STATE OF THE ART OF THE ORGANIC AGRICULTURE IN THE WESTERN BALKANS
STATE of art of the organic agriculture in the Western Balkans:

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STATE OF THE ART OF THE ORGANIC AGRICULTURE IN THE WESTERN BALKANS

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## Table of Contents

1. Introduction 6
2. Analysed countries/territories 7
3. General assessment of the organic sector in SWG Member countries/territories 7
4. Legislation/Strategy 8
   4.1. CURRENT SITUATION OF ORGANIC LEGISLATION IN SWG COUNTRIES/TERRITORIES 8
   4.2. EU LEGISLATION RELEVANT FOR TRANPOSITION IN THE INDIVIDUAL LEGISLATION OF SWG MEMBER COUNTRIES/TERRITORIES 9
5. Strategies for harmonizing with EU Acquis in the Organic sector and Action plans for harmonizing 13
6. Organic producers’ data 14
7. System of control 17
8. Accompanying documents and certificates 23
9. Prior use of foreign assistance to strengthening the capacities in organic sector 23
10. Laboratories and methods 26
11. Producer associations 27
12. Recommendations for future steps of the organic sector 28

### Albania report on Organic production 29
1. Legislation/Strategy 30
   1.1. CURRENT LEGISLATION - 30
   1.2. PLANNED TRANPOSITION OF THE EU ORGANIC LEGISLATION. 31
2. Strategy 31
3. Control system in organic agriculture in Albania 31
4. Organic agriculture production in Albania 32
5. Subsidies for organic farming in Albania 32
6. Market for organic products in Albania 33
7. Accompanying documents and certificates 33
8. Prior use of foreign assistance to strengthen the capacities in the organic sector 34
9. Laboratories and methods 34
10. Producers’ associations 34
11. Proposal for further action for growing of the organic farming 35
12. Proposal for joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies 35
**Federation of Bosnia and Herzegovina report on Organic production**

1. Legislation/Strategy
2. Strategy
3. Organic producers’ data
4. System of control
5. Accompanying documents and certificates
6. Prior use of foreign assistance to strengthen the capacities in the organic sector
7. Laboratories and methods
8. Producers’ associations
9. Proposal of further actions for growing of the organic farming
10. Proposal for joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies

**Republic of Srpska report on Organic production**

1. Legislation/Strategy
2. Strategy
3. Organic producers’ data
4. System of control
5. Accompanying documents and certificates
6. Prior use of foreign assistance to strengthen the capacities in organic sector
7. Laboratories and methods
8. Producers’ associations
9. Proposal of further actions for growing of the organic farming
10. Proposal of joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies
### Kosovo* report on Organic production

1. Legislation/Strategy
2. Strategy
3. Organic producers’ data
4. System of control
5. Accompanying documents and certificates
6. Prior use of foreign assistance to strengthen the capacities in the organic sector
7. Laboratories and methods
8. Producers’ associations
9. Proposal of further actions for growing of the organic farming
10. Proposal of joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies

### North Macedonia report on Organic production

1. Legislation/Strategy
2. Strategy
3. Organic producers’ data
4. System of control
5. Accompanying documents and certificates
6. Prior use of foreign assistance to strengthen the capacities in the organic sector
7. Laboratories and methods
8. Producers’ associations
9. Proposal of further actions for growing of organic farming
10. Proposal of joint actions for the regional cooperation to facilitate the transfer of environmentally friendly/organic technologies
Montenegro report on Organic production

1. Legislation/Strategy 80
   1.1. Current legislation 80
   1.2. Planned transposing the EU organic legislation 81
   2. Strategy 82
   3. Organic producers’ data 83
   4. System of control 84
   5. Accompanying documents and certificates 86
   6. Prior use of foreign assistance to strengthen the capacities in the organic sector 87
   7. Laboratories and methods 88
   8. Producers’ associations 88

Republic of Serbia report on Organic production

1. Legislation/Strategy 92
   1.1. Current legislation 92
   1.2. Planned transposing the EU organic legislation 92
   2. Strategy 93
   3. Organic producers’ data 93
   4. System of control 96
   5. Accompanying documents and certificates 97
   6. Prior use of foreign assistance to strengthen the capacities in the organic sector 98
   7. Laboratories and methods 99
   8. Producers’ associations 99
1. Introduction

The Federal Republic of Germany supports regional cooperation among the Western Balkan countries (Albania, Bosnia and Herzegovina, North Macedonia, Kosovo*, Montenegro, Serbia) in order to promote the economic growth and political stability of the region. The contribution to regional integration supports the efforts towards EU accession but is independent of the accession progress of the individual countries. In this context, the agricultural sector offers special opportunities for cooperation, given the strong interests, capacities and potentials on both sides. By aligning their legal frameworks with EU standards, the Western Balkan countries can promote their regional economic integration, expand regional and cross-regional trade and strengthen the economic potential of the entire region.

All Western Balkan countries have faced the rapid transition to market economies and need an alignment with the EU acquis, not only for the EU accession but also the trade, particularly for export of the agricultural and processed agricultural goods on a demanding market as the European market is. In 2018 The EU Commission explicitly reaffirmed in its Western Balkans Strategy that the door to EU accession was open to all six Western Balkan countries if they fulfilled the relevant criteria. The strategy contains an action plan with six concrete flagship initiatives in specific areas of common interest: rule of law, security and migration, socio-economic development, transport and energy connectivity, digital agenda, reconciliation and good neighbourly relations. To implement the EU’s Western Balkans Strategy, concrete actions in these areas were planned between 2018 and 2020, and funding under the Instrument for Pre-Accession Assistance (IPA) was gradually increased until 2020.

The Federal Ministry of Food and Agriculture (BMEL) has a long-standing relationship with the ministries in the Western Balkans. In this context, there is a regular exchange between the BMEL and the respective ministries, as well as with the Regional Standing Working Group for SEE (SWG), where the BMEL has observer status in the SWG. In addition, the BMEL, its departments and various state administrations (e.g., from Bavaria) support the Western Balkan countries through expert missions within the framework of twinning’s project and TAIEX.

Since 2018, the BMEL and the SWG have been cooperating within the framework of the “Expert dialogue on wine regulation” project (November 2018 - October 2021). As part of this project, the partners have discussed the possibilities for expanding the project work to include other topics in the fields of agriculture and rural development. Concrete discussions on an APD started in 2020, and a concept proposal was developed by the SWG and GFA in January 2021 and discussed with the BMEL. The agreed concept proposal was presented to the delegates of the ministries of the Western Balkan countries and the SWG assembly adopted the proposed project concept without any objections.

In the context of the APD, specific advisory and support activities will be offered in three focus areas of common interest to all six Western Balkan countries: (i) technical dialogue on wine (continuation of existing cooperation), (ii) Green Agenda, (iii) knowledge transfer & innovation/AKIS. For each of these focus areas, a Regional Expert Advisory Working Group (REAWG) will be established, consisting of SWG experts, representatives of the ministries of agriculture and rural development, other regional technical experts as well as experts from Germany (at least one representative of a German institution plus one key expert).

As one of the focus areas in the Green Agenda is sustainable agriculture and rural development, the SWG will use its established platforms for regional policy dialogue to analyse the needs of the Western Balkan countries for alignment with the EU’s Green Agenda in the sustainable agriculture and rural development, including specific topic on organic farming. In this respect, it is open to the SWG to also
work on specific technical issues, such as agri-environmental measures and organic farming, as time and finances allow. Where the SWG has also worked on these two topics before and developed a basis for cooperation (previously established REAWGs and assessments), it is important to update the data, analysis and current status of the legislation and make it accessible to all experts involved. International support and expertise are needed to monitor the process, but most importantly to develop guidelines and recommendations based on best practices and expertise.

The SWG has established a Regional Expert Advisory Working Group on Organic Production with relevant representatives and stakeholders from the respective ministries and related institutions and selected the regional and the national country/territory experts responsible for evidence-based evaluation of rural development and sustainable agriculture and organic production policy. After the organization of the kick-off REAWG regional meeting, the national experts are requested to provide an initial assessment on organic production in the six respective countries/territories. Based on the national findings, the regional expert has asked to prepare a regional synthesis report that identify gaps and challenges and to provide recommendations for future sustainable and organic production steps in line with the Green Agenda for the Western Balkans and the EU CAP 2021-2027.

2. Analysed countries/territories

Analysed organic sectors involved following SWG member countries/territories:
- Albania (in the tables indicated with ALB);
- Bosnia and Herzegovina (in the tables indicated with BIH),
  - Federation of Bosnia and Herzegovina (in the tables indicated with FBIH),
  - Republic of Srpska (in the tables indicated with RS);
- Kosovo* (in the tables indicated with KOS*);
- North Macedonia (in the tables indicated with NMKD);
- Montenegro (in the tables indicated with MNE);
- Serbia (in the tables indicated with SRB).

3. General assessment of the organic sector in SWG Member countries/territories

Today, the development of any sector requires compliance with the principles of sustainability, i.e. economic, social and environmental development. Organic farming is an agricultural method aimed at producing food with natural substances and processes. This means that it tends to have a limited environmental impact, as it encourages the responsible use of natural resources in order to maintain biodiversity and ecological balance. Moreover, organic farming is becoming a very important sector to
ensure sustainable development in agriculture. SWG countries/territories have relatively good preconditions for the development of organic agriculture. This is reflected in the low environmental impact in rural areas, i.e. less use of fertilizers and other chemicals, the large number of small family farms and the high level of employment in agriculture.

However, the development of organic agriculture is at an early stage due to the many challenges still facing agriculture in the SWG region.

Based on the fact that most of the production of organic products so far is destined for export, mainly for the market of EU Member States, and the domestic demand for organic products is still very low, it would be very useful to conduct relevant market research in SWG countries/territories in order to analyze to what extent a green marketing strategy could stimulate the consumption of organic products.

Another feature of organic production in all SWG countries/territories is the low efficiency of the organic sector, which is due to the fact that exports are mainly primary products or semi-finished products rather than processed products that would allow for higher gross value added.

Considering that past experience shows that there is a strong correlation between the level of support for organic farming and organically farmed areas, supporting organic farming through public policies requires both economic instruments and legislation. Economic instruments can be, for example: market price support, market regulation, direct support, fees and excise taxes. Direct support is aimed at encouraging production, subsidies and direct investment in the development of this sector, while indirect support is based on research, education and extension services.

The development of organic farming in the SWG countries/territories should be monitored through the development of three basic indicators: the area of organic farming, the number of organic holdings and the number of processing plants.

### 4. Legislation/Strategy

#### 4.1. Current situation of organic legislation in SWG countries/territories

The first steps toward organic production regulation were taken earlier, but from 2009 onwards, the significant historical development of the legal framework for organic agriculture began through the enactment of laws and relevant secondary regulations establishing the principles and rules of organic production in SWG countries/territories.

Common to all SWG countries/territories is that the existing legal framework for organic production has transposed the provisions of EU Regulation No. 834/2007 and the provisions of the main implementing regulation of EU Regulation No. 889/2008 with varying degrees of harmonization.

In all SWG countries/territories, in addition to the Organic Agricultural Production Act, a number of bylaws have been adopted to make the implementing rules for crop and livestock production, aquaculture, organic food and feed processing, labelling inspections, and import more efficient.
<table>
<thead>
<tr>
<th>EU requirements</th>
<th>Corresponding EU legislation</th>
<th>Countries/territories</th>
</tr>
</thead>
</table>

"-" data were not reported

4.2. EU legislation relevant for transposition in the individual legislation of SWG member countries/territories

The European Union has clearly regulated the production and trade of organic products in order to satisfy the demand for reliable organic products from consumers at the same time creating a fair market for producers, distributors and retailers.

In order for farmers to benefit from organic production methods, consumers must have confidence in organic production. Therefore, the EU maintains a strict control system (which is also an accreditation system) to ensure that the rules and regulations for organic products are respected. The control rules also apply to the transformation, distribution and retail sectors. Imported organic food is subject to control procedures to ensure that it has been produced and transported in accordance with organic production principles.

Organic farming was regulated for the first time in Europe with the EU regulation no. 2092 of 1991. At that time, the European Community was called upon to manage the problem of production surpluses. Therefore, a regulated organic market could be supportive of the food market. However, this EC Regulation indicated the method for organic production of agricultural products only, excluding the livestock...
sector and the production of wine and oil, included in the subsequent regulations. However, the procedure and rules for the labelling and control of organic products were already indicated.

With the EU Regulation n. 834/2007, organic production extended its space of relevance. New requests for environmental and biodiversity protection introduce new issues. The objectives were not only to provide a specific market that could respond to consumer demand for organic products but also to provide public goods which would contribute to environmental protection, animal welfare and rural development.

The comparison of the objectives of 2007 with those set out in 1991 clearly shows that organic agriculture had by then made a great deal of progress. Organic agriculture was no longer instrumental to the conventional food market; it had become autonomous with its own proper functions. In this new identity, environmental protection played a central role. This Regulation governed the entire organic agriculture supply chain, including all stages of production, preparation and distribution of organic products. The general principles and objectives of organic farming set by this Regulation were complemented by Regulation (EC) No. 889/2008 which established specific rules regarding organic production, labeling and control of products in the vegetable and animal sectors.

Considering the experience with the application of Regulation (EC) No 834/2007 and after a long consultation process with key stakeholders, in 2018 the European Commission approved a proposal for a new regulation and adopted the new Organic Regulation (EC) No 2018/848. It was originally intended to apply from 1 January 2021. The text of the new regulation was focused on the objective of strengthening consumer confidence in the product, focusing on its quality. However, some of the delegated and implementing acts that should complete this new framework have not yet been drafted, mainly because of the large number of issues that need to be addressed in them and the high level of detail that is required and, of course, the COVID crisis has slowed down the consultation process with stakeholders necessary for the drafting of these acts.

For these reasons, the date of application of the new organic regulation is now postponed to 1 January 2022.

As operators also need time to adapt to these new rules, Regulation (EC) No 2018/848 and the implementing rules provide for transitional periods for the application of the new policies.

The reasons for the intervention of the EU legislator are articulated along two main guidelines:

- Economic development: organic agriculture is one of the sectors that has expanded most in the last decade,
- Adaptation to the regulatory environment: in fact, the Europe 2020 strategy gives priority to sustainable growth and the promotion of a more efficient, greener and more competitive economy.

In the new regulation the objectives will be the following:

- respect natural systems and cycles in order to maintain the balance between the state of the soil, water, air, plants and animals,
- keep the natural heritage unchanged,
- use energy and natural resources responsibly,
- produce high quality food.
Table 1: Main changes brought by Regulation (EU) 2018/848 compared to the Regulation (EC) No 834/2007

<table>
<thead>
<tr>
<th>Scope</th>
<th>Annex I of the Regulation contains a list of products that do not clearly fall under the categories: Live and Unprocessed Agricultural Products; Processed Food; and Feed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective</td>
<td>Promoting short distribution channels and local production</td>
</tr>
<tr>
<td>Production rules for farmers</td>
<td>Certification of producer groups will be possible anywhere in the EU.</td>
</tr>
<tr>
<td></td>
<td>Enabling organic farmers to have access to heterogeneous material, i.e. mainly seeds for arable crops.</td>
</tr>
<tr>
<td></td>
<td>In animal husbandry, a higher proportion of feed should come from the farm itself or from the same region. From 2023, 70% of the feed for cows, sheep, goats, horses, deer and rabbits and 30% for pigs and poultry should come from the region. Today, these percentages are 60% and 20%, respectively.</td>
</tr>
<tr>
<td></td>
<td>Farmers will continue to have access to non-organic seeds or young animals if they are not available as organic products - but only for a certain period of time.</td>
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<tr>
<td></td>
<td>The new rules allow mixed farming, combining conventional and organic production, provided the two are sufficiently separated.</td>
</tr>
<tr>
<td>Production rules for food processors</td>
<td>The most important change concerns the production and use of flavorings. Only natural flavors derived from the specified ingredients (at least 95%) may be used in organic processing.</td>
</tr>
<tr>
<td></td>
<td>A restricted list for detergents and disinfectants for use in processing is established.</td>
</tr>
<tr>
<td></td>
<td>The flexibility in stating the origin of the ingredients is slightly reduced from 98% to 95%.</td>
</tr>
<tr>
<td>Control and certification</td>
<td>The annual physical inspection will be based on a risk-based assessment and will no longer be mandatory for all operators. The physical inspection of low-risk farms or facilities can only be carried out every 24 months.</td>
</tr>
<tr>
<td></td>
<td>The organic inspection system is closely linked to Regulation (EU) 2017/625 on official controls on food and feed.</td>
</tr>
<tr>
<td></td>
<td>Retailers selling only pre-packaged organic products do not need a certification but are subject to official controls under Regulation (EU) 2017/625.</td>
</tr>
<tr>
<td>Labelling</td>
<td>The rules on “labelling” in the new organic regulation apply to any statement, indication, trademark, trade name, picture or sign relating to a product on packaging, documents, signs, labels, rings or bands accompanying or referring to that product. Thus, the rules cover more than just the product’s label.</td>
</tr>
<tr>
<td></td>
<td>Rules for indicating the origin of the agricultural raw materials that make up the product.</td>
</tr>
<tr>
<td>Import rules</td>
<td>By January 1, 2025, at the latest, all non-EU producers will have to be certified in accordance with Regulation 2018/848 in order to export their organic products to the EU.</td>
</tr>
</tbody>
</table>
Table 2: Relevant EU legislation for organic production

<table>
<thead>
<tr>
<th>Basic Act</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulation (EU) 2018/848</td>
<td>Organic production and labelling of organic products and repealing</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Secondary Legislation:</th>
<th>Scope</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Production Rules</strong></td>
<td></td>
</tr>
<tr>
<td>C.I.R. (EU) 2020/2042</td>
<td>Postponement of the date of application</td>
</tr>
<tr>
<td>C.D.R. (EU) 2020/2146</td>
<td>Additional production rules for exceptional and catastrophic</td>
</tr>
<tr>
<td></td>
<td>circumstances</td>
</tr>
<tr>
<td>C.D.R. (EU) 2020/427</td>
<td>Production rules for germinated seed, bees, aquaculture</td>
</tr>
<tr>
<td>C.D.R. (EU) 2020/1794</td>
<td>Improving the availability of propagation material</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/716</td>
<td>Production rules for sprouted seed and chicory heads feed for certain</td>
</tr>
<tr>
<td></td>
<td>aquaculture animals, and treatment of parasites in aquaculture</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/1165</td>
<td>Approval of certain products and substances for use in organic</td>
</tr>
<tr>
<td></td>
<td>production</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/1189</td>
<td>Production and marketing of plant propagating material of organic</td>
</tr>
<tr>
<td></td>
<td>heterogeneous material of certain genera or species</td>
</tr>
<tr>
<td>C.I.R (EU) 2021/1165</td>
<td>Authorization of certain products and substances for use in organic</td>
</tr>
<tr>
<td></td>
<td>production</td>
</tr>
<tr>
<td><strong>Control Rules</strong></td>
<td></td>
</tr>
<tr>
<td>C.I.R (EU) 279/2021</td>
<td>Composition and size of the group, percentage controls and sampling:</td>
</tr>
<tr>
<td></td>
<td>suspicion of non-compliance.</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/715</td>
<td>Requirements for groups of contractors</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/1006</td>
<td>Sample certificate</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/1691</td>
<td>Requirements for record keeping for entrepreneurs in organic production</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/1698</td>
<td>Requirements for the recognition of control authorities and control</td>
</tr>
<tr>
<td></td>
<td>bodies</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/1342</td>
<td>Monitoring of third countries, control authorities and control bodies</td>
</tr>
<tr>
<td>C.I.R (EU) 2021/279</td>
<td>Measures to ensure traceability and compliance with regulations</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/771</td>
<td>Specific criteria and conditions for the verification of the accounts</td>
</tr>
<tr>
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<td>in the framework of official controls</td>
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<tr>
<td><strong>Border Control Procedures</strong></td>
<td></td>
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<tr>
<td>C.I.R (EU) 2020/479</td>
<td>Existing rules for the certificate of inspection - COI (Certificate of</td>
</tr>
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<td></td>
<td>Inspection).</td>
</tr>
<tr>
<td>C.D.R. (EU) 2021/1697</td>
<td>The criteria for the recognition of control authorities and control</td>
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<tr>
<td></td>
<td>bodies responsible for carrying out controls of organic products in</td>
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<td></td>
<td>third countries</td>
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<tr>
<td><strong>Labelling</strong></td>
<td></td>
</tr>
<tr>
<td>D.R. (EU) 2021/642</td>
<td>With regard to certain information to be indicated on the label of</td>
</tr>
<tr>
<td></td>
<td>organic products</td>
</tr>
</tbody>
</table>
5. Strategies for harmonizing with EU Acquis in the Organic sector and Action plans for harmonizing

Members of SWG countries/territories are fully committed to the European integration process and intend to gradually adopt and implement the EU acquis in the field of agriculture and rural development but are also aware that this process requires significant changes in the field of agriculture and rural development.

