



EUROPEAN COMMISSION  
HEALTH AND CONSUMER PROTECTION DIRECTORATE-GENERAL  
Directorate F - Food and Veterinary Office

DG(SANCO)/1052/2000 – MR Final

**REPORT**  
on a mission carried out in  
**ITALY**  
from 15 to 19 May 2000

**APPLICATION OF COUNCIL REGULATION (EEC) NO 2092/91 ON  
ORGANIC FARMING IN ITALY**

*Please note that certain comments from the Italian authorities have been included in the text of the report in bold, italic type.*



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## **1 MISSION DETAILS**

### **1.1 Participants**

Two inspectors from the Health and Consumer Protection Directorate-General, Food and Veterinary Office.

### **1.2 Meetings and visits**

Ministry for Agricultural and Forestry Policies, Rome  
(Ministero per le politiche agricole e forestali - MIPAF)

Regional administration of Emilia-Romagna region, Bologna

Regional administration of Tuscany region, Florence

Inspection bodies (2)

Organic production operators in Campania region

- Organic farm: fruit and vegetables
- Importer of arable products
- Importer and processor of nuts and dried fruits

An opening meeting was held on 15 May 2000 with officials of the Ministry of Agricultural and Forestry Policies.

## **2 SCOPE AND OBJECTIVES OF THE MISSION**

The scope of this technical on-the-spot inspection mission was the production rules and inspection system governing organic farming in Italy.

The objective of the mission was primarily to obtain a clear picture of the way in which Italy applies Article 11(6) of Council Regulation (EEC) No 2092/91. The mission included an exchange of views concerning the competent authority's supervision of compliance by inspection bodies in third countries with the requirements of the EN 45011 standard.

The second objective of the mission was to get an overview of the general application of Council Regulation (EEC) No 2092/91 in Italy.

## **3 LEGAL FRAMEWORK**

Council Regulation (EEC) No 2092/91<sup>1</sup> on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs, lays down rules on the production and labelling of organically grown products.

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<sup>1</sup> OJ No L 198, 22.7.1991, p. 1, as last amended by Commission Regulation (EC) No 1073/2000 (OJ No L.119, 20.5.2000, p. 27)

Article 11 of this Regulation provides for equivalency arrangements for products imported from third countries. These arrangements are managed either by the European Commission (Article 11(1) - 11(5)) or, as is currently the case for the majority of products imported into the Community, by the Member States (Article 11(6)). The Regulation states that, before organic products are imported into the European Community, it must have been adequately demonstrated that they were produced in accordance with production standards and inspection arrangements equivalent to those applied to organic production in the Community.

#### 4 BACKGROUND

This mission was the fifth in a programme of planned visits to all Member States, which is initially focusing on those with significant import activity under Article 11 (6).

#### 5 MAIN FINDINGS

##### 5.1 General information on organic farming in Italy

In December 1998, 43 124 operators had notified their activities, of which 41 270 had been inspected. Of these, 39 156 were farmers, 764 farmers/processors, 1 327 processors and 23 importers. On 1 March 2000, there were 50 registered importers.

The organically cultivated area was 723 917 ha (of which 436 973 ha were in conversion to organic farming), accounting for about 5 % of the total agricultural area.

The very strong growth in the number of operators since 1993, when the number of operators was 4 165, and the area 91 500 ha, is due, in part, to the increase in the area eligible for the incentives available under measure A02, pursuant to Regulation (EEC) No 2078/92<sup>2</sup>.

67 % of all operators in Italy are based in the southern regions, 13 % in the central and 19 % in the northern regions. Sicily and Sardinia have the highest proportion of organically cultivated area. Emilia-Romania, Tuscany , Marche, Lazio and Apulia also have relatively high proportions.

The most important categories of organic products produced in Italy are forage (46 %) and grains and cereals (23 %). Olives (10 %), fruit (7 %), vegetables (2 %), industrial crops (3 %) and vines (3 %) account for smaller proportions. The products are sold in specialised shops and in supermarkets. The availability in the northern regions is higher.

