Final Statement of the AFI-Seminar
Residue testing in organic production
– what and why are we testing?"

In the last few years, the number of cases related to the detection of residues in organic products has considerably increased. An important indicator is the number of cases raised by EU Member States and documented in the Organic Farming Information System (OFIS) of the EU. OFIS-Notifications are being monitored by the Member States and the EU-Commission. This monitoring has substantially increased the workload. Authorities, control bodies and the organic industry are investigating the cases by looking up relevant scientific information, verifying operators' compliance and when needed, transferring the case to another control body "upstream" in the supply chain aiming at the identification of the origin of the detected residues.

Investigations of residue cases are characterized by the substance found and the product which has been analyzed. For some substances, investigations from past cases and scientific literature show that their presence is inevitable because they are simply everywhere in the environment. What makes it complicated is that some of these substances "could" originate from plant protection products which are not authorized for use in organic production, even when such use would be very unlikely, and such presence cannot be avoided by installing appropriate and proportionate precautionary measures.

The AFI 2020 international Seminar aimed at identifying best practices to deal with the presence of three specific substances in organic products (Anthrachinon, Chlorate and Phthalimide, see corresponding presentations on the webpage www.organic-integrity.org). It proposes as best practice in case of any analytical findings to conduct a risk assessment regarding irregularities with respect to the organic regulation. The outcome of this risk assessment determines the intensity of the further investigation which focusses on the confirmation of the organic integrity of the lot represented by the sample.

Certification of organic production is about verification of the compliance with the production rules laid down in the EU-regulation on organic production. It is not about identification of potential issues resulting from production methods other than organic production (as for example use of pesticides in the past (DDT, atrazine…) , environmental pollution due to industrial activity (Orto-phenyl-phenol, …), use of substances in water supply (Chlorate) or the generation of molecules which are linked to prohibited substances during the analytical process (Phtalimide).

The interpretation of measurement results must take into account the context of the sampling. Certification of organic production is not about identification of potential issues resulting from production methods other than organic production (as for example use of pesticides in the past (DDT, atrazine…) , environmental pollution due to industrial activity (orto-phenyl-phenol, …), use of substances in water supply (Chlorate) or the generation of molecules which are linked to prohibited substances during the analytical process (Phthalimide).
The presence of contaminants, substances due to environmental pollution and of chemical artefacts in organic products can never be completely avoided in organic production only. The origin of those substances lies beyond the sphere of influence (in time and space) of operators complying with the organic production rules, including the continuous improvement of the appropriate preventive and precautionary measures.