

Audit findings related to Sampling

AFI/EOCC/IFOAM
residues workshop
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Who are we?

Directorate for Health and food audits and analysis
within DG Health and Food Safety / European Commission

Grange, Ireland

180 professionals, including

- 90 auditors
- Veterinarians
- Agronomists
- Food scientists
- Other specialist qualifications



https://ec.europa.eu/food/audits_analysis_en

Background of organic audits by EC

- Court of Auditors – report
- Memorandum of Understanding between AGRI-SANTE 2011, renewed 2 times, current valid until end of 2019
- Start of audits by the end of 2011; first CB audits: 2013
- Audits selected by DG AGRI based on an annual risk assessment

Audits in Member States and in non-EU countries

By end of 2018 the total number of EC audits on organics were 63

- EU Member States: 28
- Non-EU countries: 10
- CBs in non-EU countries: 25

China (4), Turkey (2), Ukraine (3), Peru (3), Bolivia (2) other destinations (once)

Plan for 2019: 6 CB audits in non-EU countries, 3 EU MSs

Reports:

http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm



➤ **Lack of comprehensive sampling strategy--→inadequate *timing and selection* of the most risky operators or crops:**

- Risk assessment not always fit for purpose of identifying the most risky operators
- Lack of accurate information: operators' files often incomplete (in particular for new operators) and/or lack of proper verification of the information provided (e.g. type of crop and management of crops grown in the neighbouring plots);
- Samples not taken at the most suitable time to detect the use of unauthorised substances;
- Selection of operators/members of Producer Groups not always risk-based even if the information was available;



➤ **Lack of comprehensive sampling strategy--→inadequate execution of the sample taking:**

- At individual producers, most samples were taken only close to the borders of the plots, which limits the possibility to demonstrate the use of unauthorised substances by operators.

- Composite samples taken from several Producer Groups' members or from several plots/sites at individual operators can have a dissuasive effect but:

1. Dilution factor not taken into account: samples composed of up to 14 individual samples;
2. In the case of a positive result, individual samples were not always analysed separately;
3. Heterogeneity of environmental conditions/circumstances of the individual members participating in the composite sample;



- **Lack of comprehensive sampling strategy--→incomplete scope of analysis and inadequate *evaluation* of the analytical results obtained:**
 - Some CBs operating in non-EU countries used laboratories with limited scope (e.g. multi-screening covered less than 200 pesticides);
 - Some CBs did not request laboratories to test for pesticides that can only be detected by using single-residue methods (glyphosate, chlormequat, ...);
 - Sampling sheets do not contain enough **information** on how sample was collected and about the environmental conditions/circumstances in which the sample was taken;



➤ **Lack of comprehensive sampling strategy--→inadequate *interpretation* of laboratory results:**

- Food-safety approach for the interpretation of analytical results (product-oriented instead of processed-oriented):
 1. Processing/dilution factors and uncertainty are taken into account to decide on presence/absence of substances close to quantification limit;
 2. Presence of unauthorised substances below 0.01 ppm not always followed-up, regardless of other sources of information available;
 3. Decisions taken without scientific basis (e.g. detection of phosphonic acid without detection of Fosetyl-Al is always considered as a false positive).

- Thank you!



- http://ec.europa.eu/food/food_veterinary_office/index_en.htm