

What have been the reasons for de-certification in Ukraine

Current challenges and practical examples from a CBs point of view

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OVERVIEW

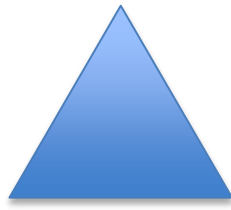
- bio.inspecta's activities in Ukraine
- Major issues with certification and inspection
 - Sufficient information about project (Data sheet, Map, ...)
 - Seeds: Treated and GMO
 - Soil condition: Crop rotation and soil practices
 - Mixing different qualities
 - Residues:
 - Drift
 - Direct application
 - Unsatisfactory storage conditions
 - Improper cleaning practices
- Conclusion: challenges & reaction of CB and operators
- Outlook

bio.inspecta's activities in Ukraine

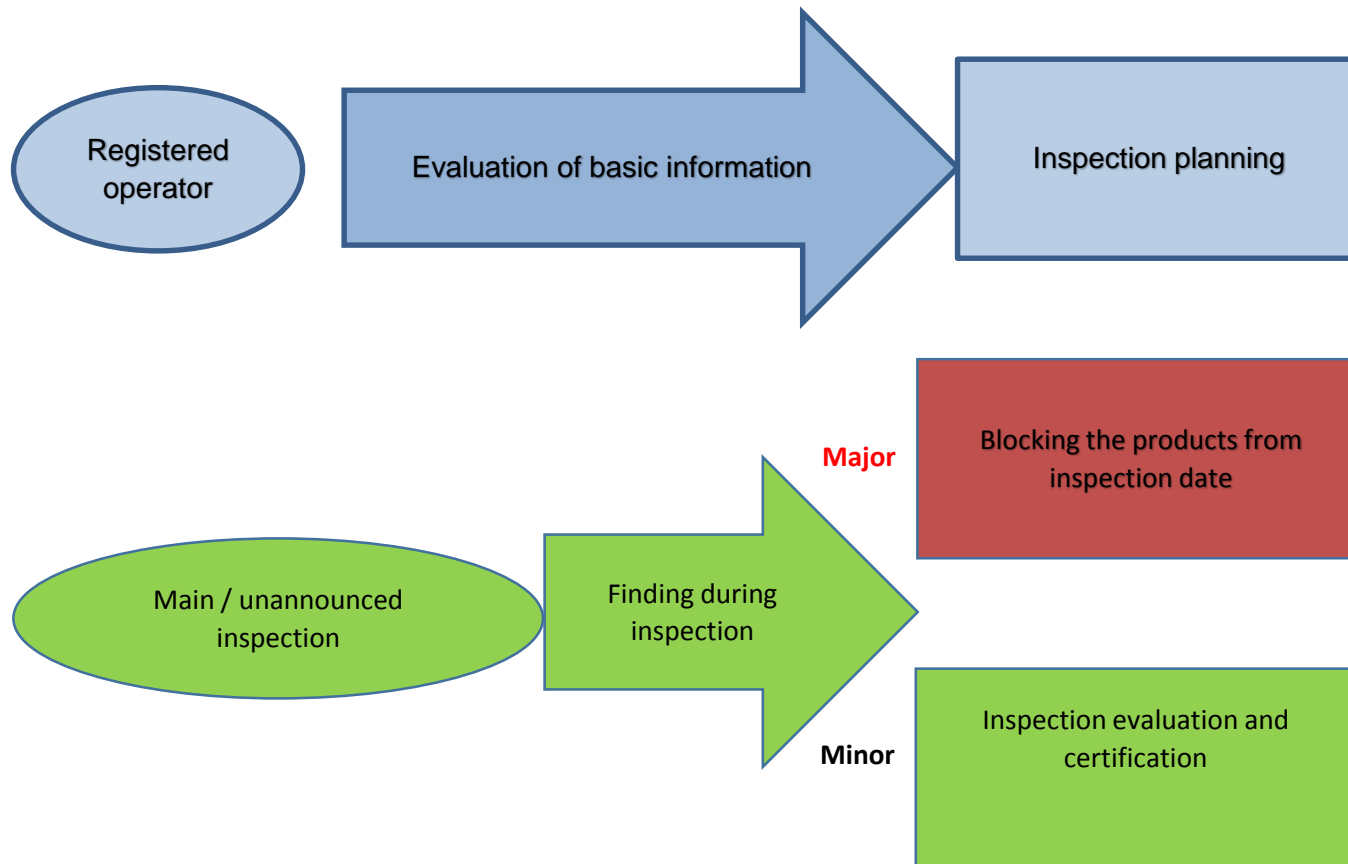
- First inspections in 2014
- Standards: NOP, bi-OS, Bio Suisse, Naturland
- Scope of activities in Ukraine: A , D
- Around 50 operators in UA
- Operation sizes vary, between 500 – 2500 ha
- Type of operators
 - Producer (Agriculture and wild collection)
 - Processor
 - Trader
 - Storage / port