A large number of organically produced products were reported not to reach the market for organic products, but are sold as conventional products. According to regional authorities, in some regions only 20 % of the operators market their products as organic.

A large effort is made to bring together all statistical information. The national database on organic farming contains data on acreage, *operators, production trends, inspection bodies* inspections done, etc. ***When required, this database can be accessed by officials of the National and Regional administration.***

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<sup>2</sup> OJ No L 215, 30.07.1992, p. 85

## 5.2 Inspection system established by Italy

### 5.2.1 Implementation of Council Regulation (EEC) No 2092/91

Initially a regulation (Decreto ministeriale 338/92) set up a centralised notification system and a national approval system of private inspection bodies. A number of regions and an autonomous province appealed against this arrangement. The Constitutional court decided in 1993 that this legislation was not constitutional. A parliamentary bill (L. 146/94) passed in 1994 temporarily confirmed the approval of the inspection bodies and assigned the national government to solve the dispute. ***Constitutional Court ruling No 126 of 17 April 1996 subsequently granted the autonomous provinces of Trento and Bolzano the right to approve private inspection bodies***

In 1995, the ***original decree*** was replaced with a new ***decree*** (Decreto legislativo 220/95<sup>3</sup>) that defines the co-ordination role of the national ministry and the supervisory task (“vigilanza”) of the national ministry and the regional authorities. This law also defines the requirements for inspection bodies and sets up a national advisory committee for the evaluation and approval of inspection bodies. It prescribes the forms to be used by inspection bodies and by operators. It also defines procedures for certificates, imports, the qualifications of inspectors and the requirement for the inspection body to have a regional office in at least 4 regions. A working group of officials from national and regional authorities, ***which has been enlarged to include the social partners***, is currently revising this ***legislative decree***.

A number of regions established regional legislation on organic farming, with detailed provisions for the implementation of national law 220/95.

In addition to the production rules in Council Regulation (EEC) No 2092/91, some inspection bodies produce explanatory documents for operators. Some inspection bodies also have their own production standards that may be more explicit and more restrictive, e.g. on rotation or on the obligation to include nature areas in the farm. Some inspection bodies do not provide the text of the Regulation to the operators, but only their own guidelines, which are claimed to be identical.

The competent authorities are entitled to grant the following derogations as foreseen in Council Regulation (EEC) No 2092/91:

- (1) Extending or reducing the conversion period (Annex I.1): detailed rules exist;
- (2) Seeds and seedlings (Article 6.3): on the advice of a scientific institute (Ente Nazionale Sementi Elette) that keeps a database of the derogations granted. A vegetable grower indicated that only 10 to 15 % of the seeds were available from organic production.

### 5.2.2 Competent authorities

The federal government, through the Ministry of Agriculture and Forestry (Ministero per le politiche agricole e forestali - MIPAF) is the co-ordinating competent authority for the application of Council Regulation (EEC) No 2092/91. Within the MIPAF, the Office for

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<sup>3</sup> Gazzetta Ufficiale della Repubblica Italiana 1995, 5.6.1995

interprofessional agreements and organic farming (Ufficio associazionismo accordi interprofessionali ed agricoltura biologica) is in charge. This office comes under the Directorate General of Agricultural Policy and agro-industry (Direzione generale delle politiche agricole ed agroindustriali nazionali – DGPAAN). The staff concerned consists of 2.5 persons. For policy making, they are assisted by several scientific institutes. Working groups of officials from the regions and MIPAF have been set up to coordinate legislative and supervision issues.

As defined in law 220/95, MIPAF and the authorities in the 19 regions and the 2 autonomous provinces have the competence to supervise the activities of the approved inspection bodies. Each region appoints a competent authority.

### **5.2.3 Organisation of the inspection system**

Italy has set up a system of approved private inspection bodies. Currently there are 9 such approved bodies. Each body receives a federal government code. Also, the name and/or trademark (or 'logo' or 'label') of the inspection body may be shown on products.

