

Report on the results of the online consultation:

Action Plan for organic food and farming

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1. BACKGROUND AND OBJECTIVES OF THE CONSULTATION

In June 1991, the Agriculture Council invited the Member States, the Commission and stakeholders to share ideas on what further action, at European level, could facilitate production, processing, trade and consumption of organic products in Europe and, in the light of these ideas, invited the Commission to analyse the possibility of a European Union Action Plan to promote organic food and farming as well as present appropriate proposals.

During 2001 and 2002, the Commission collected information and proposals from Member States and stakeholders. On this background it drafted a Staff Working Document entitled “Analysis of the possibility of a European Action Plan for organic food and farming”. The paper contained an analysis of different issues relating to organic farming and set up a list of issues which could be included in the final Action Plan. The paper was presented to the Agriculture Council in December 2002.

In accordance with its governance policy, the Commission prepared an online consultation, where the public was asked to react to different questions in relation to the working paper.

The consultation was open from 6 February 2003 to 16 March 2003.

The aim of this report is to summarise the contributions received in response to the questions in the consultation document.

2. THE QUESTIONS IN THE CONSULTATION

The consultation document contained 12 questions for which the public were asked if they found the subject “very important”, “important”, “not important” or “to be avoided”. In addition to this, the respondents were asked to submit comments and further ideas in relation to the different issues. The 12 issues which the public were asked to comment on were:

- (1) Marketing: Developing and facilitating various systems for organic produce sales.
- (2) Targeting: Targeting organic farming to environmentally sensitive areas.
- (3) Adviser Service: Encouraging the exchange of technical information between farmers.
- (4) CAP: Ensuring that the Common Agricultural Policy (CAP) supports the development of organic farming.
- (5) Traceability: Ensuring traceability and organic food authenticity.
- (6) Logo: Reinforce the use of the EU logo.

- (7) Private standards: The access to information on additional inspection requirements where they exist.
- (8) Testing methods: The harmonisation of testing methods, control procedures, supervision and accreditation together with efficient co-operation between all actors involved in the inspection system, including Community inspections.
- (9) Import: The implementation of appropriate standardised procedures to ensure that imported products respect both fair competition with EU products and EU commitments regarding developing countries.
- (10) Standards: The establishment of a body for delivering independent, excellent and transparent advice on which production methods, substances etc. can be accepted in order to assure conformity with the principles of organic farming.
- (11) Statistical data: The collection and communication of official statistical data on production, consumption, and trade (EU imports and exports) on a more permanent basis.
- (12) Research: The effective funding of research in organic farming from the point of view of food safety and quality, including expanding research into the development of new products and processing methods and the environmental sustainability of organic farming, and into comparison studies between organic and conventional food.

3. THE RESULT OF THE CONSULTATION

1136 citizens and organisations participated in the Online consultation. Of those 45% were consumers, 12% were farmers, 11% were national organisations, 9% advisors, 3% traders, 3% international organisations, 2% processors and 9% others.

The consultation was open for all countries but most replies came from France (23%), Austria (14%), Italy (13%) and Germany (11%). Annex 1 lists the number of replies from the different countries.

About 700 respondents added additional comments and contributions to the text. Some of the contributions could be developed together but the ideas and comments were conflicting at times.

It is important to realise that the input in an Online consultation like this is not representative for all consumers, farmers or organisations but only for the respondents themselves. This report, therefore, does not try to conclude which idea gains most support but simply lists a summary of the comments indicating the number of respondents behind the different statements.

Many comments were from organisations representing a high number of farmers, consumers, processors etc. When summarising the comments this report does not distinguish between the different types of respondents. However, when considering which elements to include in the final Action Plan, the Commission will naturally pay attention to this. It should also be noted that many organisations did not identify

themselves when answering the form, but only included the name of the person who filled in the answers.

Besides the 1136 direct replies to the questionnaire via the Commissions homepage, about 70 letters and emails with ideas has been submitted to the Commission. These replies are also considered in this report when summarising the comments, but they do not count in the overall statistics in the report.

3.1. Developing and facilitating various systems for organic produce sales.

3.1.1 Summary

71.1% of the respondents believe that it is very important and 21.0 % that it is important to develop and facilitate various systems for organic produce sales, 5.1% think that it is not important and 2.7% thought that it should be avoided.