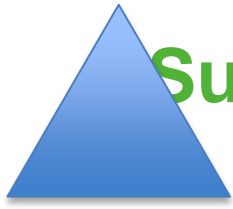
bio-inspecta scope of activities in Ukraine





Inspection and certification structure

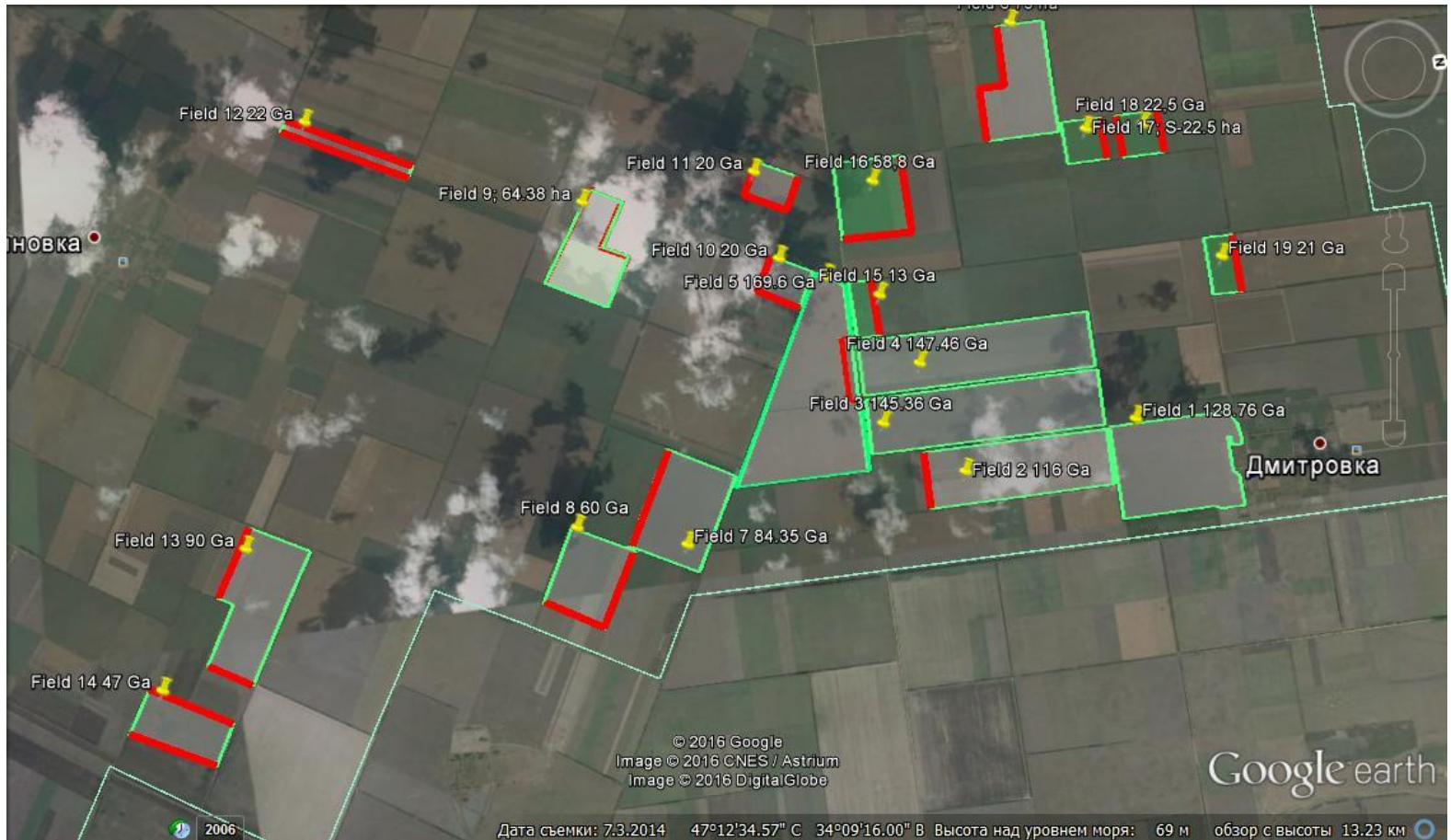




Sufficient information about project (Project overview)

- Data sheet
 - Production
 - Wild collection
 - Processing
 - Trading
- Plot list (plot number, surface, crop type/variety, buffer zone, ownership...)
- Crop rotation
- Map (borders, buffer zone, plot number, neighbours)
- Cleaning procedure
- Preparation / processing details

Map (borders, buffer zone, plot number, neighbours)



SEEDS: TREATED AND GMO

Finding during inspection:

