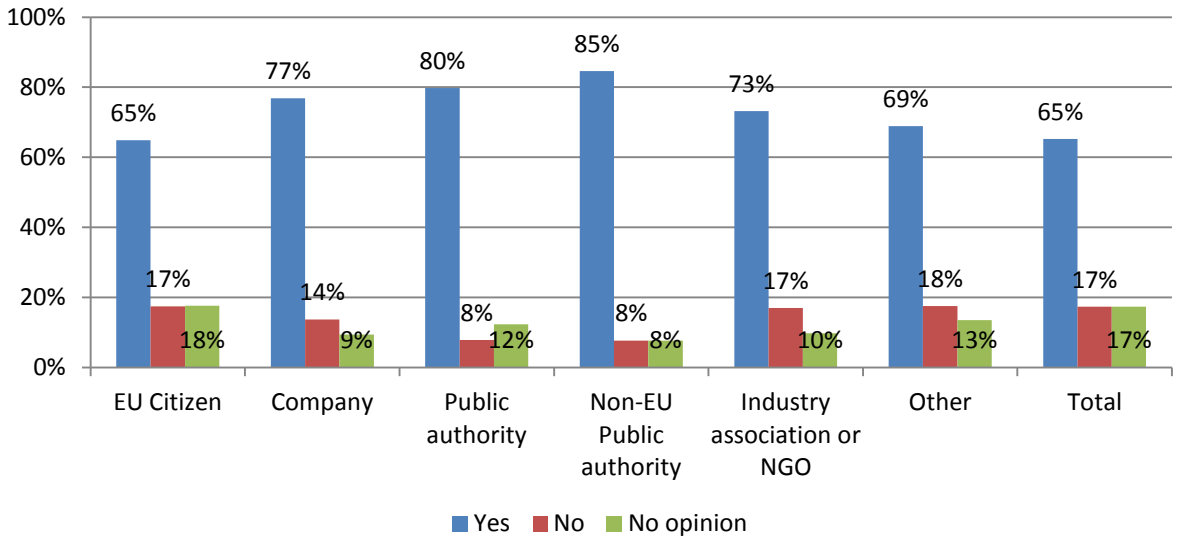


Figure 127 Percentage share of replies on necessity for opening of the non-EU markets to organic products produced in the EU countries by capacity

Regardless of the respondents' capacity, most of them in each group expressed approval for the idea of opening the non-EU market for the organic products produced in the EU countries. In detail, 80% and more of respondents answering on behalf of public authorities (80%) and non-EU public authorities (85%) strongly required the export of "made in EU" organic products to non- EU countries. In addition, the same request was made by more than 65% of the questioned stakeholders representing companies (77%), industry associations or NGO (73%), EU citizens (65%) and others (69%). A lower percentage of respondents (8-18%) in respective stakeholder's capacities disapproved the proposal for opening the non-EU markets for EU organic products (see Figure 127).

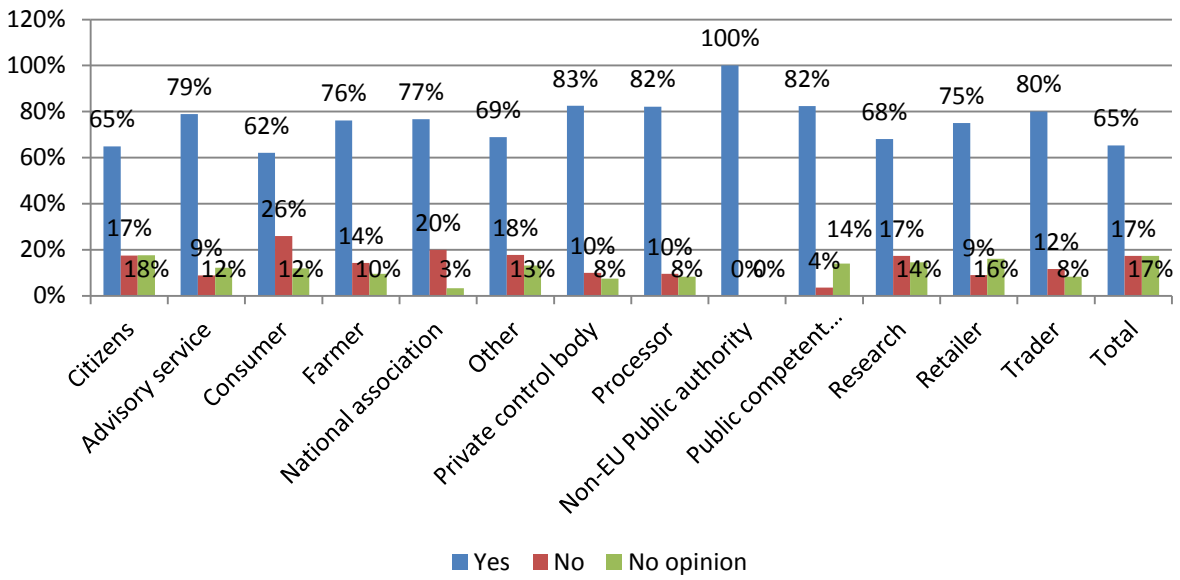


Figure 128 Percentage share of replies on necessity for opening of the non-EU markets to organic products produced in the EU countries by category of stakeholders

Figure 128 illustrates the approach of the respondents representing different categories of stakeholders towards boosting export of organic products produced in EU to non-EU countries. It appears that regardless of the category, at least more than 60% of the interviewees were in favour of opening of the non-EU markets to the EU organic products. The largest percentage share (i.e. 80% and more) of respondents affirming the proposal occurred in descending order among the following categories of stakeholders: non-EU public authorities (100%), private control bodies (83%), processors (82%), public competent authorities, public control authorities, accreditation bodies (82%) as well as traders (80%). Within the remaining categories the percentage share of positive attitude to opening of the non-EU markets to organic products produced in the EU countries ranged from 62% to 79%. However, it is important to emphasise that as many as 26% and 20% of interviewees representing respectively consumers' and national associations' interests opposed the reinforcement of EU organic products export to non-EU countries' markets.

