

**Competent Authority comments on draft report (SANCO)2013-6744 of FVO audit in the UK from 13 to 23 May 2013 in order to evaluate the control system for organic production and labelling of organic products.**

CA comments received on 6 September 2013.

**OBSERVATIONS ON THE REPORT.**

1. The opening sentence in the final paragraph on page 6 should be changed.

Current – *Two CBs approved in another MS carry out certification activities of a number of operators in the UK*”

Change to – *Two CBs approved in another MS carry out certification activities of a small number of operators in the UK*”

The two bodies certify the operations of just 20 organic operators.

2. We want to correct the supposition in the 1<sup>st</sup> paragraph of the section titled “Conclusions” (page 8) that UK CBs are not being certified on the basis of them demonstrating full adherence to the EU organic regulations. The same assumption concerning CBs is repeated in the section titled “overall Conclusion” (page 20).

All UK CBs are certified on the basis of compliance with current EU legislative requirements.

3. The CB with responsibility for certifying the operator referred to in the 3<sup>rd</sup> bullet point on page 11 has pointed out that the animal welfare comment is not a strictly correct description of its practice. The bullet point reads:

*'During the visit to the laying hen farm, the CB staff indicated that they do not include animal welfare requirements contained in other legislation and only check those requirements detailed in Regulation (EC) No 889/2008. Perching area is one such specific requirement in Regulation (EC) No 889/2008 and there were perches integrated into the floor of the slatted area, which were c. 5cm high.'*

CB2 contend that its Inspectors do check animal welfare whilst on the farm. However, this will not be detailed in CB2's inspection report where the operator is in a farm assurance scheme, as one of the conditions scheme participants would need to show is compliance of, and a continuation to fulfil, animal welfare requirements.

4. The 2 CBs seen by the FVO Team strongly questioned a sentence in the 1<sup>st</sup> paragraph under the section titled “Findings” on page 17. The sentence reads: “A CB representative explained that “a major non compliance” affects the organic status but not necessarily the integrity of the product.” Both CBs reported that a major non-compliance would affect the organic integrity of the product and thus the organic status.

5. For clarity, the findings reported on page 12 should be changed:

*Current - Organic food is included as part of the UK's monitoring programme for pesticides in and on food, as required by Regulation (EU) No 788/2012. According to Defra if there is a lack of organic samples selected in this programme then targeted samples are taken to address this so that for each food required to be monitored, at least one sample originating from organic farming is included.*

*Change to – Organic food is included as part of the UK's monitoring programme for pesticide residues in food, as required by Regulation (EU) No 788/2012. HSE CRD, the Competent Authority for pesticides, ensures that where possible at least one sample of each food being surveyed is labelled as organic.”*

6. The information under “Findings” (page 20) is incorrect.

Delegation for the management of the seed database is not delegated to one of the UK CBs. The database is managed by Soil Association Ltd. Soil Association is a registered Charity.

Soil Association Certification Ltd, a CB, is a subsidiary of the charity. Soil Association Certification Ltd does not manage the UK seed database.