Associazione Suole e Salute (ASS)  
 Associazione Italiana Agricoltura Biologica (AIB)  
 Istituto Mediterraneo di Certificazione (IMC)  
 Bio.Agri.Coop srl (BAC)  
 Consorzio per il Controllo dei Prodotti Biologici (CPB)  
 Codex srl (CDX)  
 Q.C.&I. International Services (QCI)  
 Associazione Ecocert Italia (ECO)  
 BIOS srl

Each operator, except the importers, has to notify his activity in organic production to an approved inspection body and to the regional authority where he is based. (From 1993 to 1995, the operators had to notify their activities to the national authorities.) The regions publish the regional list of organic operators in the regional official journal. They must also send the regional list of operators to MIPAF, which draws up a national list that is also public. The importers have to notify their activities in organic production to MIPAF.

The operators must send their annual production plan to the inspection body.

*An interregional programme has been arranged by the Ministry of Agricultural and Forestry Policy, with the approval of the State, Regions, Cities and Local Authorities Conference, to provide training for officials of regional and national supervisory authorities and full-scale computerised coverage of the organic farming system.*

### **Approval and supervision of inspection bodies**

MIPAF *authorises* the inspection bodies by ministerial decree, on the basis of advice from the national *authorisation* committee. This committee consists of 9 members : 3 officials of MIPAF, 3 officials of other national ministries (**Health, Industry, Trade and Foreign Trade**), and 3 representatives of the regions. Officials from a number of other regions also attend the meetings. The provision of advice is obligatory, but the advice is not binding. The committee studies the quality manuals of the bodies, their status and their resources. The results of the supervision activities of the regional authorities are not clearly or systematically fed into the activities of the committee, except that some representatives of the regions may give some information.

Since 1996, *pursuant to Legislative Decree No 220/95, responsibility for supervising the inspection bodies has lain with the Regions and Autonomous Provinces, within their area of jurisdiction, and with the Ministry.* Based on their findings, *the regional authorities* can ask the national ministry to withdraw the authorisation of an inspection body. This has never happened so far.

Supervision of these private inspection bodies, as foreseen in article 9 of this Regulation, began only in 1998, 1999 or 2000, depending on the region, and focused on the offices of the inspection bodies only. Supervision of the activities of the inspection bodies in the field is in the planning phase, or will start in 2000, targeting 3 to 5 % of the operators (farmers and processors, not importers), depending on the region.

Before 1998 verification of the effectiveness of the inspection bodies was carried out only by studying a number of documents. Before 1996 supervision was carried out by the national authorities, who restricted their activities mainly to the verification of the notifications sent in by the operators.

Current supervision includes verification of compliance with the requirements of the EN 45011 criteria. This verification involved until now only the study of the Quality Manuals of the inspection bodies. However, four inspection bodies are formally EN-45011-accredited by SINCERT, an Italian accreditation body; a number of other inspection bodies are also in the process of obtaining this accreditation. SINCERT checks the coherence between the inspection and certification activities and the quality manual. They carry out a surveillance visit at least once a year to the office of the inspection body and visit some 5 operators. The accreditation of one body was suspended for 3 months by SINCERT. Some bodies are also IFOAM-accredited<sup>4</sup>. This accreditation appears to focus more on the production rules of organic farming.

Some regional authorities mentioned that they are not entitled to visit the head office of inspection bodies located in other regions. Therefore they intend to invite the bodies with their documents to their own region. But other regional authorities do visit inspection bodies' offices in regions other than their own.

The nature of the supervision carried out by the regions varies widely per region. In general, the emphasis appeared to be on the completeness of the documentation required, without going too much into the subject or assessing the effectiveness of the inspection activities.

One regional authority gives a report to the inspection body on the spot; others do not give any feedback when there are no irregularities found. Other regions send various reports.

There is no supervision at all of the efforts made by inspection bodies to inspect importers.

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<sup>4</sup> IFOAM, the International Federation of Organic Agriculture Movements set up an accreditation programme for certification bodies on organic farming. The programme is managed by IOAS, International Organic Accreditation Services.

