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REPORT OF A MISSION  
CARRIED OUT IN ESTONIA  
FROM 24 TO 28 SEPTEMBER 2001  
IN ORDER TO EVALUATE THE APPLICATION OF PRODUCTION RULES  
AND THE EFFECTIVENESS OF INSPECTION MEASURES IN  
ORGANIC FARMING

*Please note that factual errors in the draft report have been corrected in bold, italic, type. Clarifications provided by the Estonian authorities are given as footnotes, in bold, italic, type, to the relevant part of the report.*



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Abbreviations and special terms used in the report

CCPP	Estonian Control Centre of Plant Production
CPB	Consumer Protection Board
FVO	Food and Veterinary Office of the European Commission
GMO	Genetically modified organism
HPI	Health Protection Inspectorate
MA	Ministry of Agriculture
PPI	Plant Production Inspectorate
VFB	Veterinary and Food Board

## 1. INTRODUCTION

The mission took place in Estonia from 24 to 28 September 2001. The mission team comprised two inspectors from the Food and Veterinary Office (FVO) and one Member State expert.

The mission was undertaken as part of the FVO's planned mission programme.

The inspection team was accompanied during the whole mission by a representative from the central competent authority, the Estonian Ministry of Agriculture (MA).

An opening meeting was held on 24 September 2001 with the central competent authority, the MA. At this meeting, the objectives of, and itinerary for, the mission were confirmed by the inspection team.

## 2. OBJECTIVES OF THE MISSION

The objective of the mission was to evaluate the application of production rules and the effectiveness of inspection measures in organic farming with a view to Estonia's accession to the EU.

In pursuit of this objective, the following sites were visited:

VISITS			COMMENTS
<u>Competent authority</u>	Central	1	Ministry of Agriculture
	Inspection authorities (central offices)	3	Plant Production Inspectorate Veterinary and Food Board Health Protection Inspectorate
	Inspection authority (regional office)	1	Plant Production Inspectorate
<u>Organic production operators</u>	Farmers	3	Dairy/meat, arable crops, vegetables, fruit
	Processor	1	Bakery

## 3. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation and, in particular Council Regulation (EEC) No 2092/91 of 24 June 1991 on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs<sup>1</sup> as updated.

## 4. BACKGROUND

### 4.1. Previous missions to Estonia concerning organic farming

This was the first mission on organic farming to Estonia.

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<sup>1</sup> OJ No L 198, 22.7.1991, p. 1.

## 4.2. General information on organic farming in Estonia

The number of organic farms and farms in conversion increased from 89 in 1999 to 369 farms in September 2001 cultivating roughly 20,000 ha of agricultural land or 1.4% of the total agricultural land<sup>2</sup>. In 2000, 230 farms were organic or in conversion, 167 of which had organic animal production (in total: 3,100 cattle, 730 pigs, 2,200 poultry, 1,000 sheep, 100 goats and 120 horses).

Organic farms are concentrated in South-Eastern Estonia (Võru, Põlva and Valga counties), Saaremaa island (Saare county) and Western Estonia (Lääne county), where agriculture has traditionally been extensive. The most important organic crops in Estonia in terms of area cultivated are cereals (4,200 ha), followed by potatoes (170 ha) and various types of fruits (177 ha). In addition, there are 11,800 ha of annual and perennial grassland. Milk is the main product of animal origin.

Organic processing and marketing are in an initial stage of development. So far, Estonia has rarely exported organic products.

## 5. MAIN FINDINGS

### 5.1. Legal framework for organic farming

The first revision of Estonia's 1997 Organic Farming Act entered into force on 1 May 2001. The revised act introduced a government run inspection system for the organic sector<sup>3</sup>. On the basis of this act, secondary legislation was approved concerning the requirements of organic plant and livestock production, the transfer of data and documentation from private inspection bodies to state inspection authorities, and the procedures for granting and revoking organic certification. Secondary legislation on organic processing, import procedures for organic products and four other related subjects is in preparation and scheduled for approval by the end of 2001.

Parallel production of a species is authorised, as long as the variety produced organically is different from the conventional variety. However, this provision is currently under revision so that in future a) the parallel production of crops will only be authorised if they are clearly distinguishable and b) the organic and conventional production of different varieties of one species will not be authorised.

Parallel conventional and organic production is only allowed over a maximum period of four years after the farms first certification as organic.

