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écologique**

*Translated by deepl.com*

## **Ministry of Agriculture's organic action plan for organic farming PAN-Bio 2030: Lack of political direction for a forward-looking agricultural policy – proposals for the necessary course correction**

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Shortly before Christmas, the Ministry of Agriculture presented its long-awaited action plan for organic farming, **PAN-Bio 2030**.

Mouvement Ecologique and other stakeholders in the sector had already suggested to the Minister of Agriculture months ago that a dialogue on this important action plan be held with all stakeholders concerned.

Unfortunately, there was no willingness for constructive dialogue in advance, so Mouvement Ecologique can only comment on the plan as presented. Constructive involvement in advance would have been far more effective.

Unfortunately, the action plan that has now been presented falls far short of **what is needed**.

The fact is that, as recent scientific studies show, organic farming protects **biodiversity** far more effectively<sup>1</sup> than conventional agriculture, which in its current form is unfortunately a major contributor to the destruction of natural habitats and the dramatic decline in species.

Organic farming is also absolutely advantageous from **a financial policy perspective**, as it eliminates the high costs associated with reducing nitrate pollution from conventional agriculture and reducing agricultural pesticides in drinking water, among other things. This is because organic farming avoids such pollution in the first place. The same applies to persistent chemicals and much more.

The evidence that organic farming is preferable from **a health perspective** (both due to the lower pesticide input into our ecosystems and the lower contamination of food with undesirable substances, for example) has also been known for a long time.

**Organic farming serves as a pillar for the preservation of the cultural landscape and the common good in an outstanding way and must therefore be the central element of the agro-ecological**

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<sup>1</sup> <https://www.mnhn.fr/fr/alerte-presse/une-nouvelle-etude-montre-que-la-plupart-des-especes-d-oiseaux-en-france-sont-plus>

transformation, especially in the interests of farmers. Organic farming is also far less exposed to the global market and the geopolitical situation, which is particularly relevant in today's times of crisis.

With this critical analysis, Mouvement Ecologique wishes to contribute to ensuring that PAN-Bio 2030 develops with twice the impact, and that course corrections are made and implemented. In doing so, it is essential that there be an exchange with the stakeholders concerned, at least in the design of the individual measures, if this was not already desired during the drafting of the plan.

This is because many of the points raised by Mouvement Ecologique could still be addressed now, provided there is the political will to do so. They do not conflict with the Bioaction Plan.

It should also be mentioned that Mouvement Ecologique fully supports a number of the measures listed in the plan (as they are already included in PanBio 2025). However, this does not alter the central weaknesses of the action plan.

### **Expansion of organic farming: where are the clear statements from the health, environment and finance ministries?**

It is well known that organic farming is essential if we are to meet our biodiversity targets and protect our waterways and drinking water. From a health perspective, it is a must. Conventionally produced food is proven to be far more contaminated with pesticides. A study funded by the Ministry of Health has detected pesticide residues in hair samples from ALL participating children. Persistent chemicals poison people, food and the environment. Organic farming also saves money that does not have to be spent on wastewater treatment, nitrate removal and so on.

Against this backdrop, it is incomprehensible that a completely unsatisfactory organic action plan was passed by the government council.

One could say: OK, the Minister of Agriculture is acting as a mouthpiece for conventional farmers. But at the very least, the Ministry of Health and the Ministry of the Environment should have urgently pointed out that this plan disregards the policies for which we are responsible in our ministries! It must be revised to make it more ambitious, more concrete and more effective. Apparently, this did not happen...

However, the days when sectoral ministries decide on the health of us humans, our children and the environment must be over!

Not only Agriculture Minister Martine Hansen has failed here, but also Health Minister Martine Deprez and Environment Minister Serge Wilmes.

Ultimately, the entire government must take responsibility for the plan and decide to revise this organic action plan! Prime Minister Luc Frieden is also called upon to act.

