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**Options for the development of National/Sub-regional Codes of Good
Agricultural Practice for Horticultural Products Benchmarked to
EurepGAP**

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This study will be discussed in conjunction with country case studies in three regional stakeholder consultations in Africa, Asia and Latin America

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EXECUTIVE SUMMARY

EurepGAP provides farmers the opportunity to be certified in a group. An important benefit of group certification is that it has the effect of catalyzing the development of strong and viable small-scale farmers that can compete more effectively in a global marketplace. Good Agricultural Practices (GAP) and operational quality management systems are a pre-requisite for certification and these may not be in place at subsistence farmers or smallholders' level. This paper seeks to identify the main technical hurdles that these types of farmers face and how they may be overcome.

The application of Good Agricultural Practices, stemming from either a commercial or regulatory export requirement, can also bring key food safety and environmental goods to developing National markets. There is a new opportunity for a public-private sector dialogue to explore various synergies with the goal of promoting sustainable trade and development.

A national or regional GAP standard, owned by a group such as exporters, a government agency, or a combination of both offers an option for producers to certify their products under a locally developed standard that has been recognized as equivalent to EurepGAP. The applicant standard goes through a benchmarking process by independent reviewers as well as EurepGAP members. When such a standard has been determined as equivalent farmers have the benefits of certifying their products under a single standard that has international buyer recognition rather than facing a multitude of different buyer requirements.

A benchmarked national standard has the benefit of local stakeholder support and can take into account local criteria whether these are regulatory, agronomic or social. Particularly important is the interpretation of the EurepGAP criteria to fit local circumstances. This makes implementation more successful, widespread and cost effective. A national standard can also provide the opportunity for marketplace branding and advertising.

Where there is an absence of supporting local public and/or private organisational structures involved in export horticulture, or they are in the formative stages of development, it is unlikely that the moderation of a national standard would achieve a viable critical mass of producer member support. In this situation producers can choose alternative means of EurepGAP certification more relevant to their circumstances. EurepGAP certification is open to producers worldwide without restriction.

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INTRODUCTION

The EurepGAP Fruit and Vegetables normative document for certification has been developed from a worldwide group of representatives at all stages in the fruit and vegetable supply chain. The Euro-Retailer Produce Working Group (EUREP) started as an initiative, driven by retailers in 1996, in response to consumer concerns. EurepGAP –“The Global Partnership for Safe and Sustainable Agriculture” is now governed by an elected group of equal numbers of suppliers and retailers drawn from retailers and producers worldwide¹.

EurepGAP was driven by the desire to reassure consumers and to promote confidence in the food they eat. Food safety scares such as BSE (mad cow disease), pesticides concerns and the rapid introduction of genetically modified foods have increased awareness of food safety and increasingly affluent consumers throughout the world want to know how and where their food is produced. EurepGAP is more than a food safety standard. Not only do consumers require ongoing reassurance that the food is safe, but they also expect that production is sustainable. Normally in this context sustainable, as a minimum requirement, means that the food is produced in a way that does not degrade the environment and that basic workers rights are respected. Food safety is a global issue and transcends international boundaries. Many of the EurepGAP members are global operators in the retail industry and all obtain food products from around the world, depending on seasonal availability, price and quality. For these reasons, EurepGAP fulfils the need for a commonly recognized and applied reference standard of Good Agricultural Practices that has at its core a consumer focus.

In response to the demand of consumers, retailers and their global suppliers have developed a series of sector specific farm certification standards. These include: Fruit and Vegetables, Flowers and Ornamentals, Integrated Farm Assurance (Combinable Crops, Cattle and Sheep, Dairy, Pigs and Poultry), Integrated Aquaculture Assurance (Salmon species) and green Coffee. EurepGAP is a standard operational at pre-farm gate level and includes the requirements for safe food, worker health, safety and welfare, environmental and animal welfare issues and it aims to ensure integrity, transparency and harmonization of global agricultural standards. EurepGAP has developed technical interfaces with post-farm gate standards such as the British Retail Consortium Standard and the International Food Standard so that the chain from farm to fork is assured. The combination of pre- and post farm gate assurance with risk based product testing forms the core of many food retailers strategy for product Quality Assurance.

The aim of this paper is to explain the EurepGAP certification system including the benchmarking option, procedures and importance of harmonization of different private sector food assurance standards on a global level. Two case studies are presented.

¹ <http://www.eurep.org/Languages/English/about.html>

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The first one is the case of ChileGAP, a national standard benchmarked against the EurepGAP Fruit and Vegetables V2.1-Jan04 version. Lessons that were learned are shared as well as providing an outlook for other standards that want to benchmark in future.

The other case study is of KenyaGAP, a standard that is completing its development and entering benchmarking with EurepGAP. The challenges faced by farmers in a developing country and the technical approaches developed as a solution are discussed.

EurepGAP Certification - The Options

EurepGAP provides the standards and framework for independent, third party certification of farm production processes based on international standard ISO Guide 65. Farm certification can only be done through an accredited and EurepGAP approved certification body. All approved certification bodies appear on the EurepGAP website with contact details.

Farmers can achieve EurepGAP certification under one of four options (see Figure 1)².

- Option 1: Individual certification where an Individual Farmer applies for a EurepGAP certificate.
- Option 2: Group certification where a Farmer Group applies for a EurepGAP certificate.
- Option 3: Individual Farmer applies for EurepGAP benchmarked scheme certificate.
- Option 4: Farmer Group applies for EurepGAP benchmarked scheme certificate.