The Estonian organic farming legislation has provisions for reducing the conversion period below 2 years.

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<sup>2</sup> In their response to the draft report, the Estonian authorities noted that this area represents *"2% of the total agricultural land in use"*.

<sup>3</sup> Estonia's 1997 Organic Farming Act originally established an inspection and control system run by non-governmental inspection bodies operating under state supervision.

Farmers may use conventional seeds if they can prove that no organic seeds are available<sup>4</sup>. Genetically modified seeds are not authorised in Estonia, neither in conventional nor in organic production.

Pesticides, fertilisers and feed materials authorised in organic farming correspond to the provisions of Council Regulation 2092/91/EEC.

A further revision of some of the current legislation is under way. The procedure for amending the Organic Farming Act takes between 6 and 12 months while amendments of secondary legislation can be passed in 1 to 6 months.

#### Direct payments for organic farms

In addition to promotion of organic farming through financial support for farmer training, Estonia has introduced direct per-hectare payments. *In 2000 and 2001, organic farms and farms in conversion on average received € 28 per hectare, depending on the type of crops grown. Alternatively, 32 organic farmers in two pilot areas received between € 40 and € 54 under the new agri-environmental scheme.*

#### Labelling

Estonia's official national label for organic products, the *Mahemärk* label dates back to 1997, but has been rarely used. At present, the Estonian government is working on a new label to be introduced in 2002.

Article 5 of Estonia's Organic Farming Act reserves the indication "*mahe*" [organic; but also: light/mild] to organic products unless it describes the flavour or other similar characteristics of agricultural produce and where it is evident that it does not refer to organic production and processing methods. However, in practice, "*mahe*" may be used in connection with any kind of conventional *mild* or *light* foodstuffs such as light dairy products or drinks and therefore is not associated with organic products.

In Estonia, labels of a number of conventional products include the indication *bio* (e.g. "*Biojogurt*"), which is protected by Council Regulation (EEC) 2092/91.

## **5.2. Organisational set-up and co-ordination of the organic sector**

### *5.2.1. Structure of the national inspection and control system for organic farming*

The Environment Bureau at the Ministry of Agriculture (MA) co-ordinates Estonia's organic sector. Furthermore it develops organic farming policies (incl. state support schemes) and legislation and represents Estonia at the international level. At the Environment Bureau the equivalent of 1.5 full-time professional staff work on organic farming.

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<sup>4</sup> In their response to the draft report, the Estonian authorities noted that according to the legislation "*only organically produced seed and vegetative propagating material, including planting material, shall be used in organic plant production in Estonia. As a derogation, a producer may use conventional, not chemically treated seed and vegetative propagating material (except planting material), if organic seed and vegetative propagating material is not available, but only with the permission of the inspection authority.*"