## 1. Consolidate structures in the ministry – involve non-governmental actors more consistently in implementation

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Even the best plan can only be effective if **sufficient resources** are **available for its implementation**, **both financial** and **human**. Unfortunately, it must be noted that the current structures in the Ministry of Agriculture in the area of organic farming are far too underdeveloped and inadequate. Although there is a corresponding department in the ASTA (Administration des Services Techniques de l'Agriculture), it is not exclusively responsible for organic farming. The fact that the person responsible for organic farming in the ministry also worked on the LUGA for a long time shows how criminally organic farming is neglected at the level of the Ministry of Agriculture.

- *In order to ensure concrete implementation – also in dialogue with stakeholders – an **analysis is needed to determine the extent to which the work at hand can be carried out with the available resources (human and financial)**. The question also arises as to whether the department has sufficient powers.*

The fact is that there are important non-governmental actors who, on the one hand, should generally support the development of the PAN Bio and, above all, could also participate very actively in its implementation. This assumes that the Ministry of Agriculture is prepared to involve them and, if necessary, to remunerate them for certain work. After all, it is the local actors who have the best knowledge and could implement measures with greater impact. Unfortunately, with very few exceptions, only administrations and ministries are listed as partners in the 18 measures of the plan, with hardly any other actors. However, the Belgian region of Wallonia and other neighbouring EU member states show that implementation can only take place through partnerships and cooperation.

- *The Mouvement Ecologique is pushing for the **consistent involvement of non-governmental actors** (marketers, NGOs, etc.) **in the design and concrete implementation of the measures**. Such direct, effective cooperation beyond a general exchange relieves the burden on government actors and helps to bring the action plan to life more quickly and efficiently.*

In addition, measures 1-3 stipulate that the ministry should only meet with non-governmental actors once a year to discuss the development of the action plan. An annual formal meeting can hardly be considered truly helpful. Let's not kid ourselves, this would be more of an information event than a real exchange of ideas.

- *On the one hand, it is essential to ensure a much more frequent **detailed exchange on the further development of the plan with all stakeholders** (from producers and marketers to customers and environmental organisations), for example on a quarterly basis. In addition, there must be an open exchange with the "affected" stakeholders in the sector when designing and implementing the respective measures (e.g. depending on the production sector).*

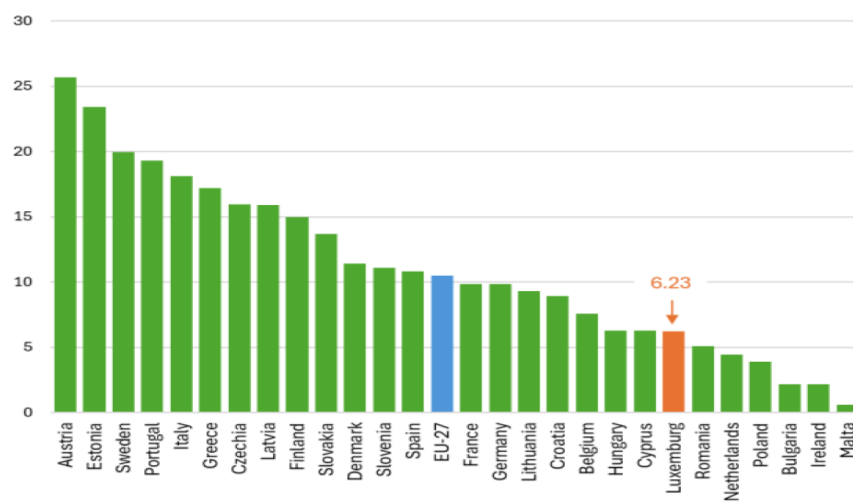
## 2. Set more ambitious expansion targets!

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The action plan, which expired in 2025, aimed to expand organic farming to 20% of agricultural land by the end of 2025. This has not been achieved: Luxembourg currently stands at around 12%. The reasons for this are obvious: the PanBio 2025 targets were certainly quite ambitious. However, much more could have been achieved if more work had been done on implementation and if there had been strong structural and binding involvement of the sector. Unfortunately, this was not the case under previous governments either. Using this as an excuse to scale back the requirements of the new action plan is not appropriate!

