BÖLW
Bund Ökologische Lebensmittelwirtschaft

Input to the consultation Fit4Future

Suggestions for simplifying and reducing burden for the organic sector arising from Regulation (EU) 2018/848 and other legislation

BÖLW is the umbrella organisation of German producers, processors and traders of organic food and represents the interests of the organic farming and food industry in Germany. Over 57,000 organic farms generate an annual turnover of 16 billion euros with organic food and drink. So we are the representative for the organic sector in Germany.

The following suggestions for simplifying and reducing burden for the organic sector were gathered through consultation and exchange with experts in DE and in the EU. The proposals for reducing bureaucratic burdens focus on the entire chain from production to trade. They include proposals for the further development of the Organic Regulation itself, for the coherence of the Organic Regulation with other legal requirements and for implementation in the Member States, which can also result in considerable burdens. This is an amended version that includes some more and some amended proposals.

1. Ensure overview of the legislative framework and relevant interpretations – simplify the understanding of Organic Regulation

Description: Since the new Organic Regulation (EU) 2018/848 – the basic act - has been adopted, it has been supplemented by at least 18 delegated Regulations and 7 implementing Regulations, with more on the way. Sometimes it lasts more than six months until a consolidated version of the modified legal acts is available EUR-LEX. This endangers transparency. The legal labyrinth represents a significant barrier for operators, in particular smaller ones, who have less resources for screening the regulatory environment and its further development. This also contradicts the objective of simplification which was one of the main goals for drafting a new Organic Regulation.

The complexity of the regulatory framework is a risk for organic integrity because often operators are not able to oversee and understand the requirements for their context. Huge efforts are dedicated by organic actors to understand the regulatory text in its complexity.

There is a need to simplify the reading of the organic regulation with a consolidated text that includes all the secondary regulations (delegated acts and implementing acts) that directly complement Regulation (EU) 2018/848. A better solution would be to really simplify the Organic Regulation and to reduce its complexity.

Furthermore, at the request of operators or national authorities, the European Commission, in cooperation with Member States, issues interpretative letters answering questions on the appli-

cation of the provisions of Regulation 2018/848 and its secondary legislation. Some of these interpretations are contained in the ‘Frequently asked questions on organic rules’ document which is regularly updated and publicly available on the Commission's website. This helps stakeholders in the organic sector to better understand and correctly apply the provisions of Regulation (EU) 2018/848. Some EU Member States also make some of these interpretations available to their national stakeholders, others do not.

As a result, the interpretations of the European Commission and the member states, despite their added value for all stakeholders in the organic production and certification chain, are only available in a patchy and uneven manner. In order to further promote harmonisation of the provisions of Regulation (EU) 2018/848 between the member states and to support stakeholders in the organic sector in correctly implementing the organic rules, it would be very helpful to provide public access to all of the Commission's interpretative letters via its website.

Expected benefits: Better overview on existing regulations for all stakeholders which is the basis for compliance with the requirements for organic production. Reduction of non-compliances due to lack of knowledge. The availability of all interpretations promotes harmonisation of the provisions of Regulation (EU) 2018/848 between the member states and supports stakeholders in the organic sector in correctly implementing the organic rules.

2. **Carry out impact assessment for the secondary legislation regarding additional costs and burden for the organic sector and retain from adopting more burdensome secondary legislation**

Description: The comprehensive legislative basic act Regulation 2018/848 gives mandate to the Commission to introduce multiple implementing and delegated acts, today accounting for 25. While the basic act was submitted to an impact assessment - even if incomplete - that considers the negative impacts on small business, this is not the case for secondary legislation. Consequently, the initial assessment has been diluted and is partially no more relevant, as the proportion of implementing and delegated acts has expanded.

Considering the already considerable number of secondary acts impacting organic operators, we suggest that no further implementing or delegated act that may entail significant cost or burden for businesses be adopted without thoroughly assessing the additional and cumulative impacts on costs and administrative burden for organic operations and especially SMEs. Furthermore, the existing legislative acts should be evaluated systematically regarding their impact on additional costs and administrative burden for the organic sector in order to reduce costs and burden for the sector. For this, a thorough exchange with stakeholders would help to assess the impacts that should be considered during the legislative process.

Expected benefits: Avoid or reduce additional costs and burden already in the drafting phase of legislative acts, in line with the objectives of REFIT.