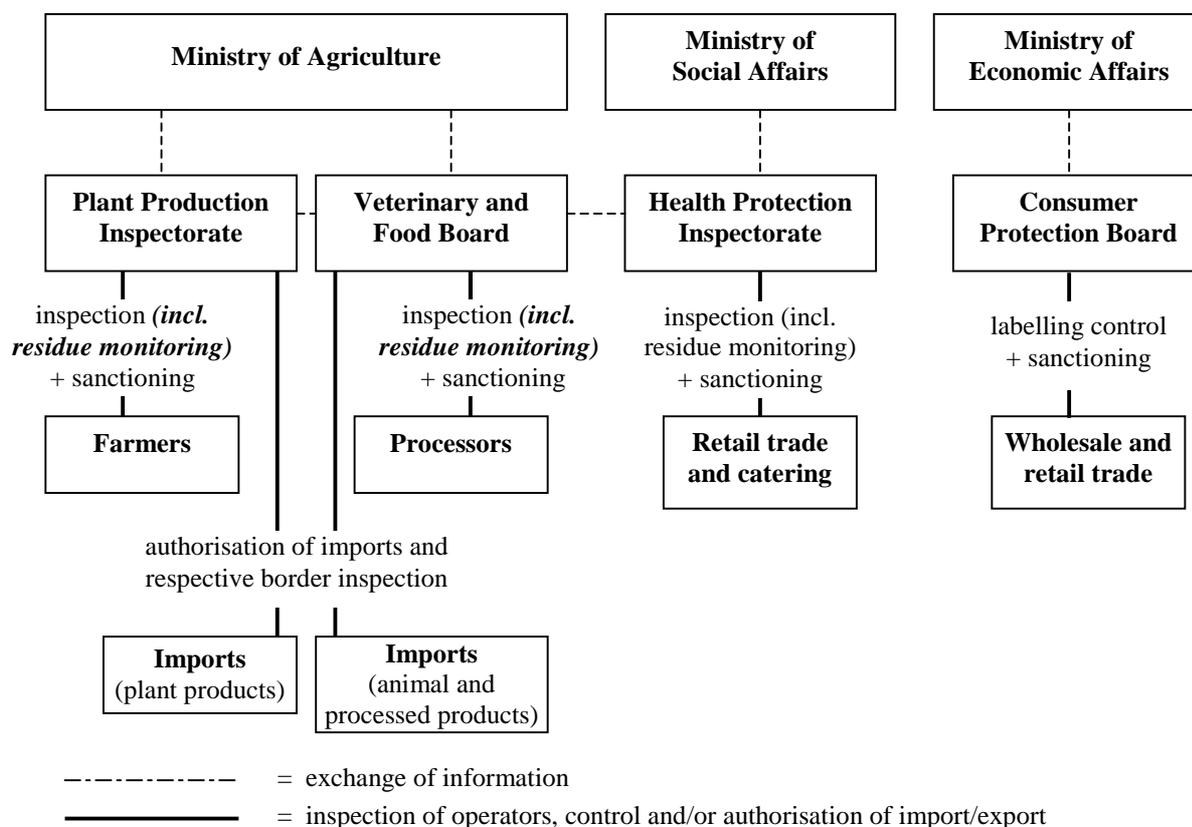
The MA may consult an advisory committee on organic agriculture consisting of 7 representatives of various government institutions, 3 representatives of non-governmental organisations, 2 scientists, and 8 private sector representatives. However, the committee has not been active in 2001.

In Estonia, the four government institutions inspecting conventional farming and food have also been entrusted with organic farming/food inspection at the various steps of the food chain. The Plant Production Inspectorate (PPI) and the Veterinary and Food Board (VFB) both report to the Ministry of Agriculture, while the Health Protection Inspectorate (HPI) and the Consumer Protection Board (CPB) report to the Ministry of Social Affairs and to the Ministry of Economic Affairs, respectively.

The main responsibility for the organic sector is with the Plant Production Inspectorate that carries out all farm inspections (plant and animal production) and keeps a central register and database on organic operators. The Veterinary and Food Board is in charge of inspecting organic processors and the Health Protection Inspectorate will inspect retailers and caterers (see Figure 5-1). Labelling of organic products will be checked by the Consumer Protection Board.

From 2002, PPI and VFB will be responsible for issuing import authorisations and border inspection for organic plant products and animal/processed products, respectively.

**Figure 5-1: Co-ordination, inspection and control in Estonia's organic sector**



Each operator has to notify his/her activity in organic production to one of the three inspection authorities. For registration, operators submit, for example, a description of their production and storage facilities and a cropping/production plan. Organic

operators must notify their organic production annually by 10 December if they wish to continue organic production in the subsequent year. VFB and HPI copy the application data they receive to the organic register at PPI. Organic operators pay a fee for registration in the state organic register, *and, from the year following the registration, an annual fee. Both fees are calculated taking into account inspection costs.*

#### 5.2.2. Pesticide residue monitoring

HPI monitors pesticide residues in food at retail *establishments* in the framework of the general food control programme. So far, no organic food samples have been analysed. In 2000, 400 market samples of conventional agricultural products were checked for pesticides in one of HPI's pesticide laboratories. Pesticide traces were detected in 28% of the samples. It was reported that 2.5% of the samples of Estonian origin and 5% of the samples from imported products exceeded the Estonian maximum residue limits (MRL). *VFB controls pesticide residues in foodstuffs at the state border and wholesale enterprises.*<sup>5</sup>

PPI takes samples of plant material or soil at organic farms for pesticide residue testing if the use of unauthorised pesticides is suspected. These samples are analysed in the laboratory for residues and contaminants at the Estonian Control Centre of Plant Production (CCPP) and, for substances that cannot be analysed at CCPP, in HPI's pesticide laboratory in Tallinn. From 2000 to 2001, two samples have been analysed for MCPA and one sample for Glyphosate. MCPA was found in both cases, while Glyphosate was not detected. The sample that tested negative for Glyphosate was not checked for any further herbicidal active ingredient.

