

European Organic Certifiers Council

**Switch from equivalence to
compliance: CBs perspective**

May 24, 2024

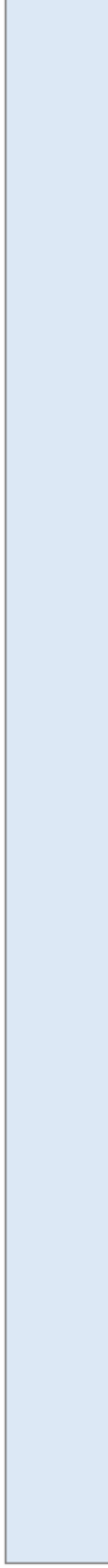


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EOCC is the European Organic Certifiers Council.

International non-profit organization, since 2010.

In 2024, 73 members (CBs, CAs, national CBs association) in more than 35 countries.





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EOCC is a key player for the switch from equivalence to compliance

Since 2017, EOCC is active:

- providing feedback on secondary legislation
- informing EOCC members and relevant stakeholders of the sector through
 - EOCC WG Import meetings,
 - Biofach presentations
 - Presentations during CDG and annual meetings
- raising awareness on retroplanning to be ready for 01.01.2025



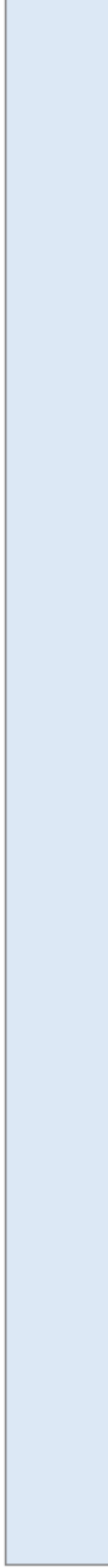
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In 2023, EOCC has had regular contacts with COM on the topic of switch from equivalence.

Recent ones:

- 24.11.2023
- 28.02.2024
- 04.04.2024
- 16.05.2024

and has informed its members and OP associations of the outcomes of these meetings.



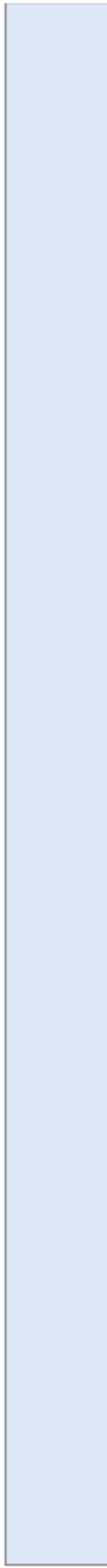


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IMPORTANT: It is possible to start the implementation of the compliant import regime *in the course of a year*

BUT in this case, it is more complex for control bodies and more costly than to start *at the beginning of a year*

The following slides aim at presenting the challenges that the control bodies will have to face





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- Risk of operator switching of CB to another: capacity for CBs to take them over?
- A new 2024 contract to be signed on the 2021/848 between CB and operator: all operators are already under contract in 2024
- A new 2024 quotation probably increasing (i.e.: double of reinspection for GoO): quotation 2024 already done, sent, accepted and payed by all operators



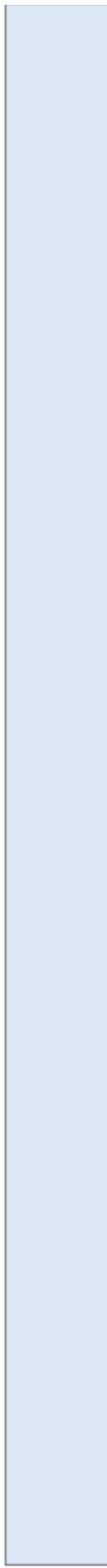
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- Pressure from groups of operators to start 01/01/25: lot of reinspections to be carried out until mid-October 2025
- Prioritization in the chronology of inspections of the operators: inspections not done not at the most appropriate moment (in 2024 and 2025)
- Double annual report for 2024: 2 incomplete annual reports considering the calendar year to be reviewed by the Commission



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- Calculation of the number of inspections (annual, additional, ...) and samples on the calendar year on two different schemes (data's consolidation).
- Risk assessment (including art. 9.2 of reg 2021/1698) to be renewed and modification of the inspection plan: 2024 inspection plan and inspector's assignments already done





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Thank you for your attention

