



European Organic Certifiers Council

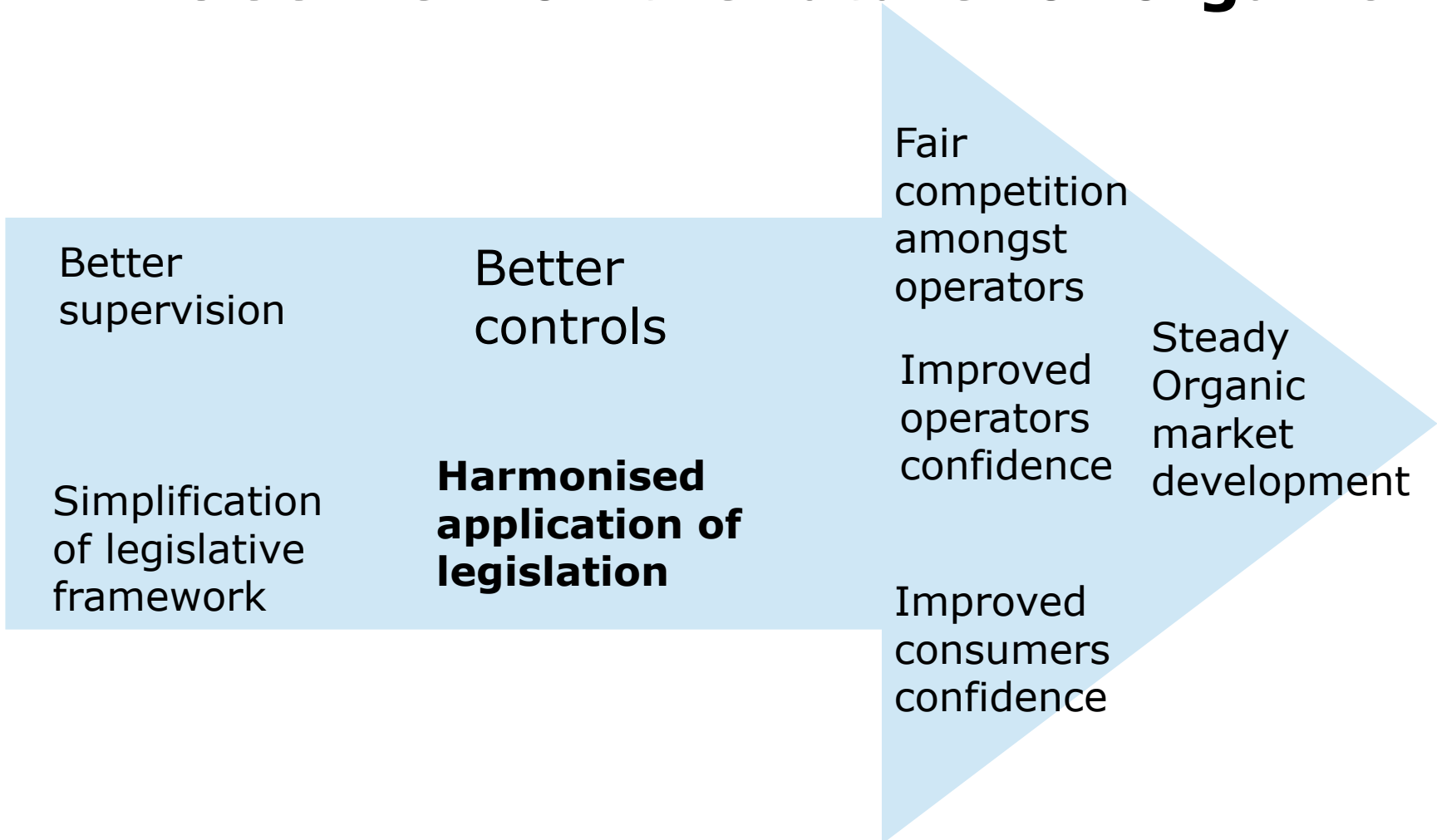
Pesticide monitoring in organic products: Facts and Figures from control bodies from various EU member States

EOCC Task Force Residues

Biofach, NCC Ost, Room Kiev

16th February 2018

EOCC view on the future for organic



Why this presentation?

