



**European Organic Certifiers Council**

# **SUSTAINABILITY, QUALITY AND INTEGRITY**

## **What shall be done to make the EU Regulation a better one**

5th International Conference on the Organic  
sector development in Central Eastern European  
and Central Asian countries

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## **EOCC Views**

1. Objectives, Challenges and Aims
2. Requirements for Operators
3. Control System
  - Risk-based Approach
  - Group certification
  - Threshold
4. Import Regime
  - Current situation
  - Equivalence vs Compliance

**CONCLUSION**

## MAIN OBJECTIVES OF THE REVISION

Providing the basis for a sustainable development of organic farming

Ensuring a fair competition and a proper functioning of the internal market

Maintaining and justifying consumers confidence in products labelled as organic

# Challenges & Aims

Simple and transparent legislative framework

Harmonised application of legislation

Fair competition among operators

Improved consumers confidence

Steady organic market development

Result-oriented controls

Result-oriented supervision

Improved operators confidence

## REQUIREMENTS FOR OPERATORS

Need for simple and understandable requirements

Need for having clear rules setting the responsibility of the operators

Quid for an organic qualification of the operators?

## CONTROL SYSTEM RISK-ORIENTED APPROACH

- Aim of the Risk oriented approach:
  - To improve the effectiveness of the control system
  - To assure cost efficiency

## CONTROL SYSTEM RISK-ORIENTED APPROACH

- The risk approach determines the nature as well as the frequency of inspections. The minimum of a physical control once a year is already existing in the current regulation and shall be maintained.
- All inspections (annual inspections + risk-based additional inspections) shall be implemented in a risk-oriented way, avoiding checklist-governance



## GROUP CERTIFICATION

### Introduction of the group certification in the regulation

Need for a clear definition for group certification, group of operators

Example for a definition of Group certification: (definition EA 6/04 M 2011)

“In group certification only the certified umbrella organisation is entitled to mark the products. Group certification is a special case of certification where Scheme owners specify that less extensive sampling can be applied by certification bodies through a focus on the management system of the umbrella organisation in combination with inspection of a sample of the sites. These schemes are often used to support small size producers that according to the scheme owner are at risk of being left out of the market unless these special conditions are applied. In the certification process the audit of the effectiveness of the supporting internal management/control system is essential.”

## GROUP CERTIFICATION

Need to clarify in the regulation the understanding of the group certification and to precise the criteria for eligibility

There is already a guideline for group certification in the EU guideline for import (2008)

There is also an EA guideline (EA 6/04 M 2011)

Main objective of the group certification approach within the EU: to give access to operators actually excluded from the control system

## THRESHOLD FOR NOT ALLOWED SUBSTANCES

- The draft proposes a decertification threshold for non allowed substances
- Organic farming is a system approach not an end product approach
- Pesticide analysis or others non allowed substances analysis are a tool to detect/evaluate contamination and/or non allowed practices.
- There are different practices implemented in the Member States, some Member State have a threshold, others not. No harmonisation.

## THRESHOLD FOR NOT ALLOWED SUBSTANCES

- A first approach would be to harmonize the practices and to set up a principle of an action level to start investigation.
- The aim is to have appropriate tools and rules to be able to remove the reference to organic products to products non conforming to the production Rules.
- Sampling and analysis should serve as inspection tool, not as a criterion whether products are organic or not.

## IMPORT REGIME

- The import regime in the current regulation is practically only based on the equivalency approach even the compliance was foreseen but is not applicable
- The revision proposes the principle of reciprocal trade agreements based on equivalency and compliance for the recognition of certification bodies

## IMPORT REGIME

Compliance – Equivalence– Necessity to rise the right question?

What is the challenge? Access to the EU Market for small scale producers

No unfair competition between EU operators and third country operator

If compliance: Applicability of the EU Regulation in third country

## **RISK ORIENTED APPROACH AND FRAUD**

- Further development of the risk-oriented inspection toolbox
- Risk assessment not limited to individual operators – but to supply chains including warning systems
- coordination of actions against fraudulent operators
- Exchange of informations and findings
- Reliable data base of certificates

## CONCLUSION

### SUSTAINIBILITY; QUALITY AND INEGRITY

A clear regulation shall set the basis for sustainability, quality and integrity of the organic sector but it will work if, each Stakeholder takes its responsibility



**THANKS FOR YOUR  
ATTENTION**

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