3. Grant appropriate transitional periods of at least 12 months for organic operators to adapt to new requirements

Description: The considerable number of legal acts issued in a short period of time has led to bottlenecks and too short transitional periods for adaption to the new requirements, preventing companies from anticipating changes, making informed decisions and organizing the necessary adjustments. This shortcoming has also been highlighted by Member States in the letter 'prospects of organic farming' addressed to the Commission.

As an example, on 1st January 2025 a new import regime for organic products will apply (see suggestion 7). While it is common commercial practice to conclude several months in advance the contracts with suppliers of raw materials in third countries, the list of control entities recognized for certifying such suppliers under the new import regime will be only published in the second half of 2024. This does not take into consideration the real market situation and its dynamics and creates legal uncertainty for operators and control bodies.

We therefore suggest a reasonable transitional period of at least 12 months for all new requirements affecting organic businesses. For new requirements concerning technical facilities such as animal housing (e.g. new interpretation of "production unit"), buildings, technical facilities or production processes, even longer transitional periods are necessary.

Expected benefits: Time for adaptation to new requirements. More legal certainty for operators all over the production chain, thus encouraging organic production.

4. Address the non-uniform and inappropriate interpretation of procedures in the case of residue findings

Description: Importers and operators within or outside the EU face serious problems and considerable burdens with different interpretation of the procedures in cases of residue findings in organic products. Residue findings can result either from the prohibited use of unauthorised substances, from comminglingor from accidental or technically unavoidable contamination. Often these substances are found in organic products because they are carried over from neighbouring non-organic fields or due to other factors related to the coexistence of organic and conventional food production.

The migration of plant protection products used in conventional agriculture into the organic food chain is well documented by EFSA. Despite this evidence, organic producers who do not use pesticides and other chemicals in the production of food are not only obliged to take measures to prevent contamination with chemicals used in conventional agriculture, but they also bear the burden of proof if such substances are found in an organic product. This leads to numerous and

expensive laboratory analyses and lengthy investigations, during which the entire organic production is put on hold - or in case of fresh products wasted. This procedure not only represents a reversa of the “polluter pays”principle, but also leads to enormous bureaucratic hurdles and associated costs.

The Organic Regulation (EU) 2018/848 regulates the handling of unauthorised substances in Articles 27-29, which explain the obligations and measures for organic operators, competent authorities and control bodies. However, the interpretation and implementation of these articles is still the subject of intensive discussions and divergent approaches by Member States, companies and control bodies.

In some Member States, organic products with a residue finding — that becomes apparent right before entry into the EU for organic imports or during controls of products produced within the EU — are decertified by the customs of the country of entry or the control authorities or control bodies in the EU without any investigation being made and without even checking whether the residue finding is a substantiated information and gives raise to a suspicion of non-compliance. In certain Member States, these are not isolated cases but rather the official policy.

This approach causes the downgrade of organic goods without an investigation and with the risk that nothing was wrong with the products in the end. Such an unjustified and unproportionate denial of trade of organic products results in massive financial and credibility losses for the companies. The legally established control and certification processes throughout the entire production chain that assures that the products comply with the Organic Regulation is not taken into account.

Further burdens for the organic stakeholders arise when investigations on residue cases completed by the inspection body are questioned by the authorities of a Member State and a new investigation procedure is started. Not only is the control system for organic certification called into question, but all parties involved (operators, authorities, control body, EU) are forced to deal with the same issue once again. This not only results in an enormous expenditure of time and money, but also in unequal treatment of the same goods within the EU. This increases the risk of organic products spoiling or having to be marketed conventionally.

Operators are the first who want a robust and demanding control system to create a climate of confidence between operators and consumers, but this control system must be efficient, provide real added value in terms of detecting and eliminating all kinds of non-compliances and preventing fraud. It should be avoided that for every presence of unauthorized substances, despite not being a substantiated suspicion a heavy procedure is launched that consumes huge resources from organic operators, control bodies, control authorities and competent authorities. The key point here is that the investigation should be appropriate to the situation (level of presence, risks in supply chain & operator etc.). To focus on cases of substantiated suspicion corresponds both to the legal requirements in the organic regulation and to the risk-based approach of controls.

While clearly a Member States implementation issue, it still harms the whole EU organic market. The Commission may contribute to rectifying the situation by providing clear regulatory provisions, more guidance as well as technical support where needed. As indicated by other suggestions, there is an urgent need for more uniform and implementable interpretation of the procedures, in this specific case for handling residue findings in import.

