



# **SOURCING ORGANIC FROM UKRAINE 2016**

## **HOW TO IMPLEMENT THE EU IMPORT GUIDELINES FROM THE CERTIFIER PERSPECTIVE**

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# THE IMPORT GUIDELINES



- **Requirements to the CBs by The EU Commission May 2015**
- **Guidelines on Additional Official Control December 2015**
- **Requirement to the CBs by the EU Commission January 2016**
- **Control Measures**
- **Sampling Measures**
- **Dealing with Exporters based in Countries not listed in the Guideline**
- **Some Recommendations**

# Requirements to the CBs May 2015



- **After several alerts the past years (pesticides residues) and findings of irregularities with products coming from Ukraine and some other countries, the EU Commission required with a letter to the CBs some specific and additional measures which have to be applied (9 third countries concerned)**
  - Exchange of information
  - Control measures
  - Reporting

A clear signal to the Certification Bodies – An oriented pesticides residues approach

# Requirements to the CBs May 2015



## ■ Increasing the Control Measures

- Sampling of each consignment of organic food and feed
- A minimum of 2 physical inspections , one of these unannounced
- One field crop sample of each operator each year or for operators not growing crops a sample of incoming raw material....
- Verification of the product flow and traceability
- To analyse in depth the bookkeeping and financial documentation

# Guidelines on additional Official Control on organic products



- **Issued on December 2015**
- **Addressed to the Competent Authority (CA) of the Member State**
- **CA to track and identify all consignment of organic Food and Feed**
- **Complete Documentation check at point of entry**
- **Sampling and Analysing the presence of pesticides residues each incoming consignment at point of entry**
- **If pesticides found: Investigation shall be started and Notification to OFIS**

# Letter to the CBs - January 2016



## ■ Reassessment of the situation

- Necessity to increase control measures in 2016
- Additional official control
- Adding the Russian Federation in the list of Countries with high risks
- Limitation to the products concerned: Code CN chapter 10,11,12 and 23

# Control Measures



- **Inspections /one unannounced , 1st „Guideline“ May 2015, late for implementation**
- **The guidelines foresees the measure within a calendar year, we have to deal with agricultural cycle**
- **Not only a problematic of risk countries but a problematic of risk Supply chain**
- **More than increasing the frequency of inspection, special attention to:**
  - Conversion period
  - Seeds
  - Crop rotation
  - Yield estimation

# Control Measures



- **For the processing /Storage/Export special attention to:**
  - Complexity of the organization of the supply chain – definition of responsibilities of each operator
  - Identification of sub-contractors, contractual relationship
  - Increasing the number of inspection to 3 inspections in some high risk operations
  - Mix of junior and senior inspectors



# Sampling measures in the third country



- **Each CB has to define the substances to be analysed based on experience with pesticides used in conventional farming and pesticides residues analysis of the previous years**
- **CBs in export countries have to deal with contradictory results with the one at the point of entry in the EU. Residues found in the export country, no residues at the point of entry. Why? The CB in the export country has a menu of 400 substances, the CB at the point of entry 100 substances. Need for harmonization**

# At least one field crop sample for each operator



- **In 2016: 222 samples taken**
  - 94 samples at fields level
  - 15 at storage level
  - 3 at processing level
  - 106 at export level
  
- **Sampling field crop is and stay an interesting tool to detect the use of non allowed substances**
  - 37% of analysis field crop were positive
  - 42 % of the sample on storage were positive

# Sampling for each consignment



- **Export: two main ways**
  - Road
  - Maritime
- **Maritime: to deal with big quantities, shipment of 15000 t or 25000 t sometimes more, representative sampling is a challenge**
- **Road: small quantity : lot sampling for several consignments**
- **Need and also it makes sense to sub-contract the sampling to professional inspection Body**
- **Problem with the export authority : opening the sampling bags (problematic in case of disputes)**

# Dealing with exporters not based in the listed countries



- **A part of export of the listed countries is not done directly but through others third countries**
- **Case Turkey**
  - Turkey is exported big quantities of the Products of the listed risk countries
  - Double certification EU and NOP, particular attention shall be adressed
  - 4 significant companies dealing with commodities are exporting organic products with very complex organization
  - Need to include these countries in the guideline

# RECOMMENDATIONS



- **Assessment of the situation by crops and countries**
- **Assessment not only done by the EU and Member States but with the stakeholders (Exporters, Certification Bodies – EOCC....)**
- **Harmonization of the list of substances to be analysed (export and point of entry) by crops and countries**
- **Sharing information with the customs authorities**

# RECOMMANDATIONS



- **A long term response to the problematic of the supply chain, not only increasing control measures but incresaing technical support**



**THANKS FOR YOUR  
ATTENTION**

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