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**Figure 12: Share of total utilised agricultural area occupied by organic farming per Member State (%), 2022**



Source: Eurostat, 'Area under organic farming', sdg\_02\_40, accessed 5 December 2024, [https://ec.europa.eu/eurostat/databrowser/view/sdg\\_02\\_40/default/table?lang=en](https://ec.europa.eu/eurostat/databrowser/view/sdg_02_40/default/table?lang=en).

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The Mouvement Ecologique therefore considers it a mistake for this government to be satisfied with the modest **expansion target of 1% per annum**.

Such an expansion target is not, as the minister says, "more realistic", but rather not ambitious enough!

An action plan is also a tool for politicians to express their clear political will and conviction. **Expansion targets are not mere communication figures, but rather have a concrete impact on resource allocation, personnel priorities and administrative logic. A low target therefore has a systemic dampening effect.** The fact that the expansion targets are now being scaled back in this way gives the impression that even a very tentative expansion would be effective and that the government is only half-heartedly behind it. However, a **strong political signal** is needed to all stakeholders.

This would also be in line with the EU Commission's guidelines. Agriculture Commissioner Ch. Hansen has repeatedly called for ambitious targets for the expansion of organic farming. **It is no coincidence that the European Green Deal, with its *Farm to Fork* and Biodiversity Strategy, envisages organic farming accounting for 25% of the EU's cultivated land by 2030.**

**And last but not least, Luxembourg is one of the lowest-ranked countries in terms of the share of organic farming in its total agricultural area, as shown in the following graph from the European Commission from 2024.**

- *Even though only the expansion target of 1% per annum has been retained in the organic action plan, Mouvement Ecologique expects the government in general (and the minister in particular) to make it clear **that organic farming is their absolute priority and that everything will be done to significantly exceed the stated target.***
- *In addition, clear language must be used: the Ministry of Agriculture must reaffirm the provision of the previous plan – that **complete organic farming should be achieved by 2050 at the latest.** This has not been done to date.*

### **3. Guiding principle of the action plan: Bringing production and marketing together**

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The guiding principle of the action plan must be to develop production and marketing together.

This is because existing and new producers need to be confident that their products can be processed and marketed sufficiently, even if supply increases.

It is already a fact that demand for organic products, with the exception of milk, exceeds Luxembourg's production capacity. The current, rather unambitious PAN-Bio does not offer local producers and processors a sufficiently secure guarantee of purchase.

- *What is needed is a **coordinated approach** to promoting young farmers – generational change and career changers – through training, production, marketing and direct sales **in order to jointly develop supply and demand.***

#### 4. Systematic evaluation/assessment of PAN Bio-25 and monitoring of PAN Bio-2030 – bringing indicators to life

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A good action plan should have been based on a detailed inventory and analysis of the implementation of PAN Bio 2025: How far has the implementation of the various measures progressed? Where did they fail, if at all, and what conclusions can be drawn from this?

Such a **systematic evaluation of the previous plan** is essential a priori! It would have been all the more important given that numerous measures in the new plan were already part of PAN Bio 2025. However, this monitoring and evaluation of strengths and weaknesses (SWAT) did not take place. According to the Ministry, there was only a general discussion within a small circle about the status of implementation, which must be considered an extremely unsatisfactory and unprofessional approach! The mistake of not conducting a systematic evaluation of the obstacles to the implementation of PAN-Bio should not be repeated.

- A **systematic, publicly accessible ex-post evaluation of PAN-Bio 2025** is essential – ideally carried out externally – to ensure the credibility and learning ability of policymakers. Only in this way can the right adjustments be made to ensure that the current action plan will be effective.

It is also a fact that, in order to develop a sound plan – and also to design the indicators mentioned – it would be important to have access to **sufficient statistical data**. Measure 2-1 of the action plan ("Mise en place d'un système de reporting avec indicateurs") provides for such indicators ("Description: Development of a system for regularly collecting and analysing indicators of the implementation of PAN-BIO 2030, changes in land area, number of organic farms, market share, training, research projects, etc.").

According to the plan, the objective of these indicators is to be an "Indicator: Publication of an annual report".