	Very important	Important	Not important	To be avoided
Total (1118)*	71.3	21.0	5.1	2.7
Consumer (514)	70.5	22.0	5.5	2.0
Farmer (133)	72.7	20.3	4.7	2.3
Advisors (105)	74.8	20.4	4.9	0.0
Traders (38)	60.0	20.0	5.7	14.3
Processors (22)	77.3	9.1	4.5	9.1
National organisations (124)	74.2	22.5	2.5	0.8
International organisation (35)	61.3	22.6	9.7	6.5
Other (147)	71.9	18.7	5.0	4.3

*Number of respondents

3.1.2 Comments¹ submitted

- More information to consumers about organic food would increase the demand (280)². This should include info-campaigns, advertisement and documentation on TV, information brochures or Internet sites with information about local markets restaurants, information about environmental issues in schools etc., including information about the differences to non-organic farming systems. The information should highlight the attributes of organic farming (the limited use of

¹ The different comments are summarised in short statements. The statements are normally listed according to the number of respondents who have expressed the statement as well as according to the subjects. Therefore comments with have been put forward by a lower number of respondents are sometimes listed before comments made by a higher number of respondents.

² Number of respondents who have submitted this idea/statement.

pesticides, fertilisers, the non-use of GMOs, the support of public goods like the conservation of the countryside) as the consumers should know that they help the environment through buying organic produce.

- Local sale and direct links between the farmer and the consumer should be facilitated (210). It was proposed to establish marketplaces in big towns where farmers could sell their own products. It was also proposed that direct sales systems should be supported together with co-operation between farmers and retailers. Moreover the need for assistance to producer-organisations was mentioned.
- Increase the use of organic products in public institutions (schools, hospitals etc.) and ensure that regulations on public procurement do not hinder such development (53).
- Organic products should be found side by side with non-organic products in the supermarket (50). Others underlined that organic products should not only be sold in supermarkets (27).
- Clear logos and clear labelling makes it easier for the Consumer to recognise the products. The use of terms like BIO on non-organic products should be avoided. It was also mentioned that the EU Logo should be used as a marketing tool (42).
- High quality standards, transparency and traceability are more likely to increase the consumption of organic food than different marketing campaigns (10).
- The main reason why organic food does not have a higher share of the market is not lack of information but the high prices for organic products. Increased support to organic farmers/producers and direct sales systems could ensure lower prices on organic food (9).
- The free market should organise itself and the authorities should not support organic farming (10).

3.2. Targeting organic farming to environmentally sensitive areas.

3.2.1 Summary

52.1% of the respondents consider that targeting organic farming to environmentally sensitive areas is very important and 29.8 % that it is important. 10.2% think that it is not important and 7.9% think that it should be avoided.

	Very important	Important	Not important	To be avoided
Total	52.1	29.8	10.2	7.9
Consumer	62.6	24.6	7.6	5.2
Farmer	45.3	26.6	16.4	11.7
Advisors	39.6	24.8	19.8	15.8
Traders	39.4	42.4	12.1	6.1
Processors	27.3	45.5	4.5	22.7
National organisations	44.5	40.3	8.4	6.7
Int. organisations	36.7	40.0	13.3	10.0
Other	46.4	38.4	8.0	7.2

3.2.2 Comments submitted

- Targeting organic farming in environmentally sensitive areas will help to protect the environment in those areas (317). Others mentioned that organic farming would not always be the best solution for such areas (31).
- Support to organic farming should not be limited to farmers living in areas designated as environmentally sensitive areas. Organic farming should be supported in all areas. Furthermore, if only organic farms located in such areas would get support this would create unfair competition with farmers outside those areas (218).

It should be noted that the intention in the Commission staff working document was not to limit organic farming to environmentally sensitive areas but rather to ensure that programmes in order to restrict the use of pesticides and fertilisers in such areas could focus on organic farming.

3.3 Adviser Service. Encouraging the exchange of technical information between farmers.

3.3.1 Summary

64.2% of the respondents consider that encouraging the exchange of technical information between farmers is very important and 31.4% believe that it is important. 3.5% think that it is not important and 0.9% think that it should be avoided.