The supervision system is in a different state of development in each region. It is clear that, when all regional authorities have to supervise the inspection bodies with activities in their region, there is a problem of repetition and overlap, which is not adding to the effectiveness of the supervision. There is no systematic planning and coordination of supervision activities between the regions.

**In Emilia-Romagna**, the competent authority is the regional ministry of agriculture (Assessorato Agricoltura) (2 persons part-time). A regional law (Legge regionale 28/97)<sup>5</sup> set up a regional commission, that can make proposals concerning the inspection bodies. The law obliges the inspection bodies to send an annual report to the regional authorities, listing the sanctions applied, and the staff and equipment used. The regional authority can suspend or withdraw the approval of the body in the region, and propose the withdrawal of approval in the whole of Italy to MIPAF.

All 9 approved inspection bodies have activities in the region Emilia-Romagna, and 4 have their headquarters in the region. In 1998, there were 3 977 operators in the region.

A supervisory visit to the headquarters of an inspection body by regional ministry officials was reported in 1999. During 1 day, 3 persons verified the operational procedures in place, the accreditation documents and a number of files. A report was sent to the inspection body with a list of non-compliances on documentation.

Supervisory visits to operators were carried out in 1997 (84 visits), and in 1998 (151 visits), the main objective of these visits being the verification of the agricultural acreage of the operators, with a view to checking the area-subsidies paid to them in the framework of EC Regulation 2078/92 on agri-environmental measures.

In August 1999, the supervision was delegated by the regional directorate general of agriculture to inspectors of the National Water and Forest Service (Corpo forestale dello Stato). This service carries out, on the basis of a convention with the regional government, a large number of controls, among others the agri-environmental measures based on EC Regulation 2078/92, the anti-fire measures, etc. They plan to carry out 2 visits to the inspection bodies' offices in 2000. They also plan for 4 inspectors to visit 450 operators, inspecting their fields, their documents, and to verify that the activities of the inspection bodies comply with their quality manuals. Monitoring of the application of EC Regulation 2078/92 is carried out at the same time.

In addition to the above, samples of organic products are taken by health inspectors in the framework of the national monitoring program. No residues were found. The region has no authority to inspect commercial activities. Regional officials also cooperate occasionally with the anti-fraud police. They carried out a specific investigation into the objectivity guarantees of an inspection body, with a satisfactory result.

**In Tuscany**, the Regional authority in charge is the Department for Economical Development (Dipartimento per lo Sviluppo Economico) (2 persons part-time). A regional law (Legge Regionale n° 49/97 of 16 July 1997)<sup>6</sup> defines the supervision

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<sup>5</sup> Bolletino ufficiale della Regione Emilia-Romagna, 7.8.1997

<sup>6</sup> Bolletino Ufficiale della Regione Toscana, 26.7.1997

activities, the regional list of operators and the financial support to operators for the inspection costs.

8 approved inspection bodies operate in the Tuscany region. On 31 December 1999, there were 1 287 operators.

Supervision started in 1998 and is carried out by the regional agency ARSIA (Agenzia Regionale per lo Sviluppo e l'Innovazione nel settore Agricolo-forestale). Five inspectors received training on the verification of quality systems. Two have a background in organic farming. ARSIA checks the compliance between the inspection activities and the quality manual of the inspection bodies. Reports on the inspection visits are written, including corrective actions. Follow-up is done during the following year's visit. ARSIA set up a quality manual to perform these activities. ARSIA reports to the regional authority, which can propose the withdrawal of the approval of an inspection body to MIPAF. The reports of 1998 were incomplete. Most of the ARSIA-inspectors in place at this time have been replaced. The 1999 reports were more complete. A number of corrective actions were noted.

In 1999, ARSIA carried out 20 supervision visits to operators. Seven samples for residue analyses were taken, no residues have been detected so far. In 2000, 13 supervision visits to operators were carried out up to 15 May 2000.

