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European Union

Brussels, 17 November 2014  
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**AGRILEG 225**  
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#### COVER NOTE

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From: Irish Parliament  
date of receipt: 14 November 2014  
To: President of the Council of the European Union

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Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on organic production and labelling of organic products, amending Regulation (EU) No XXX/XXX of the European Parliament and of the Council [Official controls Regulation] and repealing Council Regulation (EC) No 834/2007

**[doc. 7956/14 AGRILEG 71 CODEC 841 - COM(2014) 180 final]**  
*- Opinion<sup>1</sup> on the application of the Principles of Subsidiarity and Proportionality*

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Delegations will find attached the above-mentioned document.

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<sup>1</sup> translation(s) of the opinion may be available on the Interparliamentary EU Information Exchange site IPEX at the following address: <http://www.ipex.eu/IPEXL-WEB/search.do>

**An Comhchoiste um Talmhaíocht,  
Bia agus Muir**  
Teach Laighean  
Baile Átha Cliath 2



**Joint Committee on Agriculture, Food  
and the Marine**  
Leinster House  
Dublin 2

Tel: (01) 618 3717  
Ríomphost: afm@oir.ie

Tel: (01) 618 3717  
Email: afm@oir.ie

Mr. Herman Van Rompuy  
President  
European Council  
Brussels

**REF: I374**

13 November 2014

**Political Contribution on COM (2014) 180 – Proposed Regulation on Organic Production and  
labelling of Organic products**

Dear President Van Rompuy,

The Oireachtas Joint Committee on Agriculture, Food and Marine considered the COM (2014) 180 on the issue of **Proposed Regulation on Organic Production and labelling of Organic products** and has agreed the attached views for consideration as part of the Commission's political dialogue process with national parliaments.

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Andrew Doyle  
Chairman  
13 November 2014

*Cuirfe ar fáilte roimh chomhfhreagras i nGaeilge*



**Joint Committee on Agriculture, Food and Marine**

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**Political Contribution on COM (2014) 180 – Proposed Regulation on Organic  
Production and labelling of Organic products**

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**An Comhchoiste um Thalmhaíocht, Bia agus Muir**

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**An Cion Polaitiúil maidir le COM (2014) 180 – Rialacháin Beartaithe ón gComhairle  
maidir le Táirgeadh Orgánach agus Lipéadú Táirgí Orgánacha**

**November 2014**

## **Political Contribution on COM (2014) 180 – Proposed Regulation on Organic Production and labelling of Organic products**

The Joint Committee welcomes many elements of the proposal, but does harbour some concerns regarding certain provisions. It is noted that other Member States have concerns regarding aspects of the proposal and that a consensus among Member States will be difficult to achieve.

The Joint Committee:

1. Is concerned about the implementation of The TFEU (Lisbon Treaty) Alignment exercise in regard to the transfer of decision making powers to the Commission via delegated Acts.
2. Seeks clarity on the scope of the Proposal in terms of what organic products will be included in the regulation and what products will be left out.
3. Is concerned with the transfer of organic controls to the new Officials Control Regulation. This issue is currently under discussion at EU Council.
4. Is concerned about the introduction of a risk-based control system at the expense of an annual inspection requirement conducted by the Control Bodies.
5. Is wary of the harmonisation of residue sampling and analysis in regard to setting a minimum threshold for pesticide residues above which the product cannot be sold as organic.
6. Would like to see a greater degree of flexibility exercised for mixed holdings, where a farm can produce both organic and non-organic in the same holding.
7. Regards the severe restriction in the reduction of the conversion period as a concern.
8. Questions whether it is appropriate for the proposal to encompass all retailers who sell organic products.
9. Advocates for the labelling of in-conversion products as organic.
10. Seeks greater flexibility to allow – under very exceptional circumstances – the introduction of non-organic breeding stock, seeds and propagation material onto organic farms.

11. Is concerned that the expansion of the import regime to organic farms fully in compliance with the EU organic standards could be problematic, particularly with issues pertaining to ingredients and materials.

The Joint Committee hopes its views will be taken into account and looks forward to receiving a response to its observations from the European Commission.

A handwritten signature in blue ink, appearing to read 'Andrew Doyle', with a stylized flourish at the end.

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Andrew Doyle T.D.  
Chairman  
Joint Committee on Agriculture, Food, and the Marine  
November 2014