

Deputada ao Parlamento Europeu

Dear NOSB Members,

My name is Maria Lidia Senra Rodriguez, and I am a Member of the European Parliament and its Committee on Agriculture and Rural Development, as well as a shadow rapporteur responsible for the ongoing revision of Regulation 834/2007/EC on organic production in Europe. I welcome the U.S. Department of Agriculture (USDA) public consultation for a possible revised National Organic Program (NOP) regulation on organic agriculture, as it represents an opportunity to provide a clarification on the ban of hydroponic techniques and the strictly limited toleration of container-based solutions in organic production in Europe.

Regulation 834/2007/EC provides the legal framework for organic production in Europe. It includes a clear reference to soil-bound production in article 4(a), which states that organic production should strive for "*appropriate design and management of biological processes based on ecological systems using natural resources which are internal to the system by methods that: (i) practice land-related crop cultivation*". In addition, regulation 889/2008/EC implementing regulation 834/2007/EC was adopted to harmonize organic production practices among Member States and introduced a ban on hydroponic techniques (article 4, which states "*Hydroponic production is prohibited.*").

This means in Europe growing organically in the soil is interpreted as the cultivation of fruit and vegetables in the upper layer of the earth's crust (i.e. in the ground). This approach is very much in line with the original definition of organic production we strive for and supports a consistent communication to European consumers on the plant's production methods. This means European organic farmers follow the core principle of organic agriculture, which is that the soil feeds the plant, the plant feeds the animal, and the animal feeds the soil.

Only Denmark, Sweden and Finland (representing 2,7 percent of Europe's population) tolerate certain types of out-of-soil techniques in organic production called demarcated beds (ca. 18 hectares of holdings according to the EGTOP final report on greenhouse production). These are not hydroponic, but containers-based solutions filled with soil and a mixture of products allowed in organic farming. In the ongoing negotiations, the European Parliament, the European Commission and the Council strictly oppose any enlargement of such practices, as these are not in line with the soil-bound principle of organic agriculture and might pave the way, in the future, for the gradual, wider acceptance of certain types of out-of-soil solutions in organic production.

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In line with the position of IFOAM EU, the European association that represents the interest of the organic sector in Europe and the large majority of the European national organic movements, in mid-October 2015, in the context of the ongoing revision of the European organic regulation, the European Parliament Committee on Agriculture and Rural Development (COMAGRI) expressed its position for a stricter and clearer definition of soil-bound production and confirmed the prohibition of hydroponics in European organic agriculture, voting in favor of the following amendments: Amendment 102: (43e) *'soil-bound crop cultivation' means production in living soil such as mineral soil mixed and/or fertilized with materials and products allowed in organic production, in connection with the subsoil and bedrock*; Amendment 276: 1.1. *'Hydroponic production is prohibited.'* At the same time, COMAGRI took a position against an amendment proposing a derogation for demarcated beds in organic production in the Northern Member States.

In the context of the ongoing revision of the European organic regulation, a joint decision by the European Parliament and Council is expected in June 2017, with the political trend indicating that the EU supports a clear definition of soil-bound organic production, a strict ban of hydroponics and a derogation for demarcated beds limited to the Northern Member States, only for existing production without possibility of extension.

In line with the objective of the European Commission to harmonize production practices for organic cultivation, the European Parliament fully supports the clear and comprehensive definition of soil-bound crop cultivation as proposed in Amendment 102, a strict ban of hydroponic techniques as in Amendments 276 as well as a derogation for demarcated beds limited in time and space, for existing production. This reflects current political trends in Europe and corresponds with the position promoted by IFOAM EU, the association that represents the interest of the organic sector in Europe. In IFOAM EU's position paper (2013) it is in fact indicated that as *"the main principle of organic greenhouse production: greenhouse production must be in living soil (mineral soil mixed and/or fertilised with materials and products included in Annex I of regulation (EC) No 889/2008) in connection with the subsoil and bedrock"*. In addition, in case hydroponics would officially be allowed in U.S. organic agriculture, the European organic sector could promote the exclusion of these products from the current equivalence agreement for organic products between the EU and the U.S.

Yours sincerely,



Lidia Senra Rodríguez