In the context of the revision of the Regulation there is a need for

- More transparency regarding residue cases in organic products
- Sharing experience with stakeholders and decision makers regarding investigations
- Improved harmonised decision making, reduced unfair competition and maintained consumers confidence
- Realistic expectations about what is possible and what is not possible

How we did it

29-09-2016 : Outcome of the EOCC workshop :
harmonise conclusion of investigations in relation to
presence of pesticides in organic products

17-02-2017 : First sharing of data in Biofach

03-10-2017 : Evaluation of data collection method and
start of data collection 2017

16-02-2018 : Second sharing of data in Biofach

What did we get out of it?

Data of sampling and residue cases from 2017 :

- 5 EU Member States

- 8 EOCC Members

Total amount of samples taken: 6805

Sampling organic products by CB's/CA's

Reg 889/2008 : Art 65.2

The control authority or control body **shall** take and analyse samples

- for detecting of products not authorised for organic production,
- for checking production techniques not in conformity with the organic production rules or
- for detecting possible contamination by products not authorised for organic production.

Residue testing of organic products

Reg 834/2007 : Absence of rules for residue testing

Reg 882/2004 : Competent authorities are responsible for setting up a scheme for interpretation of residue analysis

=> Member States (and their competent Authorities) may develop their own system for interpretation of residue analysis and decision making.

Observations about investigations