In their agricultural and rural development strategies, SWG countries/territories have addressed organic agriculture as part of sustainable agriculture in various chapters as an important segment to achieve certain strategic goals. The strategy was identified as a need for a long-term document defining the goals and directions of agricultural and rural development based on and in accordance with the EU Common Agricultural Policy.

The action plan with concrete measures and the timeline for transposition, implementation and enforcement of Regulation (EU) 2018/848 into the national legal framework, is still missing for most SWG countries/territories.

Despite the lack of a formal strategy, action plan, or other strategic documents, the Ministry of Agriculture, Forestry and Rural Development of Kosovo* has recognized the importance of aligning national legislation with Regulation 2018/848 and has started the process of revising local law on organic production. The alignment process is expected to be completed by 2023.

According to the Serbian government’s work plan for 2022, the adoption of the new law on organic farming, which will be harmonized with Regulation (EU) 2018/848, is planned for the fourth quarter of 2022, and the adoption of secondary legislation, which will set out the detailed rules for organic farming, is scheduled for 2023. The Ministry has prepared a draft law on organic production, which is currently being the process of consultation among key stakeholders.

Montenegro also plans to adopt a national law on organic production harmonized with Regulation (EU) 2018/848 in the last quarter of 2022, and secondary legislation is planned to be adopted in 2023, which will establish certain rules for the application of the provisions of the law on organic production.

Considering the fact that most of the production of organic products so far is destined for export, mainly for the market of EU member countries, it is necessary to speed up the process of adopting appropriate action plans for the transposition, implementation and enforcement of the EU acquis in the field of organic production in SWG member countries/territories, especially considering the fact that one of the most important changes brought by the Regulation is the transition from the equivalence principle to the conformity principle. The conformity principle not only creates a level playing field for all producers, who have to meet the same high standards but also gives consumers the assurance that organic products sold on the EU market meet the same standards regardless of their place of origin.

Regulation (EU) 2018/848 states that an organic product or a product in conversion may be imported from a third country to be marketed in the European Union if the product complies with EU organic
production rules or comes from a third country or a control body or control authority whose organic production and control systems have been recognized as equivalent. In the absence of an equivalence agreement under the new organic regulation, products imported into the European Union can only be marketed as organic if they comply with the same rules that EU producers must follow. In this case, therefore, exactly the same rules apply to a producer inside or outside the EU.

As operators also need time to adapt to these new rules, transition periods are provided for in Regulation (EC) No 2018/848 and in the implementing and delegated acts. Regarding the transition period, it is important to underline that economic operators have until 31 December 2024 to adapt their activities to the new Regulation. This means that by 1 January 2025 at the latest, all operators from SWG member countries/territories will have to be certified in accordance with Regulation (EU) 2018/848 in order to be able to export their organic products to the EU, as their attestation of equivalence will no longer be valid after that date.

In this context, the preparation of a new organic law, which should be fully harmonized with Regulation (EU) 2018/848, is a high priority task for all SWG member countries/territories, i.e., for the Ministries of Agriculture as competent bodies for organic production.

6. Organic producers’ data

As far as the management of data on organic production is concerned, the situation among SWG member countries/territories is a bit different. Some of them have complete data, as the law on organic production imposes this obligation, according to which the approved control body is obliged to submit to the competent ministry an annual report on organic production for the previous year, containing at least the following data: arable land used for organic production, the number of operators, crop production by crop and data on organic livestock.

Although the collection of data on organic production is regulated by law, the creation of a data collection system and the establishment of a reliable national database are considered necessary for the future growth of the sector, as some SWG member countries/territories do not have official data and the availability of data on organic production is very limited, as the data come mainly from control bodies and/or organic associations.

One of the challenges and priorities should also be to increase the visibility of national databases that store data on organic farming, such as national statistics - organic areas, entrepreneurs, products, imports, exports, etc. - and sectoral information, such as information on relevant legislation, research activities, available subsidies, etc., so that this data be easily accessible to all actors in the sector.

The total organic area continued to slightly increase in the SWG member countries/territories
The organically farmed area is divided into three main types of use: Arable (mainly cereals, field crops, fresh vegetables, green fodder and commercial crops), permanent grassland (pastures and meadows) and permanent crops (fruit trees and berries, olive groves and vineyards).

The total organic cultivated area in 2020 was almost 37.8 thousand hectares (ha), compared to 29 thousand hectares in 2018. The increase in organic cultivated area between 2018 and 2020 was 30.3%.

The total organic cultivated area is the sum of the “conversion area” and the “certified area”. Before an area can be certified as “organic”, it must go through a conversion process, which can take 2-3 years depending on the crop. Since the conversion of agricultural land takes 2-3 years, a high proportion of conversion land is necessary to avoid stagnation in the growth of certified organic land.

Despite the historical development and continuous improvement of regulatory aspects, the growth of the sector cannot be considered satisfactory, especially when considering the organic cultivated area. The size of the organic cultivated area varies greatly from one SWG member country/territory to another. Serbia had the largest organic cultivated area in hectares (ha) in both 2018 and 2020, but the share of organic cultivated area in total Utilized Agricultural Area (UAA) is still less than 1%. In 2020, the largest share of organic cultivated area in total Utilized Agricultural Area (UAA) was in Montenegro with 1.7%, followed by North Macedonia with about 0.8% and Albania, Bosnia and Herzegovina and Kosovo* about 0.1 % of UAA. The low share of the organic area in the total Utilized Agricultural Area (UAA) means that there is a high potential for further expansion of organically cultivated land in SWG member countries/territories.

Organic forest and wild collection remain the dominant area of production of organic agriculture in Albania, Kosovo* and Montenegro, with more than one million ha.

*Cereal crops represented almost 36 % of the total organic arable area in 2020
As the organic sector is still at an early stage of development, data on organic production in Kosovo* by crops are very limited. The organic sector in Kosovo* is mainly based on the wild collection of non-timber forest products as well as small acreages of medicinal and aromatic plants such as linden, silver birch, mountain tea, as well as blueberries, rose hips, etc. Also, the organic sector also includes mushrooms, pumpkins for seed production/organic oil production and walnuts.

While in Albania the cultivation of medicinal and spice plants dominates with 395 ha (which is almost 72% of the total organic cultivated area), followed by olives (43 ha), a smaller part of the area (6 ha) is used for fresh vegetable production.

In North Macedonia, cereals represent the largest cultivated area with 1470 ha, which is 40,6 % of the total organic cultivated area, followed by fruit crops with 789 ha and fodder crops with 715 h in 2020. These sectors are represented the most mainly because these crops are produced with low use of inputs, especially pesticides, and are therefore the most suitable for conversion to organic farming.

Among perennial crops in Serbia, raspberries rank first with 2,575 ha, followed by apples and plums. Among arable crops, cereals dominate, with wheat in first place with 2,348 ha (10% of the total organic area), followed by corn with 953 ha in 2020.

Among arable crops in Montenegro, cereals are in the first place with 307 ha, and among perennial crops, combined cultivation of apples, pears and plums in the same area is the most common with 564 ha in 2020.

The 2020 figures for organic livestock showed that sheep and bovines most popular species. There were more than 130 thousand organic sheep and 13548 organic bovines in the SWG countries/territories reported in 2019.

The organic livestock sector in North Macedonia is well established in the regional context, especially in sheep with a total of 122,671 animals, followed by 8,396 heads of bovine and 5,406 heads of goat in 2020.

Sheep are the leading livestock category in Montenegro, with a total of 1369 heads, followed by 393
heads of bovine and poultry, with 300 heads in 2020.

The classification of livestock based on use indicates that all sheep are presently reared for meat, whereas goats are all intended for milk production. Among the bovine animals, meat production prevails (200 heads), while milk production accounts for a significantly smaller proportion (only 18 heads).

In Serbia, most livestock categories are evenly developed in terms of numbers, with poultry being the most numerous (14,936 animals), followed by 5,711 heads of sheep and 4,627 heads of cattle.

Beekeeping is the predominant sector in organic livestock production, reaching a total number over 26 thousand beehives. Serbia has 12,618 beehives, followed by North Macedonia with 9,826 and Montenegro with 3,381 beehives in 2020.

7. System of control

Under EU rules, all SWG countries/territories i.e. ministries in charge of agriculture issues, as the competent authority, are responsible for approving and supervising the control bodies, and applying a range of enforcement measures including sanctions, may establish an inspection and certification system, which may be private, public, or a mixture of both. All SWG countries/territories have approved private control bodies to conduct organic control and certification.

The private control bodies must be accredited according to the latest version of the ISO standard IEC 17065:2012. The controls carried out by the accreditation bodies concern the technical competence, independence, impartiality and professional integrity of the control bodies.

In addition to the control bodies recognized by the competent authorities, the inspection and certification activities in the SWG countries/territories are also carried out by the control bodies recognized by the European Commission, i.e. the control bodies recognized for the purposes of equivalence in accordance with Article 10 of Regulation (EC) No 1235/2008.

Regardless of the system chosen, the competent authority is ultimately responsible for overseeing the control system within its jurisdiction and must ensure that organic production and operators are controlled and comply with organic legislation.

**ALBANIA**

A commission for the registration of certification bodies operates in the Ministry of Agriculture, both for domestic and foreign certification bodies. This commission renews the licenses every five years and at the same time supervises the activity of the certification bodies operating on Albanian territory.

The main actor for organic certification in Albania is the only national inspection body Albinspekt, although there are also international inspection bodies. Also, Albinspekt is on the list of recognized control bodies and control authorities for the purposes of equivalence by the European Commission.

**BOSNIA AND HERZEGOVINA**

**Federation of Bosnia and Herzegovina**

The control and certification process is carried out in accordance with the Law on Organic Agriculture (“Official Gazette of the Federation of Bosnia and Herzegovina”, No. 72/16).
Organic production is subject to inspection by control bodies authorized by the Federal Ministry of Agriculture, the nature and frequency of which are determined on the basis of risk assessment, the occurrence of irregularities, and the determination of compliance with the provisions of this Law. Business operators shall be subject to a professional inspection at least once a year, with the exception of businesses engaged in the wholesale of packaged food products and businesses selling directly to the final consumer.

In addition to the compulsory professional control, organic production shall also be subject to official control in accordance with the provisions of this Law and the regulations issued on its basis.

The authorized inspection body referred to in this Law shall, on the basis of the report on the inspections carried out, issue a certificate for an enterprise that is included in the inspection system and meets the requirements laid down in this Law. The certificate shall contain at least the name of the establishment, the quantity, the type and/or the list of products to which the certificate applies, and the period of validity of the certificate.

The approved inspection body for imported organic products shall, on the basis of applications from the registered importer and the inspection of the documents and certificates issued by the competent authority of the country of origin, issue a certificate from a system equivalent to the system established by this Act and the regulations issued on its basis.

As part of the procedure for issuing the certificate, the entity importing organic products shall submit to the authorized inspection body an application and the necessary documents to establish that the product was produced in an equivalent system.

**Republic of Srpska**

Control of organic production is carried out in accordance with the Law on Organic Production (“Official Gazette of the Republic of Srpska” No. 12/13) and the Rules and Regulations on the Conditions for the Work of Control Organizations and the Manner of Carrying out Controls in the Process of Organic Production (“Official Gazette of the Republic of Srpska” No. 77/16). Control is carried out at all stages of production for all organic products using the appropriate control method and based on a documented procedure. The control starts from the moment when the producer enters into organic production, i.e. from the moment when the producer concludes a contract with the authorized control organization for the implementation of control and certification in organic production. The established control system should enable traceability of each product at all stages of production, processing and marketing in accordance with the regulations applicable to this area and ensure that the organic product is produced or imported in accordance with the law.

On the territory of the Republic of Srpska, on the basis of the Law, two control bodies are authorized to carry out control and certification activities in organic production:

- Organic Control System (OCS), Subotica, with an office in the Republic of Srpska and.
- ORGANIC CONTROL (OC), Sarajevo, with an office in Eastern Sarajevo.

The process of control and certification of organic production is also carried out by “Eco BH biocert”, but this control organization has no authorization from the Ministry of Agriculture, Forestry and Water Management of the Republic of Srpska.

Control of organic production includes also physical control and control of producer documentation and application of preventive measures. The control organization carries out an unannounced spot check at least once a year, in accordance with the long-term control plan for organic production. Inspection in organic production may be carried out several times a year on the basis of critical control
points established individually for each producer on the basis of a general assessment of the risk of non-compliance with the organic production rules and taking into account the results of previous inspections, product quality and the risk of mixing organic products with products from conventional production.

If the producer enters into a cooperative agreement with other producers engaged in a similar type of organic products for the needs of organic production, in production units, i.e. in the collection area located in the same geographical area, they shall establish their own internal control system.

When importing organic products, in addition to the data provided by domestic producers, the importer shall provide the control organization with data on the importer’s premises and its activities during import, the place of import of the product into the Republic of Srpska - Bosnia and Herzegovina, and the facilities and premises where organic products are imported until their delivery to the first recipient. At the request of the control organization, data on the organization of transport from the exporter to the first consignee shall also be provided.

If the inspection reveals certain irregularities in the implementation of the production of organic products, the inspection organization may impose corrective measures on the producer in order to bring the products into compliance with the rules of organic production in accordance with the law. A report shall be prepared on the irregularities found and the corrective measures proposed, which shall be signed by the control organization and the producer.

If serious irregularities are found in the conduct of organic products which cannot be corrected and which relate to the use of organic production methods and the use of means not permitted in organic production, the control organization shall impose a suspension measure on the producer and order the abandonment of other organic products.

**KOSOVO**

The Ministry of Agriculture, Forestry and Rural Development, as the competent body, is responsible for setting up a control system for organic production involving control bodies that carry out the control and certification procedures for organic operators. The law governing organic production foresees that these controls include physical inspections of production or processing facilities, verification of record keeping, and sampling of produce, soil, and/or plant foliage to detect pesticide (PPP) residues, unauthorized produce, and/or impurities, as well as verification of production practices that are not compatible with organic production.

Currently, there is no recognized local inspection body in Kosovo*, so the legislation is not enforced in the absence of local inspection bodies. Certification of organic products is carried out by the international certification bodies listed below:

- Albinspekt XK-BIO-139;
- Q-check P.C. XK-BIO-179;
- Organskakontrola.ba XK-BIO-101;
- Bio-inspecta.ch XK-BIO-161.

Placing the organic logo on the product with the aim of informing consumers that organic products have been produced in compliance with the requirements as provided for in the relevant legislation. For processed products, the use of the logo means that at least 95% of the ingredients of agricultural origin are organic. In addition, when the organic logo is indicated on the product, the code number of the inspection body that carried out the certification of the product should be indicated.
It is worth mentioning that the control system is not yet implemented in Kosovo* due to the lack of enforcement of the national legislation. The control of organic producers in Kosovo* is based on the control system of certification bodies to meet the requirements of the EU organic market, without the participation of local institutions.

**NORTH MACEDONIA**

The Law on Organic Agriculture (Official Gazette of Macedonia No. 146/2009) and the relevant regulations stipulate that the entire control and monitoring system for organic agriculture is carried out by the State Agricultural Inspectorate, the Food and Veterinary Agency as competent authorities, and the certification bodies. The control process begins with an application form for the certification procedure, which is submitted to one of the two accredited certification bodies in the country:

- Procert
- Balkan Biocert.

The control carried out by the certification bodies includes a series of procedures for the document verification and physical inspection of the farm/unit, the order of which is determined by the inspector/controller. The result of the inspection is a report describing the current condition of the operation/unit. Certification is based on the inspection report, which contains the results of the inspection. The certification decision is made by a suitably trained and approved certification officer who has not participated in the inspection and has no conflict of interest with the applicant. In case of non-conformities, the certification officer may impose specific conditions and sanctions.

The certification bodies have the right to carry out unannounced checks or additional inspections if non-compliances have been previously identified.

Certification body inspectors and agricultural and veterinary inspectors are allowed to take a sample for laboratory analysis and, if necessary, super-analysis on-site at all stages of organic production. The sample is sent to one of the accredited laboratories in the country or abroad for specific analysis. The laboratory analyses are also carried out at the end of the conversion period. For the products that are already on the market, the sampling and controls are carried out by the inspectors of the Food and Veterinary Agency.

In case of import of organic products, the importer’s premises and documents, other premises for storage of imported goods, traceability system, copies of certificates and other necessary accompanying documents for the producer, origin of products, export, transport, import and placing on the market are officially controlled.

**MONTENEGRO**

Law on Organic Production regulates the sector of organic production and related issues such as labelling of organic products in the territory of the Republic of Montenegro. This Law applies to organic products marketed or intended to be marketed as follows: live or unprocessed agricultural products; processed agricultural products for food use; aquaculture products; feed; seeds and seedlings; yeasts used for food and feed. The law is divided into IX chapters, which contain inspection provisions, violations and corresponding penalties.

Supervision of the implementation of the Law and the bylaws issued on the basis of this Law is carried out by the administrative body responsible for supervision through the inspector of the Ministry of Agriculture and Rural Development.

Before the beginning of the first (initial) inspection, the producer signs a contract with “Monteorganica”, the certification body approved by the Ministry of Agriculture and Rural Development. After the sub-
mission of the complete application documents, the inspector of “Monteorganica” makes an appointment with the producer to carry out the first (initial) inspection. The inspectors of the certification body go to the field at the agreed time and inspect the entire farm of the registered producer, making an on-the-spot assessment of the current situation, verifying the information provided in the applications and assessing the degree of compliance with the organic production rules.

During the physical inspection, the inspector takes samples from the production units to check compliance with the conditions for organic production. The number of samples per year is at least 5% of the total number of control subjects. The selection of control subjects for sampling is based on a risk assessment and on the basis of non-compliance with the organic production rules.

The decision-making process on the certification status of producers is the final evaluation and approval of the control results regarding the producers’ compliance with the organic production rules. Certification is strictly separated from inspection, and the decision on certification is made by the person who did not perform the inspection. If the producer complies with the conditions set out in the law and regulations on organic production, he or she is granted the status of a transitional period of specified duration; the transitional period does not apply to the collection of forest fruits and medicinal plants, while the transitional period in livestock production is linked to the provision of organic feed for livestock production.

The logo of the certification body does not have to be placed on the declaration. If the operator wishes to affix the logo of the certification body, he must first fill out the relevant application, which can be found on the official website of the certification body.

**SERBIA**

Control of organic production is carried out in accordance with the Law on Organic Production to ensure objectivity, impartiality, absence of conflicts of interest, efficiency, professionalism and consistency:

- In all phases of organic production;
- for all organic products;
- by applying adequate and appropriate control methods;
- on the basis of the documented procedure.

The control system established allows the traceability of each product at all stages of production, processing and sale/marketing, in accordance with the Food Safety Act, to guarantee that the organic product has been produced or imported in accordance with the Organic Production Act.

The control starts at the moment when the producer enters organic production, i.e. at the moment when the producer concludes and signs a contract with the authorized control body on the implementation of control and certification in organic production.

According to the Law on Organic Production, before placing products on the market as “organic” or “in conversion”, operators and groups of operators must declare their activity to one of the authorized control bodies that carry out control at all stages of organic production. The approved certification body is obliged to carry out a full physical inspection and an inspection of the operator’s documentation at least once a year and to prepare a written report on the inspection carried out, which must also be signed by the operator.

The Minister shall determine by the decision whether the requirements for inspection and certification performance in organic production have been met. The decision of the Minister shall be valid for a period of one year and may be extended in accordance with the conditions specified in this Act. The Ministry shall draw up a list of approved control bodies and publish it once a year in the “Official Gazette of the Republic of Serbia”.
For the year 2021, the Ministry has approved six approved certification bodies, namely:
- Organic Control System,
- Ecocert Balkans,
- Ekovivendi,
- TMS CEE,
- CIN, and
- SGS.

For certified organic products that are imported, the authorized certification body issues a confirmation that the product has been produced in accordance with the Law on Organic Production and the regulations issued on the basis of this law, on the basis of the performed control of the documents and the certificate issued by the competent authority of the country of origin.

Market control of organic products is the responsibility of the Agricultural Inspection Sector as part of the Ministry of Agriculture, Forestry and Water Management. The Organic Production Law prescribes penalties for companies that market non-organic products labelled as organic, market organic products without a valid certificate from an authorized inspection body, or market imported organic products for which there is no confirmation from the authorized inspection body.

In addition, the Agricultural Inspection Sector is responsible for monitoring the work of the authorized inspection bodies within the scope of the delegated tasks. The law also provides sanctions for the inspection bodies if, for example, they do not carry out the inspection and certification tasks in accordance with the law or do not carry out a complete physical inspection and an inspection of the operator's records at least once a year, or if they do not prepare a written report on the inspections carried out or issue a certificate that contradicts the report on the inspections carried out.

Every year, the approved inspection body is obliged to submit to the Ministry, by 31 January of the current year, an annual report on organic production for the previous year, containing all the above-mentioned data. Based on the data from the annual reports of the approved inspection bodies, the Ministry shall keep cumulative records of organic production.