	Very important	Important	Not important	To be avoided
Total	64.2	31.4	3.5	0.9
Consumer	59.8	35.9	3.6	0.8
Farmer	70.1	26.8	3.1	0.0
Advisors	78.4	18.6	2.9	0.0
Traders	44.1	47.1	2.9	5.9
Processors	63.6	36.4	0.0	0.0
National organisations	68.6	28.9	1.7	0.8
Int. organisations	54.8	32.3	9.7	3.2
Other	67.6	25.9	5.0	1.4

3.3.2 Comments submitted

- The exchange of technical information between farmers should be encouraged (358). Many found that the experience/expertise of organic farmers is more useful than the advice of professional advisers. It was underlined that exchanges should take place on local, interregional as well as at an international level and that it should cover the whole organic food chain. The following ideas have been mentioned as useful ways to exchange information: Demonstration farms, Internet, fairs, conferences, specialised newspapers (88). It was also proposed that the subject 'Organic Farming' should become compulsory in agronomic schools or studies.
- Extension service programs with independent (from commercial interests) consultants should be supported. The existing extension services should be better co-ordinated. (182)
- Co-operation between researchers and farmers should increase (132). Grass-roots-research and on-farm-research should be encouraged. Furthermore, a central institution collecting relevant research questions and giving an overview on current research projects and results was suggested.

- Training offered should range from technical and agronomic support, animal health, marketing, sales service, public relations and strategies, environmental protection and alternative energy production (34).

3.4. Ensuring that the Common Agricultural Policy (CAP) supports the development of organic farming.

3.4.1 Summary

80.1% of the respondents consider that it is “very important” and 12.7% that it is “important” to ensure that the Common Agricultural Policy supports the development of organic farming. 3.7% think that this is not important and 3.4% think that the CAP should not support organic farming.

	Very important	Important	Not important	To be avoided
Total	80.1	12.7	3.7	3.4
Consumer	82.2	11.2	3.6	3.0
Farmer	81.4	10.9	4.7	3.1
Advisors	72.3	19.8	5.0	3.0
Traders	76.5	14.7	2.9	5.9
Processors	68.2	18.2	0.0	13.6
National organisations	82.8	11.2	3.4	2.6
Int. organisations	73.3	16.7	0.0	10.0
Other	79.1	13.7	4.3	2.9

3.4.2 Comments submitted

- The existing CAP favours mass production at expense of food quality, health, animal welfare and environment. The CAP should be reformed in order to support sustainable agriculture such as organic farming to a much higher extent than today (286). The main reason for this is that organic farming delivers on all objectives of a more sustainable CAP in a way that no other farming systems do (42). The proposal for a reform of the CAP, which was put forward by the Commission in January 2003 is not reaching that aim far enough (75).
- The future conclusion of the ongoing negotiations of the reform of the CAP must include a reference to the Action Plan in order to ensure that it will be possible to implement the actions proposed in the Action Plan (67).
- It should not be mandatory for organic farmers to have set-aside land (47).

- The EU should harmonise the support schemes for organic farming in order to avoid unfair competition between farmers and in order to ensure that all Member States use the possibilities in the CAP. This especially concerns the fact that some Member States only support the conversion to organic farming but not the maintaining of organic farming after the conversion (46). This point was in particular mentioned by farmers in France, where there currently are no subsidies for maintaining the organic production after the conversion. Many farmers in France are therefore concerned about competition from organic farmers in other Member States, where the organic farmers receive more support.
- Organic farmers should not receive more support than other farmers (29).
- Introduce new taxes on pesticides, mineral fertilisers, antibiotics, plant and animal growth regulators in order to ensure the “Polluter Payer Principle” or alternatively introduce an environmental account system on food products on which all support to farmers should be based (18).

3.5. Traceability. Ensuring traceability and organic food authenticity.

3.5.1 Summary

75.2% of the respondents consider that it is “very important” and 22.0% that it is important to ensure traceability and organic food authenticity. 2.4% think that it is not important and 0.4 % believes that the EU should not do anything in this area.

	Very important	Important	Not important	To be avoided
Total	75.2	22.0	2.4	0.4
Consumer	83.1	14.9	1.8	0.2
Farmer	70.9	22.0	5.5	1.6
Advisors	66.7	32.4	1.0	0.0
Traders	79.4	20.6	0.0	0.0
Processors	71.4	23.8	4.8	0.0
National organisations	63.0	35.3	0.8	0.8
Int. organisations	53.3	36.7	10.0	0.0
Other	71.9	25.2	2.9	0.0

3.5.2 Comments submitted

- Traceability is a critical issue since it ensures the credibility of organic products and transparency (326).

