



European Organic Certifiers Council

EOCC proposals for a risk based approach of organic products produced in Ukraine

Anti Fraud Initiative, Kyiv Ukraine
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Content

Introduction : EOCC

Part 1 : Risk based approach regarding organic production in Ukraine

Part 2 : Risk based approach regarding import of organic products produced in Ukraine

Introduction: EOCC

International non profit organisation

50 members (CB, CA and associations of CB)

Focus on harmonised application of EU
Regulation 834/2007

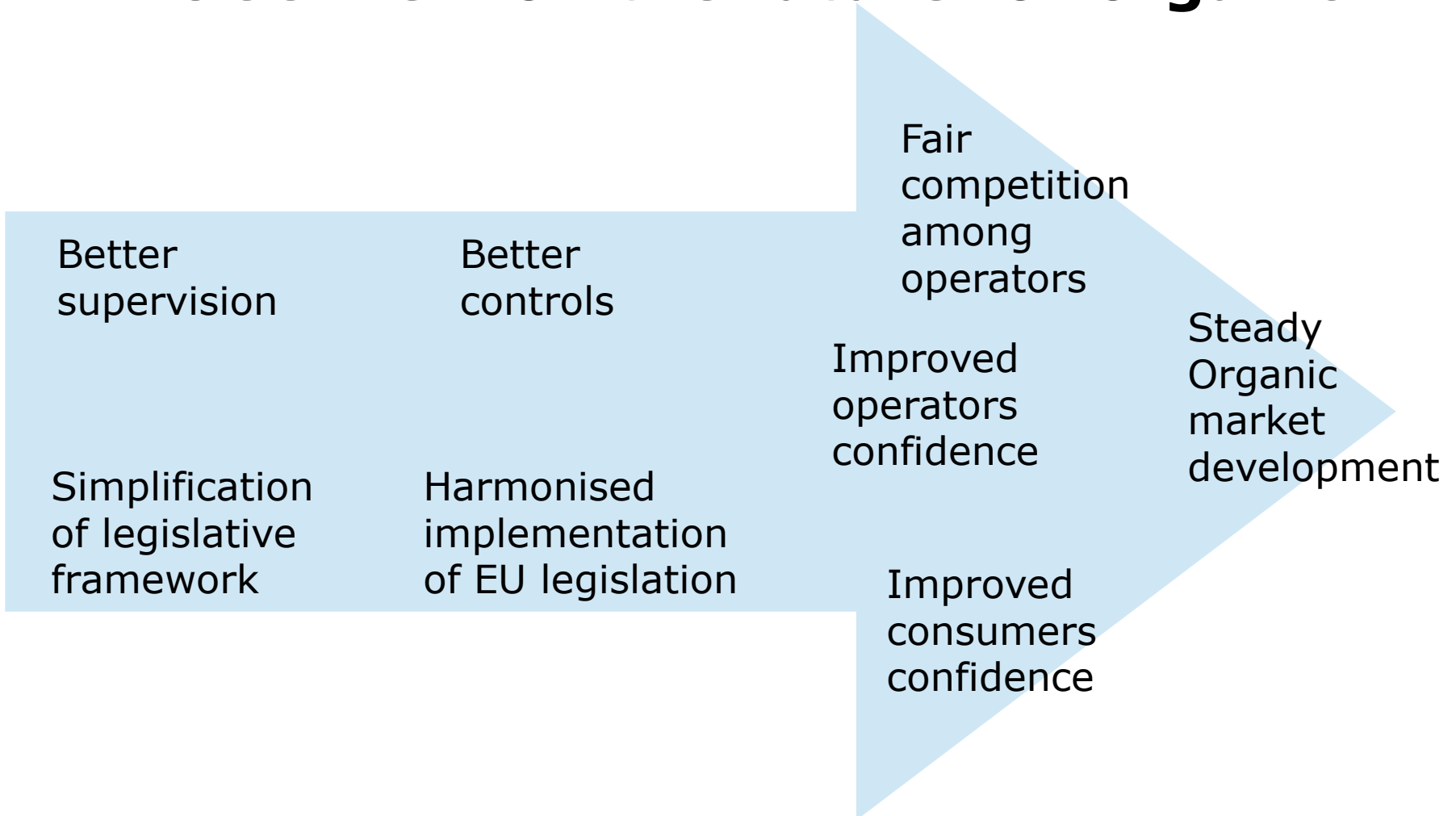
=> WG Regulation and WG Import

=> TF Residues and TF Risk Assessment

+ Platform for exchange regarding Ukraine

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EOCC view on the future for organic