Figure 1: General organization of the supervision and control system of the organic sector
8. Accompanying documents and certificates

The regulations for imported organic products are very different in SWG countries and territories, some SWG countries and territories have included the import rules in the national regulations. In Montenegro, for example, organic products may be imported if the operator has a certificate issued by an inspection body recognized by the European Commission. The certificate issued by control bodies that are not recognized by the European Commission is subject to a recognition procedure by the competent national authorities.

In North Macedonia, a certificate of conformity must be issued by Macedonian certification bodies for imported products. In BiH and Serbia, there are import regulations that are part of the national legislation for the import of certified organic products. The empowered certification body must issue a confirmation that the product has been produced in accordance with national laws and regulations and meets certain requirements (checking documents and the certificate issued by the competent authority of the country of origin).

Due to the lack of enforcement of organic legislation in Kosovo*, the control system is not applied in the domestic organic market. On the other hand, the export of organic products requires the accompanying document Inspection Certificate, which confirms that the product has been produced according to the rules of organic agriculture that are in compliance with the EU organic regulations (Regulations (EC) 834/2007 and 1235/2008), as well as a Unified Administrative Document issued by the Customs Authority and a Phytosanitary Certificate issued by the Food and Veterinary Authority of Kosovo*.

In Serbia, certified organic products can be exported only with a valid certificate issued by an approved inspection body. The exporter must indicate in the relevant section of the customs declaration that the product is organic, as well as the number of the certificate attached to the customs declaration, as specified in the Rulebook on the Form, Content, Method of Presentation and Completion of Declarations and Other Forms in the Customs Procedure, issued by the Ministry of Finance.

9. Prior use of foreign assistance to strengthening the capacities in organic sector

All SWG member countries and territories need to further strengthen their capacity to formulate, implement and enforce organic sector policies.

ALBANIA

The long-standing cooperation with the Institute of Organic Agriculture in Switzerland (FiBL) played the most important role in the training of Albanian professionals and farmers. In the framework of this project, institutions such as organic farming associations, an institute for organic farming, a certifica-
tion body and an association for the marketing of organic farming products were established. Currently, there is an ongoing project called “Organic Trade for Development” supported by the Swiss State Secretariat for Economic Affairs SECO (September 2019 - June 2023): Albania, Serbia and Ukraine. The project includes the following activities:

Activity 1: Production level - Public-private partnership projects to improve the business environment and local environment; enabling legal framework to support production and producers;

Activity 2: Marketing level - National campaign to promote OP; Facilitate market access for local farmers’ products; Promote remote areas to market;

Activity 3: Support level - Strengthening business support organizations; Training certification bodies; Establishing import and export platforms through sectoral events; Organizing Organic Leadership Course.

**BOSNIA AND HERZEGOVINA**

An important initiative among the cooperation projects in Bosnia and Herzegovina took place in 2005 within the framework of the EU program CARD (Community Assistance for Reconstruction, Development and Stabilization) when the non-governmental organization LIR (“Local Development Initiative”) implemented the project for the development of organic production and the creation of a cluster for organic production in the northwest of Bosnia and Herzegovina. Another initiative is the project “Farma II” (2016-2020) (Phase II of “Farma I” (2010-2015)) supported by USAID and SIDA. It aims to increase the confidence of local consumers to purchase organic food and agricultural products produced in Bosnia and Herzegovina and to support export to the EU market by providing technical assistance and training to improve the competitiveness of the sector and increase the production of value-added food products.

In 2015, the “Association for Rural Development - ARD Banja Luka” together with the Center for Economic and Rural Development - CERD and the Civic Association “Something More” implemented the project “Improvement of Organic Farming Policy and Harmonization with EU Standards”, funded by the European Fund for the Balkans.

In the area of capacity building and education, an important tool for the Federation of Bosnia and Herzegovina and the Republic of Srpska is the EU TAIEX - Technical support/Technical assistance and information exchange of the European Commission, which supports public administrations in harmonization, application and enforcement of EU legislation and facilitates the exchange of EU best practices.

**KOSOVO**

The main projects funded by foreign donors that have supported the organic sector can be summarized as follows:

- OSAGRI project (2010-2017) - Strengthening the Kosovar Ministry of Agriculture, Forestry and Rural Development to improve vegetable production according to EU standards: The project aimed to support the Ministry of Agriculture, Forestry and Rural Development (MAFRD) in the implementation of initiatives on the territory of Kosovo from the perspective of the European integration process and the standards required for it.

- GIZ project (2017 -2020) - Competitiveness of the Private Sector in Rural Areas (COSIRA): this project supported the competitiveness of the private sector in rural areas.

- USAID Project (2015 - 2021) - Agricultural Growth and Rural Opportunities (AGRO): this project aims to support the value chain of soft fruits (including strawberries, raspberries, and cranberries), MAPs, NTFPs, and organically grown fruits that have a profitable market and export by supporting strategic partners with technical assistance and grants to become the main drivers
- **GIZ Project (2018 - 2021) - Creating Employment through Export Promotion (CETEP):** the project aims to create employment through export promotion.
- **Caritas Project (2020- 2023) - Sustainable and Inclusive Rural Economic Development (SIRED):** the project aims to change the performance and behaviour of existing system actors (public and private) to make the market system more beneficial to beneficiaries. Using an enabling approach, project activities target systemic change along three dimensions: agroecological socio-political, and economic. More sustainable and inclusive market systems contribute to poverty reduction and empowerment, especially among rural women and marginalized people.
- **Swisscontact Project (2017 - 2021) - Phase II: The Promotion of Private Sector Employment (PPSE).** The project aims to create jobs for young people through small and medium enterprises, focusing on youth, women and minorities.

### NORTH MACEDONIA

In the previous period, there were several activities and projects implemented with the main goal to strengthen the organic production capacities, increasing public awareness, as well as to adapt the legal framework in North Macedonia:

- “Education for organic agriculture,” funded by the Peace Corps, 2005 and “Education for organic production of small fruits” funded by MAFWE, 2009, with an aim to educate farmers about the principles of organic production.
- **IPA Twinning Project “Organic Agriculture Production and Quality Protection of Agriculture Products” (2013-2014) – resulted in several amendments which were adopted in 2016**
- **International cooperation project “Increasing Market Employability-IME” (2014-2018) – established the first register of organic farmers in North Macedonia**
- **IPA INTERREG project “Produce organic – package ecologically” (2016-2018) – aimed at increasing public awareness of organic production;**
- **Collaboration with the Swiss Foundation for the Promotion of Organic Agriculture (2018), with an aim to harmonize the national legislation with the EU 2018/848 regulation. Until today, this aim is not achieved.**

### MONTENEGRO

- **The “Organic Agriculture Development Program” (OADP) is one of the relevant cooperation projects implemented in the organic sector between 2009 and 2013 and led by MARD in collaboration with the Danish government. OADP consisted of two components:**
  i) **Institutional Development (support for organic education and research, preparation of “Monteorganica” for accreditation, training of agricultural extension service providers, and support for the development of producer associations);** and
  ii) **Competitiveness Component (establishment of a grant facility for research in organic production, processing, and distribution, and support for marketing and promotion of organic food).**
- **Project “Organic Agriculture in Montenegro: Joint Support to Small Producers in Organic Agriculture” UN-FAO. Period 2008 – 2010.**

In the area of education and training, the Biotechnical Faculty (University of Montenegro) plays a leading role by conducting applied research that addresses critical issues in organic production, particularly greenhouse cultivation. Collaboration and networking with institutions in the region and in the EU dealing with organic agriculture are also encouraged in order to gain cutting-edge knowledge and expertise in this sector.
SERBIA

- Twinning project “Strengthening capacities for implementation and further development of the legal framework in the field of organic production and food quality policy” 2018-2020. This Twinning project in the field of organic production covered various topics and objectives, which are listed in the following activities:
  - Activity 1: Alignment of national legislation and implementation procedures with the corresponding EU requirements in the field of organic production;
  - Activity 2: Establish an effective control system for organic production;
  - Activity 3: Improve the capacity of the BL staff in the area of organic production promotion and awareness campaign.

- The FAO-supported project “Support to Organic Agriculture” (July 2021 to June 2023) includes the following activities:
  - Activity 1. Strengthen the policy process to align national legislation with the EU acquis, including the alignment of organic legislation with EU standards and practices;
  - Activity 2: Assess the organic livestock sector in the south-eastern region of Serbia and develop an action plan to address the gaps and challenges;
  - Activity 3: Awareness raising and promotion of the organic livestock sector.

- The project “Organic Trade for Development” is supported by the Swiss State Secretariat for Economic Affairs (SECO) (September 2019 - June 2023), with the following countries of operation: Albania, Serbia and Ukraine. The project includes the following activities:
  - Activity 1: Production level - Public-private partnership projects to improve the business and local environment; enabling legal framework to support production and producers;
  - Activity 2: Marketing level - National campaign to promote OP; Facilitate market access for local farmers’ products; Promote remote areas to market;
  - Activity 3: Support level - Strengthening business support organizations; Training certification bodies; Establishing import and export platforms through sectoral events; Organizing Organic Leadership Course.

10. Laboratories and methods

At each stage of the organic production process and after the products have been placed on the market, a sample may be taken for specific analysis in a laboratory accredited to the ISO 17025 standard. The accreditation bodies in SWG countries/territories maintain a register of laboratories accredited to the ISO/IEC 17025 standard, which contains information on the scope of accreditation, including a brief description of the scope.

In organic crop production, analyses are usually performed to detect pesticide residues or heavy metals; in organic livestock production, analyses are performed to detect antibiotics. In organic beekeeping, laboratory analyses are usually performed for pesticide residues in beeswax and for sucrose content in organic honey. For specific analyses for which there is no accredited method in SWG countries/territories, the sample may be sent to an accredited laboratory abroad.

Some SWG countries/territories do not have accredited laboratories with the appropriate level of accreditation scope for organic production, or they have accredited laboratories but very limited labora-
tory capacity for analysis, testing and diagnosis, so the majority of samples taken are sent abroad for analysis. This mainly happens in Kosovo* and Albania.

According to the Law on Regulation of Food Safety Issues, the Minister of Agriculture appoints official laboratories to perform laboratory analysis, testing and diagnosis on samples taken during official controls as well as other official activities. The Minister may designate only one laboratory as an official laboratory that operates in accordance with the EN ISO/IEC 17025 standard.

### 11. Producer associations

Adequate education and research are considered a priority for organic producers in all SWG countries/territories, as most producers face many challenges, such as understanding organic production principles, meeting organic certification requirements, and acquiring technological and practical know-how.

In all SWG countries/territories, there are several associations of organic producers and entrepreneurs at local and national levels whose main objective is to represent organic producers and promote organic production, share experiences and knowledge through training, workshops and consultations, and support the marketing of organic products.

There are several organic associations in Albania. In addition to farmers and farmers’ associations, organic associations are also composed of other stakeholders, researchers, university professors, etc. In the field of marketing, the Albanian Association of Marketing (AAM) is an important actor in the development of marketing strategies and cooperation with private and public institutions.

At the FBiH level, the National Association of Organic Producers (“Organsko FBiH”) was established, which was the first initiative of farmers’ associations. Nowadays, there are smaller local associations of organic producers that work closely with the national association “Organsko FBiH” and have various regional and cantonal associations as members.

In the Republic of Srpska, the establishment of the Association of Organic Producers in the Republic of Srpska is underway, which aims to support the development of organic production, improvement of the support system for organic producers, promotion of organic production and organic products, market development, organization of fairs and events, etc.

Currently, there are two local associations in Kosovo* that play an active role in the development of the sector: the Association “Organika” and the Initiative for the Development of Agriculture in Kosovo* (IADK). The association “Organika” focuses on improving cooperation between the actors of the sector and further development of the sector through promotion on foreign markets and lobbying. In addition, “Organika” wants to support the conversion of all its members (producers) to organic production in the next 5-7 years and cover most of the export with certified organic products. On the other hand, IADK aims to develop farmers’ production capacities, increase their competitiveness in the market, disseminate knowledge about the best practices of agricultural production and domestic food processing, and advocate for policies and projects that contribute to rural development. IADK has participated in many projects during its operation and supports organic producers mainly through organic agriculture training and capacity building.

The North Macedonia Organic Producers Federation (NMOPF) is a national umbrella organization established by the regional organic producers’ associations. It was established with the aim of coordinating and leading the organic movement in the country and is active at the local, national and international levels.
According to data on organic production managed by the Ministry of Agriculture, Forestry and Water Management of Montenegro, there are 426 operators who are dealing with organic production. Most of these operators function as individuals so no group certification at this moment is applied. There is one national association of organic producers – “Organic Montenegro”. This association was founded as an NGO, but today it is no longer in operation.

Among other important actors in the organic sector, the National Association for Organic Production “Serbia Organica”, as an umbrella organization, plays an active role among organic producers and consumers. In Serbia, there are also other associations such as “Terra’s”, the “Organic Cluster Vojvodina”, the “Center for Organic Production Selenča”, the civic association “Luka znanja” (The Knowledge Port) and others.

12. Recommendations for future steps of the organic sector

In the Western Balkan countries/territories, agriculture and its related sectors, as one of the most important productive sectors, still contribute about 10% to the Gross Domestic Product (GDP), while agriculture, forestry and fisheries employ almost 20% of all workers (40% in the case of Albania).

Since the Western Balkan countries have agreed to implement the Green Agenda Action Plan, one of the goals of which is to promote environmentally friendly and ecological agriculture, the development of an action plan with specific measures and activities to achieve this goal should be a priority for all Western Balkan countries/territories.

It is also clear from the reports of the regional experts that an action plan for further harmonization with the relevant EU acquis in the framework of organic production is missing.

Considering the fact that the new EU organic regulation replaces the equivalence principle with the conformity principle, and the fact that most organic products are marketed mainly in the EU Member States, it is necessary to accelerate the process of adopting appropriate action plans for the transition, implementation and enforcement of Regulation 2018/848 with implementing and delegated regulations in all SWG countries/territories.

As organic operators also need time to adapt to these new rules, transition periods should be also provided in the new organic law, noting that Regulation 2018/848 provides for a transition period for adapting until December 31, 2024. This means that by January 1, 2025, at the latest, all organic operators from SWG member countries/territories must be certified in accordance with Regulation (EU) 2018/848 in order to be able to export their organic products to the EU, as their certificate of equivalence will no longer be valid after that date.

In this context, the elaboration of a new organic law, which should be fully harmonized with Regulation (EU) 2018/848, is a high priority task for all SWG member countries/territories, i.e. for the Ministries of Agriculture as competent bodies for organic production.
ALBANIA REPORT ON ORGANIC PRODUCTION

Prepared by
Mr. Enver Isufi
1. Legislation/Strategy

1.1. Current legislation -

<table>
<thead>
<tr>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Harmonized with EU regulation (Yes / No / Partly)</th>
</tr>
</thead>
</table>
1.2. Planed transposition of the EU organic legislation.

Until now, the new Regulation (EU) 2018/848 has not been adopted in Albania.

The Organic Marketing Association had the initiative to invite experts from the Institute for Organic Agriculture in Switzerland, (FiBL) or experts from IFOAM, in order to assist Albanian experts in designing of new Albanian law in compliance with EU regulation 2018/848.

A project about this was discussed, but has not been finalized yet.

2. Strategy

In Albania, the last Action Plan for Organic Agriculture was for the period 2007-2013. In the framework of the Action Plan for Albanian Agriculture 2021-2027, there is a discussion to begin work on the Action Plan for organic agriculture, but a working group has not been established.

3. Control system in organic agriculture in Albania

The Commission for Biologic Production in the Ministry of Agriculture and Rural Development has authorized “Albinspekt bio.inspecta” as a certification body, for certification in accordance with Law No. 106/2016 “On biologic production, labelling of biologic products and their control”. This certification body is registered in the European Commission list for CB. Last year “Albinspekt bio.inspecta” has established cooperation with the certification body in Switzerland “BIO-INSPECTA”.

Albinspekt bio.inspecta is also certified outside Albania.

Albinspekt bio.inspecta certifies products ordered from different foreign companies. It performs this on the basis of an EC Regulation, plus some specifics of in that are required from orders.

Address of Albinspekt bio.inspecta: Rruga Ded Gjon Luli, Pall. 5, Shk.1, Ap.8, 1000 Tirana, Albania

Internet address: http://www.albinspekt.com

II. Certification of organic products intended to be exported,

“Ecocert SA”

Address: BP 47, 32600 L’Isle-Jourdain, France

Internet address: http://www.ecocert.com

In the Ministry of Agriculture, a Commission for Registration of certification bodies is in operation, both for local and foreign certification bodies. This commission renews the licenses every five years, and the same time the commission supervises the activity of certification bodies that are active on Albanian territory.
4. Organic agriculture production in Albania

From the Albanian Ministry of Agriculture, the data collection is delegated to a certification body (Albinspekt- Bio.inspecta).

In the last two years, data collection has improved in comparison to the past. Organic data are collected and prepared in accordance with the MOAN templates, which include the indicators of EU legislation such as:

- the number of organic producers, processors and exporters;
- the organic and in-conversion area;
- the organic and in-conversion production;
- the organic livestock numbers and the organic animal products;
- the organic processing production;

The collection of data for products that are exported and imported is not regulated, and all this results in the fact that there is no relevant official data for this. There were discussions and initiatives to prepare an order that would ensure the collection of data for the import and export of organic products in order to solve this issue permanently, but it was not achieved, and Albania still does not have this data.

<table>
<thead>
<tr>
<th></th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wild and forest area (Ha)</td>
<td>380612</td>
<td>613893</td>
<td>648292</td>
<td>677716</td>
</tr>
<tr>
<td>Cultivated area</td>
<td>526</td>
<td>748</td>
<td>623</td>
<td>897</td>
</tr>
<tr>
<td>Total org. area</td>
<td>381138</td>
<td>614641</td>
<td>648915</td>
<td>678613</td>
</tr>
</tbody>
</table>

In comparison with the total agriculture surface, organic is a very small part, or less the 0.2 %, although, organic surface is increasing from year to year, in line with the improvement of the subsidies scheme of the Ministry of Agriculture.

5. Subsidies for organic farming in Albania

Since 2017 in Albania there is a subsidies scheme for organic farmers.

For organic farming in 2021 the following measure was offered:

- Organic farms are supported by 750 euros for the first year of conversion,
- In the second year by 1200 euros, and
- Farms certified as organic with 1600 euros.

The average size of an organic farm is 1.5-2 ha. For the small farms the support is not so unsatisfactory, but the Ministry is in discussion in order to increase the subsidies quota for farms sized between 3-5 ha, or more than 5 hectares of cultivated surfaces.
The IPARD III Programme prepared the scheme on Environmental Protection and Organic Agriculture, which is expected to start implementation in the coming year.

The support will be provided only for cultivated vegetables, fruits and MAPs that are certified as organic or are in conversion on the whole territory of Albania.

Measure 4: Agri-environment – climate and organic farming measure is part of the second package of three measures which have been envisaged in the program strategy to be developed, adopted, and start implementation after the entrustment of the first package of measures.

6. Market for organic products in Albania

Organic production is export-oriented and only large retail shops as supermarkets are offering imported organic products in Albania.

Export remains the main orientation of the Albanian organic operators, where mainly medicinal and aromatic plants (MAPs) and plant essential oils are exported and a little amount of olive oil.

Almost all products from wild collection are exported, having as destination different countries such as Germany, Austria, France, Switzerland, USA, Bulgaria, Turkey, etc.

In Albania, the local market of organic agricultural products is lacking, while consumer demand is increasing for these products.

In the case of some products, like olive oil, significant quantities are sold directly at the farm gate but with prices which are almost the same as conventional.

Selling points are not so well organized.

Activities for consumer education, promotion of organic products, and promotion of the national logo are not so well organized.

However, the Albanian consumer demand for organic products has increased the demand for more vital organic food.

7. Accompanying documents and certificates

For the export of organic products, only a certificate from the certification body is needed, which is determined in the agreement between foreign buyers and Albanian sellers. The minimal standard must be EC Regulation in power.
8. Prior use of foreign assistance to strengthen the capacities in the organic sector

Organic Agriculture in Albania is 24 years old, when the first organic agriculture organization is founded (July 1997).

During this period many projects have been active in supporting of organic agriculture movement in Albania, in supporting technical assistance too. Some of these are Avalon Holland, USAID, Swiss cooperation, Italian cooperation, etc.

The cooperation from ten years with the Institute for Organic Agriculture in Switzerland (FiBL), was the most important institution in the education of Albanian experts and farmers (2001-2011).

This project has created institutions such as Organic Agriculture Associations, the Institute for Organic Agriculture, a Certification body, Association for marketing Organic Agriculture products. This project has supported the publication of the magazine “Organic Agriculture” and many other publications.

Last year’s extension service in organic agriculture is weaker than before.

Public extension service is organizing only some seminars. The Institute for organic agriculture has limited capacities to support the farmers and trainers, both on farm research and extension in organic agriculture too.

9. Laboratories and methods

In Albania there are laboratories for testing fertilization and pesticides, but the majority of samples are analysed in laboratories out of Albania. Albania has one accredited laboratory, but for limited analysis.