- Reinforced and harmonised controls, particularly regarding imports from third countries and from the accession countries and regarding processing or trade companies. Furthermore the penalties in cases of infringement should be much higher (134).
- Products should be labelled with the country/region of origin such as for beef meat. Processors and retailers should be encouraged to develop and market regional products, as this would reduce the risk of fraud (84).
- It should be ensured that traceability systems would not result in higher costs and bureaucracy. Traceability systems should distinguish between big complicated distribution systems and small and / or direct sale systems (77).
- Traceability systems should in particular contribute to detect contamination with GMOs (35).

3.6. The means to reinforce the use of the EU logo.

3.6.1 Summary

24.3% of the respondents consider that it is very important and 33.8% consider that it is important to reinforce the use of the EU-logo. 34.9% consider that it is not important and 7.0% would prefer to avoid any action regarding the logo. Among those who have identified themselves as processors 72.7 % find the EU-logo very important or important.

	Very important	Important	Not important	To be avoided
Total	24.3	33.8	34.9	7.0
Consumer	27.1	34.4	34.2	4.3
Farmer	22.6	33.1	31.5	12.9
Advisors	25.5	29.6	33.7	11.2
Traders	20.0	31.4	34.3	14.3
Processors	18.2	54.5	22.7	4.5
National organisations	18.6	33.9	41.5	5.9
Int. organisations	19.4	35.5	35.5	9.7
Other	23.0	32.4	37.4	7.2

3.6.2 Comments submitted

- Consumers will have more confidence in the well-known national or private logos than in the EU-logo. One reason for this is that the standards covered by the EU-

logo are sometimes less strict than the standards covered by the national or private logos. Some thought that an increased use of the EU logo would tend to increase existing confusion among consumers. Some mentioned that it simply would be a waste of money to promote a new logo, as there are already many well-known logos on the market (96). Another group mentioned that the use of the EU-logo should be reinforced, as there are too many different logos in the EU today which confuses the consumers. At the same time a uniform EU-logo will facilitate trade between Member States (68).

- Redesign the EU-logo as the existing design is too close to other quality EU-logos, which makes it difficult to distinguish between them. Open the use of the EU-logo to imported products. However, the controls should be reinforced especially concerning imports from third countries (78).
- The different logos are not a central issue for the developing of organic farming. Terms like Organic/Biologique/Ökologisch etc must be protected in all languages in order to avoid confusion (78).
- It should always be possible to use national or private logos together with the EU-logo if the use of the EU-logo is made mandatory (75).
- The EU-logo is not relevant in countries with well-known national logos but could be considered in countries where this is not the case, for instance, in some of the accession countries (32).

3.7. The access to information on additional inspection requirements where they exist.

3.7.1 Summary

29.9% of the respondents consider that it is very important and 51.5% that it is important to get access to information on additional inspection requirements where they exist. 13.4% think that it is not important and 5.3% would prefer to avoid further information about this.

	Very important	Important	Not important	To be avoided
Total	29.9	51.5	13.4	5.3
Consumer	34.9	50.7	10.0	4.4
Farmer	23.0	45.9	23.8	7.4
Advisors	26.9	49.5	17.2	6.5
Traders	34.4	50.0	15.6	0.0
Processors	28.6	47.6	14.3	9.5
National organisations	22.5	60.4	12.6	4.5
Int. organisations	25.8	45.2	22.6	6.5
Other	26.7	55.6	11.1	6.7

3.7.2 Comments submitted

Several of the comments made to this question indicate that the question was difficult to understand. It seems that many of those who replied to this question have not been aware that the EU-regulation already sets the minimum standards, which private inspection bodies must follow. Some were confused by the term “private standard” and did not realise that private in this content is the same as NGO's (non-governmental organisations).

