



## **Parallel Production in Organic Production and Processing according to the EC-Regulation 2092/91**

### **1. The EC regulation**

The EC regulation 2092/91 as amended requires **clearly separate units** for any organic production (annex III Specific Provisions A1, 3 and A2, 4 and annex I A2, 1.6) and **clear separation** of organic and non-organic operations in the case of processing (annex III Specific Provisions B 3). The term unit however does not necessarily relate to a legal entity.

There are different cases in which parallel production occurs. One operator (a) may produce organic and non-organic plant products or livestock of the same type in clearly separated units, or (b) process organic and non-organic products within one unit or (c) grow organic and non-organic crops of the same or similar variety or rear the same animal breed, as e.g. in organic fields and fields in conversion or conversion fields and conventional fields at the same time.

### **2. Inspection requirements**

#### 2.1 Parallel production in farming (annex III Specific Provisions A1, 3, A 2, 4 and annex I B, 1.6)

Parallel production within one farming unit is not allowed by the EC regulation, unless during a successive conversion of perennials or livestock. Wheat e.g. of the same or a similar variety cannot be grown at the same time in the organic and the non-organic unit of a producer. Conversion in the case of perennials must follow a predefined schedule and may not exceed five years, so that e.g. within one unit, fig orchards may be converted one after the other into organic, causing fruits of the same variety being present in conventional, conversion and/or organic quality at the same time (annex III Specific Provisions A. 1. 3). Separation of the organic and non-organic products must be ensured. In livestock production, organically managed herds and non-organic herds may be produced in the same holding (annex I B, 1.6) under the precondition that different species are involved and throughout separation is ensured.

#### 2.2 Parallel processing (annex III Specific Provisions B. 3)

Processing of organic and non-organic products in one operation is not prohibited, but strict separation in place or time has to be practiced and any organic operation must be carried out until the complete run is dealt with. Storage of organic and non-organic raw materials and finished products require separate areas. Identification of lots must be assured. If for processing of organic products the same equipment is used as for conventional products, sufficient cleaning is necessary before processing of organic products. If processing of organic products is not carried out at regular times or on a fixed day, it must be announced to the inspection body in advance, with a deadline agreed upon.

### **3. The inspection procedure**

#### 3.1 Production (annex III Specific Provisions A, A. 1. 3 and A. 2. 4)

As mentioned above, both units, organic as well as non-organic of the same operator will be inspected annually. In addition to the regular inspection of the organic unit, special attention is given to a separate storage of off-farm inputs as fertilizers and pesticides (Annex III General Provisions 8), and the documentary accounts of the conventional unit (Annex III Specific Provisions A. 1. .3, A. 2. 4). Conventional livestock units must also be inspected regarding their livestock management, livestock records and storage of animal husbandry products.

#### 3.2 Processing (annex III Specific Provisions B. 3)

Transparency is needed to minimize the probability of conventional product to be falsely identified as organic either purposely or by mistake. If the same room is used for the storage of organic and non-organic products, clear labelling and identification is needed. The separation measures and their enforcement have to be demonstrated to the inspector.