

A SYSTEMATIC APPROACH FOR OFFICIAL INVESTIGATION

**IMPLEMENTING SYSTEMATIC OFFICIAL INVESTIGATIONS TO DETECT
(ORGANIC) FOOD FRAUD**

Focus on critical non-compliances

Brussels, 27 and 28 May 2025

Replace the organic certificate by a lab analysis?

- In recent years, a pesticide-free analysis result tends to become as relevant as the organic certificate itself.
- The new organic regulation does not intend to neglect the importance of sustainable organic production and to focus only on the presence of non-authorised substances.
- The market requirement for pesticide-free organic products is a reaction of operators, facing the risk of their product being blocked pending the conclusion of official investigations.

Prevention of fraud should be based on a process-based approach rather than an end product analysis

- Focusing mainly on the lab analysis has an impact on the fight against fraud. Fraud can happen without any residues, fraudsters could also use prohibited inputs with a short persistence and a clever commingling.
- The absence of pesticide does not provide a guarantee for the integrity of a product; organic rules apply to the whole product lifespan, from before farming till the shelf at the point of sale.

Where does the Vade mecum help for investigation of suspected fraud cases?

- Importance of preparatory evaluation regarding the type of contamination and the operator including the history of non-conformities.
- Differentiate low and high-risk cases, in terms of investigation methods and intensity, time investment, speed and exchange of information.
- An inconsistency in a mass balance can be more problematic than a residue in a lab analysis!