- Colored sown seed
- Stored treated seeds
- Treated seeds / sign of treatment in seeding machine
- Suspicion during document / office check

Finding after inspection:

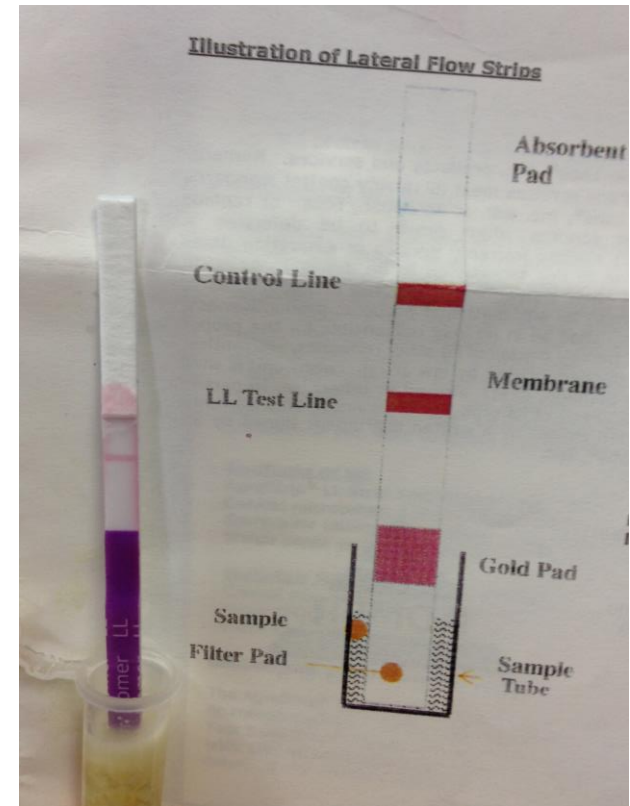
- Sample analysis result (final or stand crop)



SEEDS: TREATED AND GMO

Improvement in process:

- Adapt the inspection time (seeding time)
- Systematic sampling
- Onsite quick GMO test
- Strict check of all documents (invoices, bookkeeping, ...)
- Seed approval procedure
- GMO free declaration for risky products





SEEDS: TREATED AND GMO

bio-inspecta measures after inspection:

