



International Federation of  
Organic Agriculture Movements –  
EU Regional Group

**President:** Christopher Stopes

**Director:** Marco Schlüter

**European Office**

Rue du Commerce 124  
1000 Brussels  
Belgium

Phone: +32-2-280 1223

Fax: +32-2-735 7381

Email: [info@ifoam-eu.org](mailto:info@ifoam-eu.org)

Registered in Sweden, Uppsala  
under organisation number  
817606-9436

## *Working for organic farming in Europe*

31<sup>st</sup> October 2012

EOCC - European Organic Certifiers Council

Mr Michel Reynaud

Av. de Tervuren 216

B-1150 Brussels

Belgium

### **IFOAM EU Group comments on EOCC Pesticide Residues Guidelines**

Dear Michel Reynaud,

Thank you for inviting IFOAM EU Group to the “EOCC Launch Event “Presentation and Discussion of the EOCC Pesticide Residues Guidelines” on 13th of September 2012.

We have recognised your activities in setting up a guideline for the handling of residue in organic products on the level of certifiers. We have listened carefully to your presentations and have studied the documents provided by the EOCC. We very much appreciate your target to contribute toward a harmonised residue approach.

As you know, IFOAM EU Group initiated the discussion on the presence of pesticides residues in organic products many years ago and published “Guideline for Pesticide Residue Contamination for International trade in Organic” in August 2011. We think a common approach to this topic for all organic operators and the control bodies is challenging.

We understood from your presentation at the Launch Event that you personally stressed the topic of “critical level” for inspiring a critical debate. However, the EOCC Discussion Paper clearly demonstrates that a number of CB’s are in favour of this solution. IFOAM EU Group would like to point out clearly, and as we have done several times in the past, that we see, in establishing a “critical level”, a contradiction to the process oriented quality approach of the organic food chain which is an essential core value of the organic concept. Defining a threshold for decertification means changing the quality concept from a process base to an end product base. This is not acceptable to us and not in line with the aims and principles of organic food and farming.

Further, it is important to clarify that the concept “any quantifiable residue leads to a substantiated suspicion” will destroy the organic market because this concept will heavily disturb food chains, will cause enormous bureaucratic burdens and

tremendous costs for investigation. Therefore, we described in our “Guidelines” an action level, which allows a borderline where suspicion starts but which provides on the other hand an area of freedom for operators and CB’s to act.

We think in general a more clear adoption to the requirements of article 91 (1) and (2) of Commission Regulation (EC) No 889/2008 and to article 30 of Council Regulation (EC) No 834/2007 is needed. We have understood that in you Guidance document an “action level” similar to our interpretation is proposed. In general, we are in line with this proposal but in details we see a need for further discussions.

We also consider that the uncertainty level of 50% for instance is an essential tolerance in relation to the variability of analytical results shown in actual ring tests. Testing methods do not always give the right answer about the reason for presence of some substances, as for example the natural content of Carbon Disulphide (CS<sub>2</sub>), which is not always the result of the use of non-permitted PPP. We must also take into consideration constant contamination of soil as the result of long time use of pesticides such as DDT, 2,4 D or MCPA (2-methyl-4-chlorophenoxyacetic acid). Contaminated soils and water cannot be understood as a source of “suspicion” of use of not permitted PPP by the producer and in case of “positive” test results every single case must be carefully analyzed by the operator and CB. Holding product in such cases would cause unnecessary loss and cost.

We propose setting up a common working group of EOCC and IFOAM EU Group with a brief to try to establish a harmonized approach and to resolve these problems and work towards closer agreement on the important issues raised by the differences in the two documents. There are also a small number of minor differences in our positions, which we believe, could with work of the above working group be reconciled to enable a stronger common position to be reached. These would include discussion on the roles and methods of sampling in the hope that we could bring together a broader common guidance on this subject.

We are open to discuss these topics further on with EOCC.

Yours faithfully



Christopher Stopes  
IFOAM EU Group President