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. Therefor, 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

STARTING POINT

a) What kind of residue (determines e.g. 10 ppb DDT "way to proceed")

+ AMOUNT? e.g. 20 ppb DDT X

+ 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 competence
Working Group Follow up

- Evaluation of Analysis -> Relevant?
  
  - Risk Consideration

- Stepwise check of traceability
  
  - Authenticity

- Only traceability Doc. relevant for next step

- Intensity (from Doc check -> onsite visit)
  
  - Depends on risk consideration

- Timing: SOP (skal guide 3 to 6 month always)

- Final decision: by EU CB/CA when important

- If downgrade = trigger follow-up

- OFIS guide?