- Blocking the product from the inspection date (suspicion during inspection)
- Residue case procedure
- Downgrading plots or decertifying the whole project (in case of repeated NC)

SOIL CONDITION: CROP ROTATION AND SOIL PRACTICES



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Improvement in process:

1. Crop-rotation requirement:

- 20% of the total crop rotation surface shall be soil-building crops
- min. 50% of the arable lands must have sufficient plant cover outside of the growing season,
- 12 month break between two main annual crops of the same type (exception: rice, vegetables and herbs)

2. Input approval procedure.



MIXING OF DIFFERENT QUALITIES

Finding during inspection:

- Mixing of different qualities in storage/transportation/port (on purpose or accidentally)
- Implausibly high yields
- Not traceable flow of goods
- Document /office check: bookkeeping

Finding after inspection:

- Residues in final products
- Samples analysis result



MIX OF DIFFERENT QUALITIES

Improvement in process:

- Stock details at a specific time
- Flow of goods

bio-inspecta measures after inspection:

- Block the product from the inspection date (suspicion during inspection)
- Residue case procedure
- Decertifying the product or a whole project

RESIDUES

Sources:

- Residue out of seeds
- Direct application of unauthorized inputs
- Drift:
 - Spraying / application by neighbors
 - Insufficient buffer zones
- Contamination:
 - Uncleaned trucks/machines
 - Uncleaned storage
 - Improper storage conditions



RESIDUES

Finding during inspection:

- Risk of drift (onsite inspection and risk assessment)
- Insufficient distance to conventional plots
- Sign of not cleaned machinery and/or storage
- Finding unauthorized inputs, spraying equipment in the storage or in machinery, suspicion during field visit (trace of spraying, no weeds or insects, traces of used inputs around of the field/storage)
- Traces of spraying or dead insects in the storage.
- Document /office check: cleaning reports, bookkeeping, records on used inputs
- Interview with stuff



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RESIDUES

Finding after inspection:

- Sampling analysis results:
 - stand crop
 - final product
 - dust from the storage
- Residue in the final product

RESIDUES

Improvement in process:

- Systematic sampling, increased number of samples according to the season
- Information on buffer zones in plot list
- Google map of plots with details on neighbors and buffer zones
- Onsite risk assessment
- Dust sampling in storages
- Additional inspections
- Adapting inspection planning
- Inputs approval procedures



RESIDUES

bio-inspecta measures after inspection:

- Blocking the product/storage from the inspection date (suspicion during inspection)
- Residue case procedure
- Downgrading plots, decertifying the product or whole project

REACTION OF CERTIFICATION BODY

- Adapting the inspection time according to seeding, spraying and harvesting time
- More inspections, i.e. 3-4 additional inspections (announced/unannounced)
- A strict office or document check
- 2 inspectors to have a better view of the operation
- Taking more samples
- Improved inspector/certifier trainings

REACTION OF OPERATORS

- Unsatisfaction with inspectors coming during seeding, spraying and harvesting time, due to very high working load
- Unsatisfaction with additional inspections (announced/unannounced) and increased number of inspectors due increase of certification price
- Refusal to provide documents based on concerns of information disclose to tax authorities
- Separate accounting for cash operations
- Taking more samples – higher price to certification



Leaving bio.inspecta in favor of less strict certification body

CHALLENGES

- Low awareness on what is organic:
 - Organic is not only free of chemical inputs X
 - Improving crop rotation and bio diversity ✓
- Not well trained stuff
- Owning 2 or more companies with different production quality

OUTLOOK

- Improving according to experiences
- Applying COI system for NOP to guarantee better traceability
- Risk assessment to classify:
 - risks
 - sampling (number and time)
 - act of certification and inspection
- same procedures to operators are applied by all CBs
- Platform for exchange and experience

Question

Do we need to have a list of high-risk countries?

If yes

Why other risky countries like **Chine and Turkey** are not on the list?

Or do we need to improve the risk assessment to identify risky operators, according operation, not country?