² EUREPGAP General Regulations Fruit and Vegetables Version 2.1-Jan04

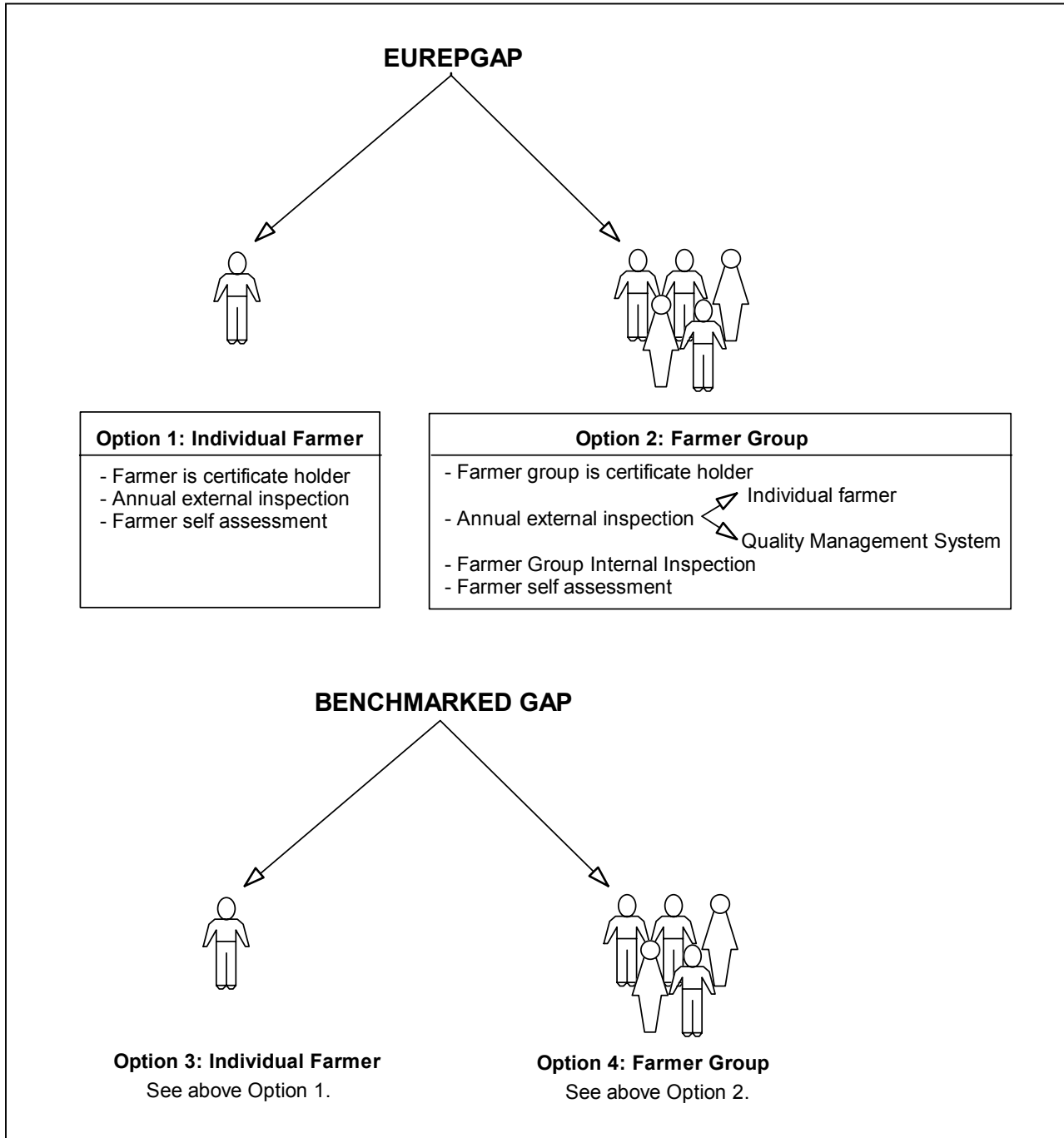


Figure 1. Certification Options within EurepGAP.

Options 3 and 4, especially Option 4, have gained interest in the last two years and EurepGAP encourages independent standard owners to benchmark. The benchmarking system of EurepGAP is an example of a transparent assessment and comparison tool for realizing a globally harmonized solution for Food Assurance Systems.

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Harmonization implies the reduction of duplication of control activities by farmers as well as by certification bodies (CB)³. This has the benefit of decreasing certification costs to farmers, as they now only have to pay for one certification inspection, but have access to all markets where EurepGAP and the benchmarked standard is required.

When a standard is successfully benchmarked against EurepGAP, it means that that particular standard is considered equivalent to EurepGAP in every sense - General regulations, Control Points and Compliance Criteria, as well internal management of the standard. However, in cases where applicant schemes do not have ISO Guide 65 accreditation, they can opt to operate with the EurepGAP General Regulations directly. This is called the EurepGAP Plus Accreditation option (see Accreditation Options).

The benchmarked standard can cover additional criteria that might be beyond the EurepGAP scope. These additional points might be market or customer specific or relate to local preferences. In all cases the EurepGAP standard requires compliance with the National legislation of the country of production. Through benchmarking, an applicant standard benefits from being set in the National or local context whilst achieving Global acceptance. This may be important for existing standards where they have created a particular local or International Brand image.

Accreditation Options for Benchmarking

| Normative Documents | EurepGAP Accreditation | EurepGAP Plus Accreditation | Benchmarked Scheme's Own Accreditation |
|---|-------------------------------|--|--|
| Control Points and Compliance Criteria | EurepGAP | Applicant Scheme's CPCC benchmarked against EurepGAP | Applicant Scheme's CPCC benchmarked against EurepGAP |
| General Regulations | EurepGAP | EurepGAP | Applicant scheme's GR benchmarked against EurepGAP |

Several standards have been successfully benchmarked against EurepGAP Fruit and Vegetable Standard Sept 2001, Rev. 01, but when the new version (2.1Jan04) was released in September 2003, these standards had to renew their benchmarking status by incorporating the changes. In April 2005, two standards were fully approved (ChileGAP and Agrarmarkt Austria Marketing GesmbH (AMA) Stamp of Quality Control Directive) and nine other standards were in different steps of the benchmarking procedure (either as a standard renewing their benchmarking status or as a standard applying for approval as equivalent to EurepGAP for the first time). MPS-GAP Floriculture from Milieu Programma Sierteelt was the first standard to be benchmarked against the Flower and Ornamental standard whereas Kenya Flower Council (KFC)

³ Möller, K, 2005. Economics of Standard Owners: Competition as Barrier to Global Harmonisation of Food Assurance Systems. 92nd Quality Management and Quality Assurance in Food Chains, EAAE Seminar, Göttingen.

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Silver Standard was the first National standard to be benchmarked (in June 2005). The EurepGAP Integrated Farm Assurance standard was released in March 2005 and Certified Natural Meat Program (CNMP) owned by Instituto Nacional de Carnes (INAC) in Uruguay, immediately applied for benchmarking. Utz Kapeh certified responsible Coffee has been successfully benchmarked against the EurepGAP green coffee standard.

There are two notable cases of where Governments have played an important role in catalyzing the development and consolidation of National GAP standards and to then enter the benchmarking process with EurepGAP. China has moved to benchmark their Good Agricultural Practices (ChinaGAP) with EurepGAP. The Certification and Accreditation Administration of the People's Republic of China (CNCA) signed a wide-ranging Memorandum of Understanding (MoU) on technical cooperation with EurepGAP/FoodPLUS in May 2005⁴. The MoU provides for specific cooperation and technical exchange in the field of certification and accreditation of agricultural products. In essence the ChinaGAP will be a validated and full translation of EurepGAP protocols that can be placed into the Chinese legislature. A National Working Group, drawn from a wide-range of stakeholders, has been established to consider the practicalities of implementation of such a standard.