Expected benefits: By addressing interpretation issues in some Member States procedures that result in unjustified denials of trade, the Commission can help establish fair, proportionate, and harmonised procedures for handling residue findings in EU and import procedures, thereby safeguarding the integrity of the organic market and promoting economic stability within the EU.

5. Withhold Certificates of Inspection only in substantiated cases of non-compliance

Description: The organic regulations set very detailed rules on procedures to be followed by control bodies and control authorities when carrying out controls and issuing certificate of inspections (COIs), as well as how to proceed when substantiated suspicion of non-compliance arises regarding import consignments of organic products intended to be put on the EU market. These specific provisions are laid down, in addition to the rules set by Regulation (EU) 2018/848, in various delegated and implementing acts.

When a contamination is found in one batch (very often linked to the checks required by the Commission in specific country-product combinations regarded and listed as high-risk products in accordance with Article 8 of Regulation (EU) 2021/1698), the investigation starts, but no COI is issued for the operator until the investigation is closed. Therefore, not only the product under investigation is blocked but also all the other products of that operator are blocked until the investigation on one batch, shipment, or COI is finalised. Although applied as common practice by some of the third-country control bodies, it does not come from the relevant provisions of the abovementioned regulations where only blocking of the batch concerned is required.

Control bodies operating in third countries report that the EU Commission requires them to withhold inspection certificates. As the EU Commission is the competent authority for authorising and supervising the third country control bodies, and as the Commission questions the authorisation of the control bodies concerned in the event of repeated cases of contaminations, many control bodies in third countries are forced to withhold the certificate of inspection if the presence of non-authorised substances occurs. However, the presence of unauthorised substances in a product is not automatically a suspicion of non-compliance.

The import of organic products relies on the COI. COI is qualifying a batch of goods for being imported as organic in the EU. Not signing a COI in cases where a suspicion arises about the presence of an unauthorised substance is a denial of the import of the respective product into

the EU. In practice, this means the product is decertified and no longer available for the EU organic market. Not signing a COI is the right option in cases of substantiated suspicion of a non-compliance or an established non-compliance. In other cases, this is an unjustified denial of trade, which is a huge loss in financial and credibility terms for the companies along the supply chain.

The impact is that organic products from third countries are blocked for a long period of time, causing severe disruption in trade and, sometimes, reducing the products' quality. The legally secured and previously executed control and certification processes throughout the entire production chain are ignored and devalued. As a result, companies are turning to "easier" new markets like the United States, taking routine pre-shipment samples, and investing in costly own investigations before trade to avoid disruptions as much as possible.

Therefore, the Commission should take steps to ensure a correct and harmonised implementation of the EU organic legislation in a way that the COI should only be withheld in cases of substantiated suspicion of a non-compliance or an established non-compliance in order to prevent market distortion. To that end, procedures to be followed in OFIS should be implemented in a timely and more harmonised way, both in the EU and in third countries. A review of these procedures should also include possibilities to shorten time frames for responses or to close cases if no further response or investigation steps can be expected. Sharing best practices and developing guidelines on export control could also be ways forward.

Expected benefits: Prevention of disproportionate measures can preserve organic integrity and reduce disruptions in trade, ultimately benefiting both producers and consumers in the organic market.

6. Ensure a healing process for clerical errors in the Certificate of Inspection without undermining the proper functioning of the internal market in organic products

Description: The aim of issuing Certificate of Inspection (COI) documents is to ensure the traceability of the products imported into the EU and intended to be placed on the EU market. Ensuring the full traceability of all products is a key concept in organic production.

During the implementation of the new import requirements, the sector discovered a problem with the application of issuing COI documents for imports into the EU. There is no so-called „healing process" established in case a formal mistake or "clerical error" is being made when issuing the COI in a situation where organic integrity is ensured. Such mistakes can occur:

- when choosing the CN (Combined Nomenclature) codes, which are often not easily assignable if the names of products are similar.
- if the date of issue stated in the COI is after the date of dispatch of the goods. For example, due to disruptions in general trade, the ship with the consignment leaves the port earlier

than planned and this information cannot be communicated to the third country inspection body in time.
- Disrupted or delayed processes at the third country inspection centre (e.g. due to public holidays, illness of employees, etc.) can also lead to a delayed issue of the COI.
- due to distortions in general trade traffic, when products are shipped on another ship than intended, and the information does not reach the control body in time.