Investigations show that detection of pesticides can be related to « organic particularities » or factors external to organic production.

Decision making after investigation depends on

- regional legislation,
- evidence of an irregularity/infringement and
- the catalog of measures for such situations.

Observations about investigations

« organic particularities » to be taken into account :

-analytical results of some

Products

Substances

-facts to deal with while investigating

Practical issues

Regulatory issues

-infringements to organic production rules (in relation to the aims of sampling, art 65.2)

Observations about investigations

-Elements external to organic :

Careful with some

Products

Substances

Complicated investigations due to regulatory
issues

Research and consultancy

-External to organic :

Products

- fertilisers containing biocides,
- boullie bordelaise containing fungicides,
- EO (for disinfection of stables) containing acaricides,
- gloves containing dithiocarbamates,
- boxes and crates containing cocktails of pesticides,
- non organic (non treated) seeds but heavily contaminated

-External to organic :

Substances

- high decay time,
- systemic vs contact pesticides

Regulatory issues

- representative sampling as a must
- pesticide use in feed storage facilities (food safety requirement),

Research and consultancy

- development of spraying programs resulting in zero detection on harvested products
- labelling « pesticide free » products

Outcomes of the investigations

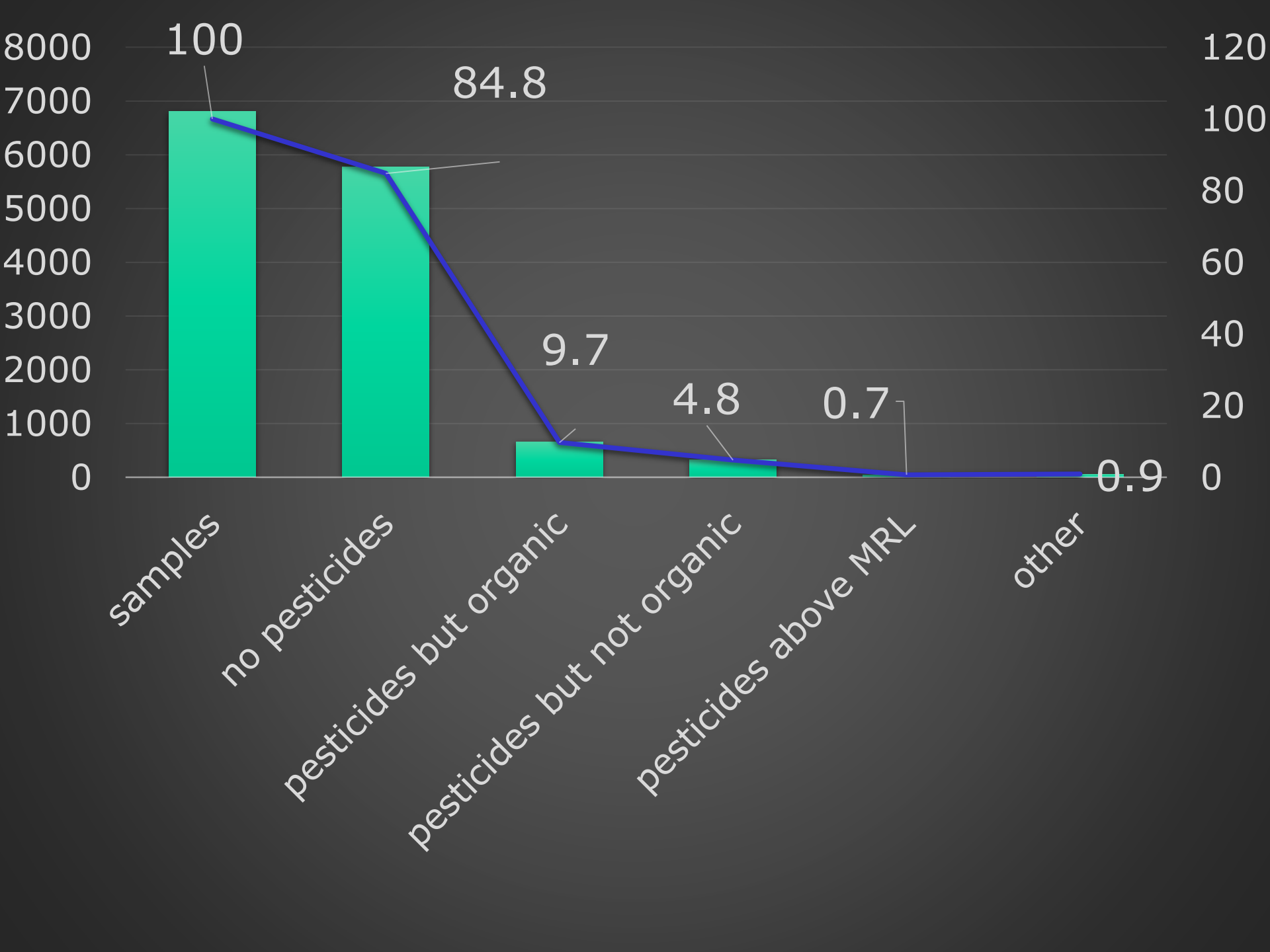
Possible outcomes of the investigations were explained and agreed upon beforehand:

