



Department
for Environment
Food & Rural Affairs

Defra Guidance on the Testing of Organic Products in the UK

ORC Producer's Conference 22-23 January 2013

Presented by: James Winpenny
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Testing of Organic Products in the UK

- Why is guidance necessary?
 - There have been cases of substances not permitted in organic production being detected in organic products.
 - The EU Regulations do not set out the procedure for testing in any detail.
 - There is a need for a clear and harmonised approach to testing within the UK.



Testing of Organic Products in the UK

- Developing guidance
 - First time that such testing on guidance has been produced.
 - Is a complex area.
 - We therefore need to work with the sector to come up with guidance that works.
 - Draft guidance developed - went out to formal public consultation on 28 September 2012.



Testing of Organic Products in the UK

- Proposed guidance includes:
 - details of when testing can or must take place;
 - the procedure for taking samples of products;
 - the procedure for livestock testing;
 - guidance on the use of laboratories for analysing products selected for testing;
 - the procedure for investigating and taking forward a substantiated suspicion that a product contains a substance not allowed in organic production;
 - the action to be taken where an irregularity or an infringement is found

Testing of Organic Products in the UK

- Views were also sought on adopting “trigger levels” for the further investigation of prohibited substances found in organic products.
 - “Trigger level” is a mg/kg level at which an investigation into the presence of that substance should take place.
 - Views sought on four options for adopting “trigger levels”:
 - specific “trigger levels” for different organic products and prohibited substances;
 - “trigger levels” based on BNN values (0.010 mg/kg);
 - “trigger levels” that are a proportion of the Maximum Residue Level;
 - investigating all positive test results (i.e. no trigger level)

Testing of Organic Products in the UK

- Formal public consultation on the draft guidance launched on 28 September 2012 and closed on 21 December 2012.
- A total of 179 responses were received.
- 148 responses focused on proposal for the testing of products that have already been certified as organic by a different organic Control Body.
- 31 responses focused on other areas.



Testing of Organic Products in the UK

- Main points raised in responses:
 - welcome clarification of the procedure for testing in the UK
 - restrictions on testing previously certified organic products pose a threat to the integrity of the organic system
 - mixed views on adopting “trigger levels” for the further investigation of a product:
 - Some support for “trigger levels” as they allow operators to know the limits they are working to
 - Some opposition to “trigger levels” as they are not set out in the Regulations and they could affect trade
 - concern that the guidelines could lead to more testing and increased costs.



Testing of Organic Products in the UK

- Next steps:
 - careful analysis of consultation responses
 - formal Government response within 3 months of consultation closing date
 - we recognise the strength of feeling on the procedure for the testing of previously certified organic products
 - final decisions will only be taken after we have considered the points raised
 - happy to receive any further thoughts or comments during this session or afterwards