The Mexican Government, through their Ministry of Agriculture (SAGARPA) has led the development of MexicoGAP, which has entered the EurepGAP benchmarking process. The development process has benefited from the expertise and experience that Mexico has acquired over many years working with the US Food and Drugs Administration. The standard implementation will be carried out by the SAGARPA owned export promotion body, known as Mexico Quality Supreme, which has close links with the main producers and exporters.

The State owners of the Brazilian Produção Integrada de Frutas (PIF) have indicated that they too are interested in evaluating the benchmarking procedures for this standard.

More recently industry organisations in Ghana have begun to evaluate this approach.

EurepGAP has received criticism that it is at risk of becoming a quality management system for privileged growers in developed countries⁵. The criticism is based on that the criteria in the standards are considered extremely difficult to comply with for subsistence or smallholder farmers that may be illiterate, poorly resourced and untrained. The benchmarking option has particular attractiveness in these situations where local natural, climatic, social and economic factors can be reflected in a benchmarked

⁴ <http://www.eurep.org/Languages/English/news/204.html>

⁵ Cambodochine, DAO, 2004. Environmental Requirements, Market Access/Entry and Export Competitiveness in the Horticulture Sector in Cambodia. Sub-Regional Workshop on Environmental requirements, market access/entry and export competitiveness in the Horticultural Sector.

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standard. FPEAK, the Kenyan Exporters Association, is the first group from the developing market in Africa that has agreed to further develop KenyaGAP and benchmark it with EurepGAP in the near future⁶. When KenyaGAP succeeds in this endeavour, other national or regional standards that incorporate implementation guidelines for smallholder farmers will follow suite. National benchmarking helps smallholder farmers by setting out requirements in a way that they can understand and still become EurepGAP certified.

The introduction of a local National GAP is to introduce a homegrown solution by identifying local policies; legislation as well as weaknesses in the fresh produce export and comparing the local techniques and requirements with those of the countries of destination of the product. Benchmarking for developing countries has the additional benefit of introducing and improving national policies and legislation to bring it in line with the global legislation (or more specific the latest EU legislation). The producers will then also be able to understand the current consumer trends and be able to respond accordingly. The benefit of benchmarking for Kenya as Owuour⁷ put it: “It is putting Kenyan growers on a similar platform as their European counterparts and ensuring [food] safety is not only for export produce, but also for the produce destined for domestic markets “

REQUIREMENTS FOR A STANDARD APPLYING FOR BENCHMARKING

1. Standard Requirements

The standard applying for benchmarking must:

- a) Certification Bodies must be ISO Guide 65 accredited and accreditation must be sought from an Accreditation Body that is either part of the European Accreditation (EA) Multilateral agreement (MLA) on Product Certification, or must be a member of the International Accreditation Forum (IAF).
- b) be drawn up by or for an organization or sector. This organization should also be the owner and/or administrator of the standard and must hold the copyright to the standard and any trademarks.
- c) be intended for assuring compliance with the food safety, environmental protection, occupational health, safety and welfare and animal welfare (where applicable) as set out in EurepGAP.
- d) ensure that all farmers/farms registered are operating under the applicant standard rules.
- e) at least regularly, but every three years at the latest, and whenever EurepGAP announces an update or change, there must be an evaluation and update together with the parties involved.

⁶ <http://www.eurep.org/fruit/Languages/English/news/182.html>

⁷ Owuor, A. 2005. Kenya Horticulture Export Ltd. Personal communication.

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- f) be clear in the language and terminology used to develop it, so that an unambiguous interpretation of the certification standard can be achieved during inspections.
- g) not allow products which are not produced under the applicable standard are labeled or described in a way which suggests that they comply with EurepGAP or the benchmarked standard.
- h) agree to a method of supervision that may be imposed by EurepGAP to ensure compliance should it be required
- i) be publicly available. The levying of a reasonable fee for the purchase of the standard will not be regarded as a restriction or limitation.

2. Stakeholder Involvement

The standard must have support and credibility in the sector, regulatory bodies and/or the relevant professional groups. Since the applicant standard needs to seek its own accreditation to ISO Guide 65, all relevant farmers and supplier organizations must be represented in the consultation process and support the standard before benchmarking. In this way the standard will gain its ISO accreditation and immediate market acceptance by all once fully approved as equivalent.

3. Technical Competence

In order for a standard to apply for benchmarking there must be a certain level of technical competence to support this side of the standard. This normally is represented by a technical committee that develops and maintains the standard. The technical committee will also be responsible for justifying the standard during the benchmarking procedure, updating the standard when EurepGAP revises its standards and must have the authority to amend the standard when required.

4. Understanding of EurepGAP

The technical committee of the applicant standard will also be responsible for completing the initial cross-reference table to be submitted during the application and must therefore understand the interpretation of the EurepGAP standard and its compliance criteria.

5. Experience with Standards (Accreditation)

The standard must be certifiable and operational. The standard must provide a framework for independent, third party certification of farm production processes based on International Standard ISO Guide 65 (Certification of production processes to ensure

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that only those products that reach a certain level of compliance with established Good Agricultural Practices, in this case as set out by EurepGAP, are certified).

The administrator of the certification scheme must record agreements with individual certification bodies to carry out the inspections. It should be demonstrable that the certification bodies operate in accordance with the standard rules. Therefore it is necessary that all certifications be carried out by EurepGAP approved certification bodies that also must be accredited to ISO 65 to the scope of the applicant standard and to the EurepGAP General Regulations. The accreditation body that accredited the certification body must be part of either the European Accreditation (EA) Multilateral Agreement (MLA) on product certification, or members of the International Accreditation Forum (IAF), which have been subject to a peer review evaluation in the product certification field.

THE EUREPGAP BENCHMARKING PROCEDURE

One of EurepGAP's core activities is the recognition of other farm assurance schemes that are essentially identical to EurepGAP via benchmarking. FoodPLUS has developed a series of procedures to ascertain whether a standard and its certification system can demonstrate equivalence to the EurepGAP standard and its certification system and as a result be formally recognised. In order for a standard to be formally recognized it must comply with *all* Control Points and Compliance Criteria as set out in the relevant EurepGAP standard. This is a strict interpretation of equivalence but is considered necessary if buyers are to have confidence in the comparability of different standards.

1. Transparency and Impartiality

Transparency is one of EurepGAP's key aims and in order to improve the perceived and actual integrity and transparency of the system, the EurepGAP Technical and Standards Committee (TSC) has approved a benchmarking procedure for EurepGAP. To ensure impartiality, the EurepGAP Steering Committee (SC) decided to appoint external, recognised and competent organisations to undertake the independent technical review and witness audits (otherwise known as "physical benchmarking").

