

Working Group Sampling and Analysis

Perspective 1: Inspections of control bodies (T Nizet, Certisys, BE)

Data collection

- Analysis of results of previous years to adjust risk based approach (operator and product identification)**
- During the on-site inspection: visual observation and reporting to facilitate the investigation and decision making process (obligation to sample in the event of suspicion of use of non authorized substances/techniques)**
- choice of the products/matrices to be sampled (on-site)**
- Traceability (labelling, commercial documents)**
- Representativity (one cereal but three fields => ?)**
- No blocking a batch prior to knowing the analytical result**
- Action plan for operators concerned by the EU GL on import of organic products (UA, KZ, RF, MV, CN)**
- Pictures of the goods subject to analysis**
- Price evolution of specific commodities (in general (for all importers) and in specific case for one operator)**
- Sampling before shipment and without analysis (to have a batch available in case of ...)**
- Exchange of information (date!) between operators and CB with low frequency of organic production**
- Get to know the practices in non organic farming, preparation and storage.**

“Smart” sampling

- selection of a whole supply chain (eg from potatoe “seed” to mashed potatoe)**
- representative sample in combination with samples of sections of fields/ingredients**
- additional sampling during the ongoing investigation (subbatches)**
- sampling during the conversion period**
- sampling of untreated seeds, “organic” feed for poultry and pigs,**
- sampling in the event of suspicion of use**
- sampling of products produced by groups of operators**
- sampling of dust**
- sampling of wood from crates during storage**
- sampling of fertilisers and disinfection products (poultry)**

-sampling of organic products with low frequency of organic preparation

Selection of lab and analytical method

-contaminants

-GMO

-not authorized additives

-pesticide residues (for cereals: always ask for detection of presence of chlormequat)

-DNA (livestock production and livestock products)

-Qualitative analysis (fatty acids in oil, pollen in honey)

-Reporting limits, accreditation, RELANA, price, reporting deadlines (urgencies), ...

Perspective 2: Traders (M Kullik, Worlee, DE)

-Share sampling policy with the CB, including a list of high and low risk products

-Trust in pre-shipment sampling by selected long term suppliers

-Sample raw materials

-Sample to have as much as possible representativity of the batch (1 delivery = 1 batch). (Sample taking on individual units of a delivery (eg 20 kg bags), because sampling after homogenisation of all units of a batch is not possible. Therefore, sample taking can never be representative for a whole batch.)

-Listen to and adapt to clients request like analysis for glyphosate

-Standard analysis request for pesticides includes GC and LC methods

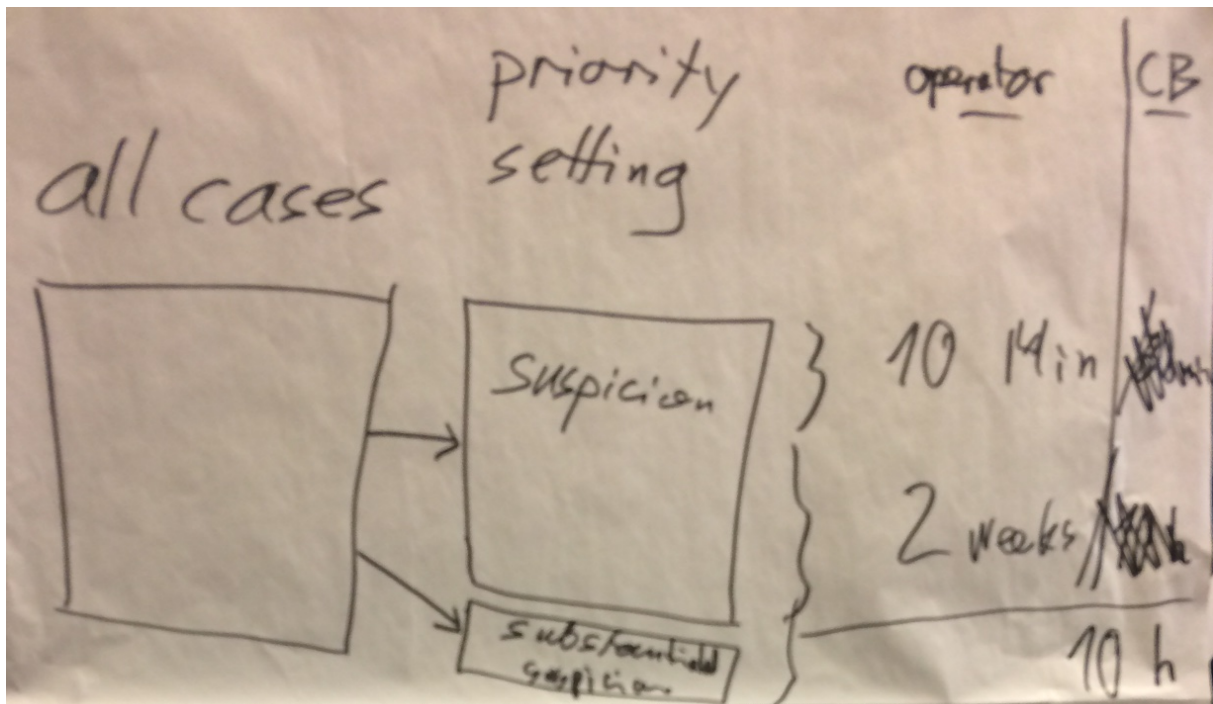
-Involve expertise from the lab for interpretation of analytical results

-Batches are always blocked for use as organic as long as all documents and the analytical result indicate the organic status.

-Pictures are taken during sampling

-A documentary check is conducted prior to sampling

Working Group Evaluation of analysis results



LAB-RESULT OPERATOR VIEW

STARTING POINT

a) what kind of residue (determines way to proceed)
 + AMOUNT? eg 1 ppb DDT ✓
 20 ppb DDT ✗
 + CROP?

↳ COLLECTION of further INFO

- could contamination/residue have been avoided? / can it be avoided in future?
- amount gives an indication if substance was used!

↳ EXPERT JUDGEMENT : Agronomists
 Lab technicians

NO SIMPLE SOLUTION : case-by-case

- TIME & MONEY
- not all operators have in-house competences

Working Group Follow up

Follow-up

- Eval. of Analysis \Rightarrow Relevant?
 - \hookrightarrow Risk Consid.
- Stepwise check-traceability
 - authenticity
- Only traceability Doc. relev. for next step
- Intensity (from Doc check \Rightarrow on-site visit)
 - \hookrightarrow depends on risk consideration
- Timing: asap (Skal guide 3m. / not always)
- Final Decision: by EU CBICA, when imported
- if Downgraded \Rightarrow proper follow-up
- OFIS Guide?