If these formalities are recognised after the goods are shipped to the EU, the mistakes cannot be corrected anymore, even if the organic status of the product is fully ensured. This can have drastic consequences. Even though an identity check by the importer's control body in an EU Member State has shown that the organic status is not in question, apart from the formal mistake, two things can happen. Either the goods have to be imported as conventional, or they have to be returned to the country of origin of the shipment to resume the export process to maintain their organic status. The former causes serious financial loss and - in the worst case - the goods end up as food waste. The latter is also very costly and far from being sustainable. The third possibility is that the organic products are spoilt directly at the point of entry into the EU as they are not allowed to be imported - with the same consequences for the operators.

In Delegated Regulation EU 2021/2306, Article 6 (1) establishes the possibility for national authorities to correct a COI after its issuance and before its endorsement by an officer in the Member States. Enabling such corrections in cases of clerical mistakes was obviously the intention of the legislator. Still, such changes should be allowed as far as they do not open the door to abuses. However, it appears that these provisions are either not sufficient to solve the problem effectively or are not properly implemented at the moment.

To prevent these issues and to provide a solution in accordance with the proportionality principle, the Commission should assess the legal and administrative mechanisms intended in Article 6 (1) of Regulation EU 2021/2306 and propose legal amendments to ensure the effective correction ("healing") of clerical errors in cases where the organic integrity of products or processes is ensured. Moreover, the Commission might explore the possibilities of defining the conditions for errors that can and cannot be covered by Article 6 (1), such as through guidance or a workshops, and take it into consideration in future evaluation of the regulation.

Expected benefits: A more efficient and fair import process for organic products. Prevention of financial loss and potential food waste that can occur if goods have to be imported as conventional due to clerical errors. Avoidance of costly and unsustainable practices such as returning goods to the country of origin to maintain their organic status. Upholding the proportionality principle in the import procedures of organic products.

7. Avoid disruption of international organic trade by bureaucratic overload when switching to compliance

Description: As stipulated in Art. 57 (1) of the Organic Regulation (EU) 2018/848, the recognition of control authorities and control bodies granted in the so called “equivalence“ import regime under Art. 33 (3) of Regulation (EC) No. 834/2007 will expire by 31.12.2024. According to the current state of play, imports of organic products under the equivalency regime will no longer be possible. A transitional period from “equivalence” to “compliance” is still missing.

For this shift to “compliance” import regime based on Art. 45 and 46 of Regulation (EU) 2018/848, a really sophisticated set of procedural requirements has been set in force e.g. by Delegated Regulation (EU) 2021/1698 and subsequent and additional regulations. The whole procedure seems to involve paradoxical and partly contradictory demands.

For example:

- A company in a third country is supposed to be certified under the compliance regime already in 2024 in order to be able to deliver organic products accompanied by Certificates of Inspection stating compliance with EU Regulation from 1.1.2025. As a consequence, the CB is supposed to grant operator certification stating compliance in the inspection year 2024 although the compliance regime will start by 1.1.2025 and a certification according to the compliance regime in 2024 has not yet been legally permissible.
- A CB needs to be accredited by its national accreditation body according to the compliance regime in its third country activities although the application of compliance rules is allowed only AFTER being recognized by EU-COM under the compliance regime.

However, the recognition process of CBs for compliance is quite delayed, only a part of the CBs are in the final “pipeline” of recognition in the middle of 2024. Even if some more CBs are recognized in the remaining months of 2024, this might provoke a run on them, with serious market distortions. There is a high risk that existing relations in organic trade will be disturbed or even interrupted.

Conclusions:

- Reduce the bureaucratic burden and concentrate the recognition process to the very important points only and eliminate contradictory demands in the recognition process.
- Grant a transitional period from “equivalence” to “compliance” until end of 2025.
- Keep organic operator certificates issued under the equivalence regime legally valid until they can be replaced by certificates under the compliance regime.
- Enable TRACES from 1.1.2025 onwards to issue Organic Operator Certificates and Certificates of Inspection under the equivalence and the compliance regime, for a transitional period of one year.

Expected benefits: Smooth implementation of new rules in international organic trade. Avoiding possible conflicts with international trade rules. Avoiding disruption of relations between organic

trading partners and their certification bodies and authorities. Increasing acceptance of interventions to improve legal acts. Securing the supply of the European organic market.

8. A simpler and clearer regulatory framework letting sufficient flexibility for an appropriate implementation at national or regional level

Description: Excessive regulation and unnecessary detailed rules are the first limiting factor for companies in the organic sector. Especially within the husbandry rules, there are many very detailed rules that do not fit to the different geographical and climatic situations all over Europe. This makes it difficult for organic farmers to comply with the requirements. In many cases, the detailed requirements limit the flexibility of the organic farms to adapt to their local situation and reduce the willingness of farmers to convert to organic farming. This is in contrast to the political aims of expanding organic farming within in the Member States and the EU.

