



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate H. Sustainability and quality of agriculture and rural development
 H.3. Organic farming

15 AVR. 2010

Brussels,
 AGRI H.3/ MF/ kt D(2010)/178388

Subject: double labelling for organic products

Dear Mr

Thank you for your fax of 12th March 2010 in which you address your concern on certain aspects of the labelling rules according to Regulation (EC) n° 834/2007 for organic products. You are asking for amending that legislation, more precisely for the labelling elements which will enter into application as of July 2010, regarding the mention of the origin of the agricultural raw materials, arguing of "double origin labelling requirements" for a number of products.

First of all, let me draw your attention to the "history" of the new Council Regulation, which was adopted by the Council in June 2007. The text as it stands now was the result of lengthy discussions in several Council meetings during a period of more than two years, and as such is the result of a balanced compromise which conceived support and agreement by the EU agricultural ministers. And this was not challenged by the Council in October 2008, when it was agreed to postpone by one and an half year certain elements of the new obligatory labelling rules. The Commission has therefore no intention to make in 2010 a proposal of substance to the Council and the Parliament to modify the Regulation n° (EC) 834/2007.

Regarding the matter itself, I do not follow your argument that the organic labelling on the "indication of the place of farming of the raw material" according to Article 24(1)(c) together with certain other sectorial marketing standards is of no use to the consumer and may even create confusion. The organic labelling scheme provides for general information, which will be identical for all organic products irrespective other labelling schemes. As you already mention, there are EU rules in place also requiring the labelling of origin. However, they may present differences with the organic regulation, and that is precisely why the organic requirements will be useful for the consumer, because of their standard format and unified signification. Using the example you take, olive oil, it is exact that the sectorial legislation, Regulation (EC) No 1019/2002, requires a designation of origin, but this applies only to defined oil categories (extra virgin and virgin olive oil)

and not to others, and it may refer to the place of harvest of the olives as well as the location of the mill. In the organic legislation it is made clear for the consumer that the mention on the label refers only to the place of farming of agricultural raw material - i.e. where the olives are harvested - and not where the product is processed i.e. the location of the mill, even this information is supplemented by the origin of the olives themselves.

About the space on the labels which may be reduced by the information required by European legislation, you will probably agree with me that this can be easily solved by the operators.

Of course all operators involved in the organic sector must adapt to the new rules, but considerable timeframe for adjustment was agreed in the Council. This was supplemented with provisions under Article 95 of the implementing rules in Regulation (EC) No 889/2008 to facilitate the transition from the old to the new organic labelling scheme.

To conclude, there is no reason to modify the labelling rules which have been fixed by the Council Regulation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Hulot', written over a horizontal line.

Jean-François HULOT

Head of Unit

CC: Ms. María Angeles Benítez Salas