10. Producers’ associations

Albania has organized production associations in the field of organic production. Most of the farmers are individual farmers (especially focused on export) and are members of the Institute for Organic Agriculture, and some of them are organized into small farmer groups (with 15 to 20 farmers). It is difficult for organic agriculture associations to function without donors. One of the groups is Bio-Zadrima in North Albania. The Albanian Association for Marketing is also in operation. This association is engaged in marketing, promotion of bioproducts, logo protection, in the marketing of local and typical products, brand name creation etc.
11. Proposal for further action for growing of the organic farming

- Designing as soon as possible an Action Plan for the development of Organic Agriculture in Albania (2021-2030)
- As soon as possible, to finalize Albanian legislation in conformity with the last EC organic regulation
- Within 2030, organic agriculture should reach 5% of total agriculture surface
- To organize farmers in associations in big cooperatives and in Federates, in order to be competitive in the market.
- Strengthening of on-farm research and extension in organic agriculture
- In the Ministry of Agriculture, there must be a directory for organic agriculture in function, for coordination of all the actors that are engaged in the production, processing and in the marketing of organic products.
- To increase in the significant figure the budget for subsidizing organic agriculture operators
- More public education on the value of the organic agriculture system in human health, biodiversity and environmental protection in general, including the children, pupils, and students in universities.

12. Proposal for joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies

- To develop some regional activities, in order to better know the organic agriculture between Balkan countries such as:
- Exchange of information about organic agriculture in each Balkan country through a list of organic products, produce by each country
- To organized Balkan organic fears with the participation of all Balkan producers, one season in one country in another season in another Balkan country.
- Visits of farmers, processors, and traders to each other, in order to exchange experience and information.
- To have an agreement for recognition of Bio-certificates between countries in the region. This is to avoid the certification cost.
- To have information for a positive list of inputs, in order to stimulate the marketing between region countries
- To organize a regional conference for organic agriculture and marketing of organic products between Balkan countries.
- To link Universities to exchange the experience for the development of organic agriculture practices and innovation technologies
- To exchange the experience for organization and function of extension service in Balkan countries
- To have a regional website platform for organic agriculture at the regional level.
- This will be a window, where each country will see the development steps of the neighbouring countries.
FEDERATION OF BOSNIA AND HERZEGOVINA REPORT ON ORGANIC PRODUCTION

Prepared by
Prof. Dr. Mirha Djikic
### 1. Legislation/Strategy

#### 1.1. Current legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
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<th>Harmonized with EU regulation (Yes / No / Partly)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law/bi-laws</td>
<td>- Law on Organic Production of the Republika Srpska (“Official Gazette of the Republika Srpska”, No. 12/13) &lt;br&gt; - Rulebook on the conditions for issuing certificates for organic products &lt;br&gt; - Rulebook on the conditions for the work of control organizations and the manner of performing control in the process of organic production &lt;br&gt; - Rulebook on technological processing procedures in organic production &lt;br&gt; - Rulebook on methods of organic, plant and livestock production and conversion period &lt;br&gt; - Rulebook on the content, form and manner of keeping records in organic production &lt;br&gt; - Rulebook on conditions and manner of storage, transport and placing on the market of organic products</td>
<td>834/2007</td>
<td>NO Refer to answer number 2</td>
</tr>
</tbody>
</table>

#### 1.2. Planned transposition of the EU organic legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Remark</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law/bi-laws</td>
<td>Answer 2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2. Strategy

Bosnia and Herzegovina does not have a Strategy for the Development of Organic Agriculture, but only a general Medium Strategy for the Development of the Agricultural Sector for the period 2015-2019 (extended until 2021) for the Federation of Bosnia and Herzegovina, and at the national level there is a Strategic Plan for Rural Development, which deals with the issue of organic development, but on a very limited scale.

**Announcement from the session held on 14.7.2020**

The Council of Ministers of B&H adopted the Information on the harmonization of the legislation of Bosnia and Herzegovina with the EU legislation, as well as the possibilities of expanding the organic production sector.

The Ministry of Foreign Trade and Economic Relations will, in cooperation with the Directorate for European Integration and competent authorities of the entities, cantons and Brčko District of B&H, prepare and submit to the Council of Ministers a comprehensive analysis of the harmonization of legislation in the field of organic production in Bosnia and Herzegovina with the legislation of the European Union.

In 2021, the legislation of the European Union introduced changes in the field related to strengthening the control system, new rules for the production and import of organic products that will provide the same product standard, as well as a wider range of products that can be marketed as organic.

In the legislation of B&H, this field is partially regulated at the entity levels, and the European Commission's Opinion on B&H's Application for EU Membership from 2019 states that B&H should adopt a Law on organic production at the state level.

In accordance with the conclusion adopted today, the Ministry of Foreign Trade and Economic Relations should prepare this law in the third quarter of this year.

**Conclusions from the session held on 14.7.2020.**

Information on the harmonization of the legislation of Bosnia and Herzegovina with the EU legislation, as well as on the possibility of expanding the organic production sector.

The Council of Ministers considered the Information on the harmonization of the legislation of Bosnia and Herzegovina with the EU legislation, as well as on the possibility of expanding the organic production sector, and concluded that:

- the Information on the harmonization of the legislation of Bosnia and Herzegovina with the EU legislation, as well as on the possibility of expanding the organic production sector is adopted;
- the Ministry of Foreign Trade and Economic Relations of Bosnia and Herzegovina is instructed to prepare a comprehensive analysis of the harmonization of legislation in the field of organic production in Bosnia and Herzegovina with the legislation of the European Union, in cooperation with the Directorate for European Integration of the Council of Ministers of Bosnia and Herzegovina, competent bodies of the entities, cantons and Brčko District of Bosnia and Herzegovina, and submit it to the Council of Ministers of Bosnia and Herzegovina;
- the Ministry of Foreign Trade and Economic Relations of Bosnia and Herzegovina is instructed to prepare a Draft Law on Organic Production of Bosnia and Herzegovina, in the third quarter of this year at the latest.
3. Organic producers’ data

Organska Kontrola (http://www.organskakontrola.ba/site/) is the only national body that widely publishes information regarding organic producers. Other information was collected through different national and international sources, and data are provided below.


<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Organic soil (ha)*</td>
<td>691</td>
<td>691</td>
<td>580</td>
<td>580</td>
<td>343</td>
<td>343</td>
<td>292</td>
<td>353</td>
<td>576</td>
<td>992</td>
<td>1.273</td>
</tr>
<tr>
<td>Share in total agricultural land (%)</td>
<td>0,04</td>
<td>0,04</td>
<td>0,03</td>
<td>0,03</td>
<td>0,02</td>
<td>0,02</td>
<td>0,01</td>
<td>0,02</td>
<td>0,03</td>
<td>0,05</td>
<td>0,1</td>
</tr>
<tr>
<td>Number of producers</td>
<td>n/a</td>
<td>n/a</td>
<td>27</td>
<td>27</td>
<td>25</td>
<td>25</td>
<td>24</td>
<td>24</td>
<td>36</td>
<td>45</td>
<td>304</td>
</tr>
<tr>
<td>Number of processors</td>
<td>n/a</td>
<td>n/a</td>
<td>27</td>
<td>27</td>
<td>12</td>
<td>12</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>17</td>
<td>31</td>
</tr>
<tr>
<td>Number of exporters</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>6</td>
<td>6</td>
<td>6</td>
<td>6</td>
<td>10</td>
<td>13</td>
<td>15</td>
</tr>
<tr>
<td>Value of exports (mil EUR)</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>2</td>
<td>2</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>consumption/resident (EUR)</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0,1</td>
<td>0,1</td>
<td>n/a</td>
<td>n/a</td>
<td>0,03</td>
<td>n/a</td>
<td>0,1</td>
</tr>
<tr>
<td>Organic hives</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>373</td>
<td>329</td>
<td>561</td>
<td>238</td>
<td>291</td>
<td>293</td>
<td></td>
</tr>
<tr>
<td>Wild plants (ha)**</td>
<td>69.310</td>
<td>150.604</td>
<td>220.000</td>
<td>220.000</td>
<td>78.550</td>
<td>78.550</td>
<td>63.910</td>
<td>124.141</td>
<td>50.250</td>
<td>69.310</td>
<td>150.604</td>
</tr>
</tbody>
</table>

*including land in the conversion period

**total wild plants including berries and mushrooms, dominated by medicinal plants (in 2017, of a total 150.604 ha, medicinal plants include 103.575 ha)

4. System of control

Law on Agricultural Organic Production (“Official Gazette of Federation of Bosnia and Herzegovina”, No. 72/16) - the details on the control system are given in the following articles:
- Article 29 - Control System
- Article 30 - Application of the Control System
- Article 31 - Written evidence
- Article 32 - Measures in case of irregularities
Law on Organic Production of the Republika Srpska (“Official Gazette of the Republika Srpska”, No. 12/13)
5. Accompanying documents and certificates

Law on Organic Production of the Republika Srpska ("Official Gazette of the Republika Srpska", No. 12/13) - Chapter IV - PROCESSING, LABELING, STORAGE, TRANSPORT AND TRADE OF ORGANIC PRODUCTS

67-18 Rulebook on conditions and manner of storage, transport and placing on the market of organic products for Republika Srpska

Article 5.

The application for the import of organic products contains the information:

1. Name and address, i.e. business name and registered office of the importer;
2. Address of facilities and premises used by the importer for storage of imported organic products;
3. Organic products imported:
   a) the name and quantity of organic products;
   b) the country of origin of organic products (name of the country in which the organic product was produced) and the country from which the organic product was imported,
4. Name and address, i.e. business name and registered office of the exporter of organic products;
5. Control body or authority that certified organic products, which is on the list of the European Commission (List of control bodies and control authorities in organic production, list of recognized control bodies and control authorities for equivalence, list of recognized countries with equivalent rules of organic production and control system).

6. Prior use of foreign assistance to strengthen the capacities in the organic sector

Multiple organizations support the development of organic agriculture, like USAID/SIDA, UNDP, Caritas, etc.

7. Laboratories and methods

All laboratories accredited according to ISO / IEC 17024 can be found on the BATA page, under the title: Akreditirana tijela (bata.gov.ba)
8. Producers’ associations

Organic farmer’s association of Federation of Bosnia and Herzegovina, http://www.organskofbih.ba/, president Sejad Herceg, info@organskofbih.ba

The Federation of Associations of Organic Producers of FBiH was created by the voluntary association of associations of organic producers from the territory of Bosnia and Herzegovina.

The objectives of the Association are:

- improvement of agricultural production,
- connecting producers and distributors, advisors and all those who are interested in the development of organic production and related activities and marketing,
- membership and cooperation with similar associations in the country and abroad,
- cooperation with consumer organizations in order to promote organic agriculture,
- preparation and implementation of projects related to organic agriculture,
- representation of interests in institutions that decide on the creation of agrarian policy at the level of BiH, entities and cantons

Activities of the Association:

- organizing visits in the country and abroad, in order to exchange experiences,
- media and other promotion of the importance of organic food and organic production methods,
- promotion of eco-tourism, preservation and protection of the environment,
- education of producers and consumers of organic products,
- collection and distribution of information related to all types of organic production, processing and distribution of organic products in FBiH,
- procurement of appropriate brochures, literature and propaganda material.

9. Proposal of further actions for growing of the organic farming

Bosnia and Herzegovina, with its large areas of arable land, can become a significant producer of organic products, especially since 50% of arable land has not been cultivated for many years. When unpolluted areas of natural pastures and forests are added to that, the possibilities for this production become even greater.

For further progress of this production, investments are needed in the production itself, institutional strengthening, and the education of producers, because it is a production that implies compliance with extremely strict rules and procedures at every stage of the production process.

Therefore, for the future growth of organic production it is necessary:
- To establish and finalize the legal framework:
- To harmonize with EU regulations;
- To strategically promote, in local communities and at the regional level, the significance of certified organic agricultural production for sustainable rural economic and ecological development;
- To increase awareness level in the general population and potential consumers about organic products;
- To increase the level of knowledge about certified organic production among decision-makers, agricultural experts and stakeholders involved in economic and rural development in local regions;
- To increase knowledge level on organic production among existing producers and among potential organic producers;
- To increase knowledge level on the market aspect of organic production and consumers characteristics, on sale and distribution and on product presentation methods;
- To increase awareness level and knowledge on ecology and living environment protection among the population, agricultural producers and public authority function bearers in selected areas and among other development partners and stakeholders;
- To support research and inform on autochthonous plant and animal species from selected areas;
- To provide support in the conversion process, i.e. transfer from conventional to organic agriculture;
- To support start-up initiatives in organic production;
- To support associating potential and existing certified organic producers, processors and distributors of organic products to formal or non-formal groups;

10. Proposal for joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies

- Harmonization with EU regulations would facilitate access to IPA and other rural development funds
- To promote at the regional level, the significance of certified organic agricultural production for sustainable rural economic and ecological development;
- To provide an exchange of good practices, knowledge and experience among organic producers.
REPUBLIC OF SRPSKA REPORT ON ORGANIC PRODUCTION

Prepared by
Prof. Dr. Vida Todorovic
## 1. Legislation/Strategy

### 1.1. Current legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Harmonized with EU regulat. (Yes / No / Partly)</th>
</tr>
</thead>
<tbody>
<tr>
<td>By-Laws</td>
<td>Rulebook on the Content, Form and Manner of Keeping Records in Organic Production (&quot;Official Gazette of Republic of Srpska&quot; No. 77/16)</td>
<td>CELEX index: 32007R0834</td>
<td>Yes</td>
</tr>
</tbody>
</table>
1.2. Planed transposition of the EU organic legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>(Remark)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law</td>
<td>Law on Organic Production</td>
<td>848/2018</td>
<td></td>
</tr>
</tbody>
</table>

2. Strategy

The Strategy for the Development of Organic Agriculture in the Republic of Srpska does not exist as a separate document. However, in the Strategy for the Development of Agriculture and Rural Areas of the Republic of Srpska 2021–2027 (“Official Gazette of the Republic of Srpska” No. 92/21) organic agriculture is treated through various chapters as an important segment of achieving certain strategic goals.

Through the Vision of Development (3.1) and its definition “Agriculture of the Republic of Srpska is developing in a sustainable way, with the application of modern knowledge, integrated with the food industry and trade, and its rural areas are attractive to young people for life and business”, special emphasis is placed on sustainable agricultural production systems, and the special role of organic production is emphasised. Within the five Strategic Development Goals, i.e. in the 3rd Strategic Goal “Nature Protection and Sustainable Use of Natural Resources”, and within point 3.4, “Increasing the extent of agricultural production on the principles of organic production” is planned.

Within the chapter “Increasing competitiveness and developing the value chain in the agri-food sector” (3.4.2.), through support to the improvement of the quality system of agricultural products one of the proposed measures is “Support to the certification of organic products”. Also, within the chapter “Nature protection and sustainable use of natural resources” (3.4.3.) a way to achieve the goal leads to increasing the volume of organic production (Fig. 3) basis and effects of the strategic goal of nature protection and sustainable use of natural resources, and through the measure “Subsidizing organic agricultural production”. Chapter 3.4.5, i.e. through the goal “Improvement of the institutional and legislative environment for the development of agriculture” and the establishment of the agricultural information system, envisages the establishment of the Register of Organic Food.

Realization of the set goals of the Strategy for the Development of Agriculture and Rural Areas of the Republic of Srpska 2021–2027 period is given through Table 24 from which the items related to the organic production sector are taken.

The adopted Strategy is the result of the consensus of numerous interest groups on future goals and development, in a certain period and in a certain area, in this case the development of agriculture in the Republic of Srpska. It was created due to the need for the existence of strategic documents that define the goals and directions of development of agriculture and rural areas on the basis and principles that are compatible with the EU Common Agricultural Policy, which was recently harmonized for the period 2021-2027, as well as the so-called “Green Deal” of the European Union, and within it the Strategy for the Preservation of Biodiversity and the Strategy “From the field to the table”.

The Ministry of Agriculture, Forestry and Water Management of the Republic of Srpska for the next period plans to develop an “Action Plan” for the development of organic production.
3. Organic producers’ data

Control organizations within their activities and the system of regular control of organic production, and in accordance with the Rulebook on the content, form, and manner of keeping records in organic production (“Official Gazette of Republic of Srpska” No. 77/16) have an obligation to keep records (general data on the producer, organic status, exports, imports, etc.) and to submit them to the Ministry once a year, i.e. by January 31st for the previous year. In accordance with the regulations, the Ministry of Agriculture, Forestry and Water Management keeps records on organic production in the Republic of Srpska.

According to the data of authorized control organizations for 2020, control and certification were performed at 48 producers.

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of producers</th>
<th>Area (ha)</th>
<th>Number of heads</th>
<th>Number of hives</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>21</td>
<td>238,08</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td>28</td>
<td>282,37</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2019</td>
<td>27</td>
<td>554,22</td>
<td>158</td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td>46</td>
<td>1,013,30</td>
<td>169</td>
<td>170</td>
</tr>
</tbody>
</table>

4. System of control

On the territory of the Republic of Srpska on the basis of the Law on Organic Production (“Official Gazette of Republic of Srpska” No. 12/13) two control organizations are authorized to perform control and certification activities in organic production:

1. Organic Control System (OCS), Subotica, with a Business Unit in the Republic of Srpska and
2. ORGANIC CONTROL (OK), Sarajevo, with a Business Unit in East Sarajevo.

Also, the control and certification of organic production is performed by “Eco BH biocert”, but this control organization does not have the authorization of the Ministry of Agriculture, Forestry and Water Management of the Republic of Srpska.

Control organizations authorized to control and certify organic production must be registered in the Register of Business Entities, must be accredited by the competent accreditation bodies, and with other conditions prescribed by the Ordinance, to have established a procedure in accordance with control standards, which contains a detailed description of control measures, preventive measures and corrective measures taken during control.

Control of organic production is performed according to the Law on Organic Production (“Official Gazette of Republic of Srpska “ No. 12/13) and the Rulebook on the Conditions for the Work of Control Organizations and the Manner of Performing Control in the Procedure of Organic Production (“Official Gazette of Republic of Srpska “ No. 77/16). Control is performed at all stages of production, for all organic products, by applying the appropriate method of control and based on a documented procedure. The control starts from the moment of the producer’s involvement in organic production, i.e. from the moment when the producer concludes a contract with the authorized control organization on per-
forming control and certification in organic production. The established control system should enable the traceability of each product at all stages of production, processing and marketing in accordance with the regulations governing this area, and to ensure that the organic product is produced or imported in accordance with the Law.

The producer is obliged to enable the control organization to perform the control by providing:

1) access to all parts of the production unit and premises, and appropriate supporting documents;
2) information necessary for the purposes of control, i.e. information on imported consignments in the case of importers and first consignees, and
3) results of own production quality assurance programs.

Control in organic production includes physical control and control of producer documentation, as well as the application of preventive measures. The control organization performs control at least once a year, by the method of random sampling, unannounced, in accordance with the long-term control plan of organic production. Control in organic production can be performed several times a year, based on critical control points for each producer separately, which are determined on the basis of a general assessment of the risk of non-compliance with the rules of organic production and taking into account the results of previous controls, product quality and the risk of mixing organic products with products from conventional production. When performing control, the control organization may take samples to determine the presence of products whose use is not allowed in organic production, but also to check the production technology.

The verification of the producer's documentation in the control procedure refers to the verification of the records of the activity performed by the producer, as well as the verification of the financial documentation. For the purposes of control, the control organization may request from the producer other necessary data, i.e. documentation on the basis of which it can determine the existence of a correct relationship between the input raw materials and finished products.

For products that are from conventional production, and which are used in organic production, the control organization during the verification of documentation also checks whether these products are accompanied by a statement of the seller confirming that these products are not produced from (GMO) or by GMO.

If the producer concludes a cooperation agreement with other producers who perform a similar type of organic production for the needs of organic production, in production units, i.e. in the collection area that is in the same geographical area, they establish their own internal control system. In the system of internal control, the control of the manner of performing organic production at the producer and at the cooperative producer is performed by a person authorized by the producer, and the efficiency of the internal control system is checked by the controller of the control organization in harmony with the Law.

Based on the producer's request and the report on the performed controls, the control organization decides on certification and issues a certificate that the product or production process is in accordance with the Law and regulations adopted on its basis.

In the case of the import of organic products, in addition to data provided by domestic producers, the importer submits to the control organization data on the importer's premises and its activities during import, the place of entry of the product into the Republic of Srpska - Bosnia and Herzegovina, as well as facilities and premises imported organic products until their delivery to the first consignee. At the request of the control organization, data on the organization of transport from the exporter to the first consignee are also submitted.
If during the inspection it is noticed that there are certain irregularities in the manner of performing the production of organic products, the control organization may impose corrective measures on the producer in order to harmonize the production with the rules of organic production in accordance with the Law. A report is drawn up in connection with the observed irregularities and the proposed corrective measures, which are signed by the control organization and the producer.

