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# Towards a harmonized residue handling

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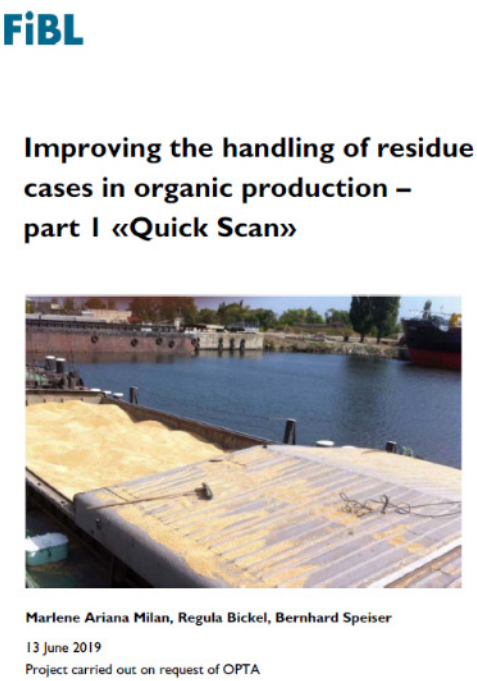
Workshop: Challenge for organic growth: harmonization of residue handling in the EU

Nürnberg, 14 February 2020

# Part 1: survey of the current situation

- Survey carried out by FiBL on behalf of OPTA
- Time of survey: spring 2019
- Method: Interviews of control bodies, control authorities and some companies
- 25 EU member states covered
- Full report: http://orgprints.org/35522/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Improving the handling of residue cases in organic production – part 1 «Quick Scan»

Marlene Ariana Milan, Regula Bickel, Bernhard Speiser

13 June 2019

Project carried out on request of OPTA

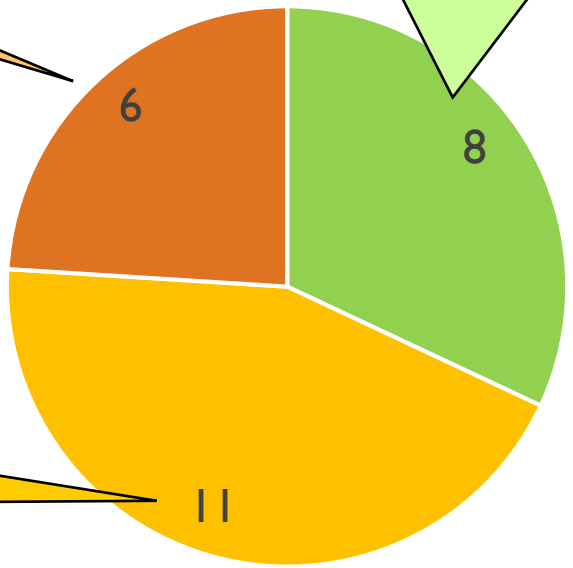
# Part 1, selected result for 'de-certification levels'

Deciding about de-certification, when residues are found:

6 MS: Certification decision depends on the **level**.

3 MS ➔ 0,01mg/kg
1 MS ➔ 80% of MRL
1 MS ➔ ranging from 0,01- 0,04 mg/kg
1 MS ➔ ranging from LOQ - 1,5 x LOQ

8 MS: Food is **always** de-certified




11 MS: Certification decision is taken **case by case**.

# Part 1, main conclusions

- Residue findings in organic products are handled very differently across the EU.
- Heterogeneity concerns all aspects, namely
  - legal basis for sampling and lab selection
  - case investigation
  - evaluation, certification decision
  - exchange of information

# Part 2 A: Evaluation of current approaches

- Workshop in November 2019
- invited experts including representatives of companies, authorities and CBs
- Coverage of various EU member states, where different approaches are currently practiced

Discussion for each approach:

- Major pros
- Major cons
- Conclusions and recommendations

# Part 2 A, selected results for 'de-certification levels'

Major pros:

- Simple, fast, clear
- Legal certainty for certifiers

Major cons:

- Can punish innocent operators
- Not in line with organic production principles
- Can be avoided by lot mixing
- Discuorages search for causes

Conclusions, recommendations:

- A multi-level approach would be more acceptable than a single level
- Levels should be linked to conventional practise