The EurepGAP Secretariat announced a tender process to accreditation bodies currently involved in EurepGAP Accreditation. The key criteria for applicants were: i) they have to be part of the European Accreditation MLA on product certification or members of the International Accreditation Forum; ii) independence, iii) technical expertise and iv) qualifications in accreditation systems (ISO Guide 65) in the agricultural field. The tender was designed to identify an organisation that can deliver the desired public and industry credibility, has the global resources, technical and organisational competence and efficiency to handle the EurepGAP Benchmarking Procedure in an industry affordable manner. From the full applications received, the tender from Joint Accreditation System of Australia and New Zealand (JAS-ANZ) and

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from Deutsches Akkreditierungssystem Prüfwesen GmbH (DAP, Germany) were accepted by the SC as most closely meeting the criteria⁸.

Furthermore, to uphold the integrity of the benchmarking system, FoodPLUS, the legal operator of the EurepGAP standards, requires that the equivalent standard owner has documented arrangements with all the individual certification bodies (CBs) certifying the equivalent (benchmarked) standard that ensure that the CB operates in compliance with all the requirements of the EurepGAP certification system, including ISO/IEC Guide 65. The equivalent standard owner can make claims only regarding equivalence in respect to the scope for which equivalence is granted if they own more than one standard. They have to incorporate technical changes and updates in the equivalent standard; and innovations and improvements in the certification mechanism implemented by FoodPLUS within the timeframes indicated by FoodPLUS.

Anybody can log onto the EurepGAP website, www.eurep.org, and under “Approved Schemes” view which standards are fully approved and what the status of the standards that are still busy with the benchmarking process is. Members of EurepGAP have the benefit of viewing the documents submitted by the applicant standard and can also take part in the peer review part of the process (see step ii in the procedures below). The Technical and Standards Committee also has the opportunity to give their votes on-line and can add comments on-line for other TSC members, FoodPLUS and the accreditation body to view.

2. Consultation and Standardising Process

Good practices for consultation and standardisation are followed during the benchmarking procedure, as with the development of the EurepGAP standard and revision of the standards which takes place on a three yearly cycle.

- The consultation process is extensive and involves the stakeholders directly.
- Formal approval of standards is based on evidence of consensus.
- Parties involved with the benchmarking procedure (see 3. Procedure below) receive timely notifications, offering them opportunity for meaningful contributions.
- Proper records of the whole benchmarking procedure are prepared, maintained and traceable.
- Recognition is given to all approved standards publicly on the website and EurepGAP members have access to the standards.

An example of how these best practices are applied in revising the EurepGAP standards is shown and described in Annex 2.

⁸ EurepGAP Benchmarking Procedure, v1.1-Apr05

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The Benchmarking Process is described in detail in the next section, and Figure 2 depicts the consultation process as described. The involvement of EurepGAP members and independent experts as shown ensures exposure to a cross-section of the industry and thus improves credibility of the benchmarked standard. The response times given to the responsible parties during the different review processes also ensure that they have enough time to give valuable input.

3. The Process

The Benchmarking process consists of a number of phases:

- i) The Application
- ii) The Technical Review Process
 - a) Preliminary Technical Review
 - b) Peer Review
 - c) Independent Technical Review
 - d) Independent Witness Assessment
 - e) Technical and Standards Committee Review
- iii) Formal recognition of Applicant Standard

i) Application

Who applies for the Benchmarking?

It is the standard owner's responsibility to apply. In the case of government ownership, there is usually a committee that can request the government representatives to proceed with the request of the benchmarking procedure.

The Application Process consists of two parts, the application by the standard owner and also the application of a CB that is certifying the equivalent standard. The standard owner must apply directly to either JAS-ANZ or DAP to undertake the benchmarking procedure. At this stage an initial contract is signed between the applicant standard owner and FoodPLUS. Among other things, this contract details the right of FoodPLUS to review the standard by an Independent Technical Review organization (refer to 3c), financial conditions, termination conditions and other review procedures.

As part of the application, which must be completed in English, the standard owner must submit, a summary of the standard detailing its objectives and its development and operating procedures. The application must also include a clause-by-clause cross-reference of the applicant standard to the EurepGAP standard (General Regulations and Control Points and Compliance Criteria). This Technical Benchmarking document details the compliance or stricter requirements of the applicant standard and provides

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any arguments necessary to justify equivalence. Each translated point is accompanied by the original language of the standard, if applicable, and translations must be officially authenticated.

The application procedure for individual CBs, which certify the equivalent standard and equivalent certification system, to become formally approved by FoodPLUS is in accordance with the EurepGAP Certification Body Approval Procedure. Applicant CBs must provide written proof that the equivalent standard owner raises no objection to the applicant CB issuing certificates to the equivalent standard scope.

ii) Technical Review Process

The technical review process is a rigorous series of review processes by various independent parties, as well as by EurepGAP members. It consists of a detailed paper review (preliminary technical review, a peer review, and an independent technical review) as well as a physical assessment or audit (the independent witness assessment) on site and finally a technical and standards committee review of the summary of all the above.

a. Preliminary Technical Review

The technical person or organization responsible for this review, appointed by EurepGAP, is independent (of the applicant standard), competent and has experience in conformity assessment. This person or organization checks whether the Technical Benchmarking document is complete and if any relevant technical omissions are detected, the application is returned for amendment by the standard owner and a new application must be submitted.

A two week period is given for a preliminary technical review report to be issued

b. Peer Review

The application is subject to peer review after a successful preliminary technical review. During the peer review EurepGAP members and stakeholders, including primary producers, manufacturers, wholesaler distributors, retailers, consumers, government, academics and CBs operating EurepGAP and/or the standard seeking equivalence, are invited to make written, technical comments. These comments can be made on-line, visible to the standard owner, FoodPLUS and other members of EurepGAP.

This review process has duration of two to three months.

c. Independent Technical Review

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An independent, impartial and technically competent person or organization, appointed by FoodPLUS, with no direct connection with FoodPLUS or the standard seeking equivalence reviews the application detail and all the consultation responses. The appointed person or organization that undertakes the independent technical review has experience in conformity assessment, and if applicable, a knowledge of the field of application and geographical region where the applicant standard and certification system is proposing to operate.

The reviewer summarizes the consultation responses and the application details in a report with one of the following recommendations: i) equivalence is accepted, ii) equivalence with agreed changes or iii) rejection of the application. If any technical deficiencies are detected, the application is returned and the standard owner has one month to propose amendments to the reviewer.