EOCC statements

Problems with organic products produced in Ukraine are most probably related to

1. **Contamination** with non authorised substances during storage (insufficient separation measures)
2. **Fraud** (selling non organic products as organic in whole or in part)
3. **Insufficient knowledge** at different levels of the supply chain

Part 1: Risk based approach regarding organic production in Ukraine

- Sep – Oct 2014 : import of heavily contaminated sunflower cake and distribution over 4 EU MS
- Dec 2014 – Feb 2015 : certification decisions in BE, NL, FR, PL and DE
- May 2015 : EU COM letter to CBs
- June 2015 : amendment of Ann IV of Reg 1235/2008
- June 2015 : **Creation of EOCC “Platform Ukraine”**
 - => Coordination of exchange of information
 - => request for information/clarifications
- Sep 2015 : answers from EU COM :

EU COM statements:

- Summary of information in OFIS (see further)
- All products imported from Ukraine and existing stock require high risk control measures at least until the end of 2015
- All relevant CBs of Ann IV of Reg 1235/2008 will be informed about COM expectations

- Issues under discussion in EOCC Platform Ukraine :
 - Feasibility of **sampling and analysis** of consignments prior to issuance of certificate of inspection:
 - Principle
 - Practical
 - Timing
 - Locations: field, storage units, port
 - Laboratories: availability, reliability
 - Scope of the analysis: herbicides, fungicides, glyphosate, GMO
 - Sampling: who, material, cost, preservation, procedures, use/contamination/drift/commingling, ...

- Issues for further reflection : how to improve (at CB level)
 - Verification of traceability statements?
 - Verification of homogeneity?
 - Verification of understanding of requirements for export of organic products to the EU?
 - Feasibility of conducting more unannounced inspections?
 - Feasibility of conducting more in-real-time verifications?

- EOCC proposes to establish reports from CBs active in Ukraine and neighbouring countries covering the whole year 2015.

Possibility for each CB to conduct an assessment for activities in the same region in 2016

- Maintain
- Reinforce
- Reduce or
- Stop the application of the European Commission requested control measures

Part 2: Risk based approach regarding **import of organic products produced in Ukraine**

Part 2: Risk based approach regarding import

After the sunflowercake case (October 2014 – Feb 2015), the EU Commission asked for increased monitoring practices regarding organic products produced in Ukraine.

- During the RCOP meeting (3&4 February) no consensus could be reached about what had to be downgraded.
- Request for collection of data at EU level (importers, products, quantities and CB's issuing CoI).

Part 2: Risk based approach regarding import : overview of monitoring results per MS

Country	Product imported	Quantity	Issuance of Col	Findings/Sampling
Italy	Frozen blueberries	100 T	Yes Ceres	No/No
Belgium	Millet	126 T	Yes Organic Standard	No/No
UK	Sunflower expeller, maize meal, sugar beet pellets and oil seed rape meal	No reported	Yes	No/Yes
Netherlands	Rapeseed Soybeans Sunflower cake, kernel, oil Wheat Corn Barley Flaxseed Millet Walnut	61.419 T 14.229 T 13.318 T 3.550 T 2.911 T 1.021 T 325 T 236 T 3 T	No reported	Yes/Yes

Part 2: Risk based approach regarding import of organic products produced in Ukraine

Findings :

- large batches of cereals, sunflower products, rapeseed, soybeans, blueberries and flaxseed enter the EU mainly via NL
 - => sampling& testing by importers and Cbs
- => non homogeneous batches

Part 2: Risk based approach regarding import of organic products produced in Ukraine

Findings :

=> OFIS : data analysis of 10 reported cases :

- 8 cases related to
 - insecticides (11 detections)
 - fungicides (6)
 - herbicides (2)(systemic and non systemic)
- 1 growth regulator and
- 1 GMO

Part 2: Risk based approach regarding import of organic products produced in Ukraine

Findings :

-import of raw materials used for **feed**

=> less monitored by sampling than food in the EU

=> if sampled, variability in « tolerance » of presence of non authorised substances in the EU and non EU

Part 2: Risk based approach regarding import of organic products produced in Ukraine

Findings :

-cereals used for **feed**

=> reliability of sampling & analysis done by importer?

=> once imported, raw materials for feed are characterised by swift distribution at large scale (1 importer ; 10 feed processors ; 1000 livestock producers)

- Issues for further reflection : how to improve (at CB level)
 - Quality of information available for verification (network?)
 - Precision of data for verification (yields)
 - Detection of fraudulent paperwork

Thank you

Questions and answer session