

Short Report
**International Workshop on EU Organic Regulation and its Application in EU
and non-EU Countries**
MOAN 9th Network Meeting

Table of Contents

Table of Contents	1
1. Place, date, participants.....	1
2. Agenda.....	1
3. Methodology.....	2
4. Outcomes of the discussions	2
4.1 Import Regime.....	2
4.2 Residue Management	2
4.3 Group certification	3
4.4 Seed Database.....	3
5. Conclusions and Considerations	4

1. Place, date, participants

Place: Mediterranean Agronomic Institute of Chania – CIHEAM IAM

Date: 25 October 2017

Participants:

- Ministry representatives of 17 Mediterranean EU member states and non-EU Countries:
 - EU Member States: France, Greece, Italy, Malta, Portugal, Slovenia, Spain
 - Non-EU Countries: Algeria, Egypt, Lebanon, Macedonia, Montenegro, Morocco, Serbia, Palestine, Tunisia, Turkey
- IFOAM EU office
- IAMB office

2. Agenda

09:00 – 09:45 **Open discussion on import regime: Compliance & Equivalence**

09:45 – 11:45 **Boot camp Session 1 – Residue management**

11:15 – 11:45 Coffee break

11:45 – 13:30 **Boot camp Session 2 – Control System**

13:30 – 14:45 Lunch

14:45 – 16:45 **Boot camp Session 3 – Plant Production Rules**

3. Methodology

MOAN members were asked in advance which topic they preferred to discuss. The vast majority set as priority the organic control system. For this reason, two out of three sessions were organised on the control system and how to deal with residues in organic food.

The last session was focused on an exchange on how seed database are established in each country.

Additionally an open discussion was planned at the beginning of the day to update the MOAN members on the possible future EU organic import system.

A briefing was circulated one week in advance and MOAN members were asked to prepare and share with the others the following items:

- National implementation on how to deal with non-compliances and residue findings
- National rules on organic inspections (frequency, announcement, possible exemptions)
- National implementation of seed-database
- National interpretation of soil-bound production and greenhouse production

Presentations were prepared to introduce and facilitate discussions.

The Briefing and the Presentations are attached to this document.

4. Outcomes of the discussions

4.1 Import Regime

The differences between the current system and the future EU import regime that will enter into force in 2020 were presented.

In particular, the import system will change towards Trade Agreements with 'equivalent' countries and Control Bodies applying full 'compliance'.

The topic was very interesting for all the countries, specifically for the ones that are about to have a National Organic legislation and for the ones that already have an equivalency agreement with the EU.

The import regime will give much less flexibility compared to today and MOAN members highlighted the problems with the use on input that are not authorised by the EU general law. An African farmer will not be allowed to use his/her own preparations on his/her farm, because all the substances and products used need to be authorised at EU level.

The process of registration for each natural substance used e.g. as fertiliser or for plant protection requires money, resources, technical dossiers and time.

EU Countries recognised that the problem of registration of natural products is an issue also in the EU. E.g. garlic or citrus extracts cannot be used in plant protection.

MOAN members also suggested to deal with this issue at level of Codex Alimentarius.

Some non-EU countries stressed the importance of organising the National organic sector and to develop the local market instead of largely relying on export. To this aim, capacity building projects are needed.

4.2 Residue Management

The second session was focused on actions that follow the findings of residues of non-allowed substances in organic products. The procedure is not harmonised at EU level and even less outside the EU.

A small workshop was organised to collect National practices and to start thinking a way forward.

The approach of MOAN members is mainly not to put on the market organic products with residues of non-allowed substances, even if the organic farmer gets contaminated by the neighbours or by the environment.

For this reason, the general approach is that if there are residues, no matter the origin, the product cannot be sold as organic. Additionally, if the farmer is proved to be guilty, the fields will go back to conversion, while if the farmer is recognised innocent, there will not be sanctions.

Most of the MOAN members decertify products with any presence of residues, while other like Italy and Portugal, have a threshold above which the product is automatically decertified.