The independent technical review must be finalized in a total period of one month (or as soon as the reviewer receives amendments, if applicable).

The detailed report, as prepared by the reviewer is sent to the auditor responsible for the witness assessment.

d. Independent Witness Assessment

This is a witness assessment of an audit carried out in the field by an auditor of a certification body that is certifying to the scope of the standard seeking equivalence and is performed by an independent, impartial and technically competent person or organization appointed by FoodPLUS with no direct connection with the certification body conducting the audit or the standard owners (FoodPLUS and owner of standard seeking equivalence). If more than one CB is certifying to the applicable scope of the applicant standard, FoodPLUS, JAS-ANZ or DAP select one to assess.

The auditor only validates the reviewed cross-reference of the Control Points and Compliance Criteria (not the General Regulations) with the selected CB. Validation of implementation of the certification system (cross-reference of the General Regulations) is carried out by an Accreditation Body (AB) as part of the accreditation process of each CB. The witness assessor produces a detailed report, summarizing all conflicting points if any. The objective of this independent witnessed assessment is to ensure that the standard is in practice equivalent to EurepGAP and that the CB interprets the standard requirements on a level that is acceptable to EurepGAP.

This report is returned to the applicant, who has one month to propose amendments to the witness assessor, where after the witness assessor will evaluate the amendments in a final report. In this final report the assessor makes one of the following recommendations: i) accept equivalence, ii) accept

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equivalence with agreed changes, or iii) reject the application, to the Technical and Standards Committee.

e. Technical and Standards Committee Review

In this step, the technical and standards committee, responsible for the development of the EurepGAP standard against which equivalence is being sought, considers the independent technical review as well as the witness assessor's report. The committee has to decide whether to accept or reject the recommendations made by the previous reviewers. If the committee does not approve the recommendations, written justification has to accompany this decision.

These proposals are normally discussed at the next scheduled meeting. In case of exceptions, the TSC has 3 weeks to give their decision.

iii) Formal Recognition of Applicant Standard

If a favourable recommendation has been given by the Technical Standards Committee, a Notice of Intent to formally recognise the standard as equivalent is circulated to everybody who participated in the peer review. The Technical Standards Committee of the respective scope the applicant standard has applied for will review any final comments and if there is no negative input, will formally accept equivalence.

The participants of the peer review have two weeks to give their final comments.

Contractual arrangements between FoodPLUS and the Standard owner of the now "benchmarked" standard will detail among other points, the termination date, cancellation clauses and dispute procedures. EurepGAP requires that the standard owner of the approved standard only makes claims with respect to the acceptance of the standard accepted through the benchmarking procedure. It may not make use of the acceptance in any way which might bring EurepGAP into discredit. In the event of suspension or withdrawal of the acceptance, use will no longer be made in any way whatsoever of advertising that makes reference to equivalence of EurepGAP. Technical modifications and updates to EurepGAP should be included in the accepted standard once they have been made available and within the period of time as specified in the contract.

The Standard Owner will receive formal, written notification of the outcome of the benchmarking process and it will also be publicly announced on the website.

Theoretically, the shortest time period to complete this process, from application to full, formal recognition, is around six months, but it can take up to 12 months when there are several corrections to be made and availability of human resources are taken into account.

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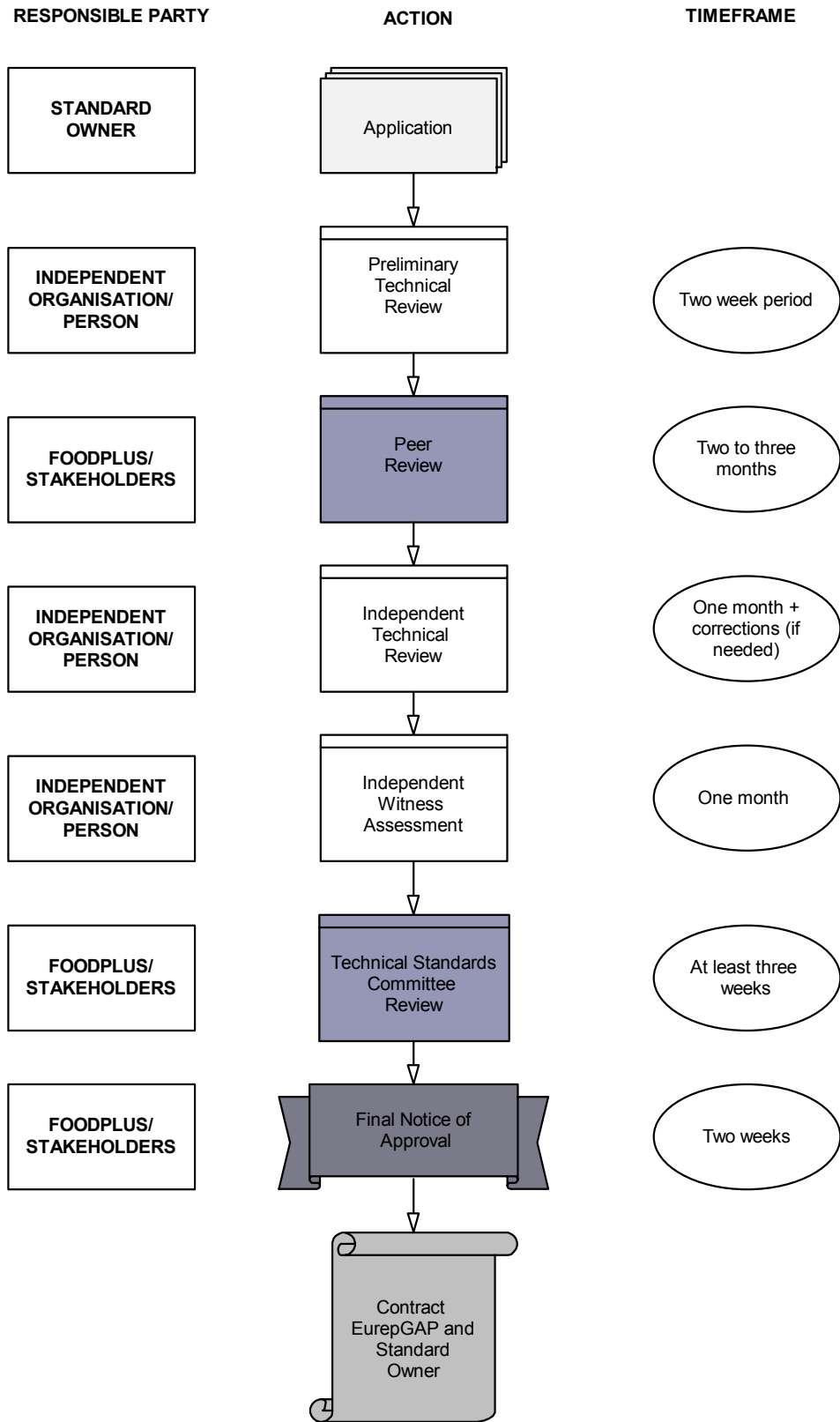


Figure 2. Flowchart of EurepGAP Benchmarking Procedure

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The benchmarking process is considerably shorter when the benchmarked standards are revised together with EurepGAP's official revision. If there were no significant changes to the benchmarked standard other than the changes that correspond with the EurepGAP changes, another witnessed assessment is not required, unless the TSC considers it as necessary. The approval will then only be based on a paper revision process.