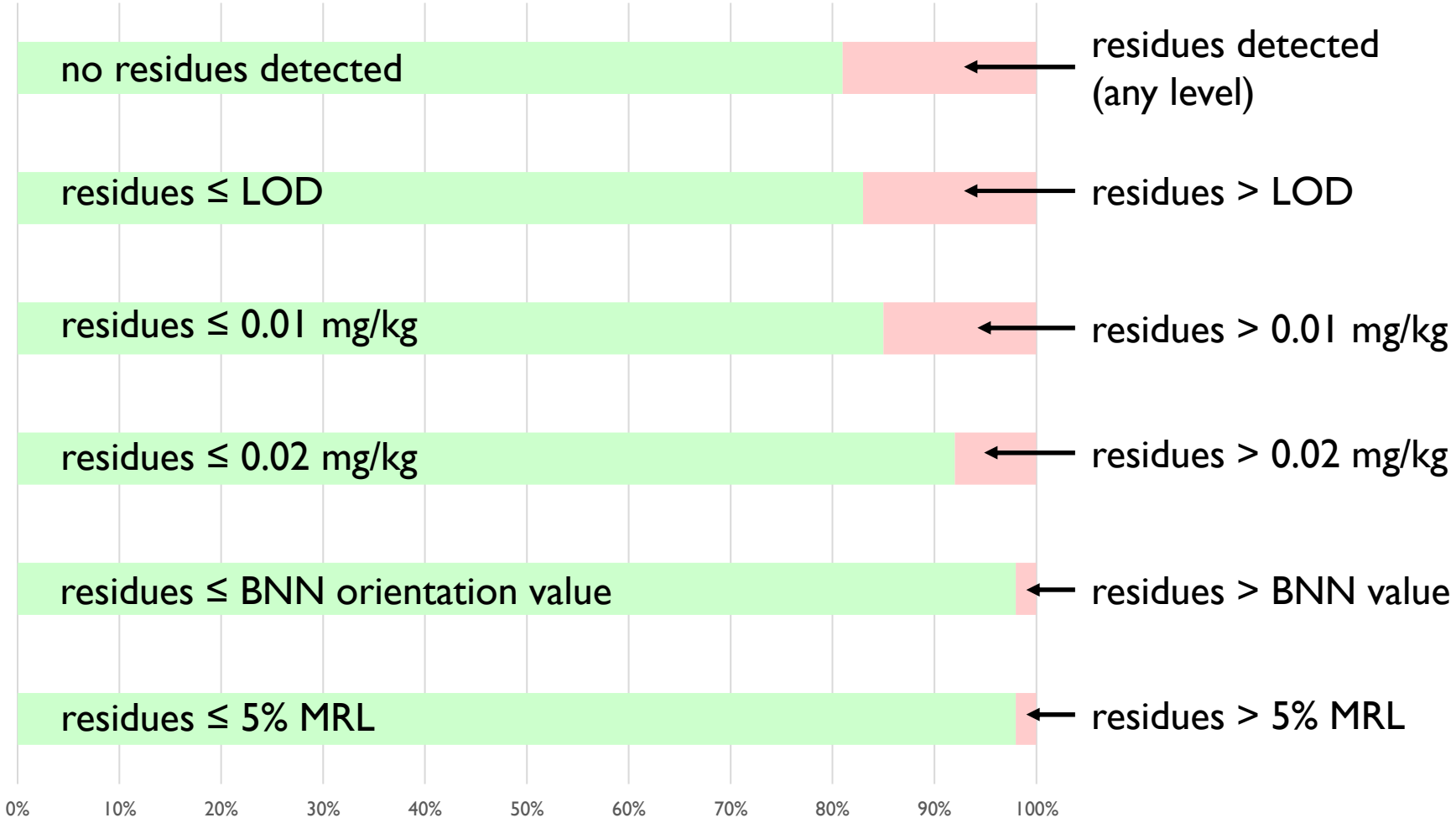
# Part 2 B: company questionnaire

- Questionnaire sent out in december 2019 to all OPTA members; informal distribution to some other companies
- Returned by mid-January 2020

- 13 companies participated
  - 9 processors
  - 8 traders
  - 1 distributor

- Over 10'000 analyses, mostly for the year 2019

# Part 2 B, selected result: residues at different levels



# Part 2 C: Requirements for a new concept

The new concept must be

- fair (no punishing of innocent operators)
- in line with organic principles
- realistically workable (labour efforts, know-how …)
- Harmonized across the EU
- clearly understandable for operators, CBs and authorities

Furthermore, it should be

- as fast as possible
- cost-efficient
- easy to communicate

# Part 2 C, summary of the proposed ingredients

**Core of the system:**

1. inclusion of residues in QA system & approval of QA system by CB/CA.
2. Procedure for handling residue cases

**Supporting tools**

3. Defining the limits of investigation
4. More effective investigation
5. Knowledge management
6. Specific trainings
7. Guidelines for handling standard residue cases
8. Backstopping by experts

# Ingredient no 1: inclusion of residues in QA system

A clear allocation of roles is needed.