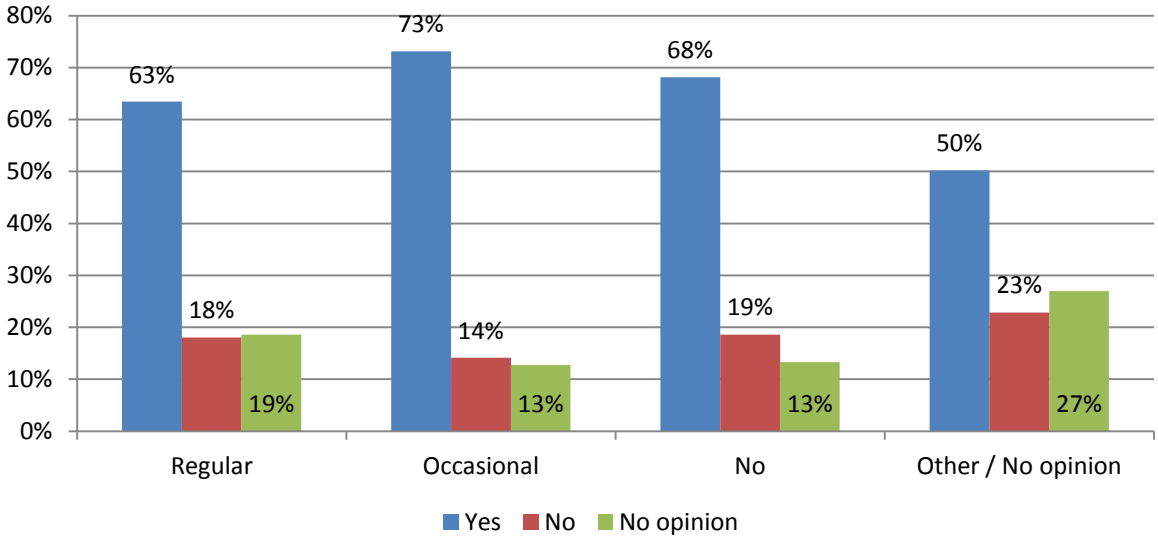


Figure 129 Percentage share of replies on necessity for opening of the non-EU markets to organic products produced in the EU countries by regularity of consumption of organic products

The proportions of affirmative and adversative replies on the necessity for opening of the non-EU markets to organic products produced in the EU countries among the different groups of surveyed private consumers appeared to be very similar to the ratio of the total questioned population. Namely, nearby 60-70% of respondents, who stated the consumption of organic products on a regular (63%) and occasional (73%) basis as well as on no occasion (68%), replied that they are support the proposal for opening the non-EU markets to the EU organic products. The remaining 30-40% were more or less evenly divided between the negative as well as no opinion choices, irrespective of the type of the group (see Figure 129).

8.2. Objectives in negotiations of trade agreements for organic products with countries outside the EU

Question no. 8.2 When negotiating trade arrangements for organic products with countries outside the EU, which objectives are the most important for the EU?

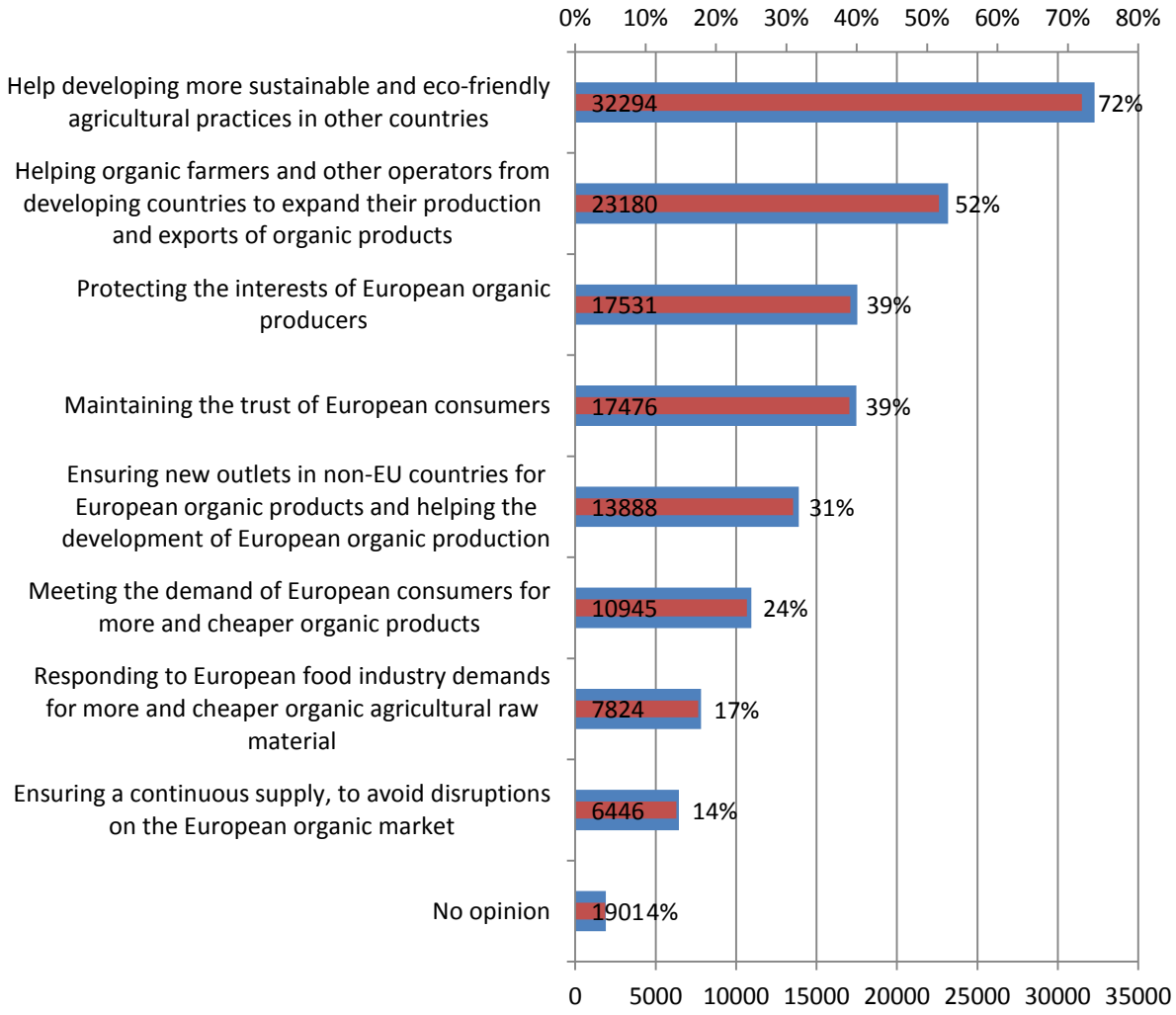


Figure 130 Percentage share of replies on specification of objectives of great significance to negotiations of trade agreements for organic products with countries outside the EU

The respondents were asked to point out the most essential objectives for the EU for negotiations of trade agreements with countries outside the EU with regard to organic products. It appeared that the most relevant objective it to support the development of more sustainable and eco-friendly agricultural practices in other countries (72%, 32294). The

second objective of great significance to respondents is to encourage organic farmers and other operators from developing countries to expand their production and exports of organic products (52%, 23180).Equally relevant for 39% of questioned citizens were the following two objectives: protection of the interest of the European organic producers (17531) and preservation of the European consumer's trust in terms of organic products (17476). Less substantial, but still indicated by approximately 15-30% of respondents were the following objectives in descending order of relevance: ensuring new outlets in non-EU countries for European organic products and helping the development of European organic production (31%, 13888), meeting the demand of European consumers for more and cheaper organic products (24%, 10945), responding to the European food industry demands for more and cheaper organic agricultural raw material (17%, 7824) as well as ensuring a continuous supply in order to avoid disruptions on the European organic market (14%, 6446). In addition, approximately 4% (1901) of surveyed publics did not have opinion with regard to this issue (see Figure 130).

