

Brussels, 26 November 2018

To: Members of the Joint CARIFORUM-EU Consultative Committee, EU-Cariforum Trade and Development Committee and Joint Council

Re: New EU organic rules: how to avoid negative impacts on small farmers in the Caribbean?

Dear all

The Fair Trade Advocacy Office (FTAO) is a joint initiative of Fairtrade International, the World Fair Trade Organisation and the World Fair Trade Organisation-Europe. Through these three networks the FTAO represents an estimate of 2.5 million Fair Trade producers and workers from 70 countries, 19 labelling initiatives, over 500 specialised Fair Trade importers, 4,000 World Shops and more than 100,000 volunteers. Our members include WFTO-Latin America and the “*Coordinadora Latinoamericana y del Caribe de Pequeños Productores de Comercio Justo – CLAC*”, amongst others.

As won't be able to participating in the upcoming EU-Cariforum JCC on 3 and 4 december 2018 in St-Lucia due an agenda clash, as members of the joint Cariforum-EU Consultative Committee, we are writing to draw your attention to the recent adoption by the European Union of the [Regulation \(EU\) 2018/848 on organic agriculture](#)¹, which, amongst other changes, replaces the the current import regime based on “equivalence” to a need to prove “full-compliance” with EU rules and list of authorised substances. While acknowledging the new EU rules also bring clarity and improvements in certain points in the implementation of the EU organic Regulation, **we are concerned about the impact that these EU regulatory changes could have on small farmers from the Caribbean. We believe it is a development worth raising at the EU-Cariforum JCC,. Trade Committee and Joint Council level.**

In relation to the future new lists of substances authorised: We are concerned about the potential risk that some of the substances (for plant protection or as fertiliser) that are currently accepted in non-EU countries with tropical climate may not be allowed in the EU market according to the future new annexes of the Regulation. EU Members States authorities will have access and be able to participate in all relevant EU Committees and Working Groups that will be coordinating the drafting of the annexes of substances, including coordination on which Member States leads on preparing dossiers for specific substances. But how will Caribbean governments be involved in this process, to ensure they have early warning about the substances that are likely to be accepted in the new lists?

¹ 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 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.150.01.0001.01.ENG&toc=OJ:L:2018:150:TOC

We understand the Regulation foresees a process to ask for 2-year derogations. However, we are concerned about timings. How much time will Caribbean governments have to have access to the final list of substances and prepare dossiers to come up with the necessary information to formally request a derogation, before the entry into force of the new Regulation? Does the Commission foresee a mechanism to coordinate which countries or organisations will lead in preparing dossiers to request derogations for such substances?

In relation to group certification: We understand that there will be an EU implementing act to add clarity to the new article on group certification. EU Member States governments will have access and be able to participate in all relevant Committees and Working Groups that will oversee the transition from the current EU rules to the new EU Regulations. But what will be the mechanism of consultation with Caribbean governments to give information and suggestions to ensure the implementing act drafting process takes into account the particularities of group certification in non-EU countries?

In relation to capacity-building of small farmers in the Caribbean to understand impact and adapt to the new rules, it would be useful if the European Commission could explain whether they plan any action to support farmer organizations in non-EU countries to have access to the right information and be supported in adaptation to the new EU rules.

We remain at your disposal and look forward to working with you to ensure that the implementation of the new EU rules contributes, rather than hinders, the jointly-agreed objective of increase of trade of sustainably-produced goods between the CARIFORUM and the European Union.

We thank you in advance

Yours sincerely



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The Fair Trade Advocacy Office (FTAO) speaks out for Fair Trade and Trade Justice with the aim to improve the livelihoods of marginalised producers and workers in the South. The FTAO is a joint initiative of Fairtrade International, the World Fair Trade Organization-Global and the World Fair Trade Organization-Europe.