



The organic perspective on ensuring GM-free value chains: current experiences and future prospects

8 October 2024

ONE VOICE FOR ORGANIC STAKEHOLDERS



WHO WE REPRESENT

- IFOAM Organics Europe represents the entire organic food chain and beyond
- We count almost 200 members in 34 European countries
- Based on the IFOAM principles of organic agriculture:
Health, Ecology, Fairness & Care

Organic Agriculture in Europe 2022

Organic Farmland



Farmland in million (M) hectares Top 3 countries

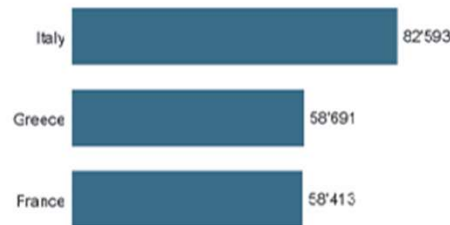


Organic Producers

The number of organic producers is increasing



Number of producers Top 3 countries

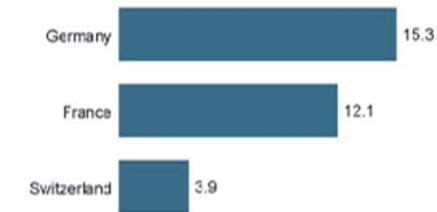


Organic Market

The European market contracts slightly in 2021/2022



Market in billion euros Top 3 countries



Market growth in percent Top 3 countries 2021/2022



FiBL Source: FiBL survey © 2024
More information: www.organic-world.net - statistics.fibl.org

[The World of Organic Agriculture - Statistics and Emerging Trends 2024 \(fibl.org\)](http://www.organic-world.net)

Importance of Topic for Organic

- Organic Agriculture is based on a **systemic approach of sustainability**, considers the interaction between the plants and their environments, and is a driver for agronomic innovation.
- **Among its core principles and practices** are the ban on use of synthetic pesticides, synthetic fertilisers and the **exclusion of all GMOs** (new and old GMOs).
 - GM-free status legally defined in Article 11 of Organic Regulation EU 2018/848
- Strong commitment to upholding value chain **integrity** and **consumer expectations**



Importance of Topic for Organic

- For organic production as a whole – including the production of organic varieties – the following legal prohibition applies:

Document 32018R0848

Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007

PE/62/2017/REV/1

OJ L 150, 14.6.2018, p. 1–92 (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, HR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV)

● In force: This act has been changed. Current consolidated version: 21/02/2023

ELI: <http://data.europa.eu/eli/reg/2018/848/oj>

Article 11

Prohibition of the use of GMOs

1. GMOs, products produced from GMOs, and products produced by GMOs shall not be used in food or feed, or as food, feed, processing aids, plant protection products, fertilisers, soil conditioners, plant reproductive material, micro-organisms or animals in organic production.
2. For the purposes of the prohibition laid down in paragraph 1, with regard to GMOs and products produced from GMOs for food and feed, operators may rely on the labels of a product that have been affixed or provided pursuant to Directive 2001/18/EC, Regulation (EC) No 1829/2003 of the European Parliament and of the Council ⁽⁴⁹⁾ or Regulation (EC) No 1830/2003 of the European Parliament and of the Council ⁽⁵⁰⁾ or any accompanying document provided pursuant thereto.
3. Operators may assume that no GMOs and no products produced from GMOs have been used in the manufacture of purchased food and feed where such products do not have a label affixed or provided, or are not accompanied by a document provided, pursuant to the legal acts referred to in paragraph 2, unless they have obtained other information indicating that the labelling of the products concerned is not in conformity with those legal acts.
4. For the purposes of the prohibition laid down in paragraph 1, with regard to products not covered by paragraphs 2 and 3, operators using non-organic products purchased from third parties shall require the vendor to confirm that those products are not produced from GMOs or produced by GMOs.

Organic Sector is Clear and United

- Organic movement wants to remain GMO-free, including from **new GMOs derived from “New Genomic Techniques” (NGTs)**.
 - **International unity:** 1993 decision, re-asserted in 2017 (Position Paper [here](#)).
 - **European unity** re-affirmed in IFOAM EU [Resolution 2023](#).



Resolution of the organic movement in favour of a system-based approach of innovation and sustainability – Keep Organic GMO-free.

Resolution from the European organic food and farming movement, adopted at IFOAM Organics Europe General Assembly on 21.06.2023.

The European organic agricultural movement re-affirms its position that the organic production process should remain free of Genetically Modified Organisms (GMOs) in the future, including GMOs derived from New Genomic Techniques (NGTs). Organic breeders, farmers, processors, certifiers, traders, and retailers demand the preservation of their freedom of choice to remain GMO-free. To that end, the principle of labelling and traceability enshrined in the current legislation, which allows for the identification of GMOs throughout the supply chain, must be maintained and applied to all NGTs.



Recent large-scale mobilization among European food industry

- Letter to EU agricultural ministers in September 2024 calling for rigorous labelling of NGTs in Europe
- 376 food businesses from 16 Member States
- **Especially widespread support from organic companies**
- Signatories include dm-drogerie market and Biocoop.



