Control and certification of the Bursa GI’s

Workshop
12.10.2017 – Bursa, Turkey
The consumer has a double concern: identify the GI, and trust the GI quality

- Identification is got with the logo
Misleading the consumer jeopardizes the consumer trust

- Origin of the fruits
- Management Of the orchards
- Organic profiles

Qualities of the fruits
Unfair competition risk

To face this risk Turkish law within Turkey and TRIPS agreements out of Turkey guarantee
That the State authority is going to punish frauds
Historical background in EU

• Years 60’s necessity of control
• State control with specific institutes such INAO in France
• 1991 regulation on organic products decides private control compulsory
• 1998 accreditation of the certification bodies according to ISO 65
• 2004 EU official control for food and feeds
• 2006 EU regulation on GI with external certification
What do we call a control?

When a product displays a specific quality, producing add value, a control is mandatory.
The control content items

- The **control plan** defines the content of the control, the frequency, the sampling and the used tools.
- The **sanction catalogue** as it is displayed in the book of specification.
- The **sanction scale**: each non-conformity is described and a sanction is applied; sanction level is increasing if the non-conformity isn’t solved.
- Administrative staff **to organize** the control as well as the control follow up.
Turkish law says …

• Inspection shall be performed by inspection committee
• Inspection committee shall be approved by Turkish patent and Trademark Office
• Inspection plan approved by TPTO
• Inspection report shall be issued
• Follow up of report findings must be implemented
-33% of the producers at least shall be inspected twice a year.
-100% of the processors and dealers shall be inspected once a year.

10% of the daily lots must be tested.
Sanction catalogue

• Remark (R)
• Warning ; after 3 warnings without effect : temporary exclusion. (W)
• Lot downgrading (LD)
• Plot downgrading (PD)
• Temporary exclusion ; after 2 temporary exclusion without effect : definitive exclusion. (TE)
• Definitive exclusion (DE)
Example of the fig sanction scale

<table>
<thead>
<tr>
<th>Point number</th>
<th>Inspected point</th>
<th>Major / minor</th>
<th>Checking</th>
<th>Specification reference</th>
<th>Sanction in case of infringement first case</th>
<th>Recurrence of the infringement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Commitment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>contract is present and signed</td>
<td>M</td>
<td>document</td>
<td>5.2</td>
<td>W</td>
<td>LR</td>
</tr>
<tr>
<td>2</td>
<td>Fruit compliance with the standard</td>
<td>M</td>
<td>test report</td>
<td>4 and 8.2.2</td>
<td>LD</td>
<td>TE</td>
</tr>
<tr>
<td><strong>Technical</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Orchard are in the delimitated area, don't exceed 20 trees/Da and is safe from industrial contamination</td>
<td>M</td>
<td>location of the orchard - visit of the plot</td>
<td>611</td>
<td>PD</td>
<td>PD</td>
</tr>
</tbody>
</table>
The possible options:

For Bursa black figs and Bursa peach Gis, control implementation is compulsory.
Three options are possible

• Option 1: ask services to State institution
• Option 2: do it yourself
• Option 3: ask for professional services

For each one we are going to study
- the organization
- the cost
- the balance inconvenience and advantage
Option 1: control is performed by a public institution

- It can be by University, Chamber of Agriculture, etc.
- The institution is in charge of the compliance with the Turkish framework
  - Control plan
  - Report issuance
  - Follow up
  - Relation with TPTI
## Option 1 - Gemlik Olive example

### Control by Institutions

<table>
<thead>
<tr>
<th>STRENGTHS</th>
<th>WEAKNESSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Low cost solution</td>
<td>✓ Low involvement of the producers</td>
</tr>
<tr>
<td>✓ Adapted to small BoS with few and simple requirements</td>
<td>✓ No mechanism to increase inspection body competences</td>
</tr>
<tr>
<td>✓ Can be used as a transition system</td>
<td>✓ Sustainability of the mechanism could be questioned (time increasing, cost increasing…)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OPPORTUNITIES</th>
<th>THREATS</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ As long as the overprice on GI product is weak compare to non GI products, the risk of traceability fraud is also weak</td>
<td>✓ Loss of confidence from clients</td>
</tr>
<tr>
<td></td>
<td>✓ Difficulties for exportation to the EU – no recognition of the GI at the EU level</td>
</tr>
</tbody>
</table>
Option 2 : do it yourself

- GI association built its own certification committee
- an internal control system containing trained internal inspectors,
- inspection tools (questionnaire, testing protocol, ...),
- an administrative officer to organize the inspections, to plan the inspection schedule, to recover the inspection files, to implement the sanction scale and to follow up the compliance of the corrective action.
Option 2: the cost

- **FOR FIGS**
  - Cost is around 50 TL per producer and every 3 years
  - If we consider the percentage on the average turnover it is 0.06%

- **FOR PEACH**
  - Cost is around 40TL per producer and every 3 years
  - And the percentage is 0.04% of the peach production turnover
## Option 2 – First party verification

Control by GI users

<table>
<thead>
<tr>
<th>STRENGTHS</th>
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</tr>
</thead>
<tbody>
<tr>
<td>✓ Strong involvement of the producers</td>
<td>✓ Lack of independence of the system</td>
</tr>
<tr>
<td>✓ Awareness of risk sharing</td>
<td>✓ Depend on internal inspectors choices: among the producers? Competence assessment?</td>
</tr>
<tr>
<td>✓ Moderate cost</td>
<td>✓ Sustainability of the mechanism could be questioned (time increasing, cost increasing…)</td>
</tr>
<tr>
<td>✓ Bursa GI association can manage both GIs</td>
<td>✓ Administrative mechanism of non-conformities follow up should be implemented</td>
</tr>
</tbody>
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<td>✓ Consultancies and capacity building can be acquired</td>
<td>✓ Confidence on the system can be questioned by clients</td>
</tr>
<tr>
<td>✓ Know-how exchanges with other GIs</td>
<td>✓ Reliability of the system in case of non-detected frauds</td>
</tr>
<tr>
<td></td>
<td>✓ Full juridical responsibility</td>
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<tr>
<td></td>
<td>✓ EU registration more difficult</td>
</tr>
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</table>
Option 3 : third part certification

• This solution is the implementation of the classical system in force in European GIs;
• a certification body accredited according to the norm ISO 65 is contracted by the GI association,
• it performs internal control system audit
• The certification body include a certification process (independent decision taking) according to the control plan and the sanction scale;
• it assumes the technical and juridical responsibility of the results.
• Thus, it is an additional inspection to the first par verification, indeed the third part certification needs to assess the internal control system to extend the reliability to all the producer group.
Option 3 the cost

• **FOR FIGS**
  - Cost per producer is 91 TL every 3 years
  - These 91 TL represent 0.14% of the GI figs turnover

• **FOR PEACHES**
  - Cost is around 83 TL per producer and every 3 years
  - And the percentage is 0.09% of the peach production turnover
## Option 3 – Third party certification

Control by accredited certification bodies

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<tbody>
<tr>
<td>✓ Full reliability on the certification body (CB)</td>
<td>✓ Risk of losing registered producers in case of non-flexible policies</td>
</tr>
<tr>
<td>✓ Full juridical responsibility of the CB in case of discrepancy</td>
<td></td>
</tr>
</tbody>
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<td>✓ External recognition of the label value</td>
<td>✓ High cost only sustainable if the overprice of the GI fruit is sufficient</td>
</tr>
<tr>
<td>✓ EU recognition is easier</td>
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</tbody>
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