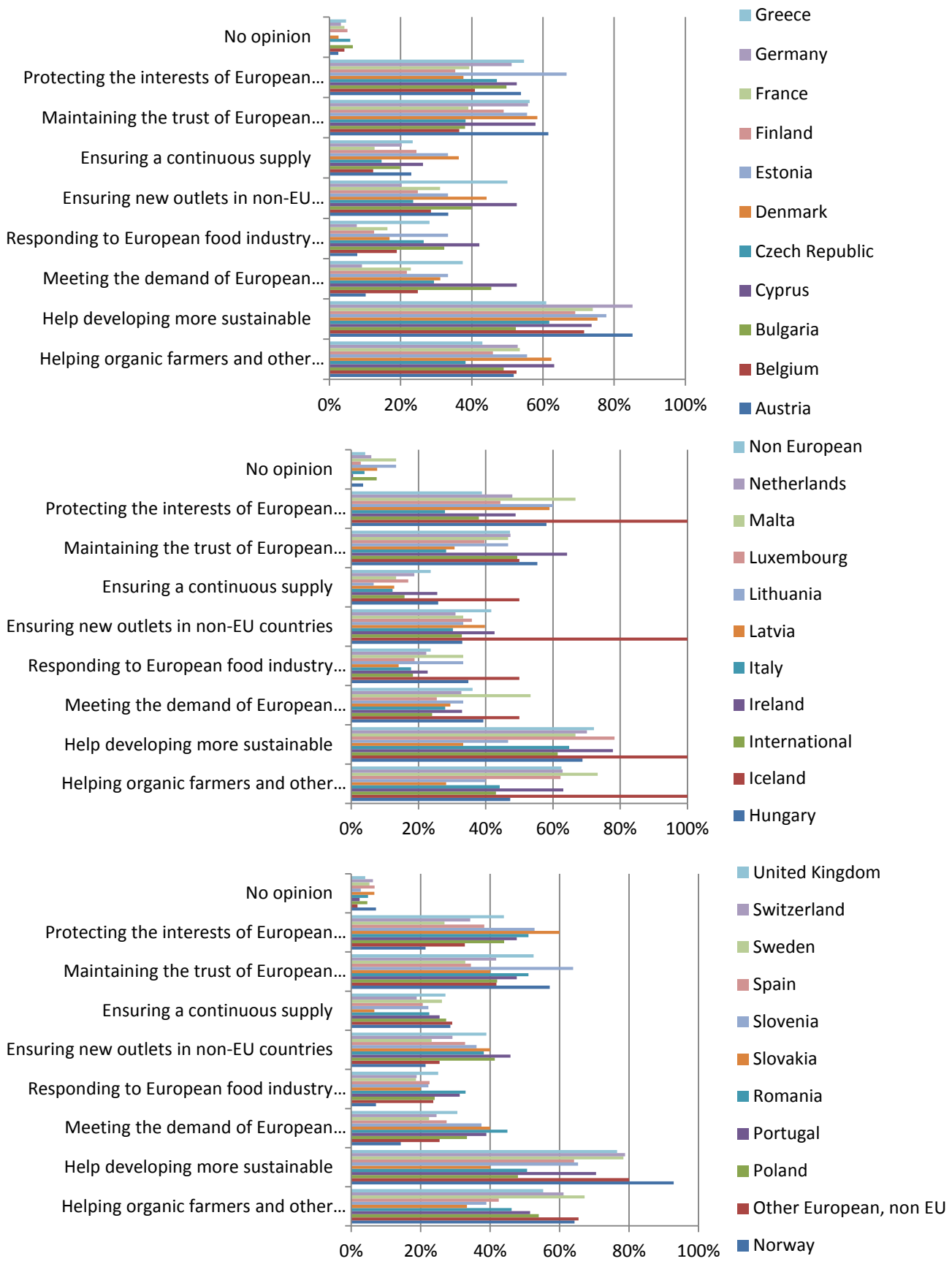


Figure 131 Percentage share of replies on specification of objectives of great significance to negotiations of trade agreements for organic products with countries outside the EU by country

Figure 131 presents countries' ranking of objectives by their significance to negotiations of trade agreements for organic products with countries outside the EU. With some exceptions the ranking of objectives for most of the countries is very similar to that of the general population. Therefore, for most of the countries, with the exception of Latvia, the most relevant objective was to help the development of more sustainable and eco-friendly agricultural practices in other countries. Less important for Czech Republic, Lithuania, Latvia, Slovenia and Slovakia in comparison with the results of general pool of respondents was the objective to support organic farmers and other operators from developing countries to expand their production and exports of organic products. Furthermore, for Estonia, Lithuania, Latvia, Malta and Slovakia a particularly important objective was the protection of the interests of the European organic producers. A lot of countries such as Greece, Germany, Estonia, Cyprus, Denmark, Austria, Ireland, Hungary, Slovenia as well as Norway highly evaluated also the objective to maintain the trust of European consumers. Ensuring new outlets in non-EU countries for European organic products and helping the development of European organic production was particularly vital for Greece, Cyprus, Denmark, Non-European countries, Iceland, Ireland, Portugal and Poland. Besides, many respondents from Cyprus, Bulgaria, Malta, Iceland and Romania emphasised the importance of meeting the demand of European consumers for more and cheaper organic products.