#### 5.2.3. Enforcement

Within its area of competence, each institution is in charge of following up infringements and of sanctioning. In 2001, PPI has detected 22 infringements at farms leading to 17 warnings and 5 withdrawals of approval.

### 5.3. Organisational set-up of the inspection authorities

#### 5.3.1. Plant Production Inspectorate (PPI)

PPI established an organic farming unit at its central office, which is in charge of a) the overall organisation and co-ordination of farm inspections, b) developing and keeping up to date the register of organic operators, c) developing inspection guidelines and procedures and d) training of regional inspectors.

#### Human resources

In total, PPI employs 198 staff. The organic farming unit at the central office has four professional staff (1 Head of Unit; 1 in charge of the register of organic operators; 1 specialist for the inspection of plant production units; 1 specialist for the inspection of animal production units). In the 15 county offices, 17 inspectors

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<sup>5</sup> In their response to the draft report, the Estonian authorities noted that *"special pesticide monitoring programmes have been implemented for fruits and vegetables (since 1998) and for food of animal origin (since 1996). The programmes will be revised taking into account the Council Regulation 2092/91/EEC."*

are assigned part time to organic farming. Apart from organic farming, the inspectors also inspect the marketing and use of plant protection products and seed production. In one of the counties visited (Saare) staff resources were stretched to the limit in order to complete the 2001 round of inspections<sup>6</sup>.

The minimum qualification required for PPI inspection staff is a degree from an agricultural high school, but more than 80% of the inspectors have a university degree in agriculture. Staff both from the central office and from the county offices was trained in organic farming inspection in four one-week training courses organised in co-operation with Denmark. Furthermore, several one-day seminars on organic farming took place (in co-operation with Finland and with an Estonian non-governmental organisation). Inspection staff in Saare county indicated that further training on the inspection of animal production units was needed.

#### Approval of operators

Based on the information submitted and on the respective inspection reports, operators are approved by PPI's central office. Approval notices *as well as non-compliance notices* are signed by *PPI's Director General*.

#### 5.3.2. *Veterinary and Food Board (VFB)*

VFB's *Bureau of Food of Non-animal Origin* is in charge of inspecting organic processors. The Bureau and its local staff inspect around 900 conventional establishments, while so far, only four processors have applied for organic certification (two fully organic and two dealing with both conventional and organic produce).<sup>7</sup>

#### Human resources

The *Bureau of Food of Non-animal Origin* employs 3 professional staff, one of whom is involved in developing inspection procedures for organic operators. Furthermore, each VFB county office has assigned one inspector for the inspection of organic processors. However, up to now the central office has handled the only four applications from organic processors. Two of these have received an initial inspection mainly dealing with food hygiene.

VFB's junior inspectors must at least have a qualification as veterinary medical assistant or equivalent. Senior inspectors are required to have a university degree in veterinary medicine or food technology, depending on the work area. The inspector in charge of organic processors at VFB's central office is a food technologist and currently seeks training opportunities on the inspection of organic processors.

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<sup>6</sup> In their response to the draft report, the Estonian authorities noted that "*on the basis of the evaluation results the number of persons working with organic agriculture will be increased both on county level and at the central office (by a total of four persons) [...] and there will also be some rearrangements in the working procedures.*"

<sup>7</sup> In their response to the draft report, the Estonian authorities noted that in the meantime "*VFB has already drawn up inspection procedures for organic processors*".

### Approval of operators

Based on the information submitted and on the respective inspection reports, operators are approved by VFB's central office. The approval notice is signed by the Director General.

#### *5.3.3. Health Protection Inspectorate (HPI)*

HPI has the mandate to monitor and enforce public health/hygiene standards in retail trade and catering facilities. It will also inspect organic operators in this area. Awaiting the first applications for registration, HPI's head office has worked out basic procedures for the inspection, approval and sanctioning of organic operators. HPI is in a process of reorganisation with the objective to establish four specialised regional centres covering inspection activities in 3 to 5 counties each. In the future, inspectors dealing with organic retail trade and catering will be based at these centres.

An inspector of the central office, who is a university graduate, plans to participate in a training course on inspection of organic catering establishments in Denmark.