- Organic farming should be as transparent as possible and a database listing the differences between different standards would be useful if the information could be presented in a logical way (77).
- A database listing the differences between standards would just be one step in order to facilitate trade between different systems. In addition to this, a common group with representatives from both public and private systems should be established in order to give advise / solution in disputes regarding mutual recognition of standards. At the same time negotiations about equivalence between the EU and IFOAM basic regulation should start (70).
- The EU-regulation should be less detailed and concentrate more on principles. This would require that also public inspections bodies could establish more

detailed standards where required. It should be noted that even though the difference between the standards is a problem for the trade it is a positive thing for farmers, who want to differentiate their products (38).

- The EU should work for a harmonisation of the different standards or should even forbid national and private standards, as they tend to confuse consumers. In addition the EU should not promote standards by listing them in a public database (25). A database would be an extra burden for inspection bodies and would be confusing for the consumers (9).

3.8. The harmonisation of testing methods, control procedures, supervision and accreditation together with efficient co-operation between all actors involved in the inspection system, including Community inspections.

3.8.1 Summary

62.1% of the respondents consider that it is “very important” and 31.7% that it is important to harmonise testing methods, control procedures etc. 4.1% think that it is not important and 2.2% would prefer to avoid further harmonisation.

	Very important	Important	Not important	To be avoided
Total	62.1	31.7	4.1	2.2
Consumer	63.1	31.3	4.2	1.4
Farmer	55.3	35.8	4.9	4.1
Advisors	62.0	35.0	2.0	1.0
Traders	64.7	32.4	2.9	0.0
Processors	66.7	19.0	4.8	9.5
National organisations	65.8	28.9	1.8	3.5
Int. organisations	48.4	29.0	12.9	9.7
Other	63.3	31.7	4.3	0.7

3.8.2 Comments submitted

- The need for harmonised inspection/testing methods in all Member States was emphasised (181). It was underlined that harmonisation should not lead to the lowering of standards, but that it should be done at a high level. At the same time the level of evaluation and supervision of the inspection systems should be improved. The EU should monitor and collect statistics of the residue analyses by national authorities and inspection bodies.

- The existing inspection system, which is based on the verification of the whole production chain, based on the on-site visits and documentary check should be maintained and analysis of the products should only be an additional tool where relevant (83).
- Accept IFOAM accreditation as equivalent to EN 45011 (54).
- Improve and facilitate mutual recognition between the private and the public sector. Examine barriers in both public and private systems (including IFOAM's standards) that hinder mutual recognition (52).
- Facilitate co-operation and knowledge exchange between all European inspection bodies, both private and authorities. Facilitate direct communication regarding product flows, fraud etc. between the responsible certification bodies (49).
- It should be ensured that more harmonisation would not result in more bureaucracy or extra cost for the producer (22).
- It should be ensured that the level of inspection would not be a parameter of competition for example by using public authorities rather than private bodies (13).

3.9. The implementation of appropriate standardised procedures to ensure that imported products respect both fair competition with EU products and EU commitments regarding developing countries.

3.9.1 Summary

64.6% of the respondents consider that it is “very important” and 28.8% that it is important to standardise the procedures for imported products. 4.1% think that it is not important and 2.3% would prefer to avoid further standardisation.

	Very important	Important	Not important	To be avoided
Total	64.6	28.8	4.3	2.3
Consumer	63.7	29.9	4.9	1.4
Farmer	70.4	22.4	2.4	4.8
Advisors	62.0	32.0	3.0	3.0
Traders	51.4	31.4	14.3	2.9
Processors	76.2	19.0	4.8	0.0
National organisations	64.3	29.6	3.5	2.6
Int. organisations	66.7	23.3	0.0	10.0
Other	65.7	29.9	3.7	0.7

3.9.2 Comments submitted

- All products available on the market should be subject to the same standards (160). It was underlined by some that standards should not be misused to exclude products from the EU-market.
- Some mentioned that the EU has an obligation to help developing countries and that buying organic products would be a constructive way to do this (30). Some expressed a wish for more Fair-trade (20). Funding of support to developing countries to build up expertise in certification of organic products was proposed (4) along with an increased possibility for small farmers to use group certification (32).
- Import of products, which are not produced in the EU, is acceptable, but products, which could be produced locally, should not be imported as this would harm the EU-farmers (34) or would increase use of energy (13).
- Trust/mistrust in imported products is a key point for the credibility of organic farming and a high level of inspection must be ensured (13). Some proposed an increased EU-inspection of imported products and suggested that EU-inspectors should visit third countries several times per year (5). Others claimed that the majority of the cases of fraud, which have been exposed, have been related to internal trade inside the EU (25).
- In order to ensure consistency between Member States, common procedures for recognition of equivalency in standards should be developed (29). Furthermore recognition of the IFOAM accreditation system should be considered (43).