THE ChileGAP EXPERIENCE

ChileGAP is a private Good Agricultural Practices (GAP) and Food Safety Scheme developed by the Fundación de Desarrollo Frutícola, (FDF), by virtue of a mandate of the Chilean Fresh Fruit and Vegetable Industry. The program was developed bearing in mind two main objectives:

a) to help growers comply with the growing market requirements in terms of Good Agricultural Practices and Food Safety through the harmonisation of the local legislation with the different requirements being made by the markets of importance to the Chilean growers, i.e. Europe and North America.

b) to reduce the direct and indirect costs for the growers, by avoiding duplication of audits through the use of one standard that considers the requirements from the market and gives clear guidelines for the implementation process.

The fresh fruit export market is important for the Chilean economy: an all time high of 200 million boxes of fresh fruit were exported during the 2004/05 season, making the country a relevant player in the world markets. Of this total volume, 31% was exported to the EU. In financial terms, the Chilean Central Bank has reported that in 2004 the value of fresh fruit export to the EU reached US\$ 584 million (FOB).

The Chilean Fresh Export Fruit and Vegetables Good Agricultural Practices Scheme (ChileGAP) has been in development since 1999. Development of the protocol, the normative documents as well as technical support material has been carried out through a strict process characterized by the participation, through formal Technical Committees, of numerous specialists and advisors. Unlike some of the other benchmarked standards that cover only the production of certain crops such as citrus or sweet corn, ChileGAP is applied to the whole fruit and vegetable industry in Chile. ChileGAP has been successfully benchmarked against the EurepGAP Fruit and Vegetables standard twice (the first and updated version).

ChileGAP General Organisation

A Steering Committee formed by 12 members; four exporter representatives, four grower representatives, 2 representatives of industry organisations and 2 academic

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representatives head ChileGAP standard. This ensures a multi-discipline conduction that encompasses all sectors involved in the production and export of Chilean fresh fruit and vegetables.

Nine members form the Technical Committee, of which four are outstanding experts from the exporter sector, four are outstanding experts from the productive sector and one is the Technical Manager of the FDF. The role of the Technical Committee is to analyse, assess, develop and propose to the Steering Committee the following matters:

- a) propose and agree revisions of the normative documents
- b) develop technical documents
- c) approval and sanctioning of the certification bodies

ChileGAP also has a secretariat at FDF, whose main function is to maintain records on certification bodies, consultants and trainers, and coordinate the actions needed to maintain the integrity of the Standard. (see Figure 3).

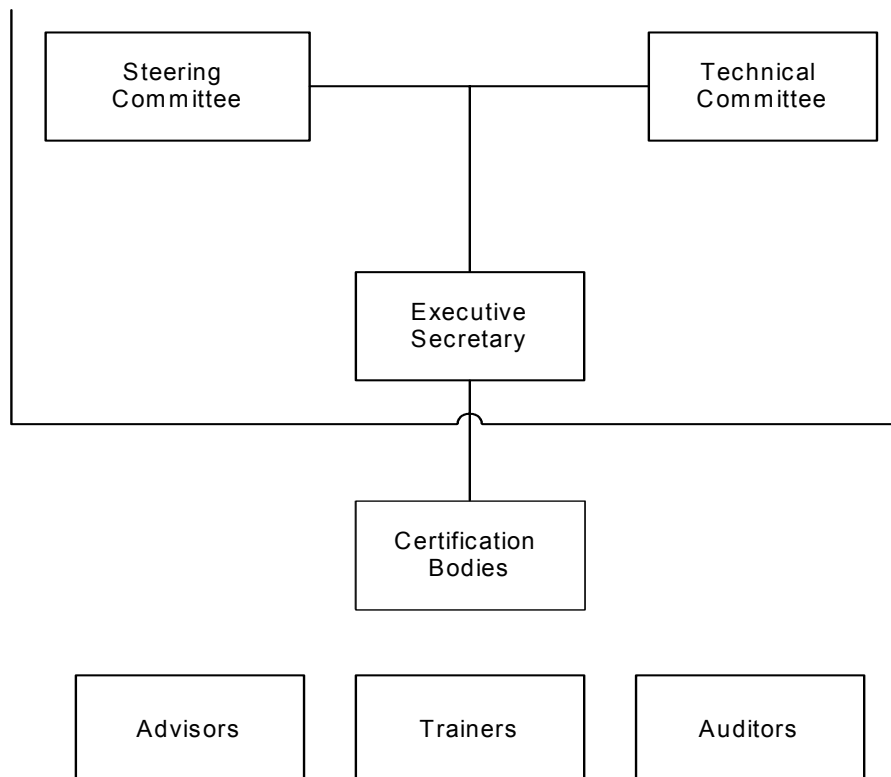


Figure 3. The ChileGAP Organisational Structure

The Benchmarking Stages

According to Adonis⁹, there are four fundamental aspects or issues that must be taken into account :

i) In the first place it is central to consider, throughout the development of the standard, the spirit and philosophy of EurepGAP, and apply it to the standard's specific requirements. In the case of ChileGAP the adequate balance and harmonization of global requirements and local application are in the essence of the standard and it this condition was especially important, to build the most accurate possible criteria for Chilean growers to use the standard without confusion .

ii) The second consideration is that the process takes a long time. It took approximately one year to prepare the final version of the standard before application to EurepGAP. The time that elapsed, from the moment the documents were submitted to EurepGAP for the benchmarking procedure up to official recognition, was of around eight months. The applicant standard is carefully evaluated and reviewed by a team of experts, which is not only important for the integrity of EurepGAP but also for the benchmarked standard.