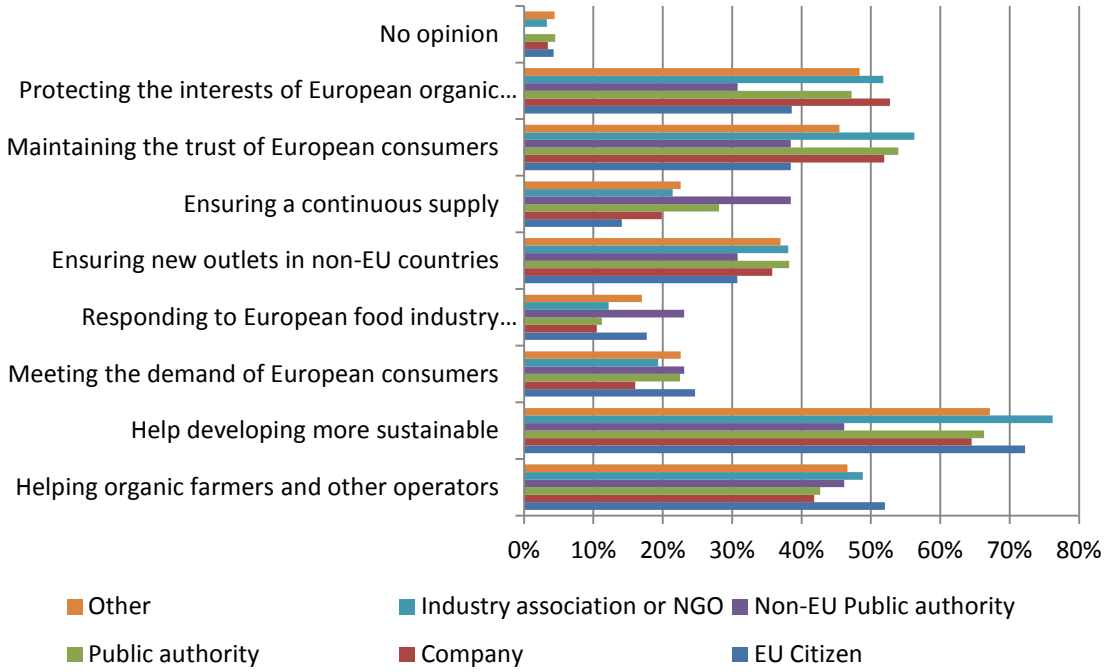


Figure 132 Percentage share of replies on specification of objectives of great significance to negotiations of trade agreements for organic products with countries outside the EU by capacity

Figure 132 illustrates the ranking of the of objectives of great significance to negotiations of trade agreements for organic products with countries outside the EU by capacity. It turned out the ranking of EU citizens is the same as this one established by the total group of respondents. In the other groups, however, there are some differences. Absolute number one objective for all capacities except for non-EU public authorities is to help the development of more sustainable and eco-friendly agricultural practices in other countries. Non-EU public authorities rated this objective equally high as the help for organic farmers and other operators from developing countries to expand their production and exports of organic products. For companies, public authorities and industry associations or NGOs next in the order are two

objectives maintenance of the trust of European consumers and protection of the interests of European organic producers. Only after these two, the following objectives in descending order: to help organic farmers and others operators from developing countries to expand their production and exports of organic products and to ensure new outlets in non-EU countries for European organic products become important for companies, public authorities and industry associations or NGOs. The remaining objectives also acquired attention from these three capacities, but to a lesser extent. Nonetheless, non-EU public authorities evaluated them quite highly.

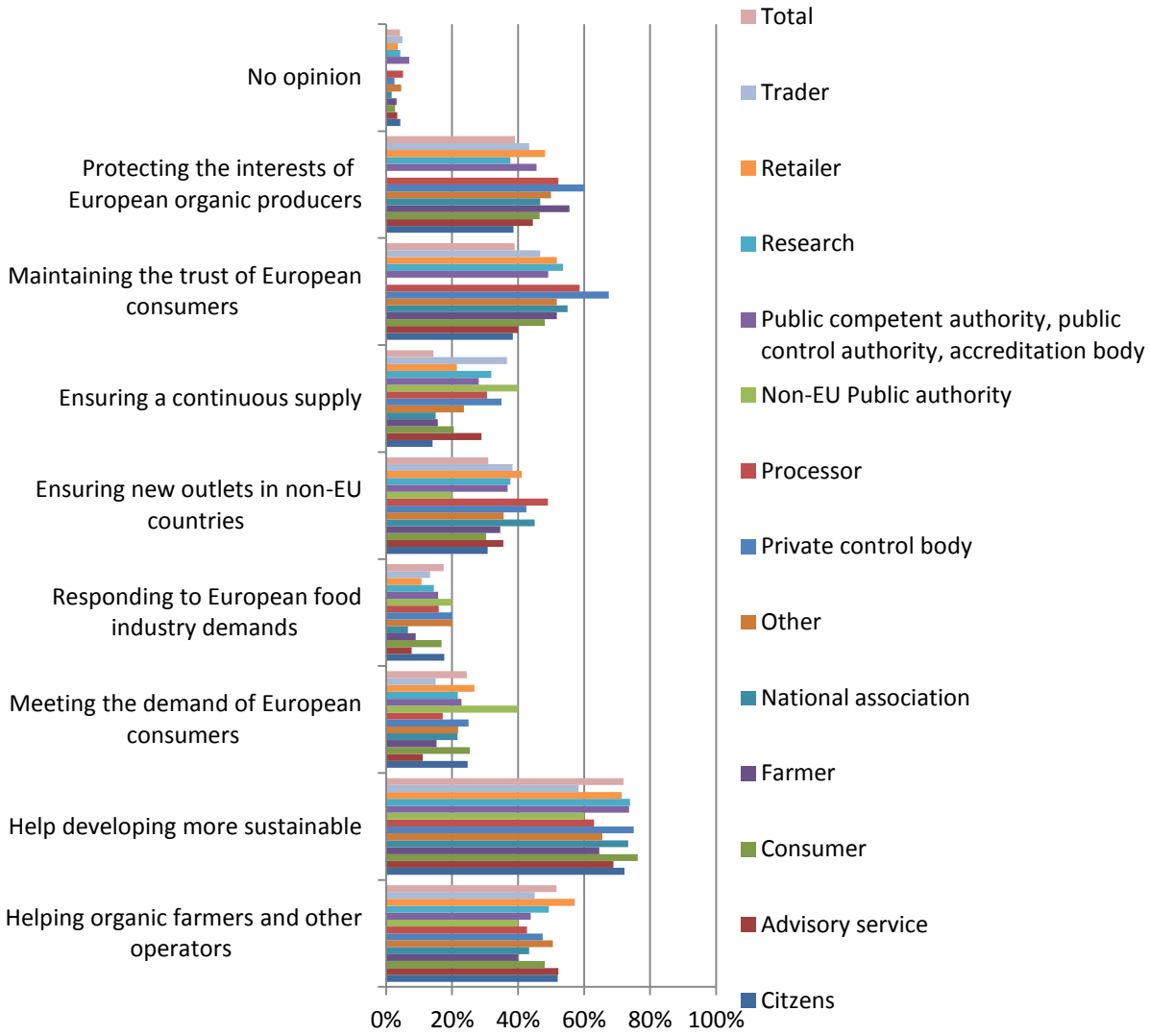


Figure 133 Percentage share of replies on specification of objectives of great significance to negotiations of trade agreements for organic products with countries outside the EU by category of stakeholders

