

Comparison of EU Commission, Council, Parliament and IFOAM EU positions on key topics

Automatic decertification threshold for not allowed substances			
EU Commission	EU Council	EU Parliament	IFOAM EU
<p>Establishment of a specific threshold (0.01 ppm) for any non-allowed substances in organic products, above which the organic products are automatically decertified, no matter if the farmer used the non-allowed substance or was contaminated.</p>	<p>Improvement of the status-quo by clarifying and harmonising the preventive measures to avoid possible contaminations. Phasing out of any threshold. Only Member States that establish a legal threshold by 2015 can continue applying it until 31 December 2020. A report and, if appropriate, a possible new legislative proposal on this issue is foreseen in 2020.</p>	<p>Improvement of the status-quo by clarifying and harmonising the preventive measures to avoid possible contamination and the investigation procedure when residues of not allowed plant protection products are detected. Establishment of a database for all non-compliances and a database recording every detection of residues. A report and, if appropriate, a possible new legislative proposal setting thresholds and compensation measures for innocent organic operators is foreseen in 2020.</p>	<p>Improvement of the status-quo by clarifying and harmonising the preventive measures to avoid possible contamination and the investigation procedure when residues of not allowed plant protection products are detected. No automatic decertification threshold should be established now or in 2020.</p>
Control system			
EU Commission	EU Council	EU Parliament	IFOAM EU
<p>Moving all the control requirements from the organic regulation into another legislation (on official controls on food and feed) Extension of the control activities on all the organic chain, including all retailers without exceptions. Abandon mandatory annual on-site inspections.</p>	<p>Reinsertion of control requirements into the organic regulation. Member states may exempt some category of retailers from control. Mandatory annual inspection. However Member States may decide to exclude low risk operators allowing a maximum 30-month period between two inspections</p>	<p>Reinsertion and clarification of control requirements into the organic regulation. Some categories of retailers are exempted from control. Member states may decide to exempt operators selling small amount of products from control. Reinsertion on mandatory annual inspection.</p>	<p>Reinsertion and clarification of control requirements into the organic regulation. Exemption for retailers selling exclusively pre-packaged organic products. Reinsertion of mandatory annual inspection.</p>

Import regime			
EU Commission	EU Council	EU Parliament	IFOAM EU
<p>Deleting the current possibility to recognise “equivalent control bodies”.</p> <p>Import regime based on two options:</p> <ul style="list-style-type: none"> - Trade Agreement btw the EU and the Third Countries - Recognition of control body which apply the EU Regulation as it is all over the world without any exception. (compliance concept). 	<p>Mostly in line with Commission proposal.</p>	<p>Mostly in line with Commission proposal. However, for products that do not comply with the Regulation, the Commission is empowered to adopt rules laying down specific conditions according to which products may be imported from third countries.</p>	<p>To allow the possibility to recognise the already existing regional standards which would cover important aspects such as: child labour, deforestation, water use, animal welfare for “working” animals.</p>

Scope			
EU Commission	EU Council	EU Parliament	IFOAM EU
<p>Clarification of the scope for products like essential oils, beer and spirit drinks, maté.</p> <p>Addition of new products such as sea salt and beeswax.</p> <p>Mass catering is kept out of the scope.</p>	<p>Clarification of the scope for products like essential oils, beer and spirit drinks, maté.</p> <p>Addition of new products such as sea salt and other salts, raw cotton, raw wool, raw hides and skins, beeswax.</p> <p>Mass catering is kept out of the scope.</p>	<p>Clarification of the scope for products like essential oils, beer and spirit drinks.</p> <p>Addition of new products such as aromatised wine products, natural corks, raw cotton, raw wool, raw hides and skins, beeswax.</p> <p>Mass catering is included in the scope.</p>	<p>Clarification of the scope for products like essential oils, beer and spirit drinks.</p> <p>Addition on new products such as natural corks, raw cotton, raw wool, raw hides and skins.</p> <p>Mass catering should be kept out of the scope.</p>

Mixed Farms			
EU Commission	EU Council	EU Parliament	IFOAM EU
Ban of mixed conventional-organic farms	Re-insertion of the possibility of mixed conventional-organic farms under strict conditions.	Re-insertion of the possibility of mixed conventional-organic farms under strict conditions.	Re-insertion of the possibility of mixed conventional-organic farms under strict conditions.
Exceptional Production Rules			
EU Commission	EU Council	EU Parliament	IFOAM EU
Deletion of most of the current exceptional rules. The few exceptional rules kept - use of non-organic seeds and animals - to be phased out by 2021.	Keeping the status quo of the current organic regulations.	Maintaining the possibility to grant derogations and adding a dynamic system to phase out the exceptional rules.	Maintaining the possibility to grant derogations and adding a dynamic system to phase out the exceptional rules.
"Regional feed" concept			
EU Commission	EU Council	EU Parliament	IFOAM EU
60% of feed for non-herbivores and 90% of feed for herbivores shall come from the same region. No definition of region is proposed.	Not in approved text. To be discussed during the implementation phase of the regulation (in 2016-2017)	20% of feed for non-herbivores and 60% of feed for herbivores shall come from 150 km radius from the farm. Member States may increase the percentages according to the availability of feed in the region.	Under discussion.

Environmental Performance

EU Commission	EU Council	EU Parliament	IFOAM EU
Processors and traders (excluding micro-enterprises) must put in place an environmental management system with a view of improving their environmental performance.	Deletion of Commission proposal	Organic operators other than micro-enterprises, farmers, beekeepers, retailers and operators producing algae and aquaculture animals, shall improve their environmental performance to protect biodiversity and to contribute to climate change mitigation such as carbon sequestration, establishing performance targets.	Organic operators other than micro-enterprises, farmers, beekeepers, retailers and operators producing algae or aquaculture animals, shall put in place methods for measuring their environmental performance.