### **5.4. Inspection of organic operators**

#### *5.4.1. Inspection of agricultural producers in Estonia*

In 2001, PPI carried out a full round of inspection of organic farms or farms in conversion.

#### General inspection procedure

PPI has elaborated a manual of procedures for the inspection of organic farms. In general, farmers are notified in advance of an upcoming inspection. Unannounced inspections are only carried out in exceptional cases, e.g. if there is a suspicion of fraud. To date, no unannounced farm inspection has been carried out. Every farm is inspected at least once a year. New applicants to the organic farming scheme receive an initial inspection upon application to verify the information submitted and a follow up inspection in the course of the production period.

Operator files are available both at the PPI headquarters and at the PPI county offices. The inspection report is similar to a checklist listing the essential points to be covered. If a point is found in order, it is just ticked off on the report form. Only findings that require corrective action are recorded in more detail.

The PPI specialist for organic animal production has accompanied a number of local inspectors to assist and train them. In view of the recent history of organic farm inspection, the work done by the inspectors has not been evaluated through witness audits or re-inspection.

#### Farm visits during the mission

The mission team visited a milk and beef producer (second year conversion), a small mixed farm with crop production in first-year conversion and conventional animal production, and a big plant production co-operative that has been certified organic since 2000. In 2001, all three farms had been inspected twice, firstly for the

assessment of the data submitted by the farmer upon application and secondly during the production period.

On all farms, separation between organic and conventional plots was at least 1 metre.

#### *Animal production*

The farm keeps 70 cattle including 25 dairy cows and cultivates around 200 ha of arable land, mainly for fodder production. The farm has a large number of pastures and the stable is spacious.

In addition to the feed produced at the farm, the animals were supplied with synthetic minerals and vitamins. Neither the farmer nor the inspector knew whether or not the vitamins used had been produced by genetically modified micro-organisms.

Documentation on crop and animal production was available at the farm. However, as confirmed by the inspector in charge of the farm, some documentation was difficult to follow. For example, in the chronological listing of the application of veterinary medicinal products, it was laborious to identify the number of treatments made to each particular animal.

#### *Plant production*

The mixed farm basically was a subsistence farm with strawberries being the only cash crop. The farm received subsidies both under the agri-environmental and under the organic farming scheme. For this reason, a field book has been kept since early 2001, recording input use and agricultural measures of each plot. In 2001, no fertilisers and crop protection inputs had been used. The grain produced at the farm was dried in a facility shared with conventional farmers. The farmer dried and stored her grain separately from the conventional products.

The inspections realised in 2001 did not include the conventional animal production at the farm.

The organic co-operative visited had crop production only. Most of its products were sold as conventional because marketing channels for organic produce were lacking. Only strawberries packed at the farm premises were marketed as organic.

In 1999 and 2000, the farmer had used farmyard manure from a conventional farm for composting and subsequent spread on a number of fields. No crop protection inputs had been used. The farmer was not aware that under the new legislation he had to seek authorisation by the inspection authority for the application of conventional manure.

The farmer had only a few notes on input use and agricultural measures taken. He found it complicated/difficult to keep a field book containing precise information on the management of each plot.

#### 5.4.2. *Inspection of processors in Estonia*

##### General inspection procedure

VFB has not yet worked out procedures for the inspection of organic processors awaiting the approval of secondary legislation on organic processing. All inspections by VFB, both organic and conventional, are unannounced.

##### Visit of processor during the mission

The mission team visited a bakery that started to produce organic bread in 2000. To date, the organic production has been carried out on an experimental basis (a few loafs of organic bread two to three times a week). Lacking marketing opportunities are the main constraint to an increase in production. The manager indicated that many consumers did not realise that the label "*mahe*" referred to the organic production method, but assumed instead that "*mahe*" indicated the bread contained less salt.

A recent VFB food hygiene inspection of the bakery also addressed the separation of organic and conventional produce in the production line. However, material flows (quantities of inputs and outputs) had not been checked.

The flour used for organic bread was packed in bags with organic labels indicating that the grain had been grown on an organic farm. Documentation available at the bakery showed that the mill processing the cereals had been inspected and certified in 2000. However, no such certificate was available for 2001.

#### **5.5. International trade with organic products**

The Estonian market for organic produce has not yet been developed, hence, there is little interest in importing organic produce. Procedures for import authorisation are being developed and were not available during the mission.

