

# Regulations for the importation and labelling of organic foods in the EU

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# Regulations ...

- Talk about regulation EC 2092/91
  - Organic food production & processing & labelling
    - Food production increasingly regulated
    - Food safety is big issue in horticulture
- Regulations are
  - Part of market specification
  - Market driven production

# Seen as a source of

## – Confusion

- it is not clear what is wanted
- differences in demands among MS

## – Frustration

- changes all the time
- ill-matched to local reality and to dynamics of trade

## – High costs

- re-visits, multiple certification

## – Limits market access/development

# What regulations

- Public regulation
  - EC 2092/91
  - But also pesticide harmonisation
- Private standards
  - IFOAM based private standard (certifiers)
- Industry/buyers standards
  - Eurep GAP
  - HACCP

# Regulations cover

- Production standards
  - How to produce the crop
- Inspection/certification requirements
  - How this is inspected, monitored, assured

# Production standards

- Conversion period
  - for land
  - for the crop or animal
  - monitored or reciprocal inspection
- Approved inputs
  - Seeds
  - Pest & disease management materials
  - Fertility management materials

# Prod. standards cont.

- It is each Member State's authority to implement and interpret 2092/91
  - (8-10 important 'importing CAs)
- They do it quite differently
- Acceptance of foreign practices based on
  - compliance = easy way
  - equivalence = more responsibility for the bureaucrat

# Inspection requirements

- Inspection requirement
  - Annual inspection of all operators
  - Documented system
- Difficulty for LDC, smallholders
  - Internal Control Systems
  - IFOAM leads the way in co-operation with certifiers and competent authorities (at least in EU)

# Internal Control Systems

- An ICS is a documented quality assurance system that allows the external certification body to delegate the annual inspection of individual group members to an identified unit within the certified operator
- Based on ISO 53, 62, and common sense

# ICS cont.

- The main task of the certification body is to evaluate the proper working of the ICS
- Re-inspection rate based on review of documented system and on risk assessment
- ICS combined with extension, research, other quality management functions

# Certification requirements

- The ideal: the Third Country list
- Otherwise: importer derogation
  - Equivalent standard
  - Fulfill requirements of EN 45011/ISO 65
    - EU approved control body
    - 3 options:
      - Accredited to ISO 65 with regard to 2092/91
      - Approved/monitored by own competent authority
      - Expert audit

# Cert. req. cont.

- Public based on govt to govt recognition
  - does not cover certification abroad
- Importing country establishes equivalence
  - First point of entry
  - Applications take 6-9 months in some MS
- Lack of transparency
  - Demands not documented
  - Difficult to understand (language problem)

# Cert. req. cont.

- IFOAM Criteria based on ISO 65
  - One set of global criteria
  - Discussion with authorities to accept
    - IFOAM accreditation as equivalent to 2092/91
    - IOAS as accreditation body (possibly ISO 65)
  - Discussion with organic certifiers who resist industry review
  - Accredited CBs have forum for co-operation

# Accreditation

- Government (approval, registration)
- National accreditation bodies
- International accreditation bodies

# Accreditation

- Application
- Document screening
- Evaluation visit
- Accreditation decision
  - pre accreditation CAR
  - post accreditation CAR
- Annual surveillance
- Re-evaluation (4 years)

# Multiple of single accreditation

- Each country own rules for approval of CBs
  - Means multiple accreditations
- IFOAM Accreditation is the one international accreditation for a certifier, covering all operations in all countries
- IFOAM Accredited certifiers have forum for trust building, joint development, joint action, signed MLA for fast transference

# Producers 1

- Be organic producers
  - Do not adhere to just the minimum
  - Be active organic, have a good system
  - Continue to improve, to develop
  - Study the relevant standards yourself
  - Comply with the strictest
  - Be organic yourself
- Communicate, talk, ask, shop around, liaise, co-operate, negotiate, stop the bad talk

# Producers 2

- Work with CBs that guarantee access
  - Inspect (certify) to all standards
  - Comply with all certification requirements
  - Are accredited for all markets (incl. IFOAM)
- Are transparent, good on information
- Give you a good service for a good price

# Exporters

- See producers
- Be aware, be ahead of regulations and market requirements
- Be on time
- Communicate, participate in developments
- Unite to defend common interests

# Certifiers 1

- Act like a service provider
- Do not insist on own standards but on the standards and requirements that markets demand
- Be accredited for all markets
  - Multiple accreditations coming up
    - Better bet on IFOAM accreditation

# Certifiers 2

- Be open to extend/expand your inspection & certification services
  - Eurep GAP
  - HACCP
- Stop the bad talk
- Stop pretending that you are in charge

# Certifiers 3

- Involve in local organic movement
- Train & use local inspectors
- Assist in the emergence of an independent national certification body

# Importers

- Follow developments
- Unite, lobby, express your disagreement before it is too late
- Co-operate with fellow importers in other markets
- Insist that CBs act like service providers
- Use and compare different certifiers

# Authorities

- Be transparent, communicate (language)
- Synchronise demands in documentation
- Be aware of different local realities
- Listen, visit
- Be a facilitator, not a barrier

# Conclusion

- Plenty of new developments, changes ahead
- Should **not** be more of a problem than in other export sectors
- Requires an open mind, co-operation instead of individualism, every actor plays the role he/she plays best
- Information, communication