



European Organic Certifiers Council

**Sampling by organic
control/certification bodies**

**International AFI Seminar “Residue testing in organic
production – what and why are we testing?”.**

Juan Carlos Pérez Montero

EOCC Board member

Date: Brussels 4 of February 2020

Summary

- Little introduction about EOCC
- Sampling and analysis in the inspector's toolbox
- Targeted vs representative sampling
- Interpretation of results

1. Little introduction about EOCC

International non-profit organization, since 2010
55 members (CBs, CAs) from 32 countries.

The association aims to increase the reliability of control and certification in relation to the European organic regulation.

1. Little introduction about EOCC

2 Working Groups:

- REG and Import

5 Task-Forces:

- High Risk Supply Chains
- Residues
- Traceability and Cross-checks
- OFIS
- OCR

2. Sampling and analysis in the inspector's toolbox

2.1 Official Control Rules 2017/625. Article 14.
Methods and techniques for official controls

2.2 Draft of COM Implementing Act on controls
about methodology for the detection and
evaluation of the presence of non-authorized
products or substances

2.1 Official Control Rules 2017/625. Article 14



OTHER ACTIVITY REQUIRED TO IDENTIFY CASES OF NON-COMPLIANCE



AUTOCONTROL:
Controls that operators have put in place



INSPECTION:
-Equipment, means of transport, premises and other place.
-Animals, goods, raw materials and other products.
-Cleaning and maintenance products and processes.
- Traceability, labelling, presentation,...



AUDITS OF OPERATORS



Methods and techniques for official controls



CONTROLS ON THE HYGIENE CONDITION



SAMPLING, ANALYSIS, DIAGNOSIS AND TEST



ASSESSMENT OF PROCEDURES ON GOOD MANUFACTURING PRACTICES



VERIFICATION OF MEASUREMENTS



INTERVIEWS



EXAMINATION OF DOCUMENTS, TRACEABILITY RECORDS AND OTHER RECORDS

2.2. Draft of COM implementing act on Controls. **November 2019**

Art 3. Methodology for the detection and evaluation of the presence of non-authorized products or substances

1. ...CA or CB.. **shall use** the following tools :

- Investigation ;
- **Sampling;**
- **Laboratory analysis;**
- **Interpretation of results;**

... CA or CB ..can use the tools ... **in any order, together or separately**, depending on the situation

2.2. Draft of COM implementing act on Controls. November 2019 (Cont)

Art 4. Investigation

4. For the purpose of the official investigation in accordance with point (a) of Article 29(1) of Regulation (EU) 2018/848, the competent authority or, where appropriate, the control authority or control body shall use the **methods and techniques referred to in Article 14 of Regulation (EU) 2017/625.**

3. Targeted vs representative sampling

3.1 Existing sampling EU documents for official Controls

3.2 Draft of COM Implementing Act on Sampling and laboratory analysis

3.3 Laboratories analyses and risk approach

3.1 Existing sampling EU documents for official Controls

- **DIR 2002/63/EC**: food safety oriented => not adapted to organic farming

Food safety: representative sampling, food (final product)

Organic farming: not representative sampling depending on what is search (routine/suspicion ; use/contamination), multi-matrix (leaves, soil, water, utensils, ...)

3.2. Draft of COM implementing act on Controls. November 2019

Art 5. Sampling and laboratory analysis

...CA or CB.. shall carry out sampling and laboratory analysis with the following objectives:

- - (a) To confirm the presence of non-authorized products or substances in the lot/batch of the product concerned if still available. For this purpose the competent authority or, where appropriate, the control authority or control body shall take samples that:
 - i. are taken from clearly defined lots/batches,
 - ii. **fully represent** the lot/batch concerned;

3.2. Draft of COM implementing act on Controls. November 2019

Art 5. Sampling and laboratory analysis (Cont)

(b) To identify the source of the contamination. For this purpose and where relevant, the competent authority or, where appropriate, the control authority or control body shall take samples from the field that:

- i. include soil and tissue/crop,
- ii. **fully represent** the entire field and crop;

3.2. Draft of COM implementing act on Controls. November 2019

Art 5. Sampling and laboratory analysis (Cont)

(c) To discriminate between the intentional use in the organic farm and the application **drift** from the neighbouring farm. For this purpose the competent authority or, where appropriate, the control authority or control body **shall take two samples**. First sample shall be is taken along the edge of neighbouring conventional farm on the side from where there is drift and the second one from centre of the organic field at a distance where drift is unexpected.

3.3. Laboratories analyses and risk approach

Do the scopes of the current analyses fulfill the expectations of risk-based controls?

3.3. Laboratories analyses and risk approach

Organic standards

- Pesticides (screening per matrix + mono-residues), herbicides
- GMO (screenings per matrix)
- Ionising radiation
- Antibiotics tests
- Isotopic analysis : conformity of N inputs

Organic standards + general regulation

- Additives and forbidden compounds (melamine, polyphosphates, authenticity, sulfites, ...)
- Cleaning agents (QAC, ...)

General regulation

- Pollinic examen to verify origin and/or honey authenticty
- Heavy metals
- Dioxins/PCB and HAP
- Mycotoxins
- ect

4. Interpretation of results

- 4.1. No Common regulation at the moment.
Competent Authorities internal procedures.
- 4.2 Draft of COM Implementing Act on
Interpretation of results

4.1. No Common regulation at the moment. Competent Authorities internal procedures

- BTSF Exercise Comparing different Sanction catalogues
- Very different approaches between EU Countries and DG Sante interpretations in third country audits

4.2. Draft of COM implementing act on Controls. November 2019

Art 6. Interpretation of results

1. The presence of non-authorized products or substances is established when the result from the laboratory analysis exceeds the reporting limit ($>RL$ mg/kg) as defined in **the EU document SANTE 11813/2017**

2. For the purpose of discrimination between the intentional use in the organic farm and the application **drift** from the neighbouring farm, if the **residue level at the edge of the conventional farm is more than in the centre of organic field, it is assumed that the residues are resulted from application drift.**

Why is it given such high importance to the sampling as core of certification decision?



Thank you for attention!