Estonia's organic sector is interested in exporting organic grains and peas to the EU. The Estonian government at present is considering various options for obtaining EU approval for organic imports from Estonia.

### **6. CONCLUSIONS**

#### **6.1. Legal framework for organic farming**

The organic farming legislation in place at present covers a substantial part of the provisions laid down in Council Regulation 2092/91/EEC. Six pieces of secondary legislation addressing areas such as organic processing and procedures for the approval of organic imports are being prepared and scheduled for approval by the end of 2001.<sup>8</sup>

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<sup>8</sup> In their response to the draft report, the Estonian authorities noted that since the mission "*rules on organic processing, the establishment of the Register of Organic Farming, export procedures, the standard description of the ecolabel and the procedure for use thereof have been approved. Two pieces of secondary legislation, one of them being the rules on import, are to be adopted in the light*

The Estonian indication "*mahe*" for organically produced or processed products can be used in connection with many types of conventional foodstuffs and therefore is ambiguous. It seems difficult, if not impossible, to reserve its use for organic products as requested by Article 2 of Council Regulation 2092/91/EEC. This is a significant point, in particular because the Estonian government plans to introduce and promote a new label for organic products from 2002.

## **6.2. Official supervision and co-ordination of the organic sector**

The new Organic Farming Act implements a government run control system co-ordinated by the Ministry of Agriculture. Even though organic farming is in its initial stage of development, Estonia has set up a solid institutional framework for organic inspection. The authorities carrying out inspections of conventional production, processing and marketing also deal with the respective organic operators. Considerable conceptual and practical work has been done in a short period of time indicating that Estonia anticipates a substantial development of the organic sector.

However, only few residue analyses, as laid down in Annex III.A.1(6) and Annex III.B(4) of Council Regulation 2092/91/EEC have been carried out and the scope of the analyses was narrow.<sup>9</sup>

## **6.3. Organisational set-up of the inspection authorities**

The institutional framework is designed to respond to further growth in the sector. The Plant Production Inspectorate (PPI) is the only institution that has gained practical experience in inspecting operators while the Veterinary and Food Board (VFB) and the Health Protection Inspectorate (HPI) are preparing for organic inspection. In view of the few operators registered at the moment, it is positive that VFB and HPI have concentrated the inspection activity in the hands of one or a few inspectors.

The inspectors met during the mission were well qualified in their respective fields of work. PPI inspectors had received training in inspecting organic farms. However, they need further support in the inspection of animal production units. Inspectors of processing, catering and retail facilities also seek opportunities for training on inspection of organic operators.

While it is an advantage to have qualified personnel for the inspection of the various types of operators, it will require continuous effort to ensure good co-operation and information exchange between the four institutions involved.

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*of Commission Regulation 1788/2001/EC in early 2002. Several technical and terminological amendments to the legislation are in the pipeline, including those mentioned in the report."*

<sup>9</sup> In their response to the draft report, the Estonian authorities noted that "*12 additional multimethod-analyses have been carried out in connection with the export of organic peas to Denmark in December 2001. The Action Plan of PPI for the year 2002 will also include [...] up to 50 analyses with a fairly wide scope.*" Both HPI and VFB will introduce separate headings for multimethod pesticide residue testing of organic food in 2002.

## 6.4. Inspection of organic operators

### Agricultural production

At the time of the mission, the first round of farm inspections by PPI had been completed. While the overall impression of the inspection capacity was positive, a number of deficiencies were addressed during the mission (e.g. record keeping at farms and check of material flows). Furthermore, more detailed inspection reports (e.g. regarding the use/storage of chemical inputs) and/or an evaluation of the work done by inspection staff (e.g. through witness audits or re-inspection) could help to ensure a high inspection standard.<sup>10</sup>

So far, no unannounced farm inspections have taken place.

On the farm visited with parallel organic and conventional production only the organic unit was inspected, which is not in compliance with Article 8(1b) and by Annex III.A.1(9) and Annex III.A.2(5) of Council Regulation 2092/91/EEC.

Operators (and to some extent inspection staff) were not aware a) that the authorisation for the use of conventional inputs (such as conventional manure) on organic farms is required (see Annex II and Annex IV of Council Regulation 2092/91/EEC) and b) that it must be documented that feed additives such as synthetic minerals and vitamins were not generated by genetically modified organisms (Article 6(1d) of Council Regulation 2092/91/EEC).

