

Alliance for Organic Integrity

Comments for the new EU Organic Action Plan

27th November 2020

The Alliance for Organic Integrity welcomes the European Commission's intention to publish a new Organic Action Plan. With organic farming becoming increasingly recognised for its strategic importance in helping to combat climate change, improve environmental health, foster rural regeneration, and safeguard human health, it is right that there should be a coordinated approach to supporting its ongoing development.

Most areas addressed in the consultation are not within our primary area of expertise, so we will not comment on these specifically (hence the rather bland responses in the various multiple-choice questions). Rather, we strongly support the paper of IFOAM Organics Europe and its recommendations.

The Alliance for Organic Integrity was set up 'strengthen organic assurance globally' by helping to develop and share best practice, harmonise systems to protect organic integrity and work towards better tools for fraud prevention. As such, we'd like to comment further on question 4 in section 2x.

In addition to the excellent recommendations in the IFOAM Organics Europe paper, section headed 'Food fraud prevention', we'd like to elaborate further.

1. With regard to IFOAM-OE's third bullet, 'Minimum criteria for qualification and training on control actors should be established', we recognise these might be different for those in the Commission and competent authorities but we do urge it is crucial that competent authorities are both 'competent' and also operate consistently with each other. We also consider it essential that relevant personnel in control bodies and authorities and also accreditation bodies are adequately trained for the job they do. This can best be achieved by developing and instituting an appropriate qualification system, together with mandatory continuing professional development to instil best practice throughout the surveillance system.
2. Trade in organic products is international, with (in particular) Europe and the US receiving high levels of imports from all over the World. These are almost invariably from the same countries and often the same producers – in the Far East, Near East, Africa, South America and Australasia. When the respective (EU and US) regulations

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are different, either for production, or for control systems or import requirements, then that increases the potential for fraud, as idiosyncrasies, loopholes and lack of communication can be exploited by unscrupulous operators. We strongly urge that the Action Plan recognises the risks involved in such differences and includes commitments to review these with a view to identifying how a more harmonised approach to import requirements might be achieved between the main organic trading blocks. This should at the very least include the USA but preferably also other significant importing countries, and should as well involve those representing predominantly exporting countries in such discussions.

3. As the organic market has grown, driven in part by increasing demand, the risk of fraud grows with it. The bigger fraud events that have been detected tend to involve complex, opaque supply chains, involving multiple transactions in different countries, using several control bodies and destined for more than one market. Thorough surveillance, clear responsibilities, quick and open (within the control community) communications, and coordinated and decisive action are all important in exposing and dealing with such cases. They are not confined to just the EU and so the mechanisms to handle them need also to be commonly agreed and implemented. We propose the Action Plan should include an intention to set up an international fraud taskforce, involving participants across the control community and the supply chain to review best practice measures to identify and combat fraud in the organic market.

The Alliance for Organic Integrity is fully aligned with these recommendations and would be pleased to assist in developing these further.