

**To: Rt Hon George Eustice MP, Secretary of State, Defra**

**By Email**

Dear George

Martin Jenkins' recent letter to you (24 July 2021, copied below for your ease of reference) was also copied to me as chair of the APPG on Science and Technology in Agriculture.

The letter raises serious concerns that certified organic growers taking part in oilseed rape trials in Scotland were illicitly marketing crops grown from 100% conventional seed as organic, receiving premiums in excess of £500/tonne yet in clear breach of organic rules requiring conventional seed to be sown as a mixture with organically grown seed.

For conventional OSR growers struggling with pest-ravaged crops following the loss of neonic seed treatments, this flagrant breach not only of the law but also the spirit of organic farming principles must feel like a kick in the teeth.

I would strongly urge you to investigate the apparently routine practice of non-organic seed use by certified organic growers, including a review of how compliance with the law is independently policed, monitored and enforced.

With kind regards

Julian Sturdy MP  
Chair  
APPG Science & Technology in Agriculture

**By Email**

**To: Rt Hon George Eustice MP, Secretary of State, Defra**

Dear Secretary of State

We have met in person once when my then MP, Heidi Allen, arranged for Jim Orson of NIAB and myself to meet you at Portcullis House to discuss Neonicotinoids and Glyphosate. At least that pre-eminently useful molecule, Glyphosate, remains in use.

I trust I came over as a farmer, passionate about the environment (for the whole of my 45-year career) and equally passionate that the resolution of environmental concerns must involve the farming efficiency that science can provide, I don't usually think it helps to pit one farm type against another.

No farming system has a monopoly on the solution to feeding a hungry, warming planet sustainably.

But I suspect we will not get there by turning back the clock to some fake nostalgic past, by rejecting scientific advances, or by focusing on lower yielding production systems.

I was surprised last November when Helen Browning, launching the Soil Association's 'Grow Back Better' manifesto, [described](#) the devastating Covid pandemic in terms of a wake-up call from Mother Nature to return to more traditional farming practices.

Ironically this coincided with the release of the first Covid vaccine, developed by Pfizer using the very same genetic engineering technologies that the organic lobby has campaigned so vigorously against after Prince Charles declared that genetic modification strayed into 'realms that belong to God and God alone.'

I'm sure, like the rest of us, that both Ms Browning and HRH have been happily turning up for their Covid jobs in response to the Government's excellent vaccine rollout programme.

But my concern is that such double standards extend to the organic industry's respect for their own rules, and that both consumers and non-organic producers are unfairly disadvantaged as a result.

A recent report from the Soil Association on organic profitability, entitled [Organic Farming and Growing – does it stack up?](#), claimed to show how much more profitable organic farmers are compared with their conventional counterparts, with organic arable farmers receiving a net income of £690/ha compared to £288/ha for non-organic.

But when you consider the following tale of duplicity, that's hardly surprising...

It concerns a series of oilseed rape trials in Scotland. 'How Scottish organic OSR growers delivered yields up to 3.1t/ha', [Farmers Weekly](#) reported. According to the article, growers in the Aberdeenshire trials were pocketing a tidy £520 premium per tonne over conventional for their 'organic' OSR.

A farming acquaintance of mine in Scotland contacted one of the researchers involved to ask whether the seed used in the trials was organically grown or conventional. There was a hasty response. 'There's no organically grown OSR seed available. It was untreated conventional hybrid seed.'

In other words, seed grown using precisely the artificial fertilisers and synthetic pesticides banned under organic standards – then the resulting harvest marketed as 'organic'.

Of course, this is nothing new to organic growers, who routinely make use of an 'emergency' derogation to use non-organic seed. You will no doubt be aware that sector bodies are required to produce an [annual report](#) detailing the organic industry's use of conventionally grown seed.

Compared with 2019, the 2020 report indicates that the tonnage of non-organic seed used by organic potato growers increased by a staggering 84%, and by 73% for spring-sown cereal seed.

But there's a catch – and it came in the Government's own response to a [Parliamentary question](#) tabled by Viscount Ridley on the organic sector's use of non-organic seed.

*"There is no certified organic farmland that uses wholly non-organic seeds, as use of organic seeds is a requirement for certification. In cases where, due to limited availability, a producer cannot source the required seeds in sufficient quantities, the organic regulation does, however, allow producers to use a mixture of organic and non-organic seeds. The organic legislation recognises that the seed sector is not sufficiently developed to meet the demand for organic seeds with a 100% requirement. In*

*these cases, non-organic seeds must make up the minimum proportion possible and the mixture must be evenly mixed and spread across the land in question.”*

It would appear, therefore, that crops grown from 100% non-organic seed cannot legally be marketed as ‘organic’, i.e. there must be at least some organic seed in the mixture sown (although no threshold is specified). So the afore-mentioned Aberdeenshire trials, and the handsome reward, would appear little more than a dubious con-trick. So much for a ‘holistic’ approach.

I wonder how organic consumers would perceive this apparently routine use of non-organic inputs and the obscene profiteering taking place at their expense?

If the organic industry has ambitions to be part of mainstream agriculture – the Soil Association has called for the UK to exceed Europe’s ambitions to increase the organic area to 25% of farmed land – then in my view it needs to behave with a little more integrity and honesty about practices such as this.

I trust the Government will investigate how widespread this apparently flagrant breach of both the spirit and letter of the organic marketing rules is in commercial practice, and instigate the necessary safeguards to protect consumers.

Yours sincerely

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cc. Victoria Prentis MP, Food & Farming Minister, Defra  
Neil Parish MP, Chair, House of Commons EFRA Committee  
Julian Sturdy MP, Chair, APPG Science & Technology in Agriculture  
Mairi Gougeon MSP, Cabinet Secretary for Rural Affairs, Scottish Government  
Anthony Browne MP, South Cambs