



Canolfan Organig Cymru
Organic Centre Wales

Response from Organic Centre Wales, IBERS, Aberystwyth University SY23 3EB to the Soil Association consultation on:

Trigger levels for the investigation of residues found in organic products

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Organic Centre Wales (OCW) was established in 2000 as a focal point for the dissemination of information on organic food and farming to producers and other interested parties in Wales. In 2003, it was agreed that it should extend its focus to public education, public procurement, policy and strategy development, thus providing support to the whole of the organic community in Wales. It is based at Aberystwyth University.

OCW is run by a partnership of three organizations actively involved in organic farming research and knowledge transfer in Wales: ADAS, The Organic Research Centre Elm Farm (ORC) and Institute of Biological, Environmental and Rural Sciences (IBERS) at Aberystwyth University.

The funding for OCW comes from the Welsh Assembly Government (WAG) to carry out the co-ordination functions, with additional funding through a separate WAG contract for delivery of the Organic Conversion Information Service. Additional support from the European Union EAFRD provides the Farming Connect Organic Development Programme and the Better Organic Business Links Supply Chain Efficiencies project for the organic sector.

General comments

- We believe that the trigger level needs to strike a balance. On the one hand it must maintain the integrity of the product and ensure that where instances of significant contamination or deliberate use of prohibited pesticides occur, they are detected and dealt with swiftly and robustly. On the other, where there is no case to answer it needs to avoid wasting resources on investigations, causing unnecessary stress to growers and food businesses and undermining public confidence in organic food.
- Because the MRLs vary with active ingredients (AI) and crop, the trigger should be based on a proportion of the MRL, rather than a single figure.

- It would be useful to have an indication of the scale of the problem, for example the frequency with which prohibited AI's are detected, at any level, on organic products.

Specific proposals levels

We support the approach put forward by Norton organics, but propose some changes to the specific triggers

- Level at < 10% - result to be advised and recorded, along with basic investigation of origin of the product etc. For pesticides with low MRLs (and there are many), a 10% residue may approach the lowest detectable level, and therefore a lower trigger will be not be enforceable in many cases.
- Level at < 15 % - rigorous investigation of supply, additional analysis required. Product quarantined until issue resolved. Something has gone wrong, and it needs to be investigated.
- Up to 40% MRL – actions above to be conducted and the product should be withdrawn from the organic market. This suggests a serious contamination incident, and raises the possibility of the deliberate use of a prohibited input. We think that allowing a product with this level of contamination onto the organic market would undermine confidence in organic food and the certification system.