### Processing, retail and catering

Organic farming legislation regarding processing, internal trade and catering is in the process of being approved. Therefore, to date no full inspection of organic processors has been carried out. The respective inspection authorities anticipate that initially, only few operators will apply for organic certification.

## 6.5. International trade with organic products

At present, organic trade is insignificant. However, Estonian farmers anticipate good export opportunities for organic crops to the EU.<sup>11</sup> At the same time, the government and producer organisations see a need to develop Estonia's internal market.

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<sup>10</sup> In their response to the draft report, the Estonian authorities noted that "*new recommended record keeping forms (multi-annual crop rotation plan; yearly schedule of plant production, fertilizers, cultivation procedures, plant protection; summer and winter feeding schedules; livestock production plan, etc) have been drawn up for the year 2002.*" *Work will continue to simplify record keeping for producers and to make it easier for advisors and inspectors to keep notes, understand and follow the documentation at farms. More detailed report formats will be considered in the annual update of the inspection manual and inspection reports.*

*In the future, re-inspections will be carried out by county inspectors. In 2002, all county inspectors will be evaluated by the Organic Farming Department within the framework witness audit.*

<sup>11</sup> In their response to the draft report, the Estonian authorities noted that "*export of organic products started in December 2001 where the first shipment of 239 tons of organic peas was sent to Denmark for fodder.*"

## **7. CLOSING MEETING**

A closing meeting was held on 28 September 2001 with the central competent authority, the Estonian Ministry of Agriculture. At this meeting, the main findings and conclusions of the mission were presented by the inspection team. The authorities acknowledged that the indication "*mahe*" chosen for organic produce was ambiguous, but indicated that in Estonian, other indications might be misleading, too.

The authorities inquired to what extent the results of the FVO mission could contribute to Estonia's possible application for equivalence in organic farming. The team informed the authorities that the mission report would be an important piece of information for the evaluation of the dossier but that further examination of the developments in Estonia's organic sector would be required.

## **8. OVERVIEW**

The Estonian government promotes organic farming through information transfer to operators and specific support programmes. The number of organic farms has increased substantially over the past two years. However, the organic sector is still in an early phase of development, in particular with regard to marketing, processing and trade. The critical points made in the report must be seen in this context.

The Estonian government has established a solid institutional framework for organic inspection in a short period of time. Now the operators – and in particular the farmers – need to adapt to the new requirements and inspectors need to acquire more experience.

The overall impression of Estonia's inspection and control system for the organic sector was positive. The government is strongly committed to developing the organic sector and it seems that the deficiencies identified during the mission can be overcome shortly.

## **9. RECOMMENDATIONS TO THE COMPETENT AUTHORITIES OF ESTONIA**

In view of Estonia's forthcoming accession to the EU it is recommended that the competent authorities in Estonia:

- (1) Reconsider the choice of the indication "*mahe*" for organic produce, taking into account Article 2, Article 5(1) and Article 10(2) of Council Regulation 2092/91/EEC as updated.
- (2) Continue the training activities for PPI inspection staff, in particular regarding the inspection of animal production units, and initiate training on the inspection of organic operators for VFB and HPI staff carrying out organic inspection.
- (3) Ensure that, in case of parallel production, both the organic and the conventional units are inspected as required by Article 8(1b) and by Annex III.A.1(9) and Annex III.A.2(5) of Council Regulation 2092/91/EEC.
- (4) Ensure that a certain proportion of farm inspections are unannounced.

Estonia is requested to report to the Commission within two months after receipt of the final report on action taken and on plans for future action including a timetable on the above points.

## **10. ADDENDUM**

In their response to the draft report, the Estonian authorities indicated that:

- (1) *The use of the indication "mahe" is being discussed and possible solutions are under review.*
- (2) *Over the coming years, additional national resources and resources of an EU pre-accession project will be used for the training of inspectors in the fields of [organic] animal husbandry and processing and for upgrading the inspection manual.*
- (3) *Inspectors have been requested to inspect both the organic and the conventional parts of an enterprise. This will be followed most thoroughly over the next years.*
- (4) *According to the 2002 PPI action plan, at least 5% of the approved enterprises will undergo unannounced inspection.*

*More detailed information on action taken and plans for future action in response to the report will be provided within two months after receipt of the final report.*