- pollution
- drift
- contamination
- unauthorised use

- no investigation, unclear/unknown and natural presence and authorised use.

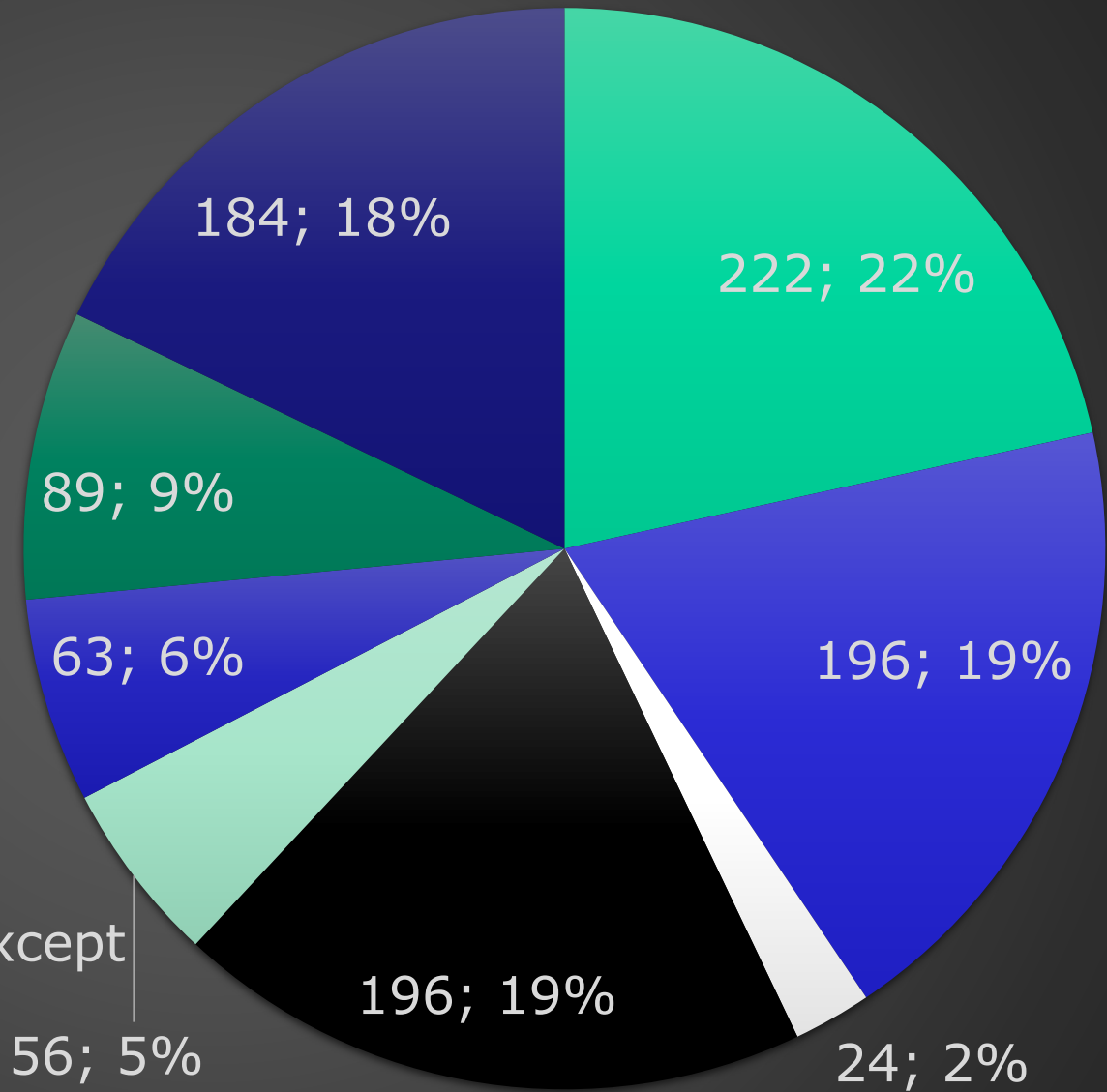
Outcomes of the investigations

- pollution: unavoidable presence of non authorised substances due historical or industrial activity in the environment.
- drift: unavoidable presence of non authorised substances due to (non compliant) use by non organic farmers
- contamination: avoidable presence of non authorised substance due to insufficient separation between organic products and not authorised substances
- unauthorised use: intentional use of non authorised substances