3.10. The establishment of a body for delivering independent, excellent and transparent advice on which production methods, substances etc. can be accepted in order to assure conformity with the principles of organic farming.

3.10.1 Summary

44.8% of the respondents consider that it is “very important” and 41.1% that it is important to establish a body offering advice on the standards. 8.9% think that it is not important and 4.9% would prefer to avoid establishing such a body.

	Very important	Important	Not important	To be avoided
Total	44.8	41.4	8.9	4.9
Consumer	54.1	36.0	6.8	3.1
Farmer	37.2	41.3	13.2	8.3
Advisors	30.7	46.5	14.9	7.9
Traders	34.4	43.8	12.5	9.4
Processors	31.8	54.5	9.1	4.5
National organisations	38.7	50.5	3.6	7.2
Int. organisations	35.7	39.3	21.4	3.6
Other	40.4	47.1	8.8	3.7

3.10.2 Comments submitted

Many comments were not directly connected to the question about establishing a new body but rather related to other issues like pro or contra harmonised standards, the need for advices to farmers etc. Those subjects are covered in other sections and are not referred to here.

- A new independent body, which could give advice to the Commission and governmental experts about standards, would be seen as very useful (85). Others found that such a body should not only consist of independent scientists but should rather represent farmers, producers and consumers (71).
- In addition to a new body the Commission should arrange conferences/workshops/internet consultations dealing with specific subjects when developing the standards (31).
- It is not necessary to develop a new body as IFOAM and other organisations already have this expertise (19). A new body would result in more bureaucracy and local farmers would have more expertise than experts in such a body (17).

3.11 The collection and communication of official statistical data on production, consumption, and trade (EU imports and exports) on a more permanent basis.

3.11.1 Summary

26.4% of the respondents consider that it is “very important” and 52.0% that it is important to get access to better statistical data. 19.8% think that it is not important and 1.7% would prefer to avoid collecting more statistics.

	Very important	Important	Not important	To be avoided
Total	26.4	52.0	19.8	1.7
Consumer	23.6	52.7	22.6	1.0
Farmer	21.7	58.3	15.8	4.2
Advisors	32.3	48.5	18.2	1.0
Traders	45.5	27.3	21.2	6.1
Processors	36.4	50.0	9.1	4.5
National organisations	32.1	56.3	10.7	0.9
Int. organisations	13.3	60.0	26.7	0.0
Other	28.6	47.4	21.8	2.3

3.11.2 Comments submitted

- It would be very useful to have better statistical information about the market situation (90). This remark was, in particular, made by traders and processors who think that this could help them when planning their activities. Also farmers who are considering starting conversion or who want to plan future production ask for better statistics.
- Better data about production and marketing could help decision-makers in governments etc. (69).
- Statistical data are unproductive and the Action Plan should focus on marketing and developing clear rules (17).
- Some farmers and small producers feel that they already give a lot of statistical information to different bodies and that they do not want more paper work (7).

3.12. The effective funding of research in organic farming from the point of view of food safety and quality, including expanding research into the development of new products and processing methods and the environmental sustainability of organic farming, and into comparison studies between organic and conventional food.

3.12.1 Summary

69.3% of the respondents consider that it is “very important” and 23.6% that it is important” to ensure effective funding of research in organic farming. 4.7% think that it is not important and 2.4% would prefer to avoid any public funding of such research.

	Very important	Important	Not important	To be avoided
Total	69.3	23.6	4.7	2.4
Consumer	66.1	25.5	6.4	2.0
Farmer	66.7	27.5	1.7	4.2
Advisors	71.0	24.0	3.0	2.0
Traders	67.7	9.7	16.1	6.5
Processors	71.4	14.3	4.8	9.5
National organisations	78.0	20.3	1.7	0.0
International organisation	76.7	16.7	3.3	3.3
Other	73.4	21.6	2.9	2.2

3.12.2 Comments submitted

- Establish a dedicated organic research programme both on EU and on national level inside which it would be possible to make priority areas that are specifically related organic farming (144).
- The research programmes should be evaluated by somebody with expertise in organic farming in order to ensure that the most useful projects are chosen. This would help to ensure that organic research is based on a system approach and that organic research needs are evaluated in the right context (50).
- Research should mainly focus on improving the production methods and quality of the organic products (45). Others propose further comparison studies between organic and conventional farming (28), but it was also mentioned that there have already been many such studies and that this, therefore, should not be a priority area (14).
- Information from already finalised studies should be collected and made easily available to the users (10).