The action plan lists indicators (e.g. "number of trial fields and field visits, number of valorisation solutions identified and implemented"). However, these have not been discussed in any form and mostly do not include measurable target values. This significantly reduces their importance, as they can be seen as little more than a fig leaf from which only limited conclusions can be drawn.

- *Mouvement Ecologique* advocates that the ministry should remain open and willing to discuss which **indicators are important for the development of organic farming** and should **definitely be retained**. In addition, they should (be able to) be assigned **specific targets**. This work should be tackled as a matter of priority in 2026. STATEC should also be involved in this process, as it can provide important input, for example through the shopping basket and its specific expertise.

## 5. Establish stronger links with other government regulations

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The Organic Action Plan is very closely linked to other government requirements:

- the National Nature Conservation Plan PNPN3 and the Water Management Plan (organic farming is one of the most important cornerstones for implementing these action plans!);
- the Agricultural Act;
- the "plan alimentaire";
- the National Climate and Energy Plan (CO2 sequestration through humus formation, which occurs on organic farms through crop rotation, etc.)
- Action plan for generational renewal (see point 8);
- etc.

It is understandable that not all measures contained in these other plans/laws are set out in detail in the Bioaction Plan. However, it is not acceptable that these plans are not mentioned in any form (except for the "plan alimentaire", which is not discussed in detail either). If the action plan lists such harmless and self-evident activities as an interministerial meeting to implement the plan as a separate measure, then all the more essential aspects of the link with other plans should have been outlined.

- National Biodiversity Plan PNPN3: Biodiversity loss is closely linked to more environmentally friendly agriculture. The low nitrogen inputs in organic farming and the avoidance of pesticides have a direct impact on plant and animal biodiversity. Many endangered plant species, such as orchids and black salsify in extensive grassland, and endangered animal species, such as little owls and greater horseshoe bats, need extensive pastures, which organic farming can provide.
- Above all, however, it would be important to stipulate that the aim of the mid-term review of the Agricultural Act must be to promote the organic action plan more strongly in the Agricultural Act. The following point should actually have been a fundamental measure: *"Analysis of the Agricultural Act as part of the mid-term review to determine the extent to which provisions promoting organic farming should be further developed"*.
- The requirements for the "plan alimentaire" from the perspective of organic farming should also have been an essential aspect of the action plan.
  - *The Mouvement Ecologique expects that, as part of the development and continuation of these plans, a **direct link** will be **established with the organic action plan** and that it will be explained in all openness how these plans can contribute to the stronger promotion of organic farming.*

## 6. Clarifying responsibilities

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The action plan positively lists the actors responsible for implementing the individual measures. However, there are fundamental shortcomings:

- It is not currently specified who is responsible for development and implementation in each case. It is well known that when many actors are involved and responsibilities are not clearly defined ( ), often no one feels entirely responsible for "tackling the issue".

- Furthermore, as already mentioned, with very few exceptions, non-governmental actors are not named. Cooperation is needed in the development and implementation of the measures.
- *Mouvement Ecologique advocates that a **lead agency with decision-making and budgetary responsibility** be named for each measure. **Cooperation partners** must be involved in a binding manner. This is also possible without any problems according to the plan and would help to advance implementation more efficiently.*

## 7. Define measures in much more concrete terms

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To put it more bluntly, one could say that the Bioaction Plan is not actually a strategy, but merely an "index" – a kind of table of contents on which the actual plan should be based.

In fact, the measures are, to put it mildly, rather summarily presented. One would have expected that, in the case of some measures, the past few years – during the course of PanBio 2025 and in preparation for the new plan – would have seen a much more concrete and detailed presentation of exactly what a measure should look like and what specific initiatives should be taken. It is incomprehensible that more knowledge and preparatory work did not go into the PAN-Bio. Why has implementation failed to date? What is supposed to inspire confidence that it will now succeed – without any change in the framework conditions?