As presented on Figure 133, for all categories of stakeholders without exceptions, the most significant objective was to help the development of more sustainable and eco-friendly agricultural practices in other countries. The next three objectives which gained the highest attention with special emphasis made by respective stakeholders, were: helping organic farmers and other operators (particularly interested were retailers), maintaining the trust of European consumers (especially highly rated by all categories except for citizens and advisory services) and protecting the interest of European consumers (underlined by all excluding researchers and advisory services). Retailers, processors, private control bodies as well as national associations highly evaluated also the objective to ensure new outlets in non-EU

countries for European organic products. Other objectives were also important for most of the categories of stakeholders but not to such a large extent as the previously mentioned.

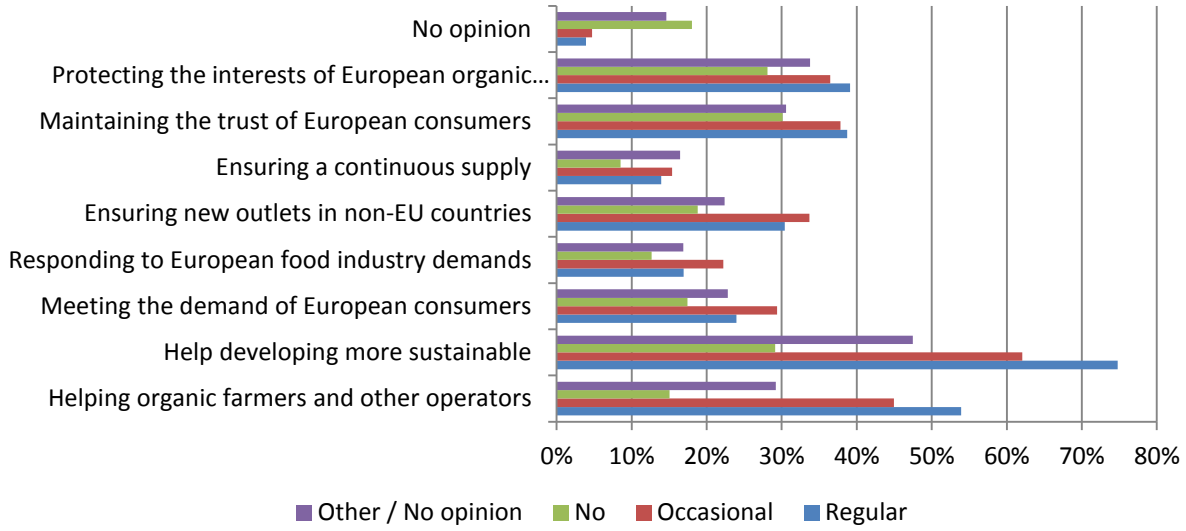


Figure 134 Percentage share of replies on specification of objectives of great significance to negotiations of trade agreements for organic products with countries outside the EU by regularity of consumption of organic products

The order of the objectives established by the consumers, who buy organic products regularly and occasionally is equal to the ranking set up by the choices made by the general questioned population. For consumers, who declared that they did not purchase organic products, the most important objectives were in descending order: maintenance of the trust of European consumers, support for he sustainable development as well as protection of the interests of European organic operators and then all the other (see Figure 134).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

The citizens expressing their views on the matter clearly agree that organic farming ought to be local with no trade implications.

- *"Promoting organic agriculture is good, importing (organic produce) from the other side of the world makes no sense"(FR 293)*
- *"Organic produce that travel thousands of kilometres is aberrant" (FR071)*
- *"It is unbearable to find organic produce that in fact come from far and sometimes even from the other side of the world (high environmental cost)" (FR 286)*
- *"Organic agriculture ought to be traditional, local and not meant for export" (FR 278)*
- *"Agriculture should be locale and regional, and should not rely on imports (…)" (FR 512)*

There are two overall reasons/objectives why the citizens associate organic farming with being local. First, with local production supplying local demand, many benefits are created by both producers and consumers. This in turn strengthens the social tissue. Second, local agricultural production without trade limits its carbon footprint, hence its impact on the environment. Few have expressed their view on organic trade other than promoting (exporting) European organic foods in Third countries. German, French and Italian citizens believe organic produce ought to be locally farmed. The British were more concerned about the origin of organic products. Like the French, many stress organic products should be farmed locally and their importation limited or banned in the EU.

With many farmers retiring and few people of the younger generation willing to take over, European farming communities have been decreasing at an alarming rate and sparked major debates and concerns on what to do the reduce the tendency. Many regard local farming as a key solution, and organic farming, with the proper framework and orientations, could greatly contribute to strengthen social inter-relations in the rural areas.

Strengthening this social tissue must go with promoting short value chains and small farming systems. Many citizen contributions stress the need for producers and consumers to be re-connected, as both actors would mutually benefit from it. Greater transparency; increased accountability; higher quality; less control, are some of the expected gains. Certain contributions go further suggesting job creation and positive spill over effects on other sectors of the rural economy.

- *"I want to emphasize that the most important is to promote local production and avoid the transportation of produce (…) The Associations for the Preservation of Peasantry Agriculture (AMAP) show that this is possible and does create jobs" (FR 280)*
- *"It seems aberrant to develop provisions from foreign countries when the needs are important within the EU. A significant effort has to be done to favour organic production within the EU, which will (…) prevent job relocations in a sector already in crisis" (FR 058)*
- *"The EU should favour an agriculture that is local and seasonal, no imports, no exports " (FR 288)*
- *"Promote organic agriculture is good, importing organic product from elsewhere makes no sense. It would be good to sensitize people to a local and seasonal consumption, favour small producers and cooperatives rather that large agribusiness industries" (FR 293)*
- *"Eating organic means respecting the environment, the people that work in this sector as well as the animals. Respecting the environment is also a consumer's duty, by favouring local production and preventing the purchase of products coming from elsewhere". (FR522)*
- *"Producing organic is good but promoting short circuits is better: what is the environmental impact of a merchandise produced limiting inputs compared to the same merchandise produced "organically" on the other side of the world and transported here? And the production controls?" (FR526)*
- *"Let's remind ourselves that organic agriculture makes sense when it is locale and seasonal (and also social). Animal feed should be produced on the farm and importing of protein should be minimal, if not banned" (FR 544)*

Organic farming is seen by Europeans as more environmentally sustainable than conventional farming (fewer inputs, inputs use within reason). Now, if organic produce are then imported/exported around the world, the question of carbon footprint arises, asking for clarifications on whether organic farming is really more environmentally friendly. Hence, French perceive that transportation -which generates greenhouse gas -of organic produce should be limited, if not prohibited. Germans are also concerned about the (adverse) environmental effects of intensive foreign protein rich crop production, imported and given as feed to sustain European meat production. Consequently, some stress decreases in meat consumption to reduce such imports.