Some examples:

- In poultry production, the number of poultry houses for fattening poultry might be limited due to a new interpretation of production unit. This would lead to the loss of substantial production capacities in organic production in some countries.
- For cattle and pigs, a maximum percentage of 50% for outdoor covering is defined regardless the different situations regarding housings, weather, soil etc. within Europe. The dichotomous approach (from the 1990s) of distinguishing between the barn and the outdoor area does not fit in with new, innovative and animal-friendly barn systems in which the functional areas inside and outside cannot be clearly separated For organic processing and trading facilities the set up of new detailed substance lists for cleaning and disinfection products (see suggestion 10) is an example to show that adaptation for organic food operations might be difficult or extremely burdensome.
- For organic food production, additives and processing aids must be specifically approved. In many cases, specific conditions of use for specific products are defined for these substances. The distinction between an additive and a processing aid does not correspond to the horizontal food law and therefore repeatedly leads to problems with implementation. Besides that, more and more of the additives and processing aids must be of organic origin. If an ingredient is of organic origin, it can be used without further authorization in organic food production whereas a processing aid must first be authorized. This could be harmonized and simplified.
- In the labelling, elements such as the place of origin and the code number are mandatory. There is no solution if the origin of the products changes during the year and the last preparating operator changes. More flexibility in the labelling for such cases would be desirable.

Expected benefits: Simplification and letting sufficient flexibility in organic regulation for an appropriate implementation at national or regional level depending on the geographical and climatic conditions, traditions and socioeconomic realities helps organic farmers and operators to comply with the rules. A simplified framework would be an incentive for operators to convert to organic.

9. Eliminate double reporting and take into account the performance of organic farming in certain basic requirements of the CAP: "green by concept"

Description: In general, the current system does not favour organic farmers, especially small and medium-scale farmers who need to complete a lot of paperwork to receive funding that, in some cases, may not compensate for the cost incurred. At the same time, the stakeholders report that the administration of EU subsidies for organic producers is becoming even more time-consuming and burdensome. This may discourage organic farmers from applying for these subsidies as well as deter conventional farmers from considering conversion to organic.

At present, it seems that goals such as pesticide reduction, less dependence on fossil fuels, mineral fertilisers and protein crop imports, or the reduction of antibiotics in animal husbandry are being pushed into the distant future by legislation. For this reason, organic farming should be more strongly focussed on as a transformation path. This is because organic farming, enshrined in law by the EU Organic Regulation and secured by even higher standards under private law, is already realising these goals today. Unlike conventional agriculture, organic farming uses environmentally friendly production methods that prioritise biodiversity, soil health, and natural processes. It emphasises crop rotation, composting, green manures, and biological pest control.

All these organic requirements are legally established by Regulation 2018/848, ensuring legal certainty and vouching for environmental excellence in agricultural production methods. Organic farmers must pass a number of inspections to demonstrate that they adhere to the strict regulatory requirements. Therefore, these requirements should be taken into consideration whenever possible to avoid double controls, double reporting obligation and other administrative requirements for farmers.

As a result, organic should, in many cases, qualify and mean automatic compliance with CAP conditionality. Instead, organic farmers in many Member States report that they are being subjected to the same requirements and reporting as conventional farmers, which sometimes does not make sense. For instance, an organic farmer may be inspected for compliance with agro-environmental climate measures required by organic regulations and may then be inspected again for participation in eco-schemes related to organic farming. This results in an increased workload for both the inspection body and the farmer.

Unfortunately, one year after the start of the new funding period, it is becoming apparent that the national CAP implementation is slowing down the development of organic farming instead of helping to achieve the expansion targets for organic farming of the EU, of federal governments and

federal states. Organic farming, with its systemic and sustainable approach, is in a relatively worse position in the new support system. This can be seen - in addition to the disadvantages in the Organic Regulations - also in the CAP conditionality.

There is a clear margin for improvement by taking advantage of the well-functioning system of organic certification and controls to align with CAP requirements. The system that would recognise and—in a practical way—favour organic farmers would also incentivize more farmers to convert to organic agriculture.

