



STATEMENT

» WHO IS FOOTING THE POLLUTION BILL? OPTA EUROPE REACTION TO EFSA REPORT ON FINDINGS OF NOT AUTHORISED SUBSTANCES IN FOOD AND FEED CERTIFIED AS ORGANIC

At the request of the European Commission, EFSA has issued a technical report on non-authorized substances present in organic products. OPTA Europe welcomes the recognition that pesticides are ubiquitous but is disappointed that EFSA recommendations are inconsistent with the established evidence. We also regret that the study is too narrow in scope and does not cover the unauthorized substances that operators most frequently have to deal with, mainly environmental contaminants.

SUMMARY

EFSA has issued a technical report on 21 active substances not authorised for use but detected more frequently in organic products. The highlights :

- Quantifiable residues were found in 3.95% of organic commodities, against 17.5% of conventional ones.
- They are distributed in a slightly uneven manner between imported organic products (58,7%) and EU-origin ones (41,3%).
- For each substance, several possible sources of residues were identified. Other the unauthorized application, the report acknowledges that the transfer from contaminated soil, water and air, from short and long distances, can also explain the presence of residues in organic products.

For all the substances investigated, EFSA confirms the possibility of presence in the organic product due to transfer from contaminated soil, water or air.

- Concentration ranges are helpful to differentiate active use from contamination.
- Food processing plays an important role in the concentration/dilution of residues.

- When residues are found in organic commodities, EFSA recommends in first place to investigate the possibility of unauthorized direct use. In addition, EFSA recommends to investigate the possible transfer of residues due to drift from conventional crops growing in the vicinity. For 9 substances, EFSA recommends additional analysis of the soil where the plants were grown or the water source used for irrigation.

OPTA EUROPE REACTION

» We welcome that scientific light has been shed on this longstanding technical issue

We welcome the scientific insight brought to bear on this longstanding challenge. EFSA report confirms what organic operators and researches have been claiming for years: an increasingly polluted environment corresponds to unavoidable transfer of pesticides into organic products.

» We regret that the scope of the study is too restricted and fails to cover environmental contaminants, which are the most frequently found unauthorized substances

We regret that the scope of the study is based on OFIS database, which is statistically not representative of the reality on the ground. Regular EFSA's reports on pesticides residues in food best reflect the non-authorized substances that organic operators most frequently encounter, mostly environmental contaminants such as bromide or chlorate.

» In our views, EFSA recommendations are not aligned with the established evidence

Having acknowledged the different pathways of non-authorized substances into organic products, it is not understandable that EFSA's recommendations put the focus on direct use, and only additionally on the possibility of transfer from pesticides used in the vicinity or from contaminated soil or water.

KEY RECOMMENDATIONS

We urge policymakers to use this wealth of technical knowledge to improve the lives of organic operators.

1 | Reduce the emphasis that EU legislation puts on the presence of unauthorized substances as indicator of non-compliance affecting the organic integrity

We call for a reassessment of the whole range of indicators of non-compliances and infringements affecting the organic integrity, to readjust the inappropriate weight attributed to the presence of non-authorized substances.



2 | Remove the burden of proof from the organic operator in case of residues of non-authorized substances

EFSA's recommendation to investigate into all possible causes is the common practice imposed by the EU organic regulations. These investigations are complex, lengthy and often do not lead to a single root cause. Products remain blocked until the end of the investigation, which delays the supply chain and increases the cost for the organic operator, irrespective of who is at fault. Given the many factors that can explain the presence of residues in organic products, it is disproportionate that the burden and cost of proof remain with the organic operator.

3 | Fine-tune control procedures to better integrate technically unavoidable contamination, for both imported and EU products

In a context where no progress has been recorded in the last years towards reducing pesticide use in conventional farming, control measures of organic products must better integrate the unavoidable contamination. EFSA's report offers valuable clues for this, such as the concentration ranges that differentiate active use from contamination.

4 | Foresee a differentiated treatment for processed products, with harmonized processing factors

Another evidence emerging from the report is the need to foresee a differentiated treatment for processed products, to take into account the concentration/dilution of residues due to food processing. We advocate an harmonized use of processing factors as established by EFSA for many pesticide/commodity/process-combinations.

The ongoing simplification exercise of agriculture policies is a timely opportunity to review the organic legislation in the light of the EFSA report. OPTA Europe remains committed to working alongside stakeholders and EU institutions to find a balanced way forward.

ABOUT OPTA EUROPE

OPTA Europe is the membership organization representing the interest of European organic processing and trade companies. OPTA Europe's members play an essential role in an efficient organic supply chain.