The process can be significantly shortened if the initial work has been done carefully in order to have a strong platform to work from.

iii) The third fundamental issue for the success of the benchmark process is the "on-site" visit made by an independent expert (witness assessor) together with an approved certification body. This is perhaps the most critical step, as the compliance criteria that have been developed for the applicant standard, are tested in real life conditions against those of EurepGAP. It is imperative that those criteria have been well defined so that they can be considered as equivalent by any inspector that could be chosen for this witness assessment step.

iv) The final issue that needs consideration is the fact that harmonization is a continuous process and that the manager of the standard is responsible for staying abreast of any changes that need to be incorporated. The challenge is to carefully maintain the standard according to the market requirements, but avoiding continuous changes which will affect implementation. Adonis says that the secret for achieving this is the quality of the development and harmonization work that was described in the first stage.

⁹ Adonis P, R. 2005, Technical Manager, Foundation for Fruit Development, Chile. Personal communication

Impact of Benchmarking on Chile

The Chilean Fruit Industry organisations looked for harmonisation of the requirements of all major markets, and using this concept the ChileGAP initiative was created, developing a standard that could easily be implemented by local growers and have recognition in the main markets. To achieve this, two successive initial versions of the standard were developed and applied on the farms for two years, as a trial period in which growers got accustomed to all the, then, new GAP requirements such as record keeping, self-assessments and also external inspections. This trial period was based on an Industry agreed plan and 1380 growers participated.

In some cases the content of, for example the EurepGAP standard (whose official version is in English), needed some specific interpretation for the local conditions. Developing very clear and precise definition of the Compliance Criteria specific for ChileGAP from a grower and exporter's perspective solved this. Because EurepGAP had a clear, transparent and well-defined process for benchmarking, it was decided to obtain international recognition of ChileGAP.

Many of the suppliers of the export companies are small and medium size growers and they are all implementing ChileGAP because it is easy to understand. The benchmark has had a definite and significant impact on the small-scale growers¹⁰. For them, ChileGAP is more than just a Standard, because it offer to growers a series of tools to solve specific aspects aroused from the Standard requirements, such as standardized formats for farm records, guidelines for pest monitoring, Internal audits software, Traceability standard, etc

Costs during the development stages were shouldered by the private sector and governmental agencies. The private sector covered around 60%, mainly financing the salaries of the experts working on the process and also preparation of guidelines, and assistance to international forums. The remaining 40% of costs, which included activities such as training, publications, and promotional activities, were co financed by governmental agencies. In other areas, some government agencies have taken a proactive role to maintain updated information for growers, as requested by ChileGAP. An example is the agency in charge of the registration of crop protection products that now has a list of all the registered crop protection products available on Internet and has developed a faster registration process for the crop production products. The Ministry of Agriculture has established the Chilean Commission for GAP, with participation of the private sector, having a role in the expansion of GAP mainly to small-scale growers. Finally the government plays a role in the promotion of ChileGAP in the foreign markets

¹⁰ Around 1000 small-scale growers that cultivate raspberries have implemented and benefit from ChileGAP's guidelines and principles

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through the organization of commercial missions to explain ChileGAP to customers in Europe and the USA.

Technical cooperation/capacity building is one of the important benefits from the ChileGAP benchmark process. This has been an opportunity for the establishment of strong technical capabilities inside ChileGAP, such as:

- Technical capability to harmonise other standards with ChileGAP, such as USA standards.
- Peer review participation in other EurepGAP benchmarking applications
- Participation in specific technical committees
- ChileGAP has been one of the leaders (in conjunction with the Southern Hemisphere Association for Fresh Fruit Exports (SHAFFE)) pushing for a global harmonisation process with EurepGAP.
- Instruments aimed at solving of specific aspects related to ChileGAP's requirements including an interactive guideline for the insect monitoring in different crops, a special format for registers in the farm and packhouses, hygiene monitoring systems, software for internal audits, etc.

Capacity that has been built through these activities remains for the benefit of the Chilean growers and ChileGAP standard actualisation and management.

It is important to point out that before the benchmarking Chilean growers, in many cases, had to be EurepGAP¹¹ certified to comply with European retailer requirements, but because Chilean growers also export to the United States of America, they needed verification for that market as well. This meant at least two inspections per farm every season and certification cost for the grower was high. Before ChileGAP, the certification prices were around US\$900 to 1000 per inspection per farm per year. Today the prices have been reduced to around 550 to 600 US dollars per year¹².

Conclusion - ChileGAP

The work done with effort to create ChileGAP and the harmonization process has demonstrated to the markets the commitment of the Chilean industry in matters as important as GAP and Food Safety. Retailers now trust ChileGAP as a standard and there are clear benefits for Chilean produce as a distinguishable Brand in the marketplace.

Although the benchmarking process of ChileGAP was without any major problems, there was the challenge of scheme accreditation. It was decided that ChileGAP would make use of the EurepGAP Plus Accreditation option, therefore,

¹¹ European supermarkets can still require EurepGAP certification instead of ChileGAP. This is possible because the EurepGAP General Regulations do not limit the options of the supermarkets in this matter. This has however not happened, and on the contrary, retailers have immediately considered a ChileGAP certificate equivalent to EurepGAP.

¹² Estimated

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applying the EurepGAP General Regulations directly. Producers initially received an accredited EurepGAP certificate and an unaccredited ChileGAP certificate. The additional criteria can be submitted to an Accreditation Body and once approved, the producers can receive accredited ChileGAP certificates.

The most proactive growers are engaging in the standard, and a strong grower information and promotion activity has been done and will need to be done in the future to maintain growers' awareness of the significance of the ChileGAP system.

THE KenyaGAP EXPERIENCE

Kenya is a significant producer of high value export horticulture, mainly to Europe. In 2005 the FOB value is projected to increase by 16.6% (to \$25.6million). This is a considerable success story and according to Jaffee¹³ has been led to a significant extent by the innovation and supply chain efficiency of exporters and their major customers, the large retail chains in Northern Europe.

Visits by retailer agronomists and technologists since the mid- 1980s have led to very significant improvement of production and packing standards as well as the development of strong supply chain partnerships between various retailers and their suppliers which have contributed directly to the increase in export values. With the advent of EurepGAP in 1997 these technical requirements have been consolidated into a single GAP framework. Currently EurepGAP has membership of 31 retail chains. If each had proceeded to ratify their own standards and certifications there would be by now an untenable situation for producers.

The Industry in Kenya, whilst having a significant number of large commercial farms, is also characterized by a large number of small-scale or subsistence farmers who have come to rely heavily on this income. The actual numbers are not known but are estimated to be at least 50 000 involved in regular production of export crops. These smallholders are always associated in some way with an exporter. Where they are in more managed relationships with high capacity exporters who provide full guidance on production they are frequently termed as outgrowers. As such they provide an important supplement to an exporters own large -scale production.