Only one country, France, applies a case-by-case approach.

The way forward has to consider the balance between protect the consumer from residues in organic products and protect the organic farmers that get contaminated.

That is the only way to get to a harmonised approach in the EU and outside the EU.

A very good example of co-existence was reported by the Slovenian MOAN member. In Slovenia is common practice that conventional farmers buy the products coming from the buffer zones of the neighbouring organic farmers. It is a voluntary practice that cannot be legally regulated.

4.3 Group certification

In 2020, group certification will be allowed in the EU. Currently it is only allowed in developing non-EU Countries.

In Tunisia 92% of organic products come from group certification and in Serbia more than 95%.

Therefore, the implementation of the new requirement is of crucial importance for all MOAN members, the EU ones that have to start implementing it from 2020 and the non-EU ones that have to adapt their current systems.

The problem may lay in the possible new definition for 'group of operators'. There are a couple of criteria that may be very difficult to implement:

- 1) The group has to be managed exclusively by farmers (today is the exporter or the processor that organise the groups)
- 2) the group has to have legal personality

These two criteria might represent an obstacle to the development of group certification.

Additionally, in the EU the requirement for which the non-compliance of one operator can lead to the withdraw of the certificate for the whole group might be an obstacle. This would pose problems to farms that receive payments from the Rural Development Plans in the context of the Common Agriculture Policy.

4.4 Seed Database

The last session was an exchange on the status of implementation of the seed database in the different countries.

Every MOAN member explained how the system works in their country and this showed:

- The different stage of development of the implementation, some countries like France, Spain or Italy have a very well developed and functioning system, other countries have no system at all.
- The huge lack of harmonisation

A positive signal is that where a database is not established, local and adapted varieties are preferred and the farmers are incentivised to re-use their plant reproductive material year after year.

For example, in Algeria only one of the possible 200 varieties of dates is considered adapted to and used for organic production. Farmers produce the plant reproductive material starting from their organic plantations.

In Egypt a big project is starting for increase the availability of untreated non-GMO seeds.

In Tunisia there is a list of self-produced organic plant reproductive material on the public website.

The exchange was inspiring and enriching for everyone and steps forward are crucial on this area to increase the availability of organic seed and propagating material in the Mediterranean countries.

5. Conclusions and Considerations

It was the second time that MOAN members met with IFOAM EU on technical issues. A first meeting already took place during the 5th MOAN meeting in 2010 and focused on the new EU import rules.

MOAN members showed a big interest because the technical implementation of the organic regulation affects their every-day work activities.

One of the weakness of the EU organic regulation is the different interpretation and different implementation of different requirements within the EU and outside the EU.

This leads to huge problems for the organic producers that sell their products outside their countries and for the Competent Authorities that have to supervise the control system.

Non-EU countries were very interested to know about the new organic regulation that will apply in the EU from 2020, as so far they had received very little information.

In particular, the new EU organic import system and the new definition for 'group certification' might largely affect non-EU organic producers.

The MOAN group has a huge potential for working on harmonisation of implementation of the organic rules within the Mediterranean area. The exchange of current practices is crucial to that aim.

Secondly, having a common voice and common positions, the influence on the EU Institutions and the impact of the future EU legislations and policies can be largely increased.

Also the influence to National policies on Non-EU countries can be increased.

IFOAM EU suggest to start preparing next MOAN meeting as earlier as possible in order to have more effective discussions, in particular:

- Selecting the topic(s) to be discussed – IFOAM EU can suggest a number of topics that might be of MOAN members' interest
- Asking MOAN members to prepare their contributions in advance and send them to MOAN secretariat – IFOAM EU can help in preparing a form to collect the right information.
- Processing of the information collected and preparation of a draft report to be used in the meeting discussion by MOAN secretariat – IFOAM EU can support on the activities and the organisation of the meeting.
- Thinking at solutions on how to promote the outcomes at higher political levels and in the ongoing political debates.