Businesses for freedom of choice

Open letter to the EU agriculture ministers in summer 2024

The businesses Alb-Gold, Alnatura, Andechser, dm, Frosta and Molkerei Berchtesgadener Land have composed a second open letter, this time to the EU agriculture ministers (see right), asking for your support in the form of a signature by 31 August 2024.

Legislation on new genetic engineering technologies (NGT) is currently being negotiated at EU level. A trilogue, in which the three institutions - the European Commission, the European Parliament and the Council of Agriculture Ministers - negotiate a new law together, has not yet been able to begin because the Council of

Perspective of Organic Sector on EU Proposal on NGTs

- NGT Proposal is significant **step back for biosafety and freedom of choice** for consumers and producers
- Key demands:
 - (1) Maintain the **explicit ban of all NGTs for purposes of organic production**, as recognized by the European Commission and European Parliament
 - (2) Instating a **full traceability and labelling system** for NGT food, feed and other products
 - (3) Member States must have all legal means to ensure and implement adapted and crop-specific **coexistence rules** in their territory
 - (4) Legal solution needed for the **impact of patents** on NGT products on the breeding sector
- **Rushed and politicized** legislative process -> IFOAM Organics Europe **calls** upon policymakers **for more comprehensive discussions** in order to address the manifold **unresolved issues**



Ban of all NGTs in Organic – recognized in Commission Proposal and EP Position

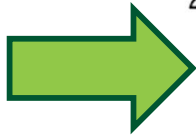
CHAPTER II

Category 1 NGT plants and category 1 NGT products

Article 5

Status of category 1 NGT plants

1. The rules which apply to GMOs in Union legislation shall not apply to category 1 NGT plants.
2. For the purposes of Regulation (EU) 2018/848, the rules **set out in its Articles 5 (f) (iii) and 11 shall apply to** category 1 NGT plants and to products produced from or by such plants.



Traceability Central to Organic Production and Labelling

- Organic production and certification is process-based (not only end-product verification), with rigorous traceability:
 - through **all stages of production, preparation and distribution**
 - regarding **food, feed, product or any substance** intended or expected to be incorporated into food, feed or any product
- Ensures GM-free status of organic products
- For verification of responsibilities in case of non-compliances traceability is a must
- Main tool of combatting food fraud
- Strict rules under:
 - Implementing Reg. (EU) **2021/279** on controls and other measures ensuring **traceability and compliance** in organic production and the labelling of organic products
 - Implementing Reg. (EU) **2021/2119** on certain **records and declarations required from operators and groups of operators**
 - Incl. traceability checks, mass balance checks, and records on precautionary and preventative measures
 - Delegated Reg. (EU) **2021/771** on specific criteria and conditions for the checks of documentary accounts in the framework of official controls in organic production and the official controls of groups of operators
 - Annex II to **Regulation (EU) 2018/848** and 9(10), point (c), Article 34(5) and Article 39(1) point (a) of Regulation (EU) 2018/848....

Traceability Central to Organic Production and Labelling

- Delegated Reg. (EU) **2021/771**:

The traceability check shall cover at least the following elements justified by appropriate documents including stock and financial records:

- *(a) the name and address of the **supplier** and, where different, of the owner or the seller, or the exporter of the products;*
- *(b) the name and address of the **consignee** and, where different, of the buyer or importer of the products;*
- *(c) the **certificate** of the supplier in accordance with Article 35(6) of Regulation (EU) 2018/848;*
- *(d) the information referred to in point 2.1.1 of Annex III to Regulation (EU) 2018/848; covering safeguards of proper identification and intactness of consignments when transported;*
- *(e) the appropriate **lot identification**.*

Detection Methods – Current Practices

- Detection methods are important analytical tools to uncover adventitious or technically unavoidable contaminations that may occur despite co-existence measures throughout the whole supply chain (e.g. despite thorough cleaning of processing machinery)
 - For example: 37 cases of seed contaminations from Austria, Croatia, France, Germany, Greece, Hungary, Ireland, Italy, Romania, Serbia, Slovenia, Sweden, Switzerland, the Netherlands and UK, from 1999 to 2015.
- The Polish authorities have conducted 1,685 samples of maize, rape and mustard seeds between 2005 and 2010
 - 7 samples contained GMOs above the quantification limit (0.1%)
- In order to guarantee that a final product is under the labelling threshold (0.9%), seeds need to be guaranteed to have a contamination level of less than 0.01%.
- 1 RASFF alert concerning GMOs on an organic foodstuff in 2020 and 3 alerts in 2024 (compared with 74 alerts on conventional foodstuffs over the same period).
- Sampling is done by own staff or by external bodies.
- Testing is done by external laboratories.
- For example, for feed maize and soy, organic control and certification bodies in Spain and France test samples 1 – 3 times per year

Detection Methods – Future Perspectives

- Availability of detection methods for NGTs **does only not depend on the “scientific feasibility” but instead on the political willingness** to gear up related research projects and mandate the provision of detection methods and information on genetical material from NGT developers that want to market their crops
- Promising recent EU-funded Horizon 2020 research projects: DARWIN and DETECTIVE
 - IFOAM Organics Europe is part of the DARWIN consortium and strongly committed to contribute to the development of analytical detection methods



