

Brussels, 19 December 2014

Mr **João Onofre**,  
Unit B4 - Organics  
DG Agriculture and Rural Development  
European Commission  
B - 1049 Brussels

CC: Regulatory Committee on  
Organic Production members

**Re: The use of copper and potassium phosphonate for control of downy mildew in organic viticulture**

Dear Mr João Onofre,

Specific productions and traditional-used substances in organic farming could be significantly affected during the process of alignment between organic regulations and horizontal legislations.

It is the case of organic vineyards and organic wine production. The fungal disease downy mildew is the main threat for vineyards. Today in many European countries there is a strong tendency to reduce the use of copper and copper-based products in agriculture, which represented for decades the main protection instruments against this disease. Especially in these countries, over the past years, organic vine growers have tested many alternative products and farming practices aiming at decreasing the use of copper but to date no actual effective solution has been found.

Besides copper, the only product that showed a significant efficacy in organic viticulture is potassium phosphonate, in particular when it is used as a component of a protection strategy that also includes copper. However, due to alignment processes with horizontal legislation, potassium phosphonate cannot be used any longer in organic farming.

In May 2013 German competent authority sent the Commission a dossier with background information on phosphonate in order to have this substance added to Annex II of Regulation (EC) No 889/2008. The Expert Group for Technical Advice in Organic Farming (EGTOP) gave its opinion on the use of phosphonate in the second report on plant protection products<sup>1</sup> adopted in April 2014.

After having analysed the situation at EU level and based on the current discussions and on the serious pressure coming from wine growers of different regions, IFOAM EU has developed a position that takes into account the different situations and the different legal, structural and climatic conditions all over the EU:

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<sup>1</sup> [http://ec.europa.eu/agriculture/organic/eu-policy/expert-advice/documents/final-reports/egtop-final-report-on-ppp-ii\\_en.pdf](http://ec.europa.eu/agriculture/organic/eu-policy/expert-advice/documents/final-reports/egtop-final-report-on-ppp-ii_en.pdf)

- 1) IFOAM EU recognises that the use of copper and potassium phosphonate is part of a various organic history in viticulture in plant protection strategies of different EU member states.
- 2) At EU level, copper should be maintained on the annex of Regulation (EU) No 540/2011 (that implements Regulation EC No 1107/2009) and on Annex II of Regulation (EC) No 889/2008 with 30 kg/ha/5y. IFOAM EU stresses the need of a harmonised implementation of that rule in all wine-producing countries. Reducing further copper usage at national level when effective alternatives are not available is not the right strategy to develop organic viticulture.
- 3) If Member States maintain or introduce a copper reduction scheme, potassium phosphonate should be allowed as derogation on the basis of regional flexibility (Art. 22 of Regulation EC No 834/2007). This derogation should be phased out, in a reasonable timeframe, when alternatives are available or the copper usage in the member states is on the same level as currently allowed in the EU organic regulation (6 kg/ha/y or 30 kg/ha/5y).
- 4) More research has to be initiated and funded by the EU to develop alternative plant protection practices or products able to reduce losses due to powdery mildews infections in organic viticulture.

IFOAM EU urges Commission and Member States to find a European solution for organic wine growers before next season starts in 2015.

That will ensure security in one of the most successful branches of organic production in the EU.

Organic regards,



Marco Schlüter

IFOAM EU Director