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INTERNATIONAL TASK FORCE ON HARMONIZATION AND EQUIVALENCE IN ORGANIC AGRICULTURE

Group Certification Information

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Overview

- Background Information
- Concept of Group Certification
- Scope and Criteria for Group Certification
- Acceptance of group certification by governments
- Recent Developments in the U.S.
- New NOSB CACC recommendation
- Concerns



Background

Group certification systems have been developed

- in order to facilitate the certification of smallholder farmers in developing countries
- to address the different socioeconomic-cultural conditions in which farming takes place around the world
- to lower the barriers for smallholder groups to enter into the organic market and to save costs for small farmers with low income



Background

Group certification systems have been developed

- by stakeholders (private certification bodies), even before public regulations on organic agriculture were developed
- Initiated by IFOAM, workshops have been conducted on the topic of smallholder group certification in 2001, 2002 and 2003 (definition, scope, inspection)
- Results:
 - consensus positions (used to revise IFOAM guidance and criteria)
 - common agreement and understanding
 - 'state of the art'



The Concept of Group Certification

- Certification is of the group as a whole, not for any individual (single legal entity)
- The group manages and documents an internal quality assurance system (Internal Control System, ICS)
- The certification body verifies functioning of the group's internal quality assurance system through audits and on-site inspections.
- Individual inspection of a sample of farms (group members) are conducted to validate the functioning of the internal quality assurance system



Scope and Criteria for Group Certification

- operations with similar production systems and inputs, geographic proximity
(large units may be part, but must be inspected annually)
- **centralized management** (organized as single legal entity, centralized marketing)
- single organic system plan
- internal quality system (ICS) that assures compliance of each farm plot of the group to organic standards in an objective and transparent manner
- training and extension service for group members



Role of Centralized Management

- contractual agreements with group members (adherence to standards, permission to carry out internal inspections)
- established decision procedures
- mechanism to sanction and/or to deal with any non-compliances including to remove members
- procedures to accept new group members
- rules to avoid or limit potential conflict of interest (e.g. production managers, field officers)



Acceptance by Governments

- in line with JAS
- European Union Guidance Document issued 2003: Evaluation of the Equivalence of Organic Producer Group Certification Schemes applied in Developing Countries
- U.S. National Organic Standards Board (NOSB) recommendation approved 2002 on Criteria for Certification of Grower Groups
- ▶ recognition of internal control to assure compliance to organic standards (special allowance)



Recent Development in the U.S.

- Denial of certification to a group for specific technical non-compliances and subsequent appeal

Led to a ruling by the USDA in October 2006:

- Requests on-site inspections of each production unit, facility and site that produces or handles organic products that is included in an operation for which certification is requested
- Inspection of only a percentage of producers of a group instead of annual inspection of each producer is inconsistent with NOP
- Internal inspection system can not be used as a proxy for the mandatory on-site inspections by a certifying agent



Result

- NOP statement (May 2007): 2002 recommendation still is in place as “interim guidance”
- NOSB CACC¹ approved new recommendation on ‘Certification of Operations with Multiple Production Units’ (October 1, 2007)
- It will be discussed at the November 27-29, 2007 NOSB meeting

¹ NOSB CACC: National Organic Standards Board (NOSB); Certification, Accreditation, and Compliance Committee (CACC)



New NOSB CACC recommendation

- shifts the focus from grower or smallholder groups to a broader concept that may include production, handling and retail operations
(accepted in general not as special allowance or exemption)
- states that the use of an internal control system as part of the organic system plan is consistent and, provided additional assurances are met, may reduce or eliminate the need for direct observation
- suggests rule changes (definitions, adds language)
- acknowledges that more specific guidance to certifying agents is still necessary



Concerns

- proposed rule change does not clarify the status of individual members of a group with respect to the definition of “production unit”
- definition of “Facility or Site” fails to recognize that both facilities and sites may also be portions of a production operation (production unit consisting of a group of sub-units or plots)
- new terminology: ‘direct observation’ as equivalent to inspection
- however, the requirements for verifying that the operation is complying with the regulations are not clarified (physical examination of sites and audit of documentation?)
- suggests a definition for initial and renewal on-site inspections



Concerns

Recommendation suggests a definition for initial and renewal on-site inspections with different procedures thus providing an unfair barrier to new entrants

- Initial inspection (requesting that each individual member of a “new” group to be inspected) and
- subsequent on site inspection with different procedures



Further Information

IFOAM's position and comments can be viewed on

www.ifoam.org

