

EOCC DECLARATION

Submitted to and adopted by the EOCC General Assembly 2015

In light of recent developments in the revision process of Regulation 834/2007, the General Assembly of EOCC would like express its concern on the revision of the EU-legislation on organic production. EOCC in particular considers that EU organic legislation must be simple, clear and robust in order to ensure a good implementation in the EU Member States and in Third Countries. For improved controls in future, it is important to build on the proven elements of the existing Regulation, eliminating deficiencies in their implementation. EOCC considers the following elements being a prerequisite to guarantee a transparent, reliable and effective control system for organic production and labelling at EU-level:

Controls

- EOCC considers that minimum requirements on the frequency and nature of the annual verification of compliance must be established at EU-level to ensure fair competition, limit the administrative burden and safeguard consumers' and operators' trust in the system.
- In this perspective, EOCC underlines that mandatory, process-based annual verification of compliance is and should remain a pillar of organic certification at EU-level for all operators with the exception of wholesalers and storage of pre-packed products. Effective controls are based both on general approaches (annual-on site controls) and more specific, risk-based approaches.
- EOCC believes that detailing the requirements for the organization of organic controls in the organic Regulation, as it is currently the case in Art 63 to 90 of Reg. 889/2008, is a key to guarantee an effective control-system and to ensure a level-playing field amongst all operators of the sector.
- EOCC underlines that the appropriate EU-legislation must make explicit that both the organization of controls and the certification decisions are to be taken by control bodies and control authorities.

Certificates

- EOCC welcomes any approach to use electronic versions of organic certificates besides hard copy versions. It is important that there will be an EU-wide publicly available database entailing all valid and fraudulent certificates, as an essential tool for effective and quick verification.

- In order to ensure a harmonized implementation and the availability of all useful information elements, the EU-Regulation should continue to provide for requirements for the minimum content of organic certificates.

Communication

- EOCC underlines that an efficient control system relies on quick and relevant communication between all actors involved in controls. The Regulation and its implementation should provide for communication in case of severe infringements, downgrading of organic products to non-organic products, finding of pesticides and suspension of organic certification of operators. In addition, EOCC would welcome the creation of EU capacities to deal with fraud cases, suspicion of fraud cases and crisis situations.
- EOCC considers that an effective and harmonized implementation of EU-legislation on organics requires a better coordination of exchange of information and action in case of irregularities between the European Commission, different competent authorities at Member States' level and control bodies. In this perspective, the access of control bodies to OFIS plays an important role.