No risk – no fun?
Challenges in high-risk countries from the surveillance perspective

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No risk on (organic) UA farms?

1. Shortening of conversion period

CB: „No inputs were used for more than 20 years. Declaration of local authority for compliance with EU 834/2007 and NOP is available.“

Is the local authority aware of the requirements of Reg. (EC) No. 834/2007 which have been fully met for more than 20 years and do they know anything about NOP?

No risk on (organic) UA farms?

2. Is there an adequate crop rotation implemented to safeguard soil fertility and to prevent pests and diseases?

3. Seeds
   CB: „The farm does not purchase any seeds. There is no GMO risk – this is legally prohibited in UA.“

   - Reproduction of hybrid seeds
     ⇨ high yields on the parcels?

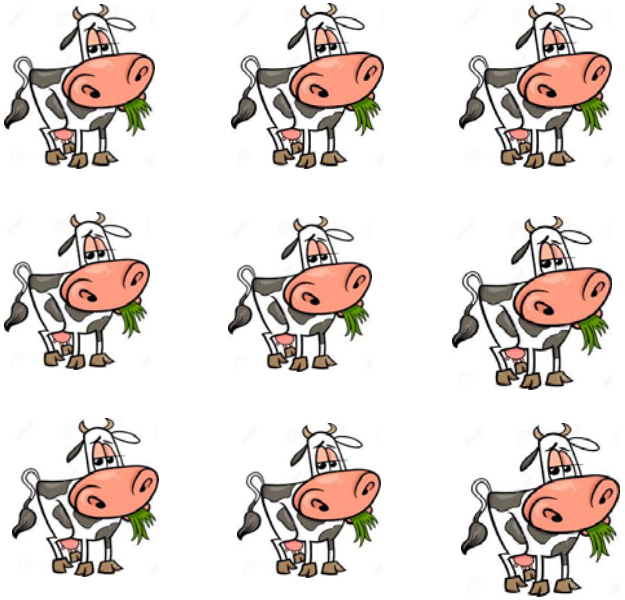
   - Seed processing?

   - Really untreated? Why are corresponding declarations often send to the CB so many weeks after inspection?

   - No GMO risk?

4. Where do the nutrients for the high yields achieved on UA organic farms come from?

CB response: „Cow manure, no factory farming“



9 cows : 1000 ha

(calculation result on an UA organic farm)

Are such planes only used for sightseeing tours?

Storage facilties and terminals

- Is there a sufficient risk assessment prior to the use of storage facilities and along the transport chain identifying critical points carried out by the operators?
- Do **all** CB take dust samples to analyse the background contamination? What about the interpretation of results?
- Are pesticides used for storage protection (bromide, phosphide…)?
- How is comingling with conventional crops stored in the same place avoided? What about traceability checks / cross checks?

How are major risks during transport mitigated?

On farm-transport of cereals in bulk

Export in sealed
big packs on trucks

Export by ship
involving terminals

Storage and transport

- According to some inspection reports, storage is only done on organic farms, partially outside of the buildings under plastic cover. We did not see examples of this storage approach yet.

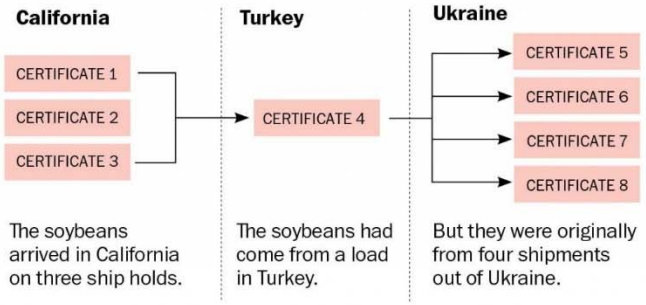
- According to an exemplary inspection report, all the harvest 1016 (3.000 tons of cereals of an organic farm) was transported in two December days at 15 degree below zero over a distance of more than 350 km to the terminal.
  We would like to see in practice how this is done.

- According to some inspection reports, ships sometimes leave Ukraine half empty, only some cells loaded with organic products.
  Is this economically viable?

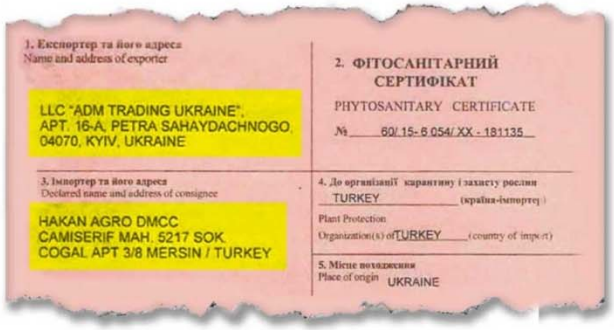
Complex chains might involve specific risks!

How 36 million pounds of soybeans became "organic"

A shipment of "USDA Organic" soybeans arrived in Stockton, Calif., in December. But were they really organic? The Post was able to trace the shipment from California back through Turkey to their source in Ukraine by using a set of linked health certificates, like the one on the right, that accompanied the soybeans.



The health certificates for the trip from Ukraine offered two clues that the soybeans were not organic. **The first clue**: The shipment from ADM originated in Ukraine and was delivered to Turkey. ADM does not sell organic products.



The second clue: The soybeans were fumigated with aluminum phosphide, which is not allowed under organic rules.

Is laboratory testing a solution?
The EU- and US-guidelines
Residues found by different certification bodies

- CB A and CB B both take risk-oriented samples for laboratory analysis.
- CB A ends up with 37% positive analysis results in 232 samples (2015).
- CB B ends up with 1% positive analysis results in 320 samples (2015).
- This applies in a similar way to the frequency of process-based sampling and analysis (green leaf, inputs, dust samples). There are major differences between CB operating in high-risk countries.
- What are the reasons for these differences?

Summary

- Ukraine has a good potential for organic production.
- UA-Exporters can develop successful trade relationships with US and EU import companies. Much depends on their business approach.
- Risk factors endangering organic integrity are well known.
- Approaches to mitigate such risk factors are often not convincing.
- We need a “better surveillance” by accreditation bodies and governments orientated to practical aspects, not to formal requirements and to “hot topics” endangering organic integrity.

Thank you very much!