



OCR implementation in France

Escaa annual meeting – Krakow 7-9 May 2025



Scope : marketing controls, imports, certification process, registration of operators

Requirements for competent authorities regarding designation, transparency of official controls, documented procedures, methods

- Designation in the French laws
- Publication of the annual report every year
- Implementation within a quality management system according to ISO standards since 2008

Delegation of tasks

- Calls for tender at national and/or European level (seed potatoes, post control plots)
- Reference to ISO standards for all delegated bodies: ISO 17020 standard specific to bodies carrying out inspections, analyses (ISO 17025 standard) and sampling (included in standards 17020 and 17025). + ISTA accreditation

Sampling, analyses, tests

- Reference laboratories, official laboratories and officially recognised laboratories within the French laws – official : ISO 17025 accredited and/or ISTA accredited
- Methods described at ISTA and IPPC level

Import

- Documentary check for the customs : Oecd, equivalence

Operators' responsibility

- French laws based on the surveillance of operators since the 90s
- Registration of any activity regarding the seed sector (multiplication, production, import, export, distribution, marketing) is mandatory



Focus on risk analysis approach

Risk based official controls for activities under official supervision

- Risk score applied to the minimum surveillance stated in EU rules on marketing and/or plant health (if different the highest is applied)
- ⇒ Risk score includes a confidence index for operators : divided in classes depending on the total number of non conformities, type of non conformities (major or minor) and whether it's on a mandatory criteria needed before the production process started or after.

Exemple : field inspection of certified seeds (under temporary experiment) – 4 categories of risk scores (5% to 12,5%).

2023 – Number of inspections realised with no risk-based approach (randomly at the minimum level rates) = 3563 / Number of inspections calculated for the same year with risk-based approach : 3392

Critical control points for operators' activities

Mandatory for plantlets since late 90s

Based on the plant health assessment only (at present date)



Implementation – highlights and « lesson learnt »

Internal State organisation and internal offices/bodies organisation

- Who's responsible for what?
 - Do I have the adapted legal tools/basis?
 - Do I have a quality management system?
 - Do I have a basis for fees or analyse my costs for different activities?
 - How do I deal with operators at a general surveillance level?
 - Do I delegate tasks and to whom? Do I change my designation of competent authorities?
- ⇒ Needs a lot of opened and constructive discussions and cooperation between authorities – Took almost 18 month in France when plant health regulation was adopted
- ⇒ All the technical basis are present in the International and EU systems for seeds so OCR is a matter of making them transparent within the National organisation

Risk based official controls and critical control points for operators' activities

Technically challenging to implement from scratch

« Retro-ingeneering » is useful : looking for instance at post control results and coming back to where the main risks or critical points are





Dziękuję

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