In the previous CAP period, organic farms were considered completely "green by definition" and fulfilled the requirements of so-called "greening". This concept was appreciated by organic farms throughout Europe and brought real relief and greater environmental performance. We therefore propose "green by concept" as a further development of "green by definition". In concrete terms, this means greater differentiation within conditionality.

Expected benefits: Introducing the idea of a green-by-concept system in which being organic could qualify and mean automatic compliance with the CAP conditionality would be a real game changer for organic farmers, potentially nudging more farmers towards this path and significantly contributing to the 25% organic goal set by the EU in its Farm to Fork strategy.

10. Simplify the introduction of requirements for cleaning and disinfection adapted to the needs of organic companies

Description: Food safety is a basic requirement for any food production. Any proposal for new rules for cleaning and disinfection within the Organic Regulation must ensure that food safety can be efficiently guaranteed by organic operators when using cleaning and disinfection (C&D) products while limiting the use of harmful substances. No organic operator should be excluded from the organic market due to restraints for cleaning and disinfection products in Organic Regulation.

The concept COM proposed was to make a positive list of approved C&D products for organic processing and storing facilities. However, in a preliminary assessment it became obvious that for all different types of organic food production in Europe more than 1.200 C&D substances would be necessary to be included in a positive list. As a result, the majority of stakeholders think an exhaustive positive list of C&D substances or products is not a realistic concept for the organic sector. This is also evidenced by surveys and projects (e.g. IFOAM OE, RuDi project, AISE) carried out in different Member States. Any reduced positive list could lead to the blockage of the organic sector: If e.g. the positive list would include 216 priority substances (proposed once by the Commission), 80% of operators would have zero compliant C&D product that they could use. Furthermore, the whole evaluation and legislative process for such long lists of authorized C&D products entails huge administrative costs and burden which are not justified if a more adequate and pragmatic solution can be found.

Most of the stakeholders are in favor of a list of criteria being the backbone for the decision on the compliance of the C&D products used. We are aware that such an approach will probably require an adaptation of the Regulation 2018/848 or eventually of a secondary regulation (Reg. (EU) 2021/1165) by adding the definition of a restrictive list only for the case of C&D products and establishing a restrictive list of criteria (respecting the principles of the Organic Regulation) in order to have a limited use of products.

Furthermore, the new rules must take into account that special situations may arise when atypical aggressive infections appear in a production facility for which special control measures are necessary. In case of such a crisis, the companies must remain capable to act without losing their organic status.

It is important that all stakeholders need enough time to adapt to any new requirements regarding the use of C&D products. A roadmap with clear objectives to be achieved step by step is necessary to maintain the course all over the time.

Expected benefits: Substantial reduction of cost and administrative burden with a pragmatic approach for regulating C&D in Organic Regulation, both during the legislative process including updates and for the operators in the application. No interruption of organic food production if a restricted list of criteria (instead of a too restricted list of C&D products) is chosen and stepwise introduced.

11. Improve access to existing datasets and provide access to relevant databases for stakeholders

Description: Control bodies around the EU and even control authorities need to collect data in enormous in quantities, even with type of data which are already available and registered in various national or EU databanks. These data are very often data linked to production (e.g. fields registers, livestock registers, general operational authorizations, financial data), collected and kept by national or regional authorities to which control bodies have no access. Consequently, existing data have to be collected several times. This huge administrative burden results in extra need for capacities, IT background, time and cost, increasing certification costs in the end because they have to be recorded again every year by the control bodies.

Organic control and certification are part of the official control system. Data should therefore be accessible to control bodies (exchange with food safety authorities, etc.). It is often experienced that control bodies receive delegation from authorities to do official controls, but still authorities perceive control bodies as private actors and do not trust their work and results instead of cooperating. Examples of good practices of data exchange in various member states should be shared to encourage shared access to data in other member states and better cooperation between control authorities and control bodies.

Organic stakeholders are of course not part of the official control system. Nevertheless, giving them access to e.g. the OFIS database (respecting data protection rules) would enable them to better refine their risk analyses and analysis plans. This would help the stakeholders to improve their internal systems. Also access to the TRACES database would be helpful for operators as it gathers all certificates. TRACES should be further developed so that organic operators could use the database for checking their supplier certificates and thus easily improve their quality systems.

Expected benefits: Repeated collection of data could be avoided leading to a substantial reduction in costs and burden both for control bodies and organic operators. More efficiency in organic controls as more time could be dedicated to the control itself. Improvement of the internal systems of stakeholders and reduced burden for gathering cerficates of the suppliers.

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