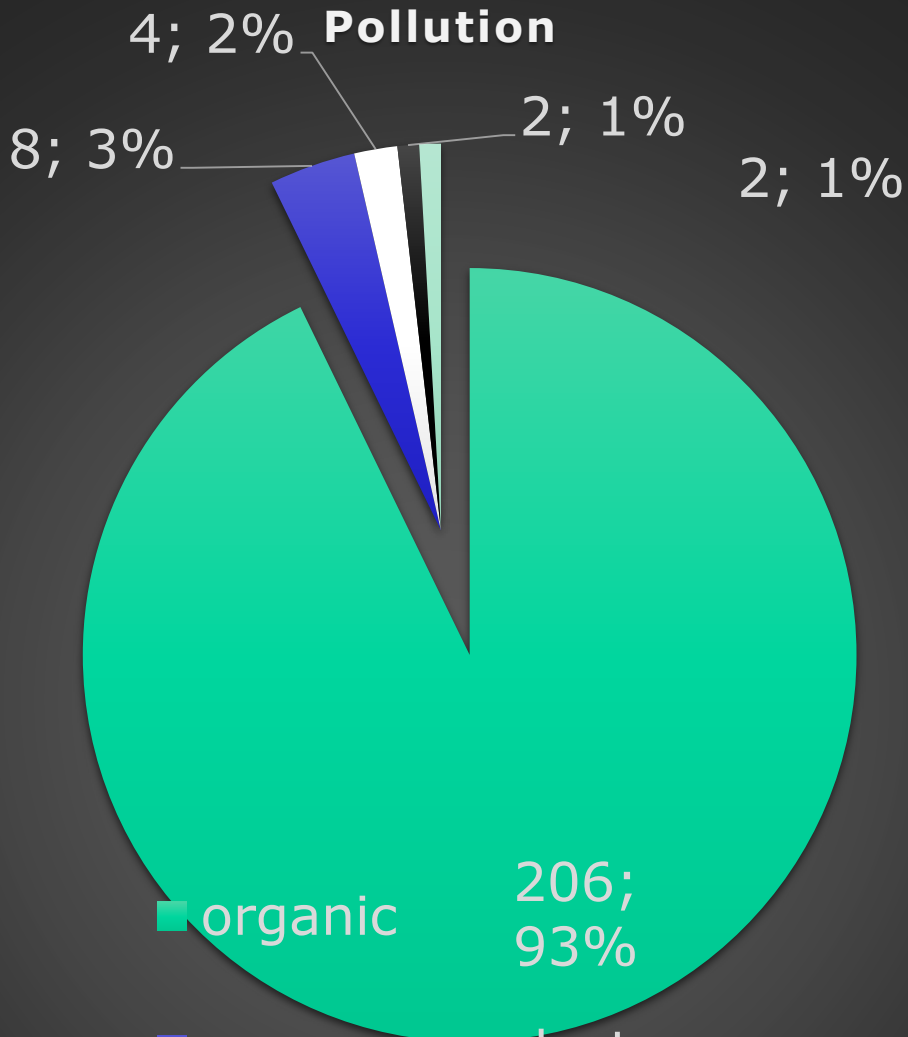


Outcomes of investigations

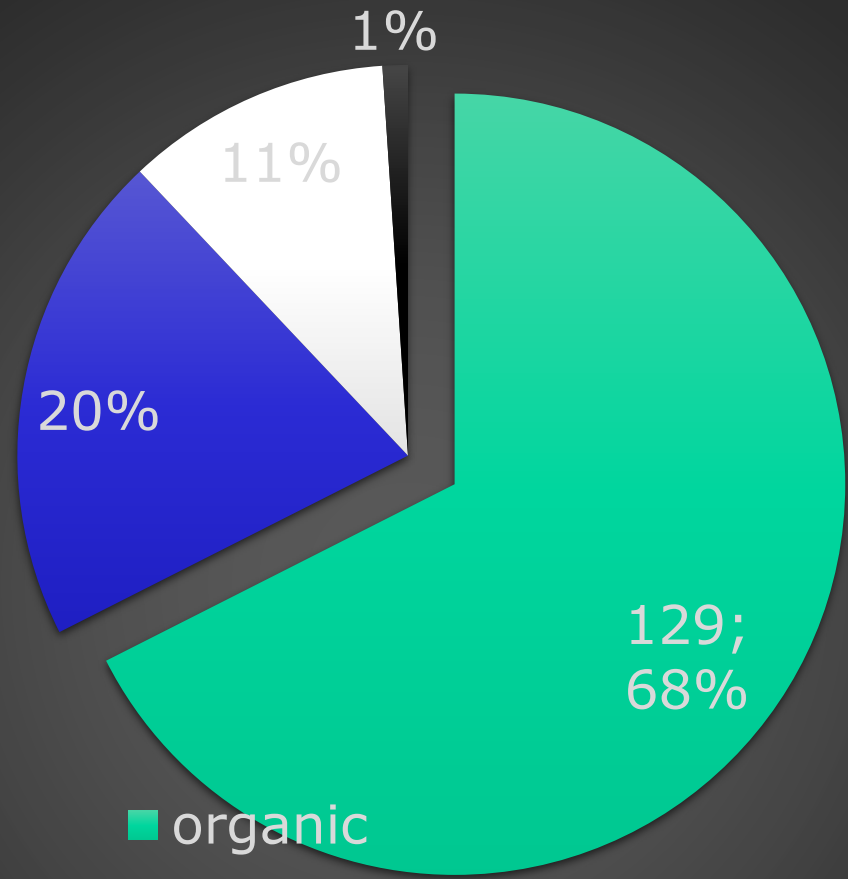
- pollution
- drift
- natural presence
- contamination
- unauthorised use
- authorised use
- no investigation (all except ana-)
- unclear/unknown



