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1. ***Organic crop production:***

1.1. I am seeking clarification on some issues regarding the approved organic crop processing methods and what pre- or post-harvest treatments to organic crops are allowed?
Processing occurs post-harvest. Pre-harvest treatments are for the control of pests, disease and occasionally amending fertility all inputs are strictly controlled, and verifiable at the annual inspection.

1.2. The regulations seem to allow the application of synthetic substances only for the purpose of 'plant protection' although no clear definition of what this actually means is given. Regulations are not fully specific about what processing is included for organic crops, stating that synthetic chemical inputs may be used in 'exceptional circumstances', does this include pre and post harvest processing treatments?
This is correct. Substances not contained in the Annexes of the Reg are only allowable under 'exceptional circumstances' and with the permission of the Competent Authority of the relevant Member State. By the definition of exceptional circumstances, we are not able to provide a general comment.

1.3. Of particular concern is the potential use of glyphosate as a desiccant pre-harvest. Desiccation is not explicitly forbidden in organic regulations and at present glyphosate appears to be the only approved substance for use as a desiccant within the EU. Considering that synthetic chemical inputs are allowed where no organic alternative exists and where land contamination is not likely to occur, it may be possible that glyphosate desiccation can be performed on organic crops in exceptional situations to avoid loss of crop, is this correct?
Glyphosate or any herbicide is strictly forbidden from organic farming and is not available under any circumstances

1.4. I cannot find a definitive list of approved organic or synthetic substances approved for organic crop production. Where can I find this information?
This is contained in the Annexes of 889/2008, synthetic substances are not approved under the Reg and are only available under 'exceptional circumstances' by permission by the relevant Member State

1.5. The organic substances approved for use in organic crop production are safety tested to a basic level, but it is not acceptable that EU legislation does not provide for a comprehensive and

integrated assessment of cumulative effects and co-toxicity of different chemicals known to co-occur in the environment, taking into account different routes of exposure. Are there any plans to improve the standard of safety testing performed on substances that the public are consuming as trace residues within their food, particularly organic produce.
It is not clear that organic food would be subjected to any different testing regime to other non-organic food.

1.6. It seems EFSA have recently started sample testing for pesticide residues in organic produce, although this is for information only, rather than compliance testing. I am concerned that despite the fact that pesticide residue contamination levels of organic food, are continually rising, but there are no measures being put in place to combat this growing problem and that no other testing is performed to ensure the quality and conformity of organic food products. It is essential to establish land management practices in the regulations, to protect organic crops from contaminants such as glyphosate. Are any plans in place to review or improve our current management practices to reduce contamination of organic produce with pesticides and other harmful residues?
Standardised pesticide residue testing has taken place on organic produce for many years. This is carried out alongside conventional food and is standard regulatory practice. In practice, buffers and physical separation are in place to prevent cross contamination between conventional and organic crops. This is taken on a risk based approach and is confirmed by the annual inspection and a testing regime carried out by the organic control bodies. Organic products also fall under the trading standards regime.

2. Organic livestock management:

2.1. In the case of livestock farming, I appreciate that synthetic drugs and medicines are at times required, especially to reduce animal suffering, but this seems to be very minimally regulated by the current regulations. I cannot locate a definitive EU list of approved synthetic substances, or clear criteria for the when the use of organically approved phytotherapeutic, homeopathic and other products are inappropriate, or what withdrawal periods apply specifically for substances.
It is also unclear where the information is available on withdrawal periods for livestock treated with drugs and medicines.
Withdrawal periods are set for each individual product as part of the licensing programme by the Veterinary Medicines Directorate (VMD). Manufacturers must submit all medicine and treatments for testing and approval before they are available on the market for use by any farmers/user. There is not a list of approved synthetic substances within the EU Reg for Organic as no synthetic substances are approved for use, they must be applied for individually. Phytotherapeutic and homeopathic remedies are not regulated therefore they do not fall under any particular regulation.

2.2. I am aware that in the UK, it is the responsibility of Defra, to specify the withdrawal period between giving an allopathic veterinary medicine and the production of organically produced

foodstuff to be twice the legal withdrawal period, or if not specified, 48 hours, but where are legal withdrawal periods defined? How are the established and what testing is performed to ensure that no residues are remaining in the organic produce?
2.3. I am also concerned that Defra regulations state that "for synthetic allopathic veterinary medicines used in a manner other than that specified in the Marketing Authorisation, the withdrawal period is 7 days in the case of eggs or milk; 28 days for meat from poultry or mammals (including fat and offal)". This implies that livestock can be treated with synthetic medicines in a non-prescribed manner (which is not defined so open to wide interpretation) and that only one month of withdrawal is required, which seems completely inadequate for organic produce. Where is the data to support these withdrawal periods?
This is held by the VMD as part of the licensing for any veterinary medicine treatment can only be carried out under veterinary permission and guidance. This is checked as part of the control inspection. Allopathic treatment is not available for organic producers so this is not relevant in the case given above.

2.4. Withdrawal periods for livestock do not seem to be specified within EU regulations for either non-organic feed or drugs and medicine inputs, so what about the rest of the EU? And what checks are in place for imported food goods, to ensure there are not drug and medicine residues present?
Withdrawal periods are specified by the VMD and these are then lengthened and implemented under the EU Organic Reg. Some control bodies may choose to implement longer withdrawal periods on their licensees if they wish.

3. Processed and packaged organic food:

3.1. Imported organic food goods are, it seems, a poorly controlled area in organic regulations, as they do not seem to be monitored or checked by the UK or the EU. Instead we put complete trust in the exporting countries country control body, as the EU "expects" that products to be produced with equivalent production rules and control measures of equivalent effectiveness, based on a certificate of inspection. If no product sampling or back-checking is performed how can we really be sure the products are of an acceptable standard?.
All produce is checked on entry to the EU, and full traceability is available either to a country with equivalence to the EU Reg or under a trade agreement. If outside either of these then the produce must have been inspected and licensed by a body approved by the EU or EU Member State to which it is being imported. The Port Health Authorities are responsible in the first instance for checking that all relevant documentation is in place.

3.2. There are various reports of harmful substances being used in packaging materials, which are not regulated to ensure a minimum standard, so organic products may be contaminated by harmful substances from its packaging. It also seems to me shocking that organic produce may be packaged in materials that are causing significant environmental damage due to the effects of waste and disposal. Are there any plans to enforce the use of biodegradable, organic or environmentally friendly packaging requirements for organic products? If not then surely the use

of packaging known to release harmful substances into its contents should be banned in organic products?

We are not aware of any planned legislation that would enforce the use of biodegradable packaging. If there are fully referenced and peer reviewed 'reports' regarding harmful substances effecting the products they contain then we are not aware of them. We believe it would be counter intuitive for packaging to negatively impact on the product it is designed to protect.