Inspection and Control Bodies in Organic

- EU Organic Regulation permits Member States to decide whether the inspection procedure should be carried out by government agencies or a state-supervised private system
- Carry out on-the-spot and additional unannounced controls to check for compliance on a risk-oriented basis
- The inspection body controls agricultural holdings as well as processors and importers at least once a year and more frequently, if necessary.
 - Rules according to Article 38 of Regulation (EU) No 2018/848

Co-existence measures in the EU

2020 Report: “Preventing GMO contamination – an overview of national “coexistence” measures in the EU”

- Key messages:
 - National co-existence measures **vary strongly in the EU**
 - National opt-out bans, liability and compensation schemes, technical segregation measures, public registers, mandatory notifications...
 - The 0.9% labelling threshold but most farmers and processors **strive to ensure a far lower presence**. For organic food processors, this is around 0.01-0.1% of GMOs in raw materials

PREVENTING GMO CONTAMINATION

› AN OVERVIEW OF NATIONAL “COEXISTENCE” MEASURES IN THE EU

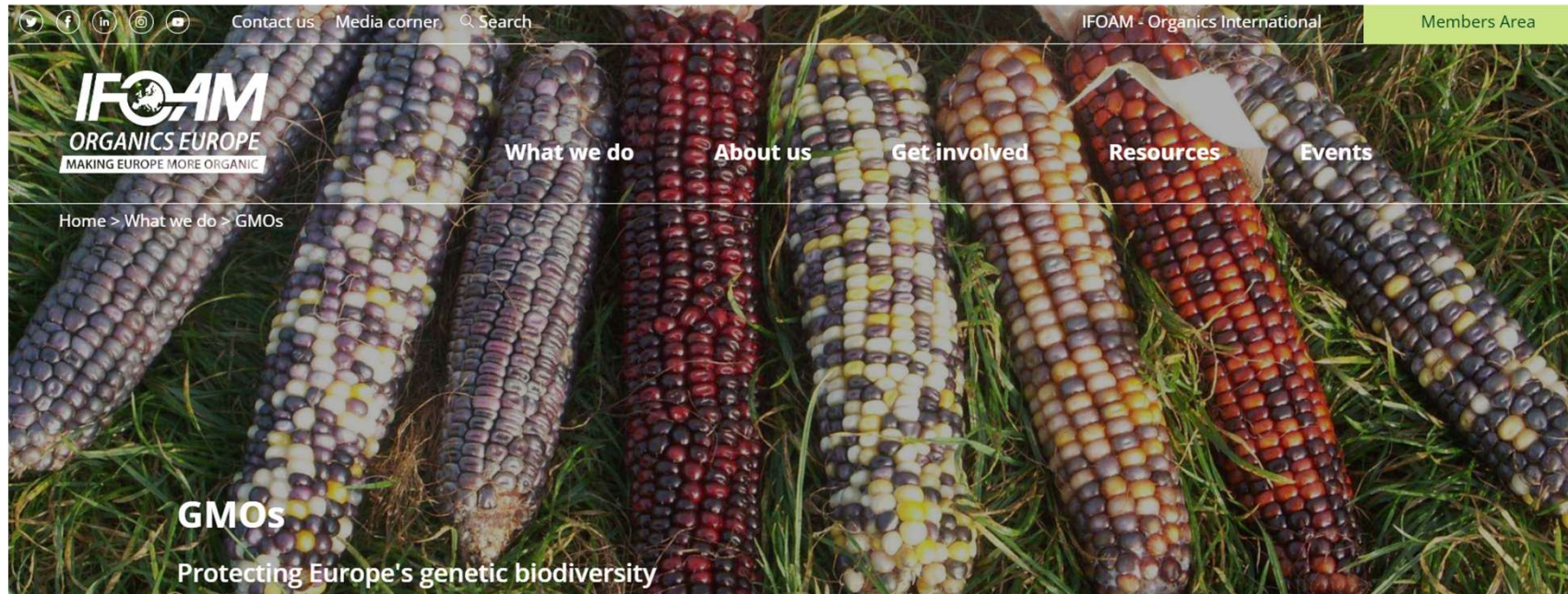
Co-existence measures in the EU

- In practice, the European food industry **prefers to source its raw materials from regions with no GMO cultivation** at all in order to minimise both costs and risks.
- Once contamination is found in a product, a **farmer risks permanent loss of market share**
- **High economic costs to mitigate contamination** (e.g. from forced unseasonal sowing dates)
 - Estimates calculate additional costs of €14,756 per farmer
- A ban on GMO cultivation is the most efficient and least expensive way to protect organic and conventional farming from contamination

Navigating the Road Ahead – The Legislative Process is in Full Gear



Want to know more? Visit the IFOAM GMO Website!



[GMOs - Protecting EU's genetic biodiversity \(organicseurope.bio\)](https://www.organicseurope.bio)