Corrective measures that the control organization may determine in case of identified irregularities in the manner of producing of organic products, and depending on each individual situation, are:

- a precautionary measure, determined if minor irregularities are found in the way organic products are produced, without prejudice to the methods of organic production and the nature of the organic product, and specifying the period within which the producer must rectify those irregularities, and
- distrust measure, which is determined in the event that the producer has not acted in accordance with a certain warning measure, or the identified irregularities have not been fully corrected.

If serious irregularities in the manner of performing organic production that cannot be corrected are identified, which relate to the application of organic production methods and the use of means not allowed in organic production, the control organization shall impose a suspension measure on the producer and order from other organic products. If several different control organizations participate in the process of control of the production of organic products, the control organization that has identified irregularities in the manner of performing the production process is obliged to cooperate with other control organizations or control competent bodies from other countries.

In addition to the production control procedure itself, which is regulated by the aforementioned Law and Ordinance, other ordinances that regulate some critical points in the chain are applied, such as:

- Rulebook on Technological Processing Procedures in Organic Production (“Official Gazette of Republic of Srpska” No.39/16);
- Rulebook on the Content, Form and Manner of Keeping Records in Organic Production (“Official Gazette of Republic of Srpska” No. 77/16);
- Rulebook on Conditions and Manner of Storage, Transport and Placing on the Market of Organic Products (“Official Gazette of Republic of Srpska” No. 67/18);

As this is a period of development and involvement of an increasing number of producers in organic production, the Ministry of Agriculture, Forestry and Water Management of the Republic of Srpska has recognized the need to have trained advisors who will be able to respond well to this challenge, and that is why it has formed a group of consultants that have been trained from the beginning of 2021, who will monitor the field of organic production, continue training and transfer knowledge in the field to interested producers to enter the organic production system, but also certified.

In addition, scientific institutions dealing with organic production are the Faculty of Agriculture of the University of Banja Luka, as well as the Public Institution Agricultural Institute of the Republic of Srpska.

When it comes to inspection control, the control of production is performed by the Agricultural Inspection, and the control of products on the market is performed by the Food Inspection. Both inspections are part of the Republic Administration for Inspection Affairs - the Inspectorate of the Republic of Srpska.

As for the register, the Ministry keeps a register of organic producers, with their contact details, types of production, area, number of heads, hives, and exports for those producers who export their organic products.
5. Accompanying documents and certificates

An example of the control and certification procedure is given for Organic Control System doo PJ OCS RS Laktaši in the document Information on the program of control and certification and certification during the export of organic products, as well as the model of registration of producers for control and certification.

The process of importing organic products is regulated by the Rulebook on the Procedure for Issuing a Certificate for Imported Organic Products ("Official Gazette of Republic of Srpska" No. 24/20) which prescribes the documentation to be submitted to the authorized control organization for the purpose of issuing a certificate that the certified product being imported is produced in accordance with the Law on Organic Production, i.e. the procedure and manner of issuing a certificate for imported organic products. According to the mentioned document, Organic products can be imported if they have the certificate of the control organization, i.e. control body which is on the official list of control bodies of the EU, i.e. control bodies of third countries. When issuing a certificate, which is valid in accordance with the shelf life of the imported product, the importer submits it to the authorized control organization:

1. application for import of organic products,
2. a copy of the certificate for imported organic products,
3. a copy of the invoice / proforma invoice for imported organic products,
4. a copy of a certified single customs document for imported organic products, issued in accordance with the law governing the customs procedure.

If the consignment that is imported contains several types of organic products that are grouped in the certificate to the control organization, a document with individually listed organic products that are imported is also submitted.

In addition, producers must attach or make available to the inspection body the following documentation:

- invoices and bills for purchased raw materials;
- evidence for the use of land owned, leased or used free of charge (title deed, contract, statement, sketch);
- photo documentation;
- some kind of activity log
- documentation for heads (passport, certificate of origin), etc.

The trade in organic products is also regulated by the Rulebook on Labelling of Organic Products ("Official Gazette of Republic of Srpska" No. 93/20), which prescribes the appearance of the label and the entity mark, i.e. the marking of organic products in accordance with the Law on Organic Production and regulations adopted on the basis thereof. It was adopted with the aim of protecting consumers and market competition, whereby the terms used to label organic products must be protected from use on conventional products. In order to ensure consumer safety throughout the Republic of Srpska market, the entity label for organic products of the Republic of Srpska is mandatory on every packaged organic food produced in the Republic of Srpska. It stipulates that the import of organic products into the Republic of Srpska that are placed on the market as organic if they are produced in accordance with the rules of organic production prescribed by the regulations of the European Commission, USDA/
NOP, COR (Canada), JAS (Japan), Australian Certified European Organic Standard (Australia) and Biosuisse organic (Switzerland) or other regulations adopted by countries with which the Republic of Srpska, i.e. Bosnia and Herzegovina, has a bilateral agreement on import/export of organic products and which are subject to control in accordance with the regulations on organic production and as such are marked with an entity label for organic products. The use of the Republic of Srpska entity label for organic products must in no case prevent the simultaneous use of the EU/NOP, JAS, COR, Australian Certified Organic Standard and Biosuisse organic logos/labels or other national or private logos if these products are certified in accordance with the above regulations or standards.

Appearance of the entity logo of Republic of Srpska for an organic product

6. Prior use of foreign assistance to strengthen the capacities in organic sector

As for the assistance to the organic sector in the Republic of Srpska so far, it mainly referred to the legislative part and was provided by the organizations as follows in the table:

<table>
<thead>
<tr>
<th>No.</th>
<th>Name of organization</th>
<th>Period</th>
<th>City</th>
<th>Country</th>
<th>Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>TAIEX (Multi-country Workshop on EU Policies, Regulations and Member State Experiences in Organic Farming)</td>
<td>04 – 06th December 2012</td>
<td>Sarajevo</td>
<td>BiH</td>
<td>State of Play in aligning to EU Organic Farming policy – achievements, challenges and lessons learned so far</td>
</tr>
<tr>
<td>2.</td>
<td>SWG (Expert Advisory Group on Organic Agriculture in SEE within the SWG)</td>
<td>26th February – 01st March 2013</td>
<td>Sarajevo</td>
<td>BiH</td>
<td>The three priorities that were discussed during the 2nd working meeting in 3 different sessions are: 1. Facilitation of the harmonization of the national legislations for organic agriculture in the SEE countries; 2. Joint approach for a regional promotion of organic production in the Balkan area; 3. Trade of organic products between the SEE Countries.</td>
</tr>
<tr>
<td>No.</td>
<td>Name of organization</td>
<td>Period</td>
<td>City</td>
<td>Country</td>
<td>Topic</td>
</tr>
<tr>
<td>-----</td>
<td>----------------------</td>
<td>--------------</td>
<td>---------------</td>
<td>---------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>3.</td>
<td>CERD (Center for economic and rural development)</td>
<td>26&lt;sup&gt;th&lt;/sup&gt; February 2016</td>
<td></td>
<td></td>
<td>Civil Society Sustainability program for agriculture and rural development in BiH - CSSP ARD</td>
</tr>
<tr>
<td>4.</td>
<td>TAIEX (Expert Mission on Organic Production)</td>
<td>11&lt;sup&gt;th&lt;/sup&gt;- 15&lt;sup&gt;th&lt;/sup&gt; April 2016</td>
<td>Banja Luka</td>
<td>RS/BiH</td>
<td>The objectives and aim of the mission: 1. Agreement related to the organization and implementation of activities of the mission; 2. General overview of the organic production with focus on legislation in EU; 3. General overview of the organic production with focus on legislation in BiH; 4. General overview of the organic production with focus on legislation in RS; Overview of the existing situation</td>
</tr>
<tr>
<td>5.</td>
<td>TAIEX (Workshop on Organic Production)</td>
<td>3&lt;sup&gt;rd&lt;/sup&gt; - 4&lt;sup&gt;th&lt;/sup&gt; November 2016</td>
<td>Sarajevo</td>
<td>BiH</td>
<td>1. Action plan for the future of organic production in the EU; 2. The current process for reviewing the EU organic regulation; 3. General challenges in developing the organic farming sector - experience of EU member states; 4. The setting up of a national (or entity) strategic plan for the development of organic production; 5. State system for managing of “infrastructure” for OF; 6. BiH on the EU organic map; 7. General support for organic production, subsidies: example in EU and some new Member State; 8. News in the world of organic farming (some interesting facts and movements) and the future of organics; 9. Designation of competent authority/control authority/control bodies; 10. Why is a logo important, what logo means, significance of logo;</td>
</tr>
<tr>
<td>6.</td>
<td>GIZ 1 DONAU SOJA</td>
<td>13&lt;sup&gt;th&lt;/sup&gt; June 2016</td>
<td>Banja Luka</td>
<td>RS/BiH</td>
<td>QUALITY SOYBEAN WITHOUT GMOS FROM THE DANUBE REGION - ORGANIC SOYBEAN PRODUCTION (legal regulatory framework, certification, market and production technology)</td>
</tr>
<tr>
<td>7.</td>
<td>CERD (Center for economic and rural development)</td>
<td>9&lt;sup&gt;th&lt;/sup&gt;-11&lt;sup&gt;th&lt;/sup&gt; November 2017</td>
<td>Budapest, Zambok, Paks, Fajsz</td>
<td>Hungary</td>
<td>USAID, ARD (study visit)</td>
</tr>
</tbody>
</table>

Through the FARMA I and II projects, USAID helped the organic production sector with funds through support to users in the procurement of equipment with a grant of about 600,000.00 KM and support for the preparation of the introduction of organic standards in the amount of about 30,000.00 KM.
# 7. Laboratories and methods

As a criterion for the selection of laboratories, the parameters of the necessary analyses were taken according to the assessment of the certification house controllers, and they are most often: general analysis of soil and water, pesticide residues and the presence of heavy metals in soil, water or finished product, microbiological analyses, etc.

Laboratories that are accredited according to the ISO / IEC 17025 standard, i.e., the methods they apply, have BATA accreditation, and the authorization by the Ministry of Agriculture, Forestry and Water Management of the Government of the Republic of Srpska is:

<table>
<thead>
<tr>
<th>No.</th>
<th>Name of the laboratory</th>
<th>Accredited</th>
<th>Number of accredited methods</th>
<th>Authorized</th>
<th>Authorization period</th>
<th>Official</th>
<th>Term of validity of the authorization for the official lab.</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.</td>
<td>SISTEM QUALITA´S d.o.o. Pale</td>
<td>YES</td>
<td>350</td>
<td>12.03.6-330-3893-2/19 10.03.2020.</td>
<td>10.03.2023.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
8. Producers’ associations

The reorganization (renewal) is in progress, i.e. the formation of the Association of Organic Producers in the Republic of Srpska. It is planned that the association will be established and functional by the beginning of 2022.

The association will operate on the territory of the Republic of Srpska and will deal with the development of organic production, improvement of the support system for organic producers, promotion of organic production and organic products, market development, organization of fairs and events, etc.

9. Proposal of further actions for growing of the organic farming

Agricultural production in the Republic of Srpska is characterized by production on small plots, large participation of human labour, but also migrations that take away an increasing number of people from the village, lack of specialized mechanization, slow introduction of innovations, insufficient knowledge of producers, which makes such production expensive and uncompetitive. All this is becoming more expressed in the sector of organic agricultural production. Opportunities for improvement are possible through the introduction of new (innovative) technologies, which should be seen as tools for changes in production methods and in the application of agri-environmental measures. Changes need to be made through a farming production system with a balanced ratio of livestock and crop production, which is adapted to different ways of vegetable production. The future of agriculture is sustainable ecological systems in which quality, healthy safe, and diverse food are produced with the rational use of natural resources and protection of biodiversity. The introduction of innovations in agricultural production is the best basis for the development of agriculture in the conditions of climate change. Due to all the above, it is necessary to establish guidelines in order to ensure the development of organic production in the Republic of Srpska, in accordance with the changes at the global level. Some of the necessary directions of development, which are in line with the current socio-economic development are:

- Stabilization of primary production and change the structure of production - the areas in the system of organic production must be increased, whereby the share of vegetables in the sowing structure would be from 15 to 20%. When increasing the area under vegetables, a system of growing vegetables as a second crop and/or intermediate crops should be introduced, and areas in protected areas should be increased;
- With the correct regionalization of agricultural production, it is necessary to establish the most favourable distribution of species, races and genotypes, etc. according to their biological needs. Simultaneously with regionalization, the number of species grown should be increased;
- Increase the dynamics and growth of production - it is necessary to stimulate the revival of organic production with appropriate economic measures, which appears as a necessary pre-condition for exports;
- Development of dedicated processing industry and storage capacities;
- Increasing the number of researchers and experts in organic production and establishing the transfer of science results to direct production, which would result in increased competitiveness in the organic production system - strengthening the existing capacity of the advisory service in charge of the organic production sector, through theoretical and practical training;
- Raising the level of knowledge of producers through seminars and consultations, as well as engaging local media to broadcast shows with various advice and transmission of messages, especially the forecasting service;
- Development of marketing that determines the marketability of organic products;
- Establishment of regional associations of organic producers;
- Registration of seeds and planting material for organic production on the variety list.

10. Proposal of joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies

The multifunctional character of organic production enables the development of “green jobs” (recycling, tourism, health gardens, ethno products, etc.) and the development of rural areas by connecting tradition with sustainable systems. Some of the options that can be done at the regional level are:

- Transfer of knowledge;
- Introduction of new technologies, such as composting organic residues from their own farm, production of biogas or biodiesel, etc.;
- Harmonization and introduction of necessary standards in the sector of organic production, i.e. development of guidelines for interested producers (in general what is needed to enter organic production, guidelines by types of production, etc.);
- Marketing approach to production, i.e. assistance in the design of promotion of production and finished product;
- Segment the foreign market - it is necessary to determine those segments that are of particular importance for the export of organic products;
- Formation of clusters or cooperatives of organic producers and processors of agricultural products;
- More frequent organization of regional fairs or gatherings for producers and consultants of organic production.
KOSOVO* REPORT ON ORGANIC PRODUCTION

Prepared by
Ms. Hana Voca
1. Legislation/Strategy

1.1. Current legislation

The first version of organic agriculture legislation (Law No. 02/L-122) in Kosovo* dates back to 2008. Since then, the legislation has been once revised with the purpose to harmonize with the European Union regulation (EU 834/2007 and 889/2008). This actual legislation on organic agriculture (Law No. 04/L-085) was prepared by the Ministry of Agriculture, Forestry and Rural Development (MAFRD) in 2012, and published in the Official Gazette No. 28/16 2012 and approved during the same year by the Kosovo* Parliament. The existing legislation has not been enforced yet, mainly due to the lack of by-laws to set up the system of control. Thus, in 2019 the legislation has been supplemented by eight (8) Administrative Instructions (AI) on:

- Duties, Responsibilities and Composition of the Commission on Organic Farming;
- Organic Production Control System, Control Authority, Control Bodies and the Rules for their Implementation;
- Laying Down the Rules for Organic Plant Production;
- Laying Down the Rules for Organic Livestock Production and Feed;
- Laying Down the Rules on Organic Aquaculture Production;
- Criteria, Standards and Conditions for Imports of Organic Products in Kosovo*;
- Designation of the Organic Production Logo and Specific Requirements for Labelling;
- Laying Down the Rules for Production and Methods for Organic Processed Products.

The by-laws or AIs of the organic legislation provide guidance to the legal framework of organic agriculture production.

The scope of the legislation includes unprocessed agricultural products, processed agricultural products for use as food, feed, vegetative propagating material and seeds for cultivation, and yeasts used as food and feed. It contains plant, livestock, and aquaculture production rules, processing, labelling, control and import rules.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Harmonized with EU regulat. (Yes / No / Partly)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law</td>
<td>No. 04/L-085 on Organic Farming</td>
<td>EC Regulation No. 834/2007 and EC Regulation No. 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Law/ Administrative Instruction</td>
<td>AI No. 01/2019 on Duties, Responsibilities, and Composition of the Commission on Organic Farming</td>
<td>EC Regulation No. 834/2007: Art. 37</td>
<td>YES</td>
</tr>
<tr>
<td>By-Law/ Administrative Instruction</td>
<td>AI No. 02/2019 on Organic Production Control System, Control Authority, Control Bodies, and the Rules for their Implementation</td>
<td>EC Regulation No. 889/2008: Art. 63-68; 91-92</td>
<td>Yes</td>
</tr>
</tbody>
</table>
1.2. Planned transposition of the EU organic legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>(Remark)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law</td>
<td>No. 04/L-085 on Organic Farming</td>
<td>EC Regulation No 2018/848</td>
<td>By 2023</td>
</tr>
</tbody>
</table>

2. Strategy

While Kosovo* worked to revise its local legislation on organic agriculture in 2012 to harmonize with the EC Regulation and recently in 2019 complemented it with by-laws (Administrative Instructions) to enforce implementation, the European Commission has also revised its own legislation and published the new organic regulation (EU) 2018/848 in May 2018.

The work of MAFRD to align its local legislation with the new Regulation (EU) 2018/848 on organic production is still in progress.

After completion of the draft, it needs to be approved by the Kosovo* Parliament. Although there is no official strategy, action plan, or strategic document regarding harmonization with EC Regulation No. 2018/848, the full harmonization is planned to be completed by 2023.
3. Organic producers’ data

Up to now, there is no official data collection system in place and the information sharing within the organic sector is not adequate. This year, the MAFRD is planning to put into action a data collection system for organic products through the certification bodies operating in Kosovo*.

Data available on organic production is very limited. The organic sector is still in early stage of development and the sector is mainly oriented to medicinal and aromatic plants (MAPs) such as linden, silver birch, mountain tea and non-timber forest products (NTFPs) such as blueberries, rosehips etc. However, the sector also includes mushrooms, pumpkin for seed production/organic oil production and walnuts.

<table>
<thead>
<tr>
<th>Year</th>
<th>Cultivation MAPs (ha)</th>
<th>Production of MAPs (tones)</th>
<th>Collection of NWFPs (ha)</th>
<th>Collection of NWFPs (tones)</th>
<th>Collection centers</th>
<th>Certified companies</th>
<th>Individual collectors</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>424</td>
<td>-</td>
<td>373,488</td>
<td>-</td>
<td>45</td>
<td>35</td>
<td>3,200</td>
</tr>
<tr>
<td>2019</td>
<td>480</td>
<td>-</td>
<td>373,488</td>
<td>-</td>
<td>45</td>
<td>35</td>
<td>-</td>
</tr>
<tr>
<td>2020</td>
<td>560</td>
<td>599</td>
<td>373,488</td>
<td>-</td>
<td>45</td>
<td>35</td>
<td>-</td>
</tr>
</tbody>
</table>

Source: MAFRD and Organika Association

According to estimates, the area dedicated to the cultivation of organically certified medicinal and aromatic plants is 560 hectares (ha), with 35 certified companies operating in the medicinal and aromatic plants business. Moreover, throughout Kosovo* there are 373,488 ha certified areas for the collection of medicinal plants and wild fruits, and 45 collection centers. The collection centers organize the collection, drying and sub-processing of medicinal and wild plants. In addition, there is a surface of 323.52 ha cultivated with pumpkin for seed production/organic oil production and 34.07 ha cultivated with walnuts.

The domestic market for organic products is still underdeveloped; Demand for organic products remains limited. Thus, the export market is clearly the driving force for producers’ choosing organic production. Organic goods are exported as semi-processed products, where up to 95% of all production goes to European countries, such as Germany, Austria, Switzerland, the Netherlands, etc.

There is almost no data on gender issues in the organic sector in Kosovo*, except for a study conducted by the Organika Association, which included interviews with 39 organic certified companies (out of 44, in total). The number of employed persons in those companies was recorded, excluding the number of contracted collectors and farmers. Data on the gender of the employees are shown in the table below.
Table 1. Number of employees, based on gender and type of employment, in the organic sector in Kosovo*

<table>
<thead>
<tr>
<th>Year</th>
<th>Total</th>
<th>Women</th>
<th>Men</th>
<th>Minorities</th>
<th>Total</th>
<th>Women</th>
<th>Men</th>
<th>Minorities</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>315</td>
<td>157</td>
<td>158</td>
<td>57</td>
<td>794</td>
<td>526</td>
<td>268</td>
<td>271</td>
</tr>
<tr>
<td>2019</td>
<td>344</td>
<td>146</td>
<td>198</td>
<td>66</td>
<td>1,070</td>
<td>693</td>
<td>377</td>
<td>417</td>
</tr>
<tr>
<td>2020</td>
<td>301</td>
<td>135</td>
<td>166</td>
<td>66</td>
<td>1,064</td>
<td>727</td>
<td>337</td>
<td>402</td>
</tr>
</tbody>
</table>

Raw (untreated) data collected from this study for 2018, 2019, and 2020, showed that the number of employed women is slightly lower compared to men in full-time employment. On the other hand, women clearly dominate in the number of seasonal employments.

No information is available yet on:
- kinds of jobs that women and men are employed
- representation of women and men in skilled labour
- representation of women and men in decision-making and management-level roles
- wages and income for women and men, among others.

