

How to ensure organic integrity along the supply chain

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More and more organic products sold in the European Union come from countries outside of the Union, the so-called “third countries”. Whereas within the European Union the EU-legislation on Organic Farming (Regulation (EC) No. 834/2007 and 889/2008) is mandatory in all of the Member States, in third countries the situation is different.

That is due to the fact that the conditions for organic farming are often quite different from those in the member states of the European Union. The Regulation No. 1235/2008 permits equivalent production regulations and control measures for imports from third countries. However, consumers trust must be ensured, whether or not the organic product is from within the EC or imported from a third country. During the recent years, third-country imports into the EU unfortunately gain more and more a negative reputation. Journalists qualify these organic products not to be “truly organic”, and organic consumers suspect that frauds occur in third countries more frequently. Findings of pesticide residuals in imported organic products seem to confirm this skepticism.

One attempt of the organic sector to counter these tendencies is the “Anti Fraud Initiative” (AFI). The AFI-initiative is a common approach of the Swiss Research Institute of Organic Agriculture FiBL (www.fibl.org), the German Resource Protection Ltd. GfRS (www.gfrs.de) and the Dutch Louis Bolk Institute (<http://www.louisbolk.org>). It was founded in 2007. The aim of the AFI initiative is to bring stakeholders from the organic sector together and to discuss common approaches to ensure organic integrity. Four workshops in different countries involving authorities, certification bodies and traders were already held. The next meetings will take place in Italy after the SANA fair in September, 2009 and in Belgium linked with the international workshop on organic food authentication in November, 2009.

For organic imports, some measures contribute quite effectively to ensure the integrity of organic products in the supply chain.

Agricultural Production – Production Units

Converting the entire farm to organic production is the most recommended option when starting with organic production. Unfortunately, managing a conventional production unit and an organic production unit in parallel is a common practice in particular in countries outside of the European Union. This considerably increases the risk that, if certain difficulties arise, inputs prohibited in organic farming may be used, given that they are readily at hand. In such cases, also the conventional unit(s) must be thoroughly inspected and an input-output calculation of organic and conventional crops must be made. Additional unannounced inspections and sampling contribute to ensure that no prohibited inputs are used in the organic unit.

For annual crops, the EU-legislation on organic farming prohibits parallel production of the same variety or of varieties that cannot be easily distinguished. That must also be taken into consideration for crop planning in third countries, to decrease the risk of mixing or interchanging organic products with conventional products from the same harvest. Rotating crops during different periods of the varieties in question may be useful.

Agricultural Production – Conversion Period

Many times retroactive recognition of the conversion time confers an important economic advantage because organic products may be merchandised sooner as organic products. Therefore, certification bodies operating in third countries as well as the competent EU-authorities place great importance on verification, to have grounds for retroactive recognition depending on the former use of the land. If a farm is striving for retroactive recognition, it must carefully prepare its documentation, in order to convince the certification bodies involved and the corresponding competent authorities. For probatory documentation, the operation may submit photographs over various years that clearly show the state of the fallow fields in the areas in question, evaluations and certifications from scientists or authorities in the field of study, which prove the non-use of unauthorized inputs, as well as inspections of the fallow fields made by the certification bodies before the field is converted.

It is important that the areas for which retroactive recognition is being requested meet organic production guidelines. When requesting retroactive recognition of the conversion period, a sound concept based on principles of organic agriculture must be submitted regarding how to maintain or improve soil fertility. For example, that would include a crop rotation program, cultivation of legumes and green manure, intercropping, the use of animal manure and other organic materials for erosion control. During the first inspection visit, farmers can usually only indicate that they intend to implement organic production methods in an exemplary manner, and how they intend to do so. So, generally, the actual implementation of organic production methods can only be reliably verified during the second inspection. Thus, a conversion period of a minimum of one year would be recommended for all requests even when it has been completely proven that no prohibited substances have been applied in the areas in question. That is the only manner to guarantee organic production, not merely the non-use of unauthorized inputs.

Storage and processing – Contamination and Commingling

When both organic and non organic products are stored and processed at the same facilities, there is a potentially high risk of contamination and of commingling. This is well known from cereal trading – contamination with Chlormequat and other prohibited pesticides often occurs when the organic goods are stored in silos where previously conventional cereals were stocked. Undoubtedly, the best way to minimize those risks is to use certain storage facilities and production lines exclusively for organic products. When this is not possible, risks must be minimized by using proper separation and cleaning measures. To do so, first, all the places and processes that present a risk of contamination and commingling must be

analyzed. Then measures to prevent contamination, such as cleaning steps or system purges, are implemented. Such measures must be agreed upon with the certification body. Again, additional unannounced inspections, sampling and laboratory analysis ensure that the integrity of the organic products is not put at risk.

Export

Clear identification is indispensable in the trade/exportation of organic products. At all times organic products must be clearly identified as such in the different stages of the supply chain. Identification is done in two manners: 1. by precisely labeling each one of the containers and 2. by clearly indicating that the product is an organic product on the export papers. For safety reasons, to the extent possible, organic products must be identified as such on the packing as well as on the accompanying export papers. Throughout the whole exportation process, there are innumerable possibilities for an accidental substitution or interchange of products, principally in the diverse phases of the transportation process during which the product is handled by various transportation companies, through to where the product is stored, and then until it is finally packed in the transportation container. Badly trained personnel may easily confuse improperly labeled lots. It is recommended that exporters supervise the exportation process until their products are shipped or at least they should deliver clear indications of how to proceed with the organic products. Also the risk of an accidental interchange is considerably reduced if the export container is packed and sealed at the beginning of the transportation chain (for example, in the interior of the country, as that avoids any possibility of interchange on the way to the warehouses on the coast).

Inspection and Certification

As a general psychological rule, the lower the risk of being detected and the lower the penalties, the higher the willingness to commit a fraud will be. The current system of organic inspection and certification in third countries sometimes is not sufficiently adjusted to the specific risk situations. Unannounced inspections and sampling are not carried out with a sufficient high frequency, and the penalties are low – it is easy to change the certification body in case of being suspended or decertified. This situation needs to change by an initiative for a “better implementation” and by an improved surveillance of certification bodies operating in third countries as soon as possible.

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