### ***Labelling***

The wording “Prodotto da agricoltura biologica” is mostly used as the reference for organic products. The code of the inspection body and its full name have to appear on the label, along with the code of the operator and the authorisation code for the printing of the labels for the certified amount of products. The sentence “Agricoltura biologica, Regime di controllo CEE”, including a reference to the decision and the date of the approval of the inspection body also have to be mentioned. The trademark of the inspection body is usually also on the label.

#### ***5.2.4 Approved inspection bodies***

Some private inspection bodies originate from operators' associations, which were split into two separate bodies a few years ago. Other private inspection bodies were set up as independent bodies or companies from the beginning. Most bodies have activities in most or all regions, with a concentration of their activities in a number of regions. Some also have inspection activities in third countries. Some inspection bodies do not have a contract with the operators, but a sort of membership agreement. There is one umbrella organisation of inspection bodies.

In 1998 the approved inspection bodies carried out a total of 46 042 inspection visits, of which 42 035 were announced and 4 026 unannounced. These numbers vary widely by inspection body, from less than 1 visit per operator up to 1.3 visits per operator, and from no unannounced visits at all up to 20 %.

In 1998, 3 175 samples were taken of which 2 476 were analysed, mainly for pesticide residues. MIPAF sent guidelines for sampling methods for residue analysis to the inspection bodies. The number of samples taken by the inspection bodies varies widely by inspection body, from less than 1 % of the number of operators inspected, up to 11 %. The inspection bodies visited appear to have an adequate sampling and analyses policy.

The range of pesticide residues analysed was extensive. Some operators visited did not receive the result of the analyses done on their products.

The inspection bodies visited had no established inspection measures for GMOs yet, but were about to require declarations from the suppliers and were going to send in the first samples for Polymerase Chain Reaction (PCR) analyses in the near future.

The operator files appear to be of a reasonable to good quality, although some files were not in good order and some certificates contained mistakes.

Inspection body (1) visited by the mission team is a co-operative of operators, a large number of them being co-operatives themselves. It is mainly involved in inspection activities in organic production in Italy, with four regional offices, and in a few third countries. It is also involved in inspection of products of protected geographical origin and integrated pest management. It works with 13 employees in the central office and 46 both full-time and self-employed part-time inspectors (professional contractors' contract). The inspectors follow established procedures laid down in an extensive quality manual and use standard checklists for their operations. Each inspector visits 65 operators per year on average. The operators are inspected 1.3 times a year on average. The majority of inspection visits are announced a maximum of 3 days beforehand and no unannounced visits were carried out. From 2000 onwards, some unannounced visits to processors and importers will be carried out.

As guarantees of its objectivity, the inspection body explained the separation between its inspection and certification activities and the management of the body, and the monitoring of inspectors' potential conflicts of interest. The body is SINCERT-accredited to EN 45011 standards.

An extensive annual program of sampling for residue analyses is carried out, following established procedures for sampling and interpretation of the results (10 ppb is defined as a general limit for any pesticide not authorised in organic production). A number of pesticide residues are detected every year. Infractions detected are communicated to the regional authority in the region of the operator concerned.

Inspection body (2) visited by the mission team is an association of technicians, recently turned into a company. It is only involved in inspection activities in organic production in Italy (14 regional offices) and one third country. Until 1994 the association was also providing technical assistance to operators. It works with 26 employees in the central office and 110 both full-time and self-employed part-time inspectors (professional contractors' contract). They follow established procedures laid down in an extensive quality manual and use standard checklists for their operations. Each inspector visits 150 operators per year on average. Apart from one announced inspection visit to each operator, 15 % of the operators, including all processors, receive a second, unannounced visit.

As guarantees of its objectivity, the inspection body explained the representation of different interests in its board of directors, and the separation between its inspection and certification activities and the management of the body, and the monitoring of the inspectors' potential conflicts of interest. The body is in the process of obtaining formal accreditation to EN 45011 standard from SINCERT.

An extensive annual program of sampling for residue analyses, including herbicides, is carried out.