4. System of control

According to AI No.02/2019 on organic production control system, control authorities, and control bodies and the rules for their implementation published in 2019, the national control system is governed by the MAFRD as it represents the competent authority, whereas the Food and Veterinary Agency represents the control authority. According to some AI, MAFRD has set up a control system involving control bodies that carry out visits on the operators. These visits include physical inspections of the production or processing premises, verifying the documentary accounts and sampling the products, soil and/or plant leaves to detect plant protection product (PPP) residues, unauthorized products and/or contamination and check production techniques not in conformity with organic production. Samples can be analyzed in official testing laboratories accredited with the European Standards (ISO/IEC 17025, EN 45002, EN 45003).

Operators can receive an organic certificate to market their products as organic, once they are they have been evaluated and found compliant with requirements by a control body or control authority. Control bodies need to be accredited in accordance with ISO standard IEC 17065:2012, to ensure the conformity assessment to the requirements for bodies certifying products, processes, and services. Currently, there is no local control body operating in Kosovo*, therefore in absence of the local control bodies, the legislation and AIs are not enforced. The certification of organic products is done by international certification bodies presented below:

- Albinspek XK-BIO-139
- Q-check P.C XK-BIO-179
- Organskakontrola.ba XK-BIO-101
- Bio-inspecta.ch XK-BIO-161

Operators have their own procedures in place for organic products, ranging from simple controls to complex processes. All stock and financial reports and any other information required by a control body or control authority (agency) must be kept by operators for the purpose of proper control. The
organic logo is displayed on the product to communicate that it is produced in accordance with the requirements of the control system that is responsible for controlling operators on compliance with the standards. As for processed products, using the logo means that at least 95% of the agricultural ingredients are organic. In addition, the control body code number is displayed, next to the organic logo.

It is worth mentioning that due to the lack of enforcement of the national legislation in Kosovo*, the control system as well is not yet implemented. Organic producers in Kosovo* are controlled based on the control system of the certification bodies to meet the requirements of the European Union organic market, without the involvement of local institutions.

5. Accompanying documents and certificates

Operators that wish to participate in wild collection must obtain the licenses from the Kosovo* Forest Agency (KFA) in accordance with regulation No. 2003/3 and AI No. 04/2008, only after receiving the license they can apply to certify the licensed surface into the organic zone. On the other hand, operators that wish to cultivate organic products must have proof of ownership or a leasing contract for at least the next 5-6 years for the land plant to be converted to organic.

Furthermore, the operators that want to participate in wild collation in the organic certified surfaces, need to be accompanied by other documents, such as regulations on the sustainable wild collection, a list of contacted collectors, the maps of the wild collation surfaces, a statement from third-party that ensure the collection do not affect the stability of the natural habitat or the maintenance of the species in the area.

Operators, producers, and collectors must transport organic products to other units, including collection points with accompanying documents. The documents must include information such as name, surname, and signature of both parties, quantity, cost, the lot identification mark, serial number, and the date. (Reg. (EC) 834/2007 and 1235/2008).

Due to the lack of organic legislation enforcement of organic legislation, the control system on the domestic organic market is not implemented. On the other hand, in the export of organic products the following accompanying documents are required:

- Certificate of Inspection (COI) to confirm that the product has been produced in accordance with organic production rules equivalent to the EU organic regulations (Reg. (EC) 834/2007 and 1235/2008).
- Single Administrative Document (SAD) - from the Customs.
- Phytosanitary certificate from the Kosovo* Food and Veterinary Agency (KFVA).
6. Prior use of foreign assistance to strengthen the capacities in the organic sector

The organic agriculture sector in Kosovo* has developed mainly through internationally funded agricultural projects, when in 2002 the newly established Organic Agriculture Association Kosovo* (OAAK) within the framework of the Avalon project from the Netherlands, supported a small number of farmers to produce in accordance with organic principles. Foreign assistance has played a big role in implementing and financing many organic projects in Kosovo*. Those projects had a significant impact on farmers’ capacity and skills development and their ability to learn and implement standards of organic production. Up to now, international organizations and foreign donors that focused on strengthening the capacities in the organic sector include the German Agency for International Cooperation (GIZ), the United States Agency for International Development (USAID), Caritas Switzerland (CACH), and Swisscontact supported by the Swiss Agency for Development and Cooperation (SDC).

The main objective of foreign assistance in Kosovo* has been oriented towards:

- planning the future of the organic sector in Kosovo*,
- identifying the needs and potentials of the sector,
- setting the strategic objectives and action points.

The main projects funded by foreign donors that helped the organic sector can be summered as following:

- KOSAGRI project (2010-2017) - Strengthening the Kosovo* Ministry of Agriculture, Forestry and Rural Development for the improvement of vegetable production according to EU standards: The project aimed to assist the MAFRD in the implementation of initiatives on Kosovo’s territory from the perspective of the European integration process and its required standards.
- GIZ project (2017 –2020) - Competitiveness of the Private Sector in Rural Areas (COSIRA): This project supported private sector competitiveness in rural areas.
- USAID project (2015 – 2021) - Agricultural Growth and Rural Opportunities (AGRO): The project aimed to support the value chain of soft fruit (including strawberry, raspberry and cranberry), MAPs, NTFPs and those grown in organic conditions that have a viable market and export through supporting strategic partners with technical assistance and grants to become the primary drivers of agricultural development.
- GIZ project (2018 – 2021) - Creating Employment through Export Promotion (CETEP): The project aimed to create employment through export promotion.
- Caritas project (2020- 2023)- Sustainable and Inclusive Rural Economic Development (SIRED): The project aims at changing the performance and behaviour of existing system actors (public and private) in order to make the market system more advantageous for the beneficiaries. Using a facilitative approach, the project activities target systemic changes along three dimensions: agro-ecological, socio-political, and economic. More sustainable and inclusive market systems contribute to poverty reduction and to empowerment, especially among rural women and marginalized people.
- Swisscontact project (2017 – 2021)- Phase II: Promoting Private Sector Employment (PPSE). The project aims to create employment for young people through small and medium enterprises with a focus on youth, women, and minorities.
7. Laboratories and methods

In Kosovo*, there are no laboratories accredited with the SK ISO/IEC 17025 standard for analyses of quality parameters of organic products (e.g. pesticide residues, genetically modified organisms, etc.). Therefore, companies are required to send samples of their products to laboratories abroad (mainly in Germany, Italy, and Switzerland) for analyses, prior to placing the products on market to prove they are authentically organic.

8. Producers’ associations

Currently, there are two (2) local associations that play an active role in the development of the sector, they are “Organika” association and the Initiative for Agriculture Development of Kosovo* (IADK).

<table>
<thead>
<tr>
<th>Association</th>
<th>Contact information</th>
</tr>
</thead>
<tbody>
<tr>
<td>ORGANIKA association</td>
<td>Feriz Blakçori, H-1, K-VIII, Nr.52, 10000, Pristina, Kosovo*</td>
</tr>
<tr>
<td></td>
<td>044 293 772</td>
</tr>
<tr>
<td></td>
<td>044 500 549</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:shoqataorganika@gmail.com">shoqataorganika@gmail.com</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:nm.organika@gmail.com">nm.organika@gmail.com</a></td>
</tr>
<tr>
<td></td>
<td><a href="http://www.organika-ks.org">www.organika-ks.org</a></td>
</tr>
<tr>
<td>Initiative for Agricultural Development of Kosovo* (IADK)</td>
<td>Agricultural Organization No.11, Vushtrri 42000</td>
</tr>
<tr>
<td></td>
<td>044 777 036</td>
</tr>
<tr>
<td></td>
<td><a href="http://www.iadk.org">www.iadk.org</a></td>
</tr>
</tbody>
</table>

The “Organika” association is focused on improving cooperation among stakeholders in the sector and further developing of the sector through promotion in foreign markets and lobbying. Furthermore, “Organika” aims to support conversion of all its members (producers) to organic production in next 5-7 years and cover most of the export with certified organic products. On other hand, IADK aims at developing the farmers’ production capacities, increasing their market competitiveness, disseminate knowledge for best practices of agriculture production and home food processing, by lobbying for policies and projects which contribute to rural development. Throughout their framework, IADK participated on many projects and provided support to the organic producers especially with training on organic farming and capacity building.
9. Proposal of further actions for growing of the organic farming

Key actions for the growth of organic farming include the implementation and enforcement of national legislation in harmonization with EU Regulations. In this regard, the actions proposed include the following, but are not limited to:

- to increase public awareness of the value of organic farming,
- to establish local certification bodies and control systems,
- to promote research on good practices and technological advances that can be used locally,
- to create a system for data collection, and
- to continue the support to organic farmers with further enhanced subsidy programs targeting organic and environmentally-friendly production systems.

Over the last decade, there have been investments in NWFPs and MAPs production that resulted in the growth of the organic sector, however, it has a potential for further expansion. Therefore, it is necessary to continue investing in production, collection, and processing to increase the quality, quality, and value addition of organic products. However, it is worth mentioning that organic sectors must expand toward other products, using the connections and what we learned from NWFPs and the MAPs sector.

Lastly, it is necessary to enhance the capacities on the organic certification process for small-scale operators and/or introduce group certification to facilitate the transition to organic production and improve the quality of local products.
10. Proposal of joint actions for regional cooperation to facilitate the transfer of environmentally friendly/organic technologies

Regional cooperation can facilitate the transfer of environmentally friendly/organic technologies, through instruments such as:

- Coordination among SEE countries to create synergies and achieve common goals and objectives.
- Harmonization of relevant legalizations and regulations in alignment with the EU legislation.
- Identifying common policies for environmentally friendly technologies among SEE countries.
- Creating a working group responsible for developing the strategies with a clear mandate at the regional level.
- Creating a platform to enable the exchange of knowledge and best practice experiences and to avoid errors due to asymmetric information between actors at local and regional levels (i.e., official webpage).

Collaboration amongst stakeholders at the local and regional level

- Stimulating collaboration among academia and the private sector at the regional level, i.e., with research and development (R&D) subsidies.
- Stimulating participatory stakeholder involvement, i.e., including relevant players in discussions, decision-making process, and other activities.
- Organizing events and campaigns to raise awareness, increase interest in environmentally friendly technologies, and encourage policy debate to inspire members of society to generate innovative solutions.

Demonstrations, projects, and initiatives

- Establishing small-scale experiments to demonstrate the efficiency and applicability of environmentally friendly technologies in SEE countries.
- Joint initiative to create markets for low-carbon products across the SEE countries and bridge the trade for those products.
- Investments in projects for strategic environmental assessments.
- Identifying linkages across existing and future environmentally friendly initiatives.
NORTH MACEDONIA REPORT ON ORGANIC PRODUCTION

Prepared by
Prof. Dr. Biljana Kuzmanovska
In North Macedonia, the first steps for introducing organic farming were undertaken in 2000, when the first draft of the Law on Organic Agricultural Production was prepared and adopted in 2004. Three years later, in 2007, the first National Strategy for Organic Agriculture for 2008-2011 was adopted. It set important targets for 2011, such as 2% of the total agricultural area for organic production, the range of certified products and the number of businesses involved to be increased, strengthening export channels and raising the awareness of local consumers considering the values of organic farming.

In 2009 a significant revision of the legislative framework was carried out, which resulted in the adoption of the new Law on Organic Agricultural Production and by-laws. After several revisions and amendments in 2016, the Law was completely harmonized with EC Regulations 834/2007 and 889/2008.

The first national campaign for promoting organic agriculture was launched in 2010, and the promotional activities continued in 2016-2018. In order to ensure continuous development in the organic sector, the National Plan for Organic Agriculture was adopted in 2013 for the period 2013-2020. It set even higher goals, such as 4% of the total agricultural area for organic agriculture and 4% of total livestock production (including bee families and fisheries) to be organic. The other key targets were strengthening the competitiveness of organic agriculture as well as strengthening the organic farmers’ associations, other NGO’s, and their networking in the sector.

There are two certification bodies accredited by the Institute of Accreditation of the Republic of North Macedonia and authorized by the Ministry of Agriculture, Forestry and Water Economy (MAFWE): Procert control and certification OKS and Balkan Biocert Skopje.

Although significant progress was achieved, the overall market is still underdeveloped.

# 1. Legislation/Strategy

## 1.1. Current legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Harmonized with EU regulation. (Yes / No / Partly)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rulebook on the format, content and method of keeping the Register of Legal entities for performing professional control in organic production (Official Gazette of RM No. 44/2007)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on the format, content and method of keeping the Register of all entities who produce, process and place organic products on the market (Official Gazette of RM No. 44/2007)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on the format, content and method of keeping the Register of professional scientific institutions and other legal entities for determining the composition of organic products (Official Gazette of RM No. 44/2007)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>Issue</td>
<td>Name of acts (laws and by-laws)</td>
<td>EU legislation</td>
<td>Harmonized with EU regulation. (Yes / No / Partly)</td>
</tr>
<tr>
<td>-------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on husbandry procedures, minimal areas for housing of different species of animals and maximal number of animals per hectare (Official Gazette of RM No. 162/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on the format and content of the certificate, the procedure for its issuance, as well as the procedure for collection, packaging, transport and storage of organic products (Official Gazette of RM No. 163/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on the format and content of the annual report (Official Gazette of RM No. 163/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on the format, content and method of keeping the records and databases for the entities and for organic seed and planting material (Official Gazette of RM No. 163/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on the format, content and color of the national organic product label and the national label for products in conversion (Official Gazette of RM No. 163/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>Rulebook on the procedure for issuing the authorizations of control/certification bodies for performing professional control and professional scientific institutions or other legal entities for performing analyses and super analyses in organic agricultural production, the necessary documentation, the format, the content and the method of keeping the records (Official Gazette of RM No. 163/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td>By-Laws</td>
<td>List of ingredients that are not produced in accordance with the principles of organic agricultural production (Official Gazette of RM No. 162/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
</tbody>
</table>
### Issue of acts (laws and by-laws)

<table>
<thead>
<tr>
<th>By-Laws</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Harmonized with EU regulation. (Yes / No / Partly)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>List of additives in the feed and other substances used in animal nutrition (Official Gazette of RM No. 162/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>List of products and substances used in the process of production of organically processed food (Official Gazette of RM No. 163/2010)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the format and content of the invitation for education, method of conducting the education and the method of keeping the records for the conducted education (Official Gazette of RM No. 109/2011)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the format, content and form of the certificate of conformity of production of organic products with the importing country, as well as the procedure for issuing and the supporting documentation which accompanies the shipment of products with an organic origin (Official Gazette of RM No. 38/2019)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the format and content of the request, the necessary documentation for the fulfilment of the conditions, the content and method of keeping the records (Official Gazette of RM No. 33/2019)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the format, content and form of the certificates that the product, the production process, the preparation or placing on the market of the product is in accordance with the rules and procedures established by law, as well as with the records kept by the stakeholders (Official Gazette of RM No. 38/2019)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the farming of aquatic animals, the method of nutrition, the method of prevention of diseases and veterinary treatment of aquatic animals and the cleaning and disinfection agents that are additionally used in the farming of aquatic animals (Official Gazette of RM No. 188/2020)</td>
<td>834/2007 889/2008</td>
<td>Yes</td>
</tr>
</tbody>
</table>

1.2. Planed transposition of the EU organic legislation

Considering that new EU regulations are already in force, there is an urgent need for drafting a new Law for Organic Agricultural Production which will be in accordance with the new EU regulations.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>(Remark)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law</td>
<td>Law on Organic Agricultural Production</td>
<td>2018/848</td>
<td>New Law that will be prepared according to both EU regulations</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2021/1165</td>
<td></td>
</tr>
<tr>
<td>By-Laws</td>
<td>In accordance with the new Law</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. Strategy

The Ministry of Agriculture, Forestry and Water Economy, as a competent authority for organic agricultural production, at this moment has no Strategy nor Action plan for harmonization of Macedonian legislation with EU acquis.

3. Organic producers’ data

The certification bodies are obliged to submit an annual report for the number of inspection controls performed to the Ministry of Agriculture, Forestry and Water Economy. The report contains separate parts for the crop, animal and bee organic production, processed organic products, organic products released on the market, exported and imported organic products, certified organic seed material and seedlings, and subjects involved in these activities. The report also contains data on the areas and crops and number of animals/ bee families which are organically certified or are under conversion. The Registers* for organic agricultural production for 2017, 2018, and 2019 are available at the Ministry’s website, as excel files, in the Macedonian language. *http://www.mzsv.gov.mk

Data presented in Fig. 1, clearly show that the number of operators and the area under organic agricultural production is constantly increasing in the last 16 years (2005-2020). It is apparent that there was a significant increase in the area under conversion in 2010 and 2011, which was mainly due to the increased subsidies for organic production. However, considering that the market was not regulated and there was no national label for organic products, the producers were not able to achieve higher prices for their organic products. As a result, in the following years, the area under conversion drastically decreased and reached the level before 2010. After 2014, there is a small, but constantly increasing trend in this segment.
As shown in Fig. 2, a similar trend can be observed for the area under organic agricultural production, which reached the highest level in 2010 and 2011, but the projected target in the National Strategy (2%) and National Plan (4%) for the area with organic production was far from achieved. Moreover, the area under organic production in the country at the moment is around 0.8% of the total agricultural land.

From the data shown in Table 1, it can be concluded that cereal and fodder crops are predominant in organic plant production. It is mainly due to the low input production of these crops, especially regarding the low use of pesticides, which makes them the most suitable for conversion in organic production. Regarding animal organic production, including organic beekeeping, there is a small but growing trend.
Surface of organic forests and wild collection area is around 0.5 million hectares. Data on the total value of the organic market and its share of the total market are not available. All available data are shared on the MAFWE web site.

Table 1. Data for plant and animal organic production and organic beekeeping in North Macedonia in the period 2018-2020

<table>
<thead>
<tr>
<th>Plant organic production</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crop</td>
<td>In conversion</td>
<td>Organic</td>
<td>Total (ha)</td>
</tr>
<tr>
<td>Cereal crops</td>
<td>573.92</td>
<td>359.83</td>
<td>933.75</td>
</tr>
<tr>
<td>Fodder crops</td>
<td>516.86</td>
<td>682.96</td>
<td>1199.82</td>
</tr>
<tr>
<td>Industrial crops</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Oilseed crops</td>
<td>6.23</td>
<td>0.95</td>
<td>7.18</td>
</tr>
<tr>
<td>Medicinal and aromatic plants</td>
<td>450.09</td>
<td>481.11</td>
<td>931.2</td>
</tr>
<tr>
<td>Fruit crops</td>
<td>322.65</td>
<td>204.92</td>
<td>527.57</td>
</tr>
<tr>
<td>Vineyards</td>
<td>95.22</td>
<td>20.06</td>
<td>115.28</td>
</tr>
<tr>
<td>Vegetable crops</td>
<td>77.60</td>
<td>88.05</td>
<td>165.65</td>
</tr>
<tr>
<td>Fallow</td>
<td>191.07</td>
<td>160.28</td>
<td>351.35</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Animal Organic Production</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type</td>
<td>In conversion</td>
<td>Organic</td>
<td>Total (No)</td>
</tr>
<tr>
<td>Cattle</td>
<td>2.902</td>
<td>3.654</td>
<td>6.556</td>
</tr>
<tr>
<td>Sheep</td>
<td>40.997</td>
<td>62.310</td>
<td>103.307</td>
</tr>
<tr>
<td>Poultry</td>
<td>340</td>
<td>340</td>
<td>200</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Organic beekeeping</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type</td>
<td>In conversion</td>
<td>Organic</td>
<td>Total (No)</td>
</tr>
</tbody>
</table>
4. System of control

The overall control and supervision system for organic agriculture is performed by the State Agricultural Inspectorate and Food and Veterinary Agency, as competent authorities, and by the certification bodies. In addition to this, each entity that applies for financial support to organic agriculture undergoes control by the Agency for Financial Support of Agriculture and Rural Development.

The process of control starts with an application form for the certification process, submitted to one of the two accredited certification bodies in the country (Procert and Balkan Biocert). The necessary time for inspection and certification depends on the farm/unit and is based on the information provided by the applicant. The date and the program of the inspection are agreed upon with the applicant.

The inspection is carried out once a year as a standard procedure. The applicant is informed at least 5 days before the official inspection, for which he is required to prepare all necessary documentation and responsible persons should be present during the inspection.

The applicant will be informed in advance about the inspector who will carry out the inspection of his farm/enterprise. The physical inspection corresponds to the minimum control requirements as described in Accredited Certification Bodies Equivalent European Union Production and Processing Standard for 3rd Countries 2010, Macedonian Law on Organic Agriculture (Official Gazette of Macedonia No. 146/2009) and the respective by-laws. The inspection includes a series of procedures concerning documentation checks and physical control of the farm/unit, whose sequence is defined by the inspector. The result from the inspection is a report describing the present state of the farm/unit.

The certification bodies have the right to make unannounced checks or additional inspections, or additional inspections if non-compliances are previously found.

The certification is based on the inspection report which states the findings of the inspection. The certification decision is prepared by an adequately trained and approved certification officer who has not been part of the control and doesn't have any conflict of interest with the applicant.