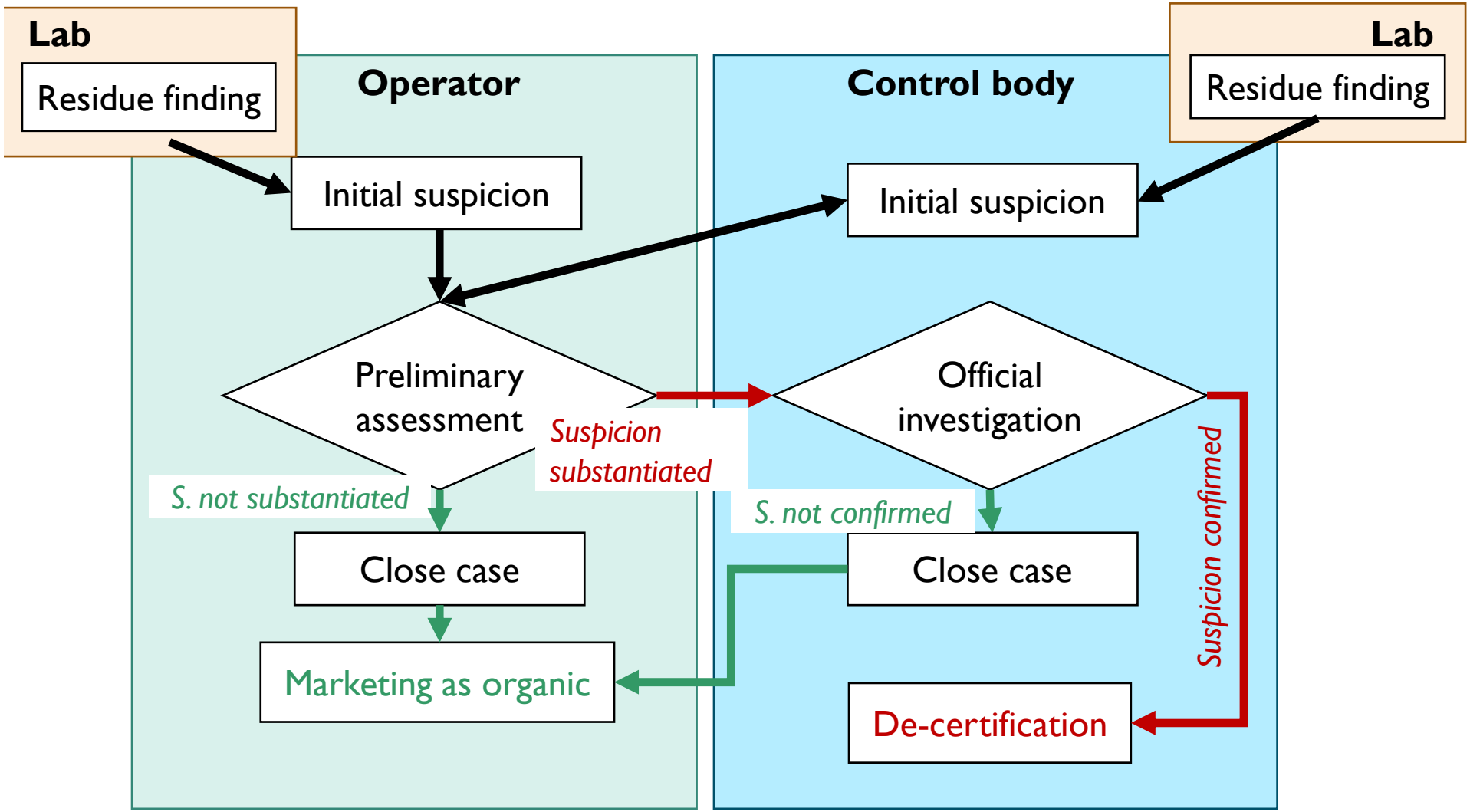
**Operator**

- Responsible for the product, including residue avoidance.
  - Includes residue handling in his QA system (e.g. GMP, HACCP, OCP).
  - Handles initial suspicions (preliminary assessement). Notifies substantiated suspicions to CB.
- Should have an important role in handling residue cases.

**Control body**

- Supervises operator.
  - Approves QA system, including residue handling.
  - May request precautionary measures.
  - Annual inspections: checks implementation of QA system and cases of non-substantiated suspicion.
- Residue cases: takes certification decision.

# Ingredient 2: Procedure for handling residue cases



# Ingredient no 3: defining the limits of investigation

## The problem

- When no cause for a residue can be found, the investigation could go on forever. The limits of investigation in this situation must be clear.

## Proposed solution

- There should be some EU-wide guidance on how deeply a residue case has to be investigated.
- The guidance could be situation-specific, probably depending on substance, residue level, commodity,
- Ideally, this guidance would be officially recognized by CBs, CAs and the EU Commission.

# Consultation with OPTA members and other stakeholders

Workshop with feedback session held just before BioFach. Main outcomes:

- Inclusion of residue handling into QA system welcomed by participants.
- Database with background information welcome.
- What is realistically workable ?
- For aspects of contamination (e.g. drift), the conventional sector should be included.
- We need a global approach.

# Thank you for your attention