- Research comparing organic and conventional farming should be carried out by neutral institutions/universities and not by the organic farmer supported research institutions (7). However, it was also mentioned that traditional research institutions would perhaps have an interest in defending conventional farming methods and therefore would not be reliable (14). Furthermore it was mentioned that it is very difficult for institutions not specialised in organic farming to develop farming production techniques as it can take many years to build up the biodiversity of the soil etc. (8).

3.13. Other ideas

The comments submitted under this point were quite varying but most of them were related to the use of GMO.

- The GMO issue is a central subject for organic farming in Europe (240). The Action Plan should recognise the scale of this problem and needs to address it properly. It was proposed that the use of GMO should not be allowed in the EU or alternatively that:
 - The organic farmers' and processors' rights not to be contaminated should be protected and liability for compensation should be ensured where contamination is found.
 - Measures to ensure that the owners of the GMOs are fully responsible for their crops and for preventing the spread of the GMOs.
 - Measures to ensure that owners of GMOs develop and make available validated testing methods for these organisms before release so they can be properly identified.
 - Keeping the level of contamination of all seed in the EU to under the detection level as this is the only viable basis for preventing the spread of GMOs.
 - Facilitating access for organic farmers and other producers to non-GMO inputs.
 - Introduce a threshold limit for GMO in seeds (non-organic and organic produced) at 0.1%
- The needs for more information to consumers were stipulated (77). The importance of information in schools about agricultural production methods was also mentioned (22).
- It should be ensured that organic farmers participate in the decision making process concerning organic farming (35).
- The Action Plan should introduce a mechanism, which would ensure a yearly review of the implementation of the proposed actions in the Action Plan (35).

- Introduce an EU environmental cost taxation on pesticides and synthetic fertilisers and / or remove VAT on organic products (28). It was explained that a tax on pesticides and synthetic fertilisers should ensure the “Polluter Payer Principle”. A tax would therefore reflect the real cost of non-organic products.
- Support the inspection, as this is a big post for farmers and producers. Conventional producers who use chemical substances do not have to pay for the analyses that public authorities carry out in order to verify that they respect the residual level; the public authorities should also pay or at least support the inspection cost in the organic sector (24).
- Support training of farmers and processors including systems for exchange of information. Such systems should also cover exchange of information between different regions and countries (16).
- Set-up targets for organic farming in the EU as this will underline the commitment of the Community to this production system (9)
- Besides those proposals, different proposals were made by one or a few respondents. These included simplification of the regulation, establishing standards for the use of energy, establishing standards for production of organic wine, stipulating the development of action plans at national level, encouraging public procurement policies, helping distributions systems and establishing standards for better conditions for the workers in organic production.
- Some proposed not to do anything at all as they found that organic farming should not be supported (11).

4. CONCLUSION

The replies to the 12 questions are summarised in the figure on page XX (next page). The figure shows that a big majority of the respondents find that all the subjects which have been raised in the questionnaire have been considered as being important for organic farming.