### 5.2.5 *Enforcement measures*

The inspection bodies may impose the following sanctions on the operators: a warning, withdrawal of indications of organic production, suspension and withdrawal of the right to use the organic labelling. An extensive guidance document issued by the competent authorities describes which sanctions should be applied for several types of irregularities and infringements. The inspection bodies have to keep a register of sanctions applied and have to notify the sanctions to the regional and national competent authorities. In 1998, the inspection bodies imposed 621 sanctions or penalties on the operators, *some of which involved financial penalties*. A wide variation between the inspection bodies is noted : from penalties on 0.02 % of the operators, up to 4 %.

Some inspection bodies reported a lack of enforcement competence. Once the certificate and/or authorisation for printing the labels is given to the operator, they do not have the power to withdraw products of the certified operator from the market. The inspection bodies *must* than hand the case over to the anti-fraud *or judicial* authorities.

The anti-fraud police is available for enforcement, but they have only intervened in a very limited number of cases so far, which have not been concluded yet. The regions have no competence in food legislation enforcement. If an infraction is discovered, it is communicated to the regional office of the anti-fraud police. Under the general legislation, cases of label infringements can be brought before the penal court, but no such cases were reported.

As to the inspection bodies, the only possible sanction is the withdrawal of their approval by MIPAF, which is the most severe sanction, and some regional authorities had commented that this sanction was not very likely to be applied.

### 5.2.6 *General measures to prevent fraud on the market*

Food control inspectors from the Ministry of Health (Local health boards) and the Central anti-fraud inspectorate (Ispettorato Centrale Repressione Frodi), belonging to MIPAF, do not look systematically into organic products, but in a number of cases they have intervened at the request of MIPAF. Specialised divisions of the state police (National Police Anti-Adulteration Unit – Nucleo antisofisticazione del Comando dei carabinieri) can also intervene, which has happened mainly in relation to subsidies and denominations of origin and protected geographical indications, but also regarding an importation of organic products. A few cases of infringements on labelling or other irregularities have been handed over to the penal court.

## 6 THE APPLICATION OF ARTICLE 11(6) IN ITALY

### 6.1 The decision-making process to grant import authorisations

The importer sends a request for import authorisation to MIPAF, which is the competent authority. One MIPAF official only deals with these requests. A draft questionnaire has been developed and a copy of the last inspection report of the exporter has to be handed over. The competent authority's assessment of equivalency is based mainly on the declaration of the inspection body inspecting the operator in the third country that equivalent production rules and inspection measures are applied. The inspection body must also be formally accredited to EN 45011/ISO 65, *although inspection bodies may also be accepted on the basis of certain Member States' own approval procedures (e.g.*

*Germany*). Special attention is paid to the starting date of organic production (a minimum conversion period of 12 months is required), to the production of the farms concerned in relation to their acreage, and to the number of members of co-operatives visited by the inspection body (a minimum of 10 to 15 % is required). The official also judges the production techniques mentioned in the inspection report. The volume of the products intended to be imported is indicated with each authorisation. The main imported products are coffee, sugar cane, wheat and sesame seeds.

The whole process of granting an authorisation takes 3 weeks if all information is available, but usually takes a lot longer, up to 6 months. The official in charge indicated that he did not have enough time to do the work. Authorisations are granted for one year. For the purpose of renewal, only a copy of the last inspection report is required.

From 1994 to March 2000, Italy granted 59 import authorisations on a total of 118 requests. They concern 14 inspection bodies and 23 third countries. Three inspection bodies cover 49 % of the authorised imports. One authorisation has been suspended.

Each application for import authorisation is treated in the same way. If the importer has already been authorised in another Member State, he must still submit all the required documentation to the competent authority, which will carry out its own assessment, though the authorisation granted by the other Member State will be taken into account as a control.

## **6.2 Control procedures in place for importers**

The inspection bodies make a documentary check at the importer's premises. They check the import certificate, but the original is not available, since MIPAF requested it to be sent to them, which is not in conformity with article 11 (3) (a), which states that the importer should keep the import certificate and produce it upon request to the inspection body. One inspection body did not check the bill of lading. The in/out balance is checked, but the correct link to the sales documents is not verified. No unannounced visits to importers or sampling were reported.

