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Organic Standard: Our control - Your confidence

**Unannounced inspections in Ukraine – the right
instrument to reduce fraud risks?**

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- organic certification body
- origin: Ukraine
- year of foundation: 2007
- main office: Kyiv, Ukraine
- active in: Ukraine,
Belarus, Kazakhstan, Russia, Moldova
- staff: 14 + 16 (freelance)
- Member of EOCC, IFOAM
- Partner of BioC and CheckOrganic



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- Operators: 370 (341 in Ukraine)
- exporters from Ukraine to EU: 57 (40 from them are producers)
- Exported to EU in 2016:
1681 consignments, 132 000 tons
- 119 organic farms (export oriented 73)
- 180 000 ha under control in Ukraine, from them 137 000 ha organic



OFIS notifications (16)

- **OFIS notification is not automatically irregularity**
- **Stereotype: if any residue find in product from Ukraine - it is contaminated in Ukraine**
- **As more analyses as more theoretical risks to find something**
- **If small consignments (e.g. by trucks), more risks to get OFIS**
- **2015-2016: 3169 consignments (200 000 tons) and 16 of OFIS notifications (0,5%)**
- **Laboratory mistake is possible**
- **Earlier samplings were organized by importers**



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Legal frameworks for unannounced inspections

- **Commission Regulation (EC) No 889/2008 (article 92c)**

At least 10% of all inspections and visits are unannounced

- **EU Commission Letter about additional control measures**

The control body should carry out 2 physical inspections per year of each operator it intends to certify. **One of these inspections shall be unannounced**





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Why it is important for Ukraine?

- Organic legal frameworks in Ukraine are not yet implemented
- Market pressure from importers
- Less possibilities for documentation cross-check
- Lessons learnt from the past





Planning of unannounced inspections

- **At the beginning of year on the base of risk assessment**

Taking into consideration history of Operator:

- Residue/OFIS cases
 - Certificate suspension or high sanctions
 - Growing risk crops
 - Complaints
 - Market pressure
 - Other risks
- **During a year as a reaction to new conditions**
 - Residue/OFIS cases
 - Complaints (from buyers, other Operators etc.)
 - Suspicions (from inspectors mostly)

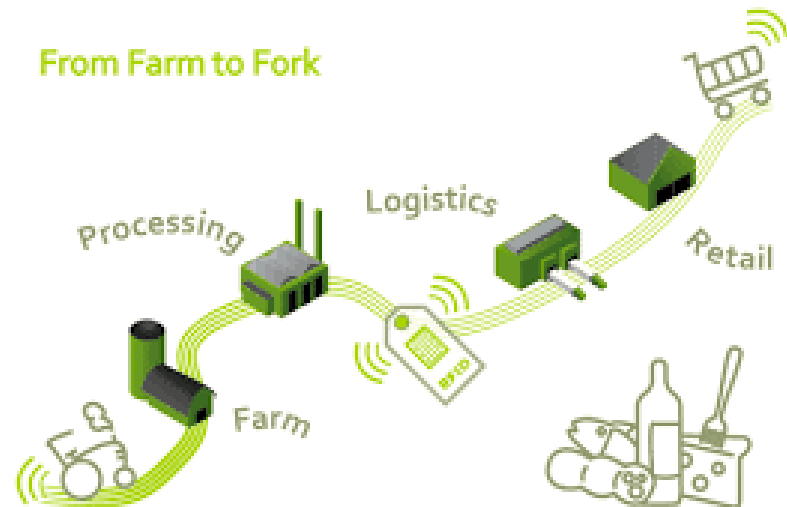




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Purposes for unannounced inspection: Traceability check

- Usually in autumn (after harvesting of most crops)
- Check product flow of crops (2-3) which:
 - are to be exported or are in process of export (1st priority)
 - potentially can be exported or are sold for the local market (2nd priority)
 - others contexts (3rd priority)





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Purposes for unannounced inspection: Traceability check

- **Availability of product (on a base of information received from Operators after harvesting)**
- **Important non-conformities from previous (annual) inspection**
- **Storage, including sampling of:**
 - products (if risk during storage or suspicion)
 - dust





Dust

- **Case 1:**

Cypermethrin=1,1 mg/kg; Folpet=0,04 mg/kg; Phtalimid=0,022 mg/kg; 2,4-D<0,02 mg/kg; Carbendazime=0,2 mg/kg; Diethyptoluamide=0,014 mg/kg; Imidacloprid=0,051 mg/kg; Tebuconazole=0,033 mg/kg; Thiaberdazole=0,015 mg/kg

- **Case 2:**

Deltamethrin=0,078 mg/kg; Fenvalerate=0,013 mg/kg; Folpet=4,8 mg/kg; Phtalimid=2,4 mg/kg; 2,4-D=0,053 mg/kg; Carbendazim=0,35 mg/kg; Carbofuran=0,034 mg/kg; Diethyltolylamide=0,37 mg/kg; Epoxiconazole=0,016 mg/kg; Imidacloprid=1,3 mg/kg; Metalaxyl=0,055 mg/kg; Thiabendazole=0,063 mg/kg



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Purposes for unannounced inspection: Risky Crop check

- **Defining risk crops**
 - according residue cases
 - other agro-technic risks in Ukraine
- **Defining appropriate time for visit** (mostly March-June)
- **On-site visit + field sampling + photos**



Risk Crops

(according Organic Standard policy)

- **High risk**

Rape; Sunflower; Corn; Mustard; Flax;
Apples; Chamomile

- **Medium**

Wheat; Burley; Peas; Blueberry etc.





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Reaction to OFIS/residues/complaints/suspicious

- Defining control tasks (and inspector)
- On-site inspection
- Documentation check / traceability check if necessary
- Sampling in most of cases





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Lot check during sampling for export

- Just lot sampling is not enough, additionally
 - Traceability check of particular lot
 - Storage conditions check
 - Identification/labelling
 - Transportation check (if possible)
- (+ photo-report)





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Important conditions for unannounced inspection in Ukraine

- **Really unannounced inspections**
- **Mobility of inspectors**
- **Local language understanding** (otherwise not possible documentation check)
- **Understanding of documentation flow in Ukraine to check traceability** (e.g. agricultural accounting documents)
- **Legal framework awareness**
- **Not accepting self-declarations and pseudo-confirmations**
- **Using of local expert knowledge**





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Challenges with unannounced inspections in Ukraine



- Operators don't like unannounced visits
- Communication is important!
- First time is always a bit challenging
- Always a challenge with Operators switched from other CB's
- What to do if Manager is not on the place?
- Involve legal company to help with procedure



Conclusions

- Important and legal tool of CB
- The most efficient way to find using of not allowed substances (e.g. pesticides) or other violation
- Effective for prevention of frauds
- Helps to check real process and more closely than during annual inspection
- Final and additional check of products before they come to market





Conclusions

- **There are many factors that should be taken into consideration for planning of unannounced inspection in Ukraine (e.g. risk crops)**
- **Operators in Ukraine don't like unannounced visits (it should be well communicated from begging)**
- **It is important to have local and professional inspectors**



... and this is our unannounced inspection Team





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Thank you for your attention!

Дякую за увагу!