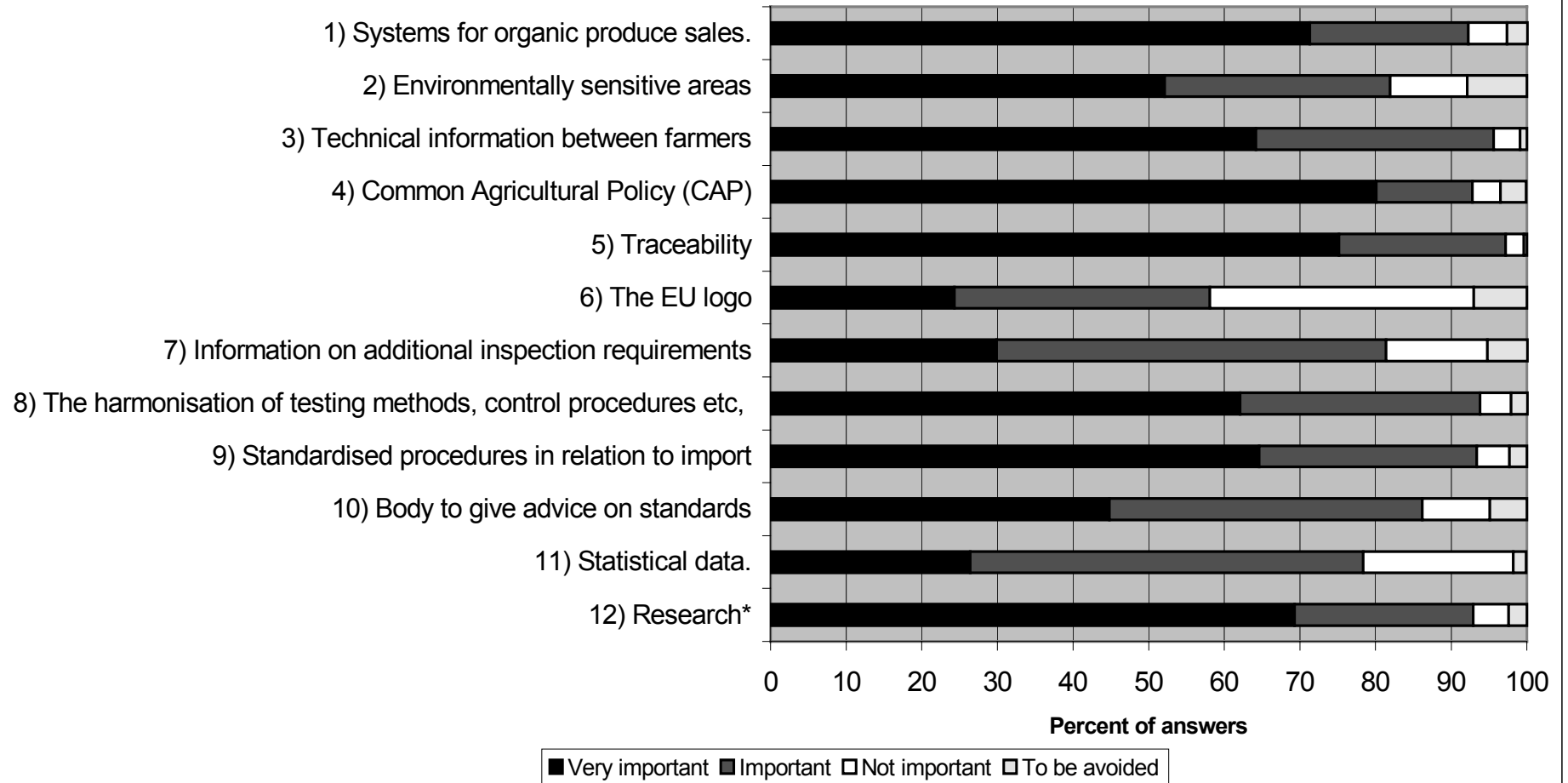
Another very valuable result of the consultation is the long list of comments and proposals. It is not the intention in this document to try to conclude on which proposals were more important or supported by most respondents but all comments will be studied carefully in the process of developing the Action Plan

The Online consultation has been a very important step in the process of developing the Action Plan.

Another important step was a hearing about organic farming organised by the Committee on Agriculture and Rural Development from the European Parliament on 12 June 2003.

After the Public Hearing, the Commission will prepare a final Action Plan in the form of a Communication to the European Council and Parliament with a list of possible actions intended to facilitate the development of organic farming.

Response to questions



ANNEX I. NUMBER OF REPLIES FROM DIFFERENT COUNTRIES

Country	Number of replies	Percent of total
France	261	23.0
Austria	159	14.0
Italy	143	12.6
Germany	124	10.9
Belgium	79	7.0
United Kingdom	71	6.3
Spain	63	5.5
Sweden	44	3.9
Denmark	43	3.8
Netherlands	34	3.0
Finland	18	1.6
Luxembourg	13	1.1
Portugal	10	0.9
Greece	9	0.8
EU Accession countries	28	2.5
Switzerland	9	0.8
Ireland	4	0.4
Norway	4	0.4
Other countries	8	0.7