In the case of non-conformities, the certification officer can impose specific conditions and sanctions. The applicant will receive a certificate and a special certification letter stating the results of the inspection and the certification, the imposed conditions and sanctions, as well as the deadlines for improvement of the found non-compliances.

During the production period, the inspectors from the certification bodies, as well as agricultural and veterinary inspectors, are allowed to take a sample for laboratory analyses, and if needed for super analyses. The sample is sent for a specific analysis in one of the accredited laboratories in the country or abroad. The laboratory analyses are also performed at the end of the conversion period. For the products which are already placed on the market, the samples are taken by the inspectors from the Food and Veterinary Agency.

Regarding the import of organic products, there is an official control of the importer’s premises and documentation, other premises that are used for storage of the imported goods, the system of traceability, as well as the copies of the certificates and other necessary accompanying documents for the producer, the origin of the products, the export, transport, import and placing on the market.
5. Accompanying documents and certificates

When importing/exporting organic products, the certificates for organic production must be provided, as well as the additional documentation for the producer, invoices, the origin of the products and traceability of the commodity during export, transport, import and placing on the market. For imported products, a certificate for compliance has to be issued by Macedonian certification bodies.

In a case when the organic products are intended for export in a particular country, additional documentation considering the quality of the product may be needed.

6. Prior use of foreign assistance to strengthen the capacities in the organic sector

In the previous period, there were several activities and projects implemented with the main goal to strengthen the organic production capacities, increasing public awareness, as well as to adapt the legal framework in North Macedonia:

“Education for organic agriculture,” funded by The Peace Corps, 2005, and “Education for organic production of small fruits” funded by MAFWE, 2009, with an aim to educate farmers about the principles of organic production;

IPA Twinning Project “Organic Agriculture Production and Quality Protection of Agriculture Products” (2013-2014) – resulted in several amendments which were adopted in 2016;

International cooperation project “Increasing Market Employability-IME” (2014-2018) – established the first register of organic farmers in North Macedonia;

IPA INTERREG project “Produce organic – package ecologically” (2016-2018) – aimed at increasing public awareness of organic production;

Collaboration with the Swiss Foundation for the Promotion of Organic Agriculture (2018), with an aim to harmonize the national legislation with the EU 2018/848 regulation. Until today, this aim is not achieved.
7. Laboratories and methods

During each step of the organic production process, as well as after placing the products on the market, a sample can be taken for a certain analysis in a laboratory accredited with Standard ISO 17025. There are several accredited laboratories in North Macedonia (P.H.I. Institute for Public Health of the Republic of North Macedonia, State Phytosanitary Laboratory-SPL, University “Ss. Cyril and Methodius”- Faculty of Veterinary medicine Skopje, Food Lab Ltd Skopje, etc.) which are performing analyses of different quality parameters before or after placing organic products on market.

Regarding plant organic production, the analyses are usually performed for the detection of pesticide residues or for the detection of heavy metals, while in animal organic production for the detection of antibiotics. In organic beekeeping, the laboratory check is usually performed for the presence of pesticide residues in bee wax, as well as the presence of sucrose in the organic honey. For specific analyses for which there is no accredited method in North Macedonia, the sample can be sent to an accredited laboratory abroad.

8. Producers’ associations

There are several organic producers’ associations, which were formed with the main goal to represent the organic producers and promote organic production to policymakers, stakeholders, media, and the public, to exchange experiences and knowledge through trainings, workshops, and consultations, as well as to support the presentation of Macedonian organic products. However, there are numerous agricultural producers’ associations that are also dealing with organic production issues.

North Macedonia Organic Producers Federation (NMOPF) is a national umbrella organization formed by the Regional Organic Producers Associations. It is created to provide coordination and leadership to the organic movement in the country and it is active on the local, national and international levels.

The list of the organic producers’ associations and their contact information is given below:

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Phone</th>
<th>e-mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Macedonia Organic Producers Federation</td>
<td>Mladinska 146, Strumica</td>
<td>0038978222044</td>
<td><a href="mailto:info@fpopm.com">info@fpopm.com</a></td>
</tr>
<tr>
<td>Chamber of Organic Producers</td>
<td>Tromegja bb, Kumanovo</td>
<td>0038970888817</td>
<td><a href="mailto:info@kop.org.mk">info@kop.org.mk</a>, <a href="mailto:komorakop@gmail.com">komorakop@gmail.com</a></td>
</tr>
<tr>
<td>Association of Organic Food Producers BIOVITA</td>
<td>Metodija Dzunov Dzikot 65, Kavadarci</td>
<td>0038978237139; 0038976573789</td>
<td><a href="mailto:biovitaorganic@gmail.com">biovitaorganic@gmail.com</a></td>
</tr>
<tr>
<td>Association of organic food producers Organic Logistics</td>
<td>Mladinska 146, Strumica</td>
<td>0038978222044</td>
<td><a href="mailto:gjorgi@nineks.com.mk">gjorgi@nineks.com.mk</a></td>
</tr>
</tbody>
</table>
9. Proposal of further actions for growing of organic farming

- To start the process of drafting a new law on agricultural organic production, which will be fully harmonized with new EU regulations, as soon as possible
- To update the published lists for products for plant protection, fertilizers, bio stimulators, feed additives, and other products and substances that can be used in the process of production and processing of organic products
- To improve the control system during the production and processing of organic products
- To promote and raise awareness among local consumers, to increase the demand for organic products and thus develop the domestic market
- To provide the basis for diversification of organic production and to strengthen the capacities for year-round production.

10. Proposal of joint actions for the regional cooperation to facilitate the transfer of environmentally friendly/organic technologies

- To improve the knowledge and to exchange experiences and good practices in the field of organic production by organizing joint workshops, seminars, exposure visits, etc., between all stakeholders in the SEE countries, in terms of:
  - To perform a comparative analysis of the national legislations and control systems to implement good practical solutions from different countries
  - To instruct farmers that in the case of seeds and other plants’ reproductive material, the varieties should be selected based on their ability to meet the specific requirements of organic agriculture, but also to give them the possibility to use their own produced seeds and other plants reproductive material to foster genetic resources adapted to the specific climate conditions and resistant/tolerant to abiotic and biotic stresses. Regarding animal organic production, when choosing animal breeds, the main focus of the farmers should be on the high degree of genetic diversity, their capacity of adapting to local conditions, the breeding value, longevity, vitality, and resistance to disease or health problems.
  - To exchange experiences and good practices to provide better and more efficient control during the processing and labelling of organic food and feed for excluding the use of substances and processing methods that can mislead the consumers about the true nature of the product.
STATE OF THE ART OF THE ORGANIC AGRICULTURE IN THE WESTERN BALKANS
MONTENEGRO REPORT ON ORGANIC PRODUCTION

Prepared by
Prof. Dr. Zoran Jovovic
### 1. Legislation/Strategy

#### 1.1. Current legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Harmonized with EU regulation. (Yes / No / Partly)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Commission implementing regulation (EU) 2020/464</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commission implementing regulation (EU) 2021/1165</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commission delegated regulation (EU) 2021/1189</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Commission implementing regulation (UU) 2021/279</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commission implementing regulation (EU) 2021/1378</td>
<td>No</td>
</tr>
<tr>
<td>Bylaws</td>
<td>Rulebook on the detailed content, manner of registration and maintenance of the Register of Entities in Organic Production (OGM 26/2015)</td>
<td>National implementing act</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commission Delegated Regulation (EC) No 2020/2146</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commission implementing regulation (EU) 2021/1165</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the content and size of the organic production logo (OGM 60/2016)</td>
<td>Commission Regulation (EC) No 889/2008</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commission Delegated Regulation (EC) No 2020/2146</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Commission implementing regulation (EU) 2020/464</td>
<td>Partly</td>
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</tbody>
</table>

The legal framework for organic production exists. The Law on Organic Agriculture was adopted in 2013 (“Official Gazette of Montenegro”, No. 56/2013). By-laws regulate specific aspects of organic pro-
duction. Supervision over the application of the Law on Organic Agriculture and regulations adopted on its basis is controlled by the Ministry of Agriculture, Forestry and Water Management, as well as supervision over the implementation of support programs within the Agrobudget, which is performed by agricultural inspectors. The legal entity “MONTEORGANICA” performs the tasks of determining the fulfilment of conditions for the establishment of organic agriculture, control of the application of organic agriculture methods, and issuance of certificates for products obtained by organic agriculture methods. It was registered in 2005 and was authorized by the MAFWM in 2006 to perform control and certification activities in organic production.

1.2. Planned transposing the EU organic legislation

According to the national legal framework in the next two years in Montenegro as a candidate country for membership in the European Union, harmonization of national legislation is planned with the relevant EU acquis. One of these regulations includes an Improvement of agriculture competitiveness —establishment of a regulatory framework for the production of agricultural and food organic products, as well as other issues relevant to organic production. In the last quarter of 2022 is planned to bring the new Law for organic production harmonized by the Regulation (EU) 2018/848. In the 4th quarter of 2022, and 2023, adopting of secondary legislation is planned which will determine certain rules for the application of the provisions of the Law on organic production.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law</td>
<td>Law on Organic Production</td>
<td>Regulation (EU) 2018/848</td>
<td>4th quarter 2022</td>
</tr>
<tr>
<td></td>
<td>Rulebook on detailed rules and conditions for plant and livestock organic production</td>
<td></td>
<td>1st quarter 2023</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the manner and methodology of performing professional control in organic production</td>
<td></td>
<td>2nd quarter 2023</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the detailed content, manner of registration and maintenance of the Register of Entities in Organic Production</td>
<td></td>
<td>2nd quarter 2023</td>
</tr>
<tr>
<td></td>
<td>Rulebook on detailed conditions and rules for processing, packaging, transport and storage of organic products</td>
<td></td>
<td>3rd quarter 2023</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the content and size of the organic production logo</td>
<td></td>
<td>3rd quarter 2023</td>
</tr>
<tr>
<td></td>
<td>Rulebook on detailed rules and conditions of organic production for aquaculture animals and seaweed</td>
<td></td>
<td>4th quarter 2023</td>
</tr>
</tbody>
</table>

After the adoption of the law, the rulebooks will be adopted and harmonized with the accompanying regulations. The framework for legislation adoption and implementation given in the table is subject to change depending on capacities, agricultural strategy, EU accession negotiations process and priorities identified.
2. Strategy

In accordance with the *Strategy for the development of agriculture and rural areas, 2014-2020* organic production is also one of the development opportunities for agriculture in Montenegro. Production processes in agriculture in Montenegro are mainly extensive and can, relatively easily, be included in the program of limited use of plant protection products, mineral fertilizers, etc. Although still underdeveloped, the trend of registering organic producers is constantly increasing, due to the characteristic climatic and soil conditions, which is an advantage for the needs of this type of production. For example, the number of registered organic producers in 2020 increased by 157% compared to 2016, and the number of issued certificates for organic production increased by 306%. However, the market for organic products is still underdeveloped.

The importance of organic production is also given in the *National strategy of biodiversity with the action plan* for the period 2016-2020 in the context of preservation of genetic resources: Agrobiodiversity plays a special role in food production, i.e. genetic resources of local plant varieties and animal breeds traditionally used in the diet, and which are the basis for organic and traditional agriculture. These resources and their conservation are particularly important in the context of climate change, as indigenous genotypes will be better adapted to expected climate change.

The strategy for the new period is in the preparation phase. Within the current drafting process strategy for the development of agriculture and rural areas (2022-2030), an increase of 25% in organic production is planned by 2030.

The *Action plan for harmonization with the legal EU acquis from 2015, Chapter 11 - Agriculture and rural development*, suggests harmonization of national legislation with relevant European legislation, the establishment of procedures to enforce detailed rules on imports of organic products in line with the EU acquis, availability of data on the official website of the MAFWM related to the database for seed and planting material, a list of certified organic producers, as well as a list control bodies operating on the territory of Montenegro.

It is pointed out that continuous supervision should be carried out by the Ministry towards the control body and producers, as well as a regular annual official control program. The inspection body supervises all entities in organic production at least once a year. In addition, the control body carries out random control visits based on risk assessments of non-compliance with organic production rules.

Through the measures of the Agro-budget (rural development measures), support continued to the producers who deal with organic production, with the aim of improving production. Through IPARD measures organic producers and processors can improve the infrastructure of farms and processing facilities. Support is planned for the establishment and promotion of direct sales channels for organic products, with the aim of efficient presentation to consumers and compliance with regulations of labelling of organic products. In addition, one type of marketing is the offer of products through tourism. Training for producers and administrative staff is planned through various instruments of assistance (Twinning, TAIEX, BTSF). 
3. Organic producers’ data

The data on total agricultural utilized land (AUL), total organic arable land, pasture and meadows is given in the table below. A slow and steady increase was measured until 2019, with a decline in 2020. This decline benefited pastures and meadows which resulted in an increase in the last year. The low share of organic land in total agricultural utilized land (0.9-1.7%) means that there is a high potential for further increase in the organic area in Montenegro.

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total agricultural utilized land (AUL)</td>
<td>255,845.8</td>
<td>256,361.2</td>
<td>256,807.2</td>
<td>256,807.7</td>
<td>257,949.8</td>
</tr>
<tr>
<td>Arable land (ha)</td>
<td>271.72</td>
<td>261.77</td>
<td>309.13</td>
<td>321.27</td>
<td>306.92</td>
</tr>
<tr>
<td>Pasture and meadows (ha)</td>
<td>2,680.19</td>
<td>2,031.77</td>
<td>3,696.14</td>
<td>3,924.97</td>
<td>3,951.84</td>
</tr>
<tr>
<td>Share of areas under organic production in total AUL (%)</td>
<td>1.2</td>
<td>0.9</td>
<td>1.6</td>
<td>1.7</td>
<td>1.7</td>
</tr>
</tbody>
</table>

The number of registered producers significantly increased from 2019 to 2020 (an increase of 40 producers), as well as that of issued certificates (53 producers) (graph and table below).

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>No of registered producers</td>
<td>280</td>
<td>316</td>
<td>351</td>
<td>397</td>
<td>437</td>
</tr>
<tr>
<td>Issued certificates</td>
<td>72</td>
<td>91</td>
<td>134</td>
<td>167</td>
<td>220</td>
</tr>
</tbody>
</table>

So far, 426 producers have been entered in the Register of Organic Production Entities, of which 302 in the field of fruit growing, are 35 are in field crop and vegetable production, livestock and field crop production 33, beekeeping sector 44, production of medicinal plants 10, and olive growing 2. Of the total registered producers, 12 are legal entities and 410 are individual producers.

The highest areas of organic farming are meadows and pastures, followed by perennial plants and arable land. Beekeeping represents the most important branch with 3381 beehives. The recent increase in the number of cattle was noted counting from 39 in 2019, to 393 in 2020.
4. System of control

In accordance with the Rulebook on the manner and methodology of performing professional control in organic production (“Official Gazette of Montenegro”, No. 78/2015 of 31.12.2015), transposing Commission Regulation (EC) No. 889/2008 of September 5, 2008, the control authority or control body performs professional control of organic production on the basis of a submitted request containing:

1) description of the production unit, i.e. activity;
2) measures implemented at the level of the production unit for organic production;
3) measures taken to reduce the risk of pollution by illicit products or substances in organic production and implemented measures in storage facilities and at all stages of organic production;
4) list of legal or natural persons with whom a contract has been concluded for the distribution, storage, transport, packaging, and processing of organic products.

The production unit is land, facility, room, or space used for organic production (production plots, pastures, open space, livestock facilities, ponds, aquaculture and seagrass production systems, storage areas for plants, plant products, seaweed products, animal products, raw materials and all other inputs important for organic production).

Professional control in organic production is performed in order to determine the compliance of organic production methods in all phases of production, preparation, and distribution of products.

Professional control begins from the moment of inclusion of legal and natural persons in organic production (hereinafter: the subject of control), i.e., from the moment of concluding the contract on performing professional control and certification in organic production.

Prior to the commencement of the expert control, the control authority, i.e., the control body, shall determine the persons who will perform the control (hereinafter: the controller) and provide the documentation necessary for the performance of the control.

Expert control is performed at least once a year by physical inspection of production units of control subjects.

During the physical inspection, the controller takes samples from the production units, in order to control the fulfilment of the conditions of organic production.

The number of samples per year is at least 5% of the total number of control subjects.

The selection of the subject of control for sampling is made on the basis of a risk assessment of non-compliance with the rules of organic production.
Expert control is performed without prior notice, based on a risk assessment, considering the results of previous expert controls, the number of organic products, and the risk of product substitution.

In the procedure of professional control, the documentation and records kept by the subject of control are checked.

In the procedure of professional control, the financial documentation is checked for the purpose of control:

1) supplier, i.e., seller or exporter of organic products;
2) types and quantities of organic products delivered to the production unit, raw materials, and additives purchased and used, including the composition of animal feed.
3) types and quantities of organic products stored.
4) types and quantities of organic products placed on the market, i.e., customers, as well as premises or storage facilities;
5) types and quantities of organic products purchased and placed on the market, suppliers, sellers, or exporters.
6) other documentation at the request of the control authority or control body.

If the subject of control within the agricultural holding also has a production unit used for inorganic production, that production unit is subject to professional control, as well as all premises and facilities within that production unit, including records and accompanying documents.

If the subject of control concludes a contract with another legal or natural person for the distribution, storage, transport, packaging and processing of organic products, those persons are also subject to professional control.

Data on performed expert controls may be exchanged by control authorities or control bodies if the expert control is performed by different control authorities or control bodies.

In order to perform professional control in organic plant production and during the collection of wild plant species from natural habitats, the subject of control shall also submit data on:

1) storage rooms, rooms for production, i.e. processing and packaging, as needed;
2) parcels, i.e. areas of collection of wild plant species from natural habitats;
3) the date of the last works on the production plots.

If wild plant species are collected from natural habitats, the request shall be accompanied by proof that the product collection areas have not been treated with products that are not permitted for use in organic production.

After the performed expert control, a record of the performed expert control is made after each control, which is signed by the controllers and the subject of control.

If during the expert control it is noticed that there are certain irregularities in the way of production of organic products, corrective measures are ordered in order to eliminate the irregularities.

A report shall be made on the observed irregularities and ordered corrective measures, which shall be signed by the control authority, i.e. the control body and the subject of control.

The annual report on implemented control activities contains:

1) list of control subjects and number of control subjects with which the contract on control and certification in organic production has been concluded;
2) areas by crops and animals in transition;
3) areas by crops and animals that are in organic status;
4) areas from which wild plant species from natural habitats are collected;
5) areas of meadows and pastures;
6) number of issued certificates;
7) data on imported and exported products.

Monteorganica is a company for the control and issuance of certificates in organic agriculture, founded in late 2005. Monteorganica is an accredited certification body for control and certification in organic agriculture according to the requirements of the standard MEST EN ISO/IEC 17065: 2013 - ATCG ACREDITATION CERTIFICATE - 0050, issued by the ACCREDITATION BODY OF MONTENEGRO. It is authorized for the activity performed by the Ministry of Agriculture, Forestry and Water Management of Montenegro, by Decision no. 060-313/07-0205-55. The assessment of the conformity of the Monteorganica certification body with the standard MEST EN ISO/IEC 17065: 2013 is performed by the Accreditation Body of Montenegro.

In order to be certified as an organic producer, the producer must be familiar with the provisions of the Law on Organic Production and bylaws. After getting acquainted with the legal regulations, the producer applies to the Certification Body for control and issuance of certificates from organic agriculture – "Monteorganica” d.o.o. The producer who is applying for the first time for the control and certification of organic production is obliged to submit the application documentation in person to "Monteorganica” d.o.o. Producers who apply for the first time and those who are already in the certification procedure are obligated to complete the application documentation and submit it to the certification body, prior to April 1st every year. Prior to the start of the first (initial) inspection, the producer shall sign a Control and Certification Agreement with the Certification Body. After submitting the complete application documentation, the controller of “Monteorganica” d.o.o., agrees with the producer on the appropriate date for the initial (first) control. The controllers of the Certification Body go to the field in the agreed time and control the entire farm of the registered producer during which the current situation in the field is observed, check the data from the applications, and assess the degree of compliance with organic production rules.

The controllers record the current situation and the results of the control in the Control Reports on the basis of which the decision on certification is made.

5. Accompanying documents and certificates

The procedure for deciding on the certification status of producers is the final assessment and approval of the results of control in terms of compliance of producers with the standards of organic production. Certification is strictly separated from control, and the decision on certification is made by the person who did not perform the control. If the producer meets the conditions defined by the Law on Organic Production and bylaws (regulations), the producer or production shall be assigned the status of a transitional period with the duration of:

- The transition period for one-year crops is two years. In the third year, a certificate for an organic product is issued.
- The transition period of perennial culture is three years. In the fourth year, a certificate for an organic product is issued.
The transition period in beekeeping is at least one year. In the second year, a certificate for an organic product is issued if the conditions from the Law and the Rulebook are met.

The transitional period for the collection of forest fruits and medicinal plants does not apply.

The transition period in animal husbandry is conditioned by the provision of organic feed for livestock.