- *"The main objective of organic agriculture is ecology, which means respecting the most fundamental laws of Nature's balance" (FR273)*
- *"It seems aberrant to develop provision from foreign countries when the needs are important within the EU. A significant effort has to be done to favour organic production within the EU, which will foster better management of water resources" (FR058)*

- *"Certification should favour smaller units of production that are oriented towards short circuits because they create jobs, in quantity and quality; they are less demanding in costly technologies; they have greater bargaining power with retailers; they are more transparent about professional practices; they favour biodiversity; they favour more sustainable rural management ; they favour moderate consumption of resources; they limit waste; favour animal health; their carbon footprint is limited (FR 092)*
- *"I think that organic agriculture should remain local and of human size: we must stop wanting to export at all cost. Local agriculture is the least pollutant and for me imports of food from half way around the world imply pollution and loss of opportunities for local farmers" (FR 257)*
- *"Favour the development of "small" and "local" organic producers practicing very short value chains. It would be an excellent source of jobs and produce. Plus, it would be good in terms of the environmental impact" (FR 264)*

Some citizens in their contributions stressed the importance of reducing our meat consumption habits to avoid imports of vegetable based protein for animal feed:

- *"I believe that organic agriculture could go further integrating a local dimension for input provision and sales" (FR 079)*
- *"Do you believe that feeding Europe with organic meat is sustainable when yearly average meat consumption is 85 kilograms per citizen?" (FR 278)*
- *"Rethink our meat consumption. Eating less is better, in particular to decrease imports of vegetable protein to feed animals" (FR 290)*
- *"Campaign for a reduction in meat consumption since feeding animals requires greater land surface compared to producing a more balanced diet based on vegetables." (FR 516)*
- *"Meat consumption in rich countries should be drastically reduced." (FR 527)*

9. RESEARCH AND INNOVATION

9.1. Research and innovation areas needed in organic food and farming sector

Question no. 9.1 In which areas are research and innovation most needed in organic farming?

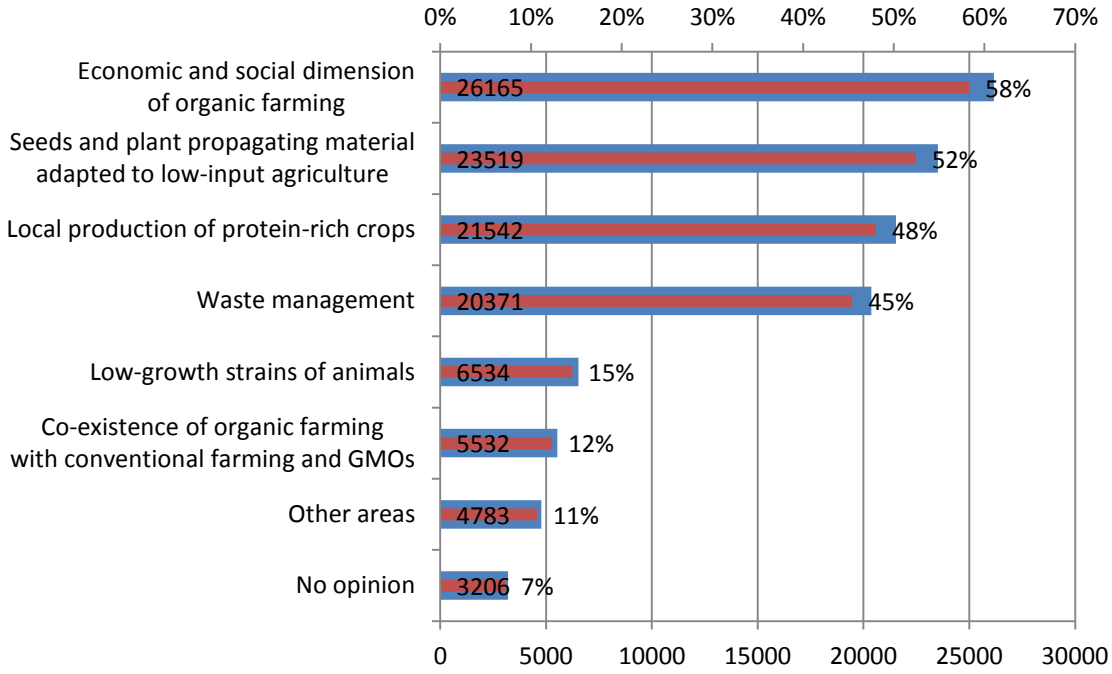


Figure 135 Percentage share of replies on most needed areas of research and innovation in the organic food and farming sector

The respondents clearly identified four areas which should benefit from more research and innovation in organic food and farming sector. "Economic and social dimension of organic farming" (58%, 26165), "seeds and plant propagating material adapted to low-input agriculture" (52%, 23519), "local production of protein in-rich crops" (48%, 21542) and "waste management" (45%, 20371) follow each other in the ranking set up by the respondents with only few percentage point of difference. Two areas were selected as areas which would need more research and innovation but with a percentage much lower than the four above listed, namely "low-growth strains of animals" (15%, 6534) and "co-existence of organic farming with conventional farming and GMOs" (12%, 5532). A relevant number of respondents identified other areas not listed in the possible set of answers (11%, 4783) or was unable to express an opinion on this issue (7%, 3206) (see Figure 135).

