

Brief Introduction to Requirements for Mixed Farms and Parallel Production

according to Regulation (EU) 2018/848, NOP, JAS, and BIO SUISSE

1. Terms, general introduction:

	Meaning	EU-Reg.	NOP, JAS	BIO SUISSE
Whole-farm conversion	The whole farm is managed according to an organic scheme, including livestock and grassland	Not required		Required by BIO SUISSE and other private standards
Mixed production	The farm has an organic and a conventional part, e.g. an organic apple orchard and conventional annual crops	Allowed (conditions see N° 3)		Not allowed, but tolerated during a short transition time under certain conditions
Parallel production	The same crop is planted on organic and conventional (or transitional) fields, e.g. conventional wheat and organic wheat	Not allowed (exceptions see N° 2)	Allowed (conditions see N° 3)	Prohibited

2. Parallel production under Regulation (EU) 2018/848:

As mentioned above, parallel production is not allowed by the EU-Regulation.

Exceptions:

- a. The **varieties** planted on organic and conventional plots can be **easily distinguished** by non-specialists. This may be the case for potato or bean varieties of different colour, for cherry and traditional tomato, etc. If that the organic crop is used for a processed product, where the distinguishing characteristics are not relevant (e.g. apple juice), CERES will not accept parallel production of different varieties.
 - o The requirements concerning different species and varieties, shall not apply in the case of research and educational centres, plant nurseries, seed multipliers and breeding operations.
- b. For perennial **crops**, the EU-Regulation allows parallel production during a conversion period (Reg. (EU) 2018/848, Art. 9). Conditions are as follows:
 - o The operator presents and implements a detailed **conversion plan**, according to which all plots must be converted to organic **as soon as possible**. Start of conversion of the last part may not exceed five years, from the date of first application for organic certification. The conversion plan and its implementation must be checked and approved annually by the certifier.
 - o Harvest, post-harvest **separation**, and separate equipment are assured (see N° 3).
 - o The certifier "is notified of the harvest of... the products ... at least **48 hours** in advance".
 - o "**Immediately upon completion of the harvest**, the producer informs the inspection body ... of the exact quantities harvested on the units concerned and of the measures taken to separate the products." In case of continuous harvesting (e.g. bananas), the operator may be exempt from the two latter obligations.
 - o The conversion plan and the measures to be taken to ensure the effective and clear separation shall be confirmed each year by the control body, after the start of the conversion plan.
- c. As a third alternative, the **holding/operation may be split into clearly and effectively separated production units for organic, in-conversion and non-organic production, provided**

that for the non-organic production units plants of different varieties that can be easily differentiated are involved.

Where not all production units of a holding are managed under organic production rules, the operators shall:

- (a) keep the products used for the organic and in-conversion production units separate from those used for the non-organic production units;
- (b) keep the products produced by the organic, in-conversion and non-organic production units separate from each other;
- (c) keep adequate records to show the effective separation of the production units and of the products

This separation must not be just on a formal level. CERES requires separate bookkeeping and administration of the two units.

Please note: The EU Regulation does not consider "parallel production", when the same crop is grown on organic fields and fields in conversion. This situation is accepted, provided that a good system of harvest and post-harvest separation is given (see below).

3. Minimum requirement for separation in case of mixed or parallel production:

For parallel production:

- a. CERES **always** (not only for EU-certification) requires operators to **notify the certifier in advance** of harvesting dates, except for continuously harvested crops. Also, farms growing the same crop on organic and "in conversion" fields must notify CERES before starting harvest. Otherwise the organic crop may not be recognised as such.
- b. **Harvest** of conventional (or transitional) and organic plots must take place on **different days**. Or harvest is performed by completely different staff under different supervision, using easily distinguishable harvesting, transport and storage containers.
- c. Harvest **records** for both conventional (or transitional) and organic products must be **very detailed**, per plot and day.

For mixed and/or parallel production:

- a. **Different** harvesting, transport and storage **containers** must be used, or containers must be duly cleaned, before being used for organic. Cleaning procedures must be recorded.
- b. **Different equipment** must be used for **plant protection**. The sprayer for the organic part must be stored in a different place and be labelled permanently. In case that purchase or renting of different sprayers is not possible, sprayers must be washed with detergents produced specially for this purpose. Washing procedures and type of detergents must be recorded. CERES may require residue analyses for spray mixtures from time to time.
- c. **Plant protection products, fertilisers** and seeds or planting stock for the organic and conventional part must be **stored in different rooms**. The room for organic inputs must be duly labelled.
- d. **Records and bookkeeping** for the conventional and for the organic part must be filed in **different folders**.