



Stakeholder Assessment of the revised import scheme

Beate Huber, Matthias Stolze (FiBL)

**Canan Abay, Özlem Karahan Uysal, Bülent Miran, Murat Boyacı
(EGE University)**

Assessment of the import regime by stakeholders

1. Identification of main concern (survey among European experts)
2. Workshops to discuss concerns and recommendations in-depth
 - Turkey: Third Country not listed on Third Country list
 - Switzerland: Third Country recognized as equivalent
 - Brussels: Workshop with international participants (EU, CH, Turkey, Ukraine, US...)

Economic Analysis of
Certification Systems in Organic
Food and Farming at EU Level



Seventh Framework
Programme Grant
agreement no.
207727

 **CERTCOST**
economic analysis of certification
systems in organic food and farming

Main issues and concerns of stakeholders concerning revised EU import rules

Results of survey:

77 experts from EU,

70 % >5 years experience in organic import/certification

43 % traders; 20 % government authorities, 17 % CB's, 20 % others

Main issues and concerns I

1. **Common interpretation of "equivalency" and "compliance"**
2. **Procedure for requesting for inclusion in the list of recognised control bodies and control authorities (including procedures to ensure updating of the list of control bodies within areas) / procedure for third countries requesting inclusion in the list of third countries.**
3. **Impact on the quality of controls in third countries / effectiveness and efficacy of the control system.**

Main issues and concerns II

4. Coordination by the Commission to ensure **harmonised procedures** / establishment of principles encouraging the harmonisation of standards.
5. Guaranteeing **fair competition** for products produced inside and outside the EU (equal requirements).
6. **Reduction of trade barriers/** easier access to the EU market.

Results of the workshops to discuss concerns and recommendations with experts

- **Turkey: Third Country not listed on Third Country list**
- **Switzerland: Third Country recognized as equivalent**
- **Brussels: Workshop with international participants (EU, CH, Turkey, Ukraine, US...)**
- **All workshops with traders, certification bodies, assessment bodies/authorities and others**

Interpretation of "equivalency" and "compliance"

Assessment:

- › **Equivalence more feasible, but**
Guidance for interpretation needed, high risk for unfair competition
- › **Compliance is seen critical by most stakeholders**
Not yet achieved in within EU

Improvement?

- ☹ **Compliance is no improvement**
- ☺ **Enforcement of equivalent approach**

Procedure for approval control bodies

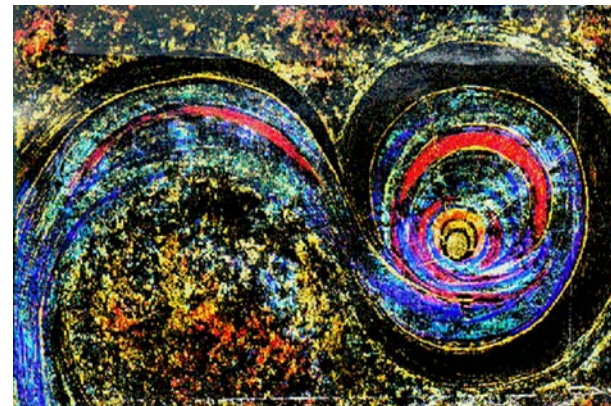
Assessment (dominantly CB's):

- › **Concerns re ambiguity and length of evaluation procedures**
Unclear requirements for technical dossier and definition of equivalence, no contact point at commission, no communication during process, no transparency...
- › **Double and threifold evaluations**
Accreditation bodies, national authorities, Commission...

Improvement?

- ☹ Frustration about delay and ambiguity dominating
- ☺ Once established good potential

„black box commission“



Impact on the quality of controls and control system

Assessment:

- › **Administrative burden and costs shifted from trader to CB**
Instead of annually 2000 assessment of import authorizations, 70-100 assessments of cb's for a period of 5 years)
- › **Enhanced surveillance in Third countries**
review audits, audits in critical locations also in third countries
- › **Quality of surveillance depend on accreditation bodies**

Improvement?

- ? **Good potential but yet to be proved**



Harmonised procedures and standards

Assessment:

- › **Harmonization expected and demanded (lead by Commission)**
Control requirements (conversion period, risk assessment, pesticide and GMO residues), application and surveillance procedures for CB's, standards requirements.
- › **Transparency contributes to harmonisation**

Improvement?

- ☺ **Comission with ist strengthened can and should lead the process for harmonization**



Fair competition inside and outside the EU

Assessment:

› Old system supported unfair competition

Varying interpretation of equivalency and policies among MS

› Concerns by trade for trade barriers

if CB of trade products is not listed

› Depends on implementation – accreditation b. play key role

Fair competition requires harmonised surveillance system and equal interpretation of standards.

Improvement?

? How is harmonization among accreditation bodies ensured?

😊 Improved potential for fair competition

Reduction of trade barriers

Assessment:

- › Reduced bureaucracy for traders
- › Good potential but depends on implementation

Number of approved CB's per country, procedure for extension of country approvals of a CB

Improvement?

- ☹ Same access for small countries?
- ☺ Good potential



Recommendations

More information, more transparency - using the COM website

- › Publication of all recognized standards**
- › Publication of interpretations of Member States**
- › Publications of explanations and comments on specific topics provided by the Commission**
- › Interactive question and answer section with the Commission.**
- › Newsletter which frequently informs the target groups about relevant updates of the websites (e.g. "The NOP Organic Insider).**

Improved surveillance of control bodies

- **Elaboration of a risk-based supervision system
(not necessarily more supervision but more targeted and thus more efficient)**
- **Harmonized reporting system allowing systematic analysis of the risk**
- **Initiating/encouraging effective exchange and cooperation among assessment bodies**
- **Frequent surveillance visits in third countries**

Harmonization

- **increasing transparency**
 - **enabling the actors to identify gaps and differences in interpretation and developing potential solutions**
- **harmonised definition for risk assessment.**
- **guidelines for conversion period**
- **procedures for defining non-conformities and subsequent sanctions.**
- **policy for dealing with residues from pesticides and GMOs**

Recommendations in brief

- **More information, more transparency**
- **Improved surveillance of control bodies**
- **More harmonisation**

Thank you very much!

For more information: www.certcost.org

Special thanks to the European Commission for their support and the members of the project consortium for their ongoing cooperation

This presentation was generated as part of the CERTCOST Project, agreement no. 207727 (<http://www.certcost.org>), with financial support from the European Community under the 7th Framework Programme. The publication reflects the views of the author and not those of the European Community, who is not to be held liable for any use that may be made of the information contained.



Seventh Framework
Programme

Grant Agreement No.
207727

 **CERTCOST**

economic analysis of certification
systems in organic food and farming