An importer visited warned the inspection body of upcoming imports by means of a monthly schedule.

## **6.3 Exchange of views as to the application of Article 11(6) in Italy**

The competent authority raised the following points regarding evaluation of the current system for granting import authorisations:

- The system is difficult to manage and requires more human resources than available.
- It is relatively difficult to get an import authorisation in Italy, and because of that Italian importers send requests for import authorisation to other Member States.
- There are discrepancies in the decisions made by the different Member States.
- An extension of the list of equivalent countries as defined in Article 11.1 is desirable, since the Commission has more means to carry out on-the-spot inspections. It was hoped that the procedure under Article 11(6) would expire in 2002, as originally foreseen.

- The requirements of EN 45011/ISO 65 are seen as an essential element in the assessment of the inspection bodies. On the other hand there is a danger that these requirements are considered as the only criteria, *which is not acceptable unless the production and inspection rules are also verified.*

Operators dealing with imports find the procedures complicated and slow, and point out a lack of written guidance. They indicate that products for which Italy refused import authorisation, are on the market in other Member states.

## 7 CLOSING MEETING

A closing meeting was held on 15 May 2000 with the officials of the Ministry of Agricultural Policy and Forestry. At this meeting, the main findings and preliminary conclusion were presented by the inspection team.

## 8 CONCLUSIONS

- (1) Italy has established an inspection system for organic farming involving one national, **19** regional competent authorities *and two autonomous provinces*. There are nine approved private inspection bodies.
- (2) Supervision of these private inspection bodies, as foreseen in article 9 of the Regulation, began only in 1998, 1999 or 2000, depending on the region. The supervision system is still in the development phase.
- (3) The supervision systems in the regions appear to vary a lot, are not complete and not co-ordinated systematically between the regions. The approach to supervision activities is predominantly administrative. There is no specific supervision carried out by any authority on the inspection activities of the inspection bodies on importers of organic products.
- (4) Administrative work involved in inspection and supervision of the inspection system is a big burden, and some supervision work appears to be duplicated. All parties met called for simplification.
- (5) The attitude of inspection bodies to residue analyses, unannounced visits and sanctions varies very widely. Some inspection bodies take only a very limited number of samples for the residue analyses foreseen in Annex III of Regulation (EEC) No 2092/91.
- (6) As to imports, a number of criteria are used for the assessment of requests for imports. One person carries out the assessment. The procedure was not well-defined and slow, and apparently not ready to cope with a larger number of imports. Importers tend to avoid importing via Italy.
- (7) The originals of the import certificates are not present at the importer's premises.
- (8) The possibilities for enforcement are present, but in practice only occasionally applied.

## **9 RECOMMENDATIONS**

### **9.1 Recommendations to Italy**

- (1) The Italian authorities should make sure that the supervision of inspection bodies is put in place completely and effectively.
- (2) The Italian authorities should take appropriate measures to address the inadequacies of the inspection system listed in chapter 8, points (3) to (8).
- (3) The Italian authorities should inform the Commission of the steps taken to implement the above recommendations within 6 months of receiving the final report, together with a timetable for their implementation.

### **9.2 Recommendation to the Commission**

- (1) To consider extending the list of equivalent countries under Article 11(1) of Council Regulation (EEC) No 2092/91.

## **10 ADDENDUM : ITALIAN COMPETENT AUTHORITY RESPONSE TO THE RECOMMENDATIONS IN THE REPORT**

On 26 September 2000 the Italian Competent Authorities forwarded comments to the draft report DG(SANCO)/1052/2000 MR Draft. While acknowledging that, on the whole, the report reflects the situation of organic farming in Italy, the Italian authorities made a number of detailed comments. Certain comments have been included in the text of the report.

The full text of the Italian Competent Authority response is published on the Commissions website with this report.