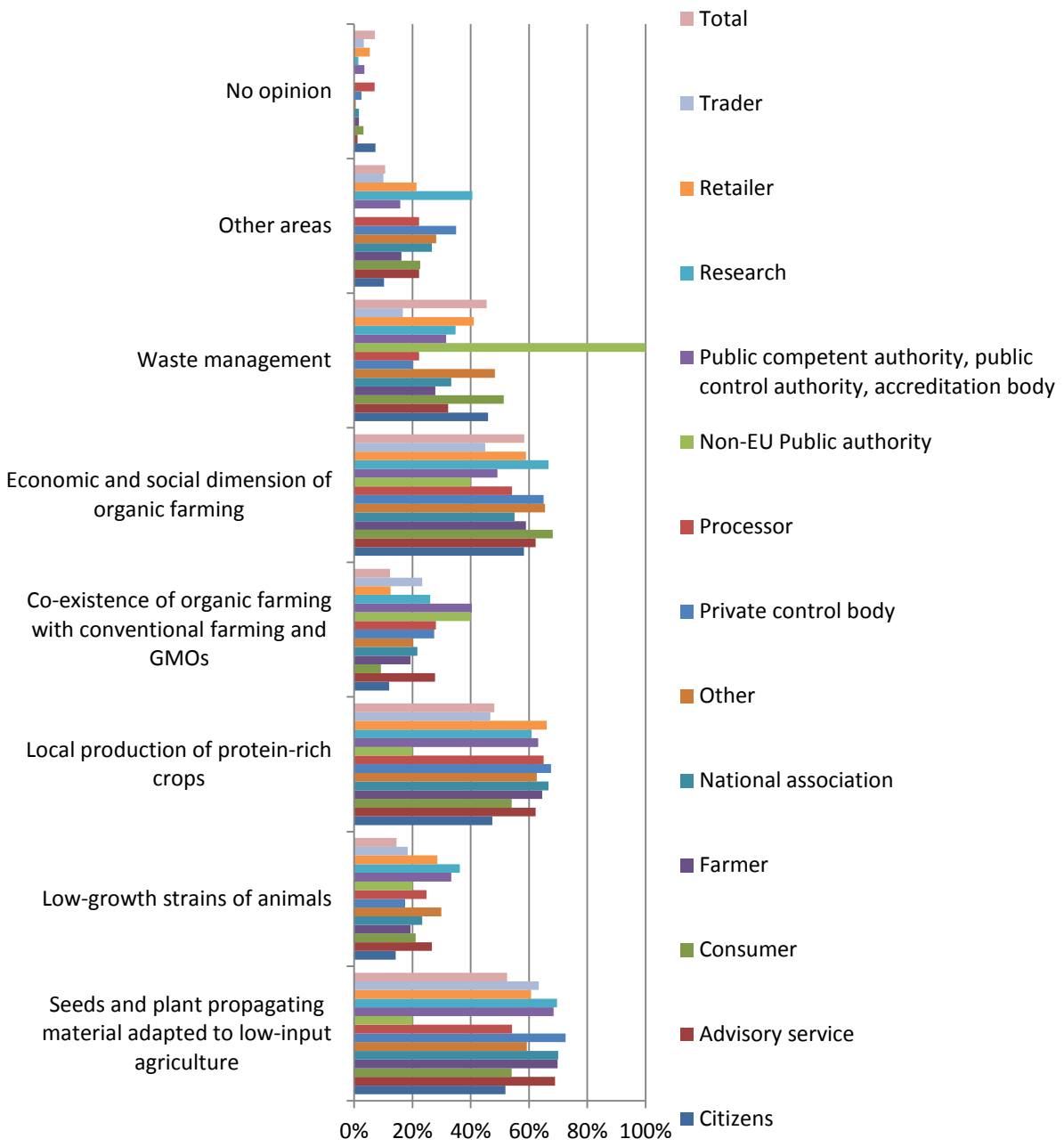


Figure 136 Percentage share of replies on most needed areas of research and innovation in the organic food and farming sector by category of stakeholders

The percentage share of replies to the question on areas that need more research and innovation in the organic food and farming sector is quite balanced among the different categories of stakeholders. More than half of respondents in each category of stakeholders except non-EU public authority, opted for the research areas entitled "seeds and plant propagating material adapted to low-input agriculture", "local production of protein-rich crops" as well as "economic and social dimension of organic farming". The representatives of retailers, consumers, citizens and others definitely and the remaining groups of stakeholders relatively opted for the topic "waste management". Consumers and farmers also decisively supported more attention to the subject area entitled "co-existence of organic farming with conventional farming and GMOs". Approximately one third of respondents from all categories of stakeholders wanted special attention to be put on the subject area "low-growth strains of animals" and other topics. Here, it should be noted that mainly the group of

respondents – researchers frequently selected also the possible answer "other areas" (see Figure 136).

9.2. Public budget and research in organic sector

Question no. 9.2 Do you think there should be a public budget reserved exclusively for research into organic production?

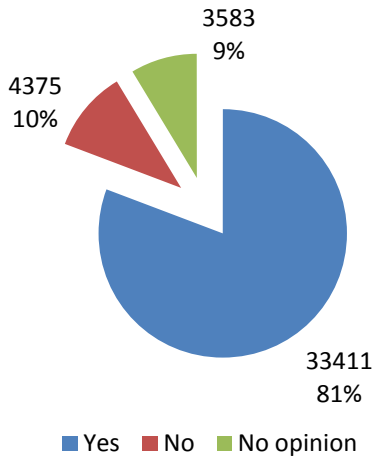


Figure 137 Number and percentage share of replies on necessity for reservation a public budget exclusively for research in organic sector: distribution of replies among 41369 records with registered answer

An overwhelming majority of the respondents (81%, 33411) thinks that organic production should benefit from a public budget reserved only for research. The other two possible answers to this question obtained comparable percentage share, namely 10% (4375) of the respondents would not reserve a public budget exclusively for research in organic sector and 9% (3583) could not express an opinion on this issue (see Figure **137**).

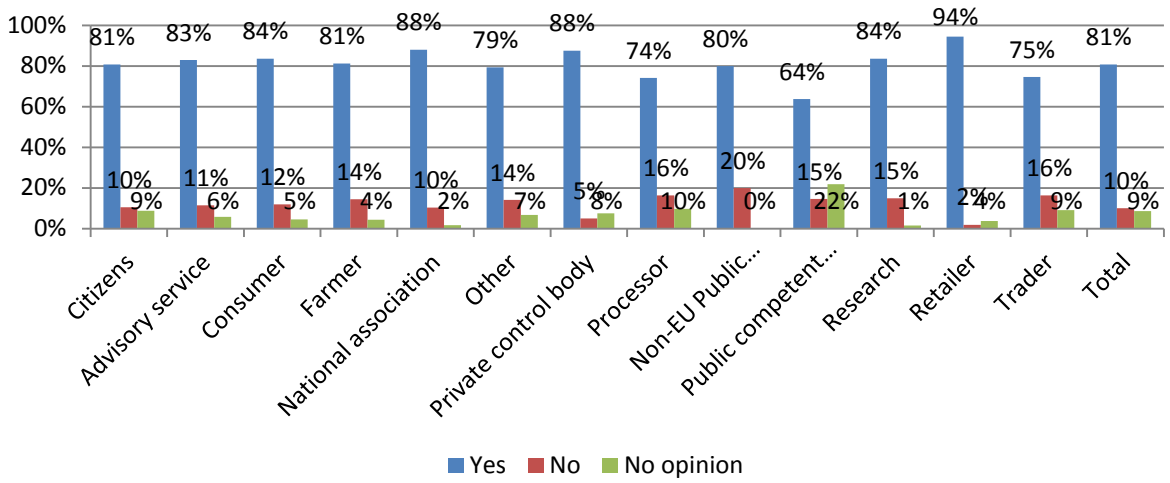


Figure 138 Percentage share of replies on necessity for reservation of public budget exclusively for research in organic sector by category of stakeholders