- *The new PanBio must move away from "headlines" and become a **quick-witted and concrete implementation tool**. This can only succeed in cooperation with the stakeholders.*  
*In doing so, it would be advisable to set joint intermediate stages.*

## 8. Address generational change, farm succession and modern agricultural structures!

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Without the systematic use of farm transfers and new installations as a cost-effective lever for structural change, the expansion of organic farming will remain limited. It is therefore all the more regrettable that generational change and new farm start-ups in agriculture are neither mentioned nor used as levers for more organic farming in the new action plan.

The handover of a farm, with the possibility of reorientation, represents a great opportunity to attract young farmers to organic farming. This is confirmed by official analyses and statistics in the EU ([Agricultural area under organic farming in Europe | Indicators | European Environment Agency \(EEA\)](#)). At EU level, around 4.6% of farms run by farmers under the age of 40 are organically managed, while the proportion of organic farms among all agricultural holdings is only 2.7% – a clear indication that young farm managers are almost twice as likely to farm organically as the agricultural sector as a whole (Eurostat, Agricultural Structure Survey 2020).

Numerous farms have no direct successor from within the family, while others are facing a generational change. For this reason, the Ministry of Agriculture is currently working on an action plan for generational renewal in order to counteract the acute problem of farm succession and farm closures.

- *Both action plans should be used to promote organic farming as the standard model for the future and not just as "another option" for young farmers. The two action plans – PAN-Bio and the "Generational Renewal" action plan – should be interlinked so that the opportunities for expanding organic farming are also sufficiently exploited. Any instruments for generational change (subsidies, land, capital, advice, training) must systematically pursue the expansion goals of organic farming.*
- *For new installations on conventional farms, **assistance** should be provided **in developing conversion scenarios**. This also means that agricultural training must be geared more towards organic farming. For example, a useful indicator could be the percentage of (new) installations that start organic production or convert to organic farming.*

## 9. Finally taking the prominent role of public canteens seriously

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Measure 4-3 states that *Restopolis* should be encouraged to continue its efforts. With all due respect, this is almost considered impertinent. *Restopolis – Supply4Future* – was launched entirely without any support from the Ministry of Education. To date, the Ministry of Agriculture has also provided no support. Without the Ministry of Education, the Ministry of Agriculture would have fallen far short of its PAN Bio 2025 targets. Would the PAN Bio 2030 targets then have been revised downwards even further?

However, the following tentative statement is made in : "*Il convient également d'étudier la possibilité d'accorder un traitement préférentiel aux produits bio locaux et aux produits locaux dans les politiques d'achat des maisons de retraite, hôpitaux et autres cantines publiques*" (It is also necessary to study the possibility of giving preferential treatment to local organic products and local products in the purchasing policies of retirement homes, hospitals and other public canteens).

With all due respect, even if the conditions vary depending on the public structure, *Restopolis* has a wealth of knowledge, and the expansion to all public structures has been discussed for decades. *Natur génésissen* is also doing very valuable work.

In addition, according to press reports, the four pilot projects currently underway are focusing on regionality rather than organic farming. To date, there has been no statement that this is a goal of the Ministry of Agriculture. In hospitals and school canteens, more organic food should be a must, if only for health reasons!

- *The goal must be **to substantially increase the proportion of organic food in all public structures** by 2030, far beyond the 15% stated in the PAN Bio.*

## Conclusions

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The Organic Action Plan, which was drawn up without the actual participation of the stakeholders and interested parties, falls short of expectations and requirements from a social, ecological and economic point of view.

The Mouvement Ecologique expects the government and the relevant ministries to make a much clearer commitment in the coming years to the need for a more extensive expansion of organic farming and to reaffirm their support for the goal of 100% organic farming in Luxembourg by 2050 (as was the case in the PAN Bio 2025).

In order for PAN-Bio 2030 to be at least partially effective as the instrument of transformation it is supposed to be, the ambition to expand must not be slowed down by the 1% target, which can be seen as a political step backwards. Clear control mechanisms with target indicators and instruments must be interlinked, and genuine partnerships with stakeholders are needed.

There is a sense of urgency – the systematic expansion of organic farming must not continue to be neglected.

Luxembourg, 21 January 2026