Transitional period, duration, and possible shortenings are defined in Art. 18 of the Law on Organic Production and Art. 29, Art. 30, and Art. 31 of the Rulebook on detailed rules and conditions for plant and livestock organic production.

Information on the granted certification status of the producer can be found in the Certification Report. In case of a positive Certification Report, the producer is obliged to register in the Register of Organic Producers kept by the Ministry of Agriculture and Rural Development. "Monteorganica" d.o.o. issues a certificate to producers as a confirmation that they have implemented methods of organic production and that the product, as a result of such production, is organic. The certification body issues certificates:

- For products from the transition period - when the methods of organic production have been implemented for at least 1 year, except for products obtained by methods of organic livestock production.
- For organic products - after the full expiration of the transition period. After issuing the Certificate, the producer of his organic products/products from the transition period must mark it as such.

The certificate is an integral part of the Rulebook on the manner and methodology of performing professional control in organic production (OGM 78/2015) - which can be found at the link:

https://orgcg.org/put-do-sertifikacije-organske-proizvodnje/

6. Prior use of foreign assistance to strengthen the capacities in the organic sector

OADP - Organic Agriculture Development program – support of Danish government to organic farming development in Montenegro (2009.-2013.). As part of the OADP project, investments have been supported since 2010-2013 in organic production, through a grant scheme.


EU pre-accession assistance for rural development (IPARD) - The existing legal framework has created the conditions for providing support to organic production through agricultural policy measures, and especially through the group of measures for sustainable management of natural resources) where organic production has a special place. In addition to this type of support, in order to improve product quality, through measures to strengthen the competitiveness of agriculture, support is provided for the inclusion of agricultural producers in organic agriculture and relates to the costs of standards, certification and participation in semi-quality.

Financial support for organic agriculture has been included in the Agro-budget since 2004. Organic agriculture is one of the priorities for the development of Montenegrin agriculture and has a significant place in the Strategy for the Development of Food Production and Rural Areas and the National Program for Food Production and Rural Areas. This priority is also recognized in the IPARD program.
7. Laboratories and methods

Centre for Ecotoxicological Research of Podgorica (CETI) was established by the Government of Montenegro for the following purposes: ecotoxicological testing and quality testing (physical and chemical analysis and testing of the radionuclide content) of all segments of the environment (water, air, soil, sediment, sea ...), control of food safety, dosimetry measurements, quality assurance and control (QA/QC), examination of working environment (comfort-microclimate, chemical and physical hazards), testing of noise and vibration in the working environment, preparation and drafting of acts on the assessment of professional risks for employees and proposal of measures for their elimination, categorization of waste, the development of toxicological studies, baseline studies, analyses and programs for the needs of state bodies, research institutions, companies and other entities. The Accreditation body of Montenegro accredited CETI for: physicochemical analyses of drinking water, food, surface water, biological materials, alcoholic beverages, air, sediment, soil, waste water, waste, transformer oil, testing of radioactivity in samples of water, air, soil, food, building materials, examining the level of external radiation, ionizing radiation testing, acoustical noise testing and sampling: surface water and drinking water, liquids and combustible liquids, soil, sediments and sludge.

The accreditation certificate for the Standard: MEST EN ISO IEC 17025: 2011 was awarded/renewed on 10.04.2008/07.09.2020. The accreditation is valid until: 06.09.2024. CETI is authorized for laboratory testing of plant protection products (pesticides); laboratory testing of residues of plant protection products (pesticides); laboratory testing of plant nutrition products (fertilizers); laboratory testing of contaminants in food of plant origin at the level of primary production; and laboratory testing of agricultural land in order to determine the amount of hazardous and harmful substances (no. 320/14-0505-43 of 23/01/2014) issued by the Ministry of Agriculture and Rural Development – Phytosanitary Office.

8. Producers’ associations

According to data on organic production managed by the Ministry of Agriculture, Forestry and Water Management of Montenegro, there are 426 operators who are dealing with organic production. Most of these operators function as individuals so no group certification in this moment is applied. There is one national association of organic producers – “Organic Montenegro”. This association was founded as an NGO, but today it is no longer in operation.
## FRAME FOR THE IMPLEMENTATION OF THE PLANNED ACTIVITIES

<table>
<thead>
<tr>
<th>Activities</th>
<th>2022</th>
<th>2023</th>
<th>2024</th>
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<tbody>
<tr>
<td><strong>Establishment of the legal framework</strong></td>
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<tr>
<td>Law on Organic Production</td>
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<tr>
<td>Rulebook on detailed rules and conditions for plant and livestock organic production</td>
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<tr>
<td>Rulebook on the manner and methodology of performing professional control in organic production</td>
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<tr>
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<tr>
<td>Reorganization of the administrative structure and certification bodies</td>
<td>✔</td>
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<tr>
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REPUBLIC OF SERBIA REPORT ON ORGANIC PRODUCTION

Prepared by

Mr. Branislav Raketic
# 1. Legislation/Strategy

## 1.1. Current legislation

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
<th>Harmonized with EU regulation (Yes / No / Partly)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law</td>
<td>Law on Organic Production (Official Gazette of the RS, No 30/10 and 17/19)</td>
<td>Regulation (EU) 2018/848 with delegated regulations</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td>Rulebook on the control and certification of organic production and organic production methods (Official Gazette of the RS, No 95/2020 and 24/21)</td>
<td>Implementing Regulation (EU) 2020/464</td>
<td>Partly</td>
</tr>
<tr>
<td></td>
<td>Rulebook on documentation submitted to an authorized control body to issue a conformation, as well as on conditions and method of sale of organic products (Official Gazette of RS, No 88/16)</td>
<td>Commission Delegated Regulation (EU) 2020/2146</td>
<td>No</td>
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<tr>
<td></td>
<td></td>
<td>Implementing Regulation (EU) 2021/279</td>
<td>Partly</td>
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<tr>
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<td></td>
<td>Implementing Regulation (EU) 2021/1165</td>
<td>Partly</td>
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<tr>
<td></td>
<td></td>
<td>Commission Delegated Regulation (EU) 2021/1189</td>
<td>No</td>
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<tr>
<td></td>
<td></td>
<td>Implementing Regulation (EU) 2021/1378</td>
<td>Partly</td>
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<tr>
<td></td>
<td></td>
<td>Commission Delegated Regulation (EU) 2021/1342</td>
<td>Partly</td>
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<tr>
<td></td>
<td></td>
<td>Commission Delegated Regulation (EU) 2021/1698</td>
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</tr>
</tbody>
</table>

## 1.2. Planned transposing the EU organic legislation

On January 28, 2021, the Government of the Republic of Serbia adopted the Program of Economic Reforms for the period 2021-2023. (Economic Reform Program - ERP), as the most important strategic document in the economic dialogue with the European Commission and the member states of the European Union (EU). The preparation of this document on an annual basis is important for the Republic of Serbia, as a candidate country for membership in the European Union, because it represents preparation for participation in the process of economic and fiscal surveillance of EU member states. As the ERP is a rolling program that establishes a system of monitoring and reporting on the implementation of structural reforms that require a longer period the reforms presented in the ERP 2021-2023 are complemented by the reforms of the ERP 2020-2022, which are four new reforms have been added, one of them is an Improvement of agriculture competitiveness - establishment of a regulatory framework for the production of agricultural and food organic products, as well as other issues relevant to organic production.
The ERP is used as a basis for drafting the Government’s Work Plan for 2022 which is planned to bring the new Law for organic production harmonized by the Regulation (EU) 2018/848 in the 4th quarter of 2022, and 2023, is planned to bring the secondary legislation which will determine certain rules for the application of the provisions of the Law on organic production.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Name of acts (laws and by-laws)</th>
<th>EU legislation</th>
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<td>Regulation (EU) 2018/848</td>
<td>4th quarter 2022</td>
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<td></td>
<td>Rulebook laying down certain rules concerning the certificate issued to producers</td>
<td>Implementing Regulation (EU) 2021/1378</td>
<td>1st quarter 2023</td>
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<td></td>
<td>Rulebook of authorizing certain products and substances for use in organic production</td>
<td>Implementing Regulation (EU) 2021/1165</td>
<td>1st quarter 2023</td>
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<tr>
<td></td>
<td>Rulebook laying down certain rules as regards the documents for the retroactive recognition periods of organic status</td>
<td>Implementing Regulation (EU) 2020/464</td>
<td>1st quarter 2023</td>
</tr>
<tr>
<td></td>
<td>Rulebook laying down rules on controls and other measures ensuring traceability and compliance and the labelling of organic products</td>
<td>Implementing Regulation (EU) 2021/279</td>
<td>2nd quarter 2023</td>
</tr>
</tbody>
</table>

2. Strategy

The Republic of Serbia is fully committed to the process of European integration and aware that the process requires substantial changes in agriculture and rural development. The commitment to European integrations is reflected in the Strategy of Agriculture and Rural Development for 2014 - 2024 (Official Gazette of the RS, No 84/14). For realizing strategic goals prescribed by the Strategy of Agriculture and Rural Development, MAFWM adopted Rural Development Programme (RDP). One of the main objectives of RDP is to develop the organic production sector, in line with sustainable production and environmental protection as well as biodiversity. Achieving this goal is carried out through 11 group activities, one of which is the harmonization of the legislative framework for organic production in accordance with the EU legislation.

The Republic of Serbia intends to gradually transpose and implement the EU acquis in the field of agriculture and rural development. Certain measures, compatible with the Common Agricultural Policy (CAP), will be introduced in the pre-accession period and financed from the national budget. Upon completion of the screening process of Chapter 11 - Agriculture and Rural Development, the Council of the EU has submitted a benchmark for opening negotiations on Chapter 11 - creating the Action Plan for the transposition, implementation, and enforcement of the acquis in agriculture and rural development (AP) (see detailed activities in table below related to organic production).
<table>
<thead>
<tr>
<th>Activities</th>
<th>2022</th>
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<td><strong>ORGANIC PRODUCTION</strong></td>
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<tr>
<td>Establishment of the legal framework</td>
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<tr>
<td>Reorganization of the administrative structure - competent authority (Adoption of the Rulebook on internal organization and systematization of work posts)</td>
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<tr>
<td>IT Infrastructure</td>
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<tr>
<td>Procurement and maintenance of new software for organic production data</td>
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<tr>
<td>Informative campaign</td>
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<tr>
<td>Informative campaign for the producers and stakeholders as well as consumers</td>
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<tr>
<td>Implementation of the legal framework</td>
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### 3. Organic producers’ data

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</tr>
</thead>
<tbody>
<tr>
<td><strong>Arable land (ha)</strong></td>
<td>2,783</td>
<td>3,007</td>
<td>5,364</td>
<td>5,355</td>
<td>7,999</td>
<td>13,398</td>
<td>12,929</td>
<td>11,875</td>
<td>13,723</td>
<td>15,915</td>
</tr>
<tr>
<td><strong>Pasture and meadows (ha)</strong></td>
<td>3,071</td>
<td>3,327</td>
<td>976</td>
<td>2,873</td>
<td>1,549</td>
<td>1,900</td>
<td>1,429</td>
<td>1,548</td>
<td>5,531</td>
<td>5,350</td>
</tr>
<tr>
<td><strong>Share of areas under organic production in total UAA (%)</strong></td>
<td>0.17</td>
<td>0.18</td>
<td>0.18</td>
<td>0.24</td>
<td>0.27</td>
<td>0.44</td>
<td>0.42</td>
<td>0.39</td>
<td>0.55</td>
<td>0.61</td>
</tr>
</tbody>
</table>

The total organic area was nearly 21.3 thousand hectares (ha) in 2019, up from 19.2 thousand hectares in 2018. The increase in organic area between 2010 and 2019 was 367%. The total organic area is the sum of the ‘area under conversion’ and the ‘certified area’. Before an area can be certified as ‘organic’, it must undergo a conversion process, which may take 2-3 years depending on the crop. The share of the total organic area in the total utilized agricultural area (UAA) was 0.61% in 2019. The low share of...
certified areas with 0.61% of UAA means that there is a high potential for further growth in the certified organic area in Serbia. Due to the 2-3 years conversion period of agricultural land, a high share of area under conversion is necessary to avoid stagnation of the growth of the certified organic area.

Serbia has the largest share of the organic area in the fruit sector, mainly berry fruits (raspberries, blackberries) and cherries, and then cereals (wheat, soya, maize…), and industrial plants.

4. System of control

The control in organic production is executed in accordance with the law governing organic production, in a way to ensure objectivity, impartiality, absence of conflict of interest, efficiency, professionalism, and consistency, as follows:

1) in all phases of organic production;
2) for all organic products;
3) by applying adequate and appropriate control methods;
4) based on the documented procedure.

The established system of control enables traceability of each product in all stages of production, processing and sale/marketing, in accordance with the law governing food safety issues, in order to guarantee that the organic product has been produced or imported in accordance with the law governing the organic production.

The control starts from the moment when the producer enters organic production, i.e., from the moment when the producer concludes and signs a contract with the authorized control body on the execution of control and certification in organic production.

According to Law on organic production prior to placing any products on the market as ‘organic’ or as ‘in conversion” operators and groups of operators shall notify their activity to one of the authorized control bodies who are carried out control at all stages of organic production. The authorized control body is obliged to perform at least once a year a complete physical control and control of documentation of the operator and makes a written report on performed control which is also should be signed by the operator.

According to the Law on organic production for the performance of control and certification in organic production, the Ministry authorizes control bodies that have been registered in the Register of economic entities in accordance with the law regulating the registration of economic entities, also they should possess the accreditation issued by the Accreditation Body of the Republic of Serbia in accordance with the SRPS ISO/IEC 17065, as well as they should meet the requirements regarding technical equipment and staff qualifications. The Minister determines by the decision whether the requirements for control and certification performance in organic production have been met. The decision of the Minister shall be valid for a period of one year and can be extended in accordance with the conditions specified by this Law. The Ministry published a list of the authorized control bodies and publishes it in the “Official Gazette of the Republic of Serbia” once a year. For 2021, the year the Ministry has authorized six authorized control bodies, and they are: Organic Control System, Ecocert Balkan, Ekovivendi, TMS CEE, CIN, and SGS.

For certified organic products that are imported, the authorized control body shall issue, on the basis of performed control of documents and certificates issued by the competent authority in the country of
origin, a confirmation of compliance that the product is produced in accordance with Law on organic production and regulations adopted based on this Law.

The Sector of Agriculture Inspection, as part of the Ministry of Agriculture, Forestry and Water Management, is in charge the market control of organic products. The Law on organic production has prescribed penalties for operators in case that placed into the market a product that is not organic is labelled as organic or placed into the market the organic products, without a valid certificate issued by an authorized control body, or placed into the market imported organic product for no confirmation by an authorized control body has been obtained.

Also, the Sector of Agriculture Inspection is in charge of supervision of the work of the authorized control bodies in the scope of the delegated tasks. The Law also provides penalties for control bodies in case, for example, if they do not perform control and certification tasks in accordance with Law or do not perform complete physical control and control of operator's documentation at least once a year, or if they do not make a written report on the performed control or issue a certificate which is contrary to the report on performed controls.

As regards keeping records, authorized control bodies are obliged to keep records, which contain particular information on:

1) name and address, or trade name and address of the head office of the operator, as well as information on the person responsible for organic production (name and contact number);
2) address of the unit engaged in organic production;
3) date of starting conversion period;
4) code number of all control bodies in which the organic operator was registered after the inclusion in the organic production;
5) arable land used for organic production;
6) area of natural habitats from which were collected wild plants and animals in accordance with the regulation governing the collecting and use of wild plants and animals;
7) species and number of animals at the agricultural estate;
8) issued certificates and confirmations;
9) production of reproductive materials.

The authorized control body is obliged to submit an annual report on organic production for the previous year to the Ministry, every year not later than the 31st of January of the current year, which includes all the above-mentioned data. Based on the data provided from annual reports from authorized control bodies, the Ministry keeps cumulative records on organic production.

5. Accompanying documents and certificates

The established system of control shall enable traceability of each product in all stages of production, processing, and sale/marketing, in accordance with the law governing food safety issues, in order to guarantee that the organic product has been produced or imported in accordance with the law governing the organic production.

In the case of import of organic products, with the aim to issue the confirmation of compliance, the importer shall submit to the authorized control organization data on the premises of the importer and
its activities in import, place of entry of product into the Republic of Serbia, as well as facilities it intends to use for storage of imported organic products until the time they are delivered to the first consignee, and the first consignee of the imported organic products, i.e. importer if at the same time also the first consignee, submits data on the facility for receiving and storage.

In the case of exporting organic products, certified organic products can be exported only with a valid certificate from an authorized control body.

The exporter shall write in the relevant section of the customs declaration, that it is the organic product, as well as the number of the certificate enclosed with the customs declaration which is stipulated by the Rulebook on the form, content, manner of submission, and completion of declarations and other forms in customs procedure, issued by Ministry of Finance.

6. Prior use of foreign assistance to strengthen the capacities in the organic sector

1. **Twinning project “Strengthening capacities for implementation and further development of the legislative framework in the field of organic production and food quality policy”** 2018-2020. This twinning project in the field of organic production covered different topics and objectives as listed in the following activities:
   - **Activity 1**: Alignment of national legislation and implementing procedures with related EU requirements in the area of organic production;
   - **Activity 2**: Setting up an effective control system for organic production;
   - **Activity 3**: Improvement of BC staff’s skills in the field of promotion of organic production and awareness campaigns.

2. **The project “Support to organic agriculture” supported by FAO** (July 2021 to June 2023) covers the following activities:
   - **Activity 1**: Policy process for compliance of the national legislation with the EU acquis, including the alignment of the organic legislation to the EU standards and procedures, strengthened;
   - **Activity 2**: Assessment of the organic livestock production sector in the South-eastern region of Serbia and development of an Action Plan to address the gaps and challenges;
   - **Activity 3**: Awareness raising and promotion of the organic livestock sector.

3. **The project “Organic Trade for Development”** donor supported by the Swiss State Secretariat for Economic Affairs – SECO (September 2019 – June 2023), countries of intervention: Albania, Serbia, and Ukraine. The project covers the following activities:
   - **Activity 1**: Production level - Public Private Partnership Projects – to improve business and local environment; Enabling legislative framework to support production and producers;
   - **Activity 2**: Marketing level - National campaign for promotion of OP; Facilitated access of local farmers’ products on the market; Remote areas promoted on the market;
   - **Activity 3**: Support level - Strengthening of Business Support Organizations; Training of CBs;
Establishment of Import-Export-Platforms through sector convening events; Organization of the Organic Leadership Course.

7. Laboratories and methods

The accreditation Body of Serbia (ATS) keeps the register of laboratories accredited with Standard ISO/IEC 17025 containing information on the scope of accreditation including a short description of the scope [http://www.registar.ats.rs/](http://www.registar.ats.rs/). According to Food Safety Law, the Minister of Agriculture designates official laboratories to carry out laboratory analyses, tests, and diagnoses on samples taken during official controls and other official activities. The Minister may only designate as an official laboratory a laboratory that operates in accordance with the standard EN ISO/IEC 17025.

In order to perform official controls as well as to issue certificates by the control body, the number and range of samples and the stage of production, processing and distribution in which samples will be taken, are based on product risk analysis but also on the base risk analysis of the producer. As the certificate is a guarantee that organic food is produced and processed without the use of pesticides and chemical fertilizers and does not contain any contaminants, most laboratory analyses refer to laboratory tests for pesticide residues in almost 90% of samples taken, and then antibiotics testing, heavy metal testing, and GMO testing.

8. Producers’ associations

According to data on organic production managed by the Ministry of Agriculture, there are 6261 operators that are dealing with organic production. Most of these operators function in the cooperation’s system, which means that producers, mainly processors, for the purpose of organic production, have concluded a contract/agreement on cooperation with farmers engaged in a similar type of organic production on production units, or collection areas located within the same geographical area, referred to as producer co-operators.

In these cases, the producer remains responsible for the organic production, in cases where the producer has not transferred that responsibility to the co-operators. This type of organization of organic production is quite common in Serbia, where producers are holders of certificates, and all their co-operators are listed in the appendix to the certificate. There are 43 certificate holders in Serbia who, through subcontracting agreements, have hired a total of 5,513 farmers as co-operators.
## Group of production in 2020

<table>
<thead>
<tr>
<th>No.</th>
<th>Name of producer/processor</th>
<th>The number of producers and co-operators.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>“AGRO DOMESTICA” ДОО</td>
<td>207</td>
</tr>
<tr>
<td>2</td>
<td>“AGRO-BIS” СТПР</td>
<td>60</td>
</tr>
<tr>
<td>3</td>
<td>“AGROFROST” ДОО</td>
<td>354</td>
</tr>
<tr>
<td>4</td>
<td>“AGROVEKS” ДОО</td>
<td>11</td>
</tr>
<tr>
<td>5</td>
<td>“APICASE HONEY” ДОО</td>
<td>17</td>
</tr>
<tr>
<td>6</td>
<td>“CMANA” ДОО</td>
<td>31</td>
</tr>
<tr>
<td>7</td>
<td>“ČOLIĆ PLUS” ДОО</td>
<td>41</td>
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