With regard to different categories of stakeholders and reservation of public money specifically for research in organic sector, it appeared that the opinion was more or less

evenly shared by all groups. In detail, on average 80% of representatives from each category of stakeholders were in favour of this action. However, surprisingly, the category of public competent authority, public control authority and accreditation body is the one that demonstrated the lowest interest (64%). Non-EU public authority (20%), followed by processors and traders (16%) were the categories of stakeholders with the highest percentage share of negative attitude towards allocation of a part of public money only for the purpose of research in organic sector (see Figure 138).

Question no. 10 Comments and suggestions – opinion expressed by respondents in free contributions

Research on agriculture and food should be specifically earmarked on innovation programs for organic production. Subjects for research are various: use of hydroponics and bionomics, biology and microbiology of soils, agro-ecological management. Research on non-renewables-based fertilizers and pest management, on rustic breeds and hybrids, less prone to disease and parasites, comparison of conventional and organic farming in stressful conditions (i.e. soil, water, air), comparison of production costs between conventional and organic farming systems, alternative production and recycling technics (wastes, etc.).

- *"20% of EU research found on agriculture and food should be specifically earmarked for different innovation programs for organic food. Further, general research should include organic relevant aspects in the design of research programs and calls." (EN 102)*
- *"Research on non-renewables-based fertilizers and pest." (EN 100)*
- *"Research on breeding methods." (DE EC1)*
- *"Research on becoming independent in feed supply, especially in protein-rich feed. / Innovations in organic farming are needed especially in the areas of plant breeding, the regional production of protein crops. / 20% of the EU's research budget for agriculture and food innovation programs in the organic food industry should be determined. In addition organic farming aspects should be taken up in all research contracts." (DE EC2)*

- *"Research found for the local community supported projects." (DE 029)*
- *"Research on environmental and health benefits of OF." (DE 036)*
- *"Research on sustainability certification, e.g. ISO 26000 (CSR)." (DE 037)*
- *"1. Research on comparison of conventional and organic farming in stressful conditions (i.e. soil, water, air); 2. Comparison of the production costs of an agricultural products from organic and conventional farming systems." (DE 026)*

Furthermore, general research should include organic relevant aspects in the design of research programs and calls.

10. MISCELLANEOUS ISSUES RAISED IN FREE CONTRIBUTIONS

About **natural alternatives**, some citizens said:

- *"(…) The questionnaire is quite well done, but I think the 4.16 issue introduced below is confusing. What kind of fertilizer is it, chemical fertilizers? It is obvious that none should be allowed in organic farming. Otherwise, if it is referred to natural fertilizers (such as nettle manure), then of course I would classify in 1 (…)" (FR 236).*
- *"(…) In the same spirit, REACH Directive destroyed chemical innovation and prohibits the use of ancient disinfectants and agricultural treatments, such as Bordeaux mixture (…)" (FR 725).*

- *"(…) On the other hand this does not prevent growing food on contaminated soils. In my opinion the policies should create a list of allowed natural substances and also should provide strict levels on various chemical substances that could occur in the soil (…)" (EN 127).*
- *"(…) Pesticides, fertilizers, etc: Only natural, looking complementarity. Never synthetics, chemicals or any other component which is not organic (…)" (ES 014).*

About **monoculture**:
- *"(…) Monoculture finally depletes the soil and pollutes the air and water, and promotes erosion. It should be about developing crop patterns where various plants and various animals and organisms coexist in symbiosis and contribute to soil fertility and fight against pollution (…)" (FR 706).*
- *"(…) Producing organic is much less difficult there where the land is suitable for a given natural plant growth. Studies leading to advice cropping patterns based on land would seem to me desirable (…)" (FR 760).*

About **permaculture**:
In "others" the most repeated point is about permaculture inspiring organic and conventional farming (permaculture is a contraction of "permanent agriculture" or "permanent culture" and relies to integrated food production systems with the use of appropriate technology3 (DG Joint Research Centre, European Commission 2004).
- *"(…) Suggestions: Permaculture, eg.:* http://www.indiegogo.com/online-permaculture *(…)" (DE 030).*
- *"(…) Not only this activity requires more labours but it would be a very positive use of EU funds for the maintenance of food quality and a bridge to employment for unemployed people. Setting aside is already a component of the agriculture policy, the land could be used to produce according to ethical principles and methods of organic farming (permaculture allows it on small areas with higher yields than traditional agriculture) (…)" (FR 060).*

About **seeds**:
A general issue is that several remarks on the organic farming regulation of European citizens have been emphasized in the public consultation. In this context the citizens have underlined the importance of seed varieties in organic farming.

In addition, citizens have a high concern about using traditional and local seed varieties in organic farming. For example, a European citizen announces that *"(…) must stop emergency to return to ways of local and varied productions, from traditional and resistant seeds adapted to the different lands, as it was the case before war (…)"*. Another example from a European citizen who argues "*preserve the rich culture and identity which characterise the diverse European territory express by their hundred thousand of traditional seeds (…)"*.

It has also to be noted that some citizens express about the liberty of seeds and that no obligation of seed selection should be forced. For example a European citizen explains that *"small organic farmers can manage very well their own seed production. For the moment it*

[3] Prospective Analysis of Agricultural Systems. DG Joint Research Centre, European Commission 2004 ftp://ftp.jrc.es/pub/EURdoc/eur21311en.pdf

exists an obligated catalogue of seeds which need to be abolish". Furthermore, a European citizen criticizes that *"Seed market as early as binding or even obligated"*.

Moreover, citizens signal that derogations should be allowed in terms of non-availability of organic seeds in order to use conventional seeds. For example, a European citizen expresses that *"Derogations should stay for seed and animal, until there will be abundance on the market. Derogations should be limited in time and should also be regularly reviewed in order to decide whether they are still needed or not"*. Contrary to that another example from a European citizens shows that *"Derogations on non-organic seeds should be allowed; on others not"*.