Pollution



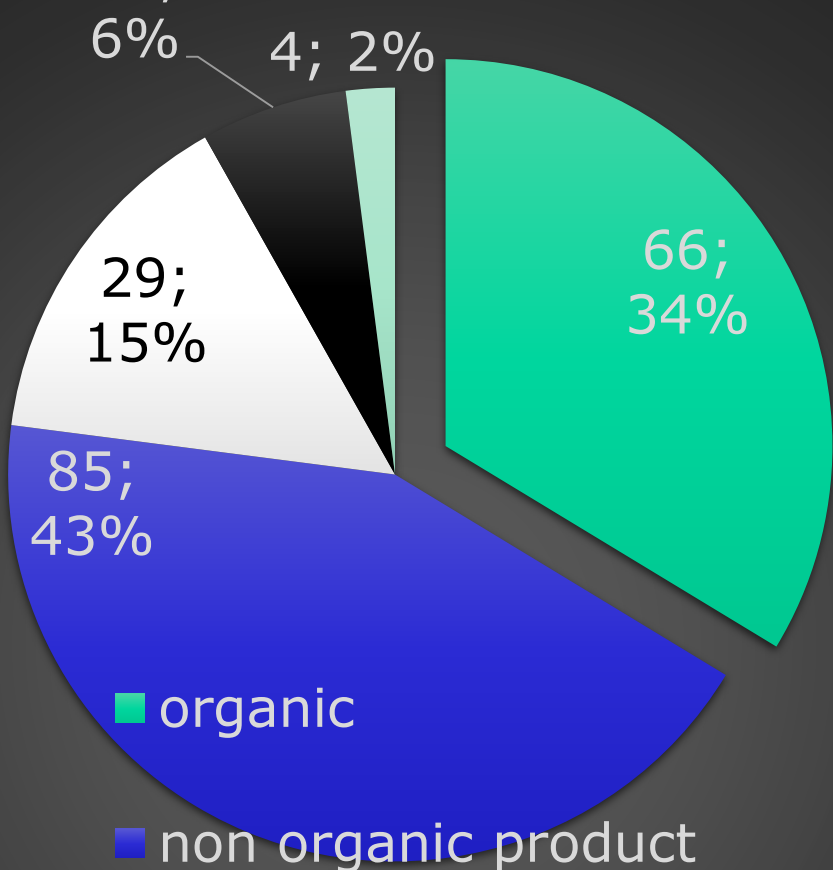
Drift



- organic
- non org product
- non organic harvest
- new conversion of land

- organic
- non organic product
- non organic harvest
- new conversion of land

12; Contamination



■ organic

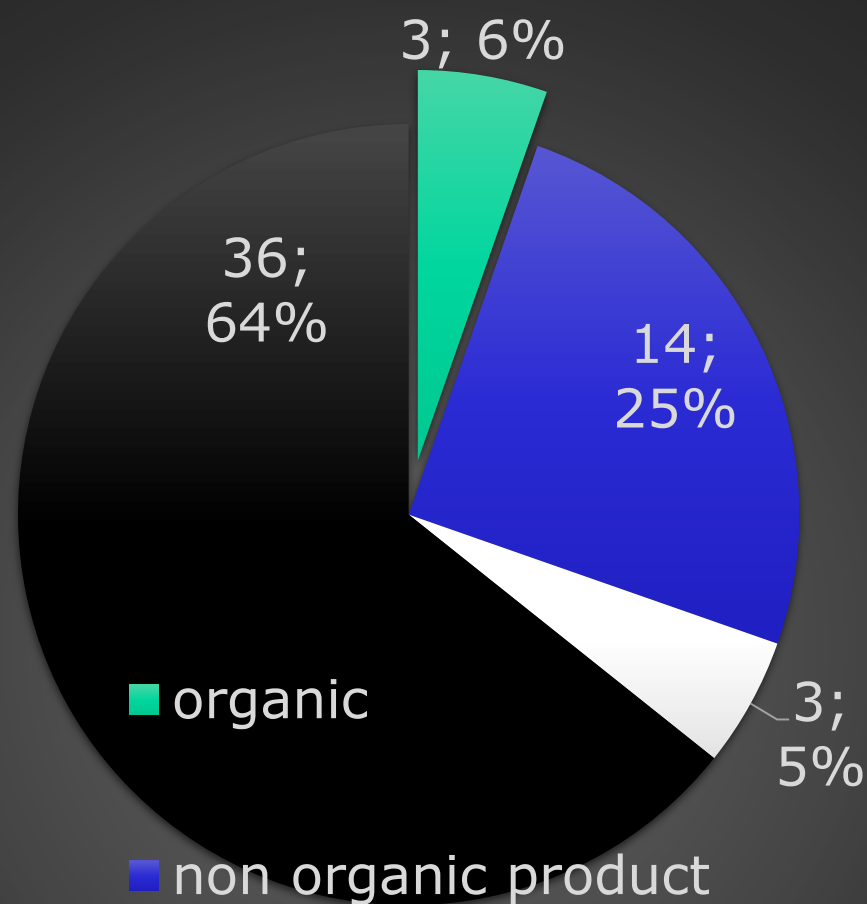
■ non organic product

■ non organic harvest

■ new conversion period

■ in process

Unauthorised use



■ organic

■ non organic product

■ non organic harvest

■ new conversion period

What we can learn from this?

Sampling and testing as a tool for verification of compliance of an operator, results into different decisions for identical outcomes of the investigations

There is a need for a methodology to differentiate presence of pesticides because of factors which can be improved by organic operators and factors which can not be improved by organic operators

What are we planning to do with this?

Share and discuss these results more in detail among participants

Exchange on sampling techniques to increase effectiveness of collection of information during sample taking (facilitate investigations)

Develop a harmonised methodology to identify the origin of the pesticides

Cooperate with decision makers on how to proceed with decision making in different scenarios

Thank you