Re: List of products & substances authorised in organic production: ethylene and its use in organic citrus production

Dear [Art. 4(1)(b) Primary]

We are contacting you in relation to the Draft Commission Implementing Regulation on the list of products & substances authorised in organic production, in particular to the part that refers to the conditions of use of ethylene for de-greening of organic citrus fruits.

In paragraph 4 of Annex I of the above-mentioned draft, under the heading “Active substances not included in any of the above categories”, the Commission would establish that the application of ethylene would be limited to bananas and potatoes and could only be used on citrus fruit “as part of a strategy for the prevention of fruit fly”. In this regard, the use of ethylene for de-greening of organic citrus fruit would no longer be allowed.

European farmers and agri-cooperatives fear that this ban will be very detrimental to the European citrus sector for the following reasons:

- Ethylene is a natural gas, which is also produced by the fruits themselves in their metabolic processes. This is harmless to the environment and leaves no trace and presents no MRI problems. It is traditionally used for the de-greening of citrus fruits prior to their commercialisation, as well as for the ripening of green bananas or the prevention of stunting and germination during the storage of potatoes. We stress that, in the case of its use on citrus fruits, ethylene is applied at very low doses, on fruit harvested at its optimum ripening point. It does not modify the rate of ripening, but in some cases can help the fruit to reach its characteristic colour, especially at the beginning of the season.

- In light of the previous point, Copa and Cogeca do not agree with the criteria to which the Commission has removed this product for the production of organic citrus. Copa and Cogeca fear that this ban will set a serious precedent that could be extended to conventional citrus production in the future. This would cause enormous damage to the marketing of citrus at the beginning of the season, when the earliest European varieties reach their optimum ripeness. These varieties still require de-greening to finish their colouring which enables them to enter the season at the optimum moment in terms of plant health, commercial and organoleptic aspects. Without this substance, European citrus will not be able to compete in the European market. Instead, third countries with counter-season imports arriving in the EU market will affect thousands of jobs in the European producers’ regions.
Based on these reasons, we support the use of ethylene in organic farming and we strongly oppose the proposed provision by European Commission to restrict the use of ethylene on organic citrus production.

We hope that you will take into account our request and we remain available for any clarification. We would welcome a meeting between Copa and Cogeca and DG SANTE in the near future to further exchange on this matter.

Yours sincerely,

[signature]

Cc: [signature] and [signature]