The association of small-scale farmers or outgrowers with exporters has developed in recent years as a mutually beneficial relationship. The smallholder relies on the exporter for advice and inputs such as seeds and crop protection products, whilst the exporter needs to plan consistent supplies of high quality crops.

¹³ Jaffee, S. PRMTR, World Bank, Washington DC. From Challenge to Opportunity: The Transformation of the Kenyan Fresh Vegetable Trade in the Context of Emerging Food Safety and Other Standards

Production Advantages of Small scale farmers

- Good availability of labour
- Close proximity to crops
- Attention to detail for high value and labour intensive crops
- Crop continuity and planning
- “Paternalistic” approach of exporters
- Quick response to changing demand needs, in particular in niche markets

One significant problem that is encountered is that smallholders are tempted by often unscrupulous “briefcase” exporters with low overheads who offer a price premium on the day to bypass the established links. This “poaching”, as it is known, is being gradually being addressed by the agreement of formal contracts between the exporters and small-scale farmer groups. In the Kenyan case this is through existing legal structures where farmers can apply for legally recognized “Self-help group” status. A consequence of this is that each relatively small self-help group of 15-20 farmers becomes a group to be certified. To ensure consistency and fairness EurepGAP have adopted a standard formula to identify the sample size for group certification. This is determined as the square root of the total number of farmers of the group. This means because of the small size of the self help groups that for a given number of producers more inspections are carried out than if the group was of a larger sample size. This has the effect of increasing certification costs.

It was with an eye to these developments by EurepGAP that the Kenyan Fresh Produce Exporters Association, FPEAK, began to develop its own standard with the assistance of COLEACP (Europe Africa Caribbean Pacific Liaison Committee). Over the latter half of 2004 it became apparent to FPEAK that a key merit of their own standard would be if it had a clear and accepted equivalence with the EurepGAP standard; the principal standard required by the customers of the exporters.

At the time of a recent visit by FoodPlus staff (February 2005), the main clauses of a KenyaGAP were well developed. The visit provided for clarification and deeper understanding of EurepGAP’s benchmarking procedures and catalyzed the formation of working group to bring together various private and public sector stakeholders. The discussion focused on how smallholders could be accommodated into a National scheme benchmarked to EurepGAP. A EurepGAP National Technical Working Group was subsequently established, facilitated by the FPEAK Secretariat. The working group is now being led by highly skilled exporter agronomists with input from the Ministry of Agriculture, KEPHIS (Kenyan Plant Health and Inspection Service) and the parastatal Horticultural Crops Development Authority. Development partners such as the UK Department for International Development (DFID) and US Agency for International Development (USAID) have continued to facilitate these meetings by arranging suitable

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facilities and securing the input of technical specialists. Consultations were also held with at least two Non Governmental Organisations (NGO's) active in the area, Africa Now and Traidcraft who attended field visits to remote smallholder locations (in the case of Africa Now) and workshops designed to discuss the impact of GAP standards on small scale farmers. The focus of the groups work is two-fold:

1. To develop a standard that is likely to succeed in gaining formal equivalence with EurepGAP.
2. To develop modalities which interpret the EurepGAP criteria in the context of small-scale farmer production in Kenya. This will follow the principles of a practical experienced based generic Hazard Analysis Critical Control Point assessment approach.

The second point is very significant, as this will improve consistency of the practical application of the standard across the entire sector creating more efficient and cost-effective application as well as a more "level playing field" for each of the exporters.

FPEAK have been in discussion with their industry peers and colleagues in neighbouring Uganda and Tanzania. Exporting groups in Zambia and Rwanda also are in contact and there appears to be significant interest to extend the KenyaGAP approach to a more regionalised one encompassing the key horticultural crop exporting countries in East Africa. It seems the main benefits of such an arrangement would be the exchange of Technical information to promote the orderly incorporation of small-scale farmers into the markets served by Anglophone Africa.

The application of the Hazard Analysis Critical Control Points (HACCP) system has been crucial in understanding the particular technical challenges facing small holders. The Business Services Market Development Project funded by DFID has studied these aspects in relation to groups of very small farmers in the Sagana Scheme. The findings have been shared within the KenyaGAP working group. It is likely that this generic risk assessment would be valid as a basis for other smallholders in Sub-Saharan Africa.

Generic Risk Assessment for smallholders (non-exhaustive)

- Risks associated with neighbouring plots
- Risks associated with cover crops (e.g. French beans in coffee orchard)
- Positioning of latrines
- Disposal of excess spray mixtures
- Quality of irrigation water
- Availability of effective personal protective equipment
- Previous land usage
- Cleanliness and suitability of transport

Challenges for Small-Scale Farmers

Significant progress in preparing small-scale farmers for EurepGAP certification has taken place in Kenya. This has been precipitated by the individual business-to-business deadlines agreed between retailers and their suppliers for EurepGAP compliance. Exporters have also felt the necessity to ensure that the EU Traceability regulations which came into force on 1st January 2005 are also met. Some unhelpful confusion arose following media reports that the EU and EurepGAP had a 1st January 2005 deadline too. In fact EurepGAP Secretariat does not set deadlines for compliance. This is an individual decision between business partners. Some retailers such as Albert Heijn, in The Netherlands have made their deadlines known publicly. This underlines the importance of the value of careful briefing of news media since they play an important role in disseminating information particularly to the farmers in rural areas in developing economies.

Challenges for Small-scale farmers (non-exhaustive)

- Little base knowledge of GAPs
- No financial independence
- Subsistence living
- Poor rural infrastructures
- Variable access to irrigation
- Record keeping
- Access to unadulterated inputs e.g. seeds

Preparing Smallholders for Certification

The universal approach of exporters has been to opt for certification of groups of smallholders, under Option 2. Three or four major exporters have recently achieved

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EurepGAP certification and there are a number of others within the pipeline. This has required a significant and concerted effort. Training and development, and implementation of Quality Management Systems were the first obstacle to overcome. Development partners such as DFID, USAID and the EU–Pesticides Initiative Programme¹⁴ have played important roles in building capacity in these areas.

There has been much discussion about the quality and availability of training, which has been given in Kenya. Training appears in its most successful form when it has focused on training of smallholders to complete specific and practical tasks. In some instances training “hawkers” have downloaded and then photocopied free to all EurepGAP documents and then charged significant sums claiming that this was the paperwork needed for the certification! Training should be undertaken only by vetted, qualified and bona-fide organizations. Ideally they should be held accountable by contract for professional standards of delivery. Official EurepGAP training courses have been conducted three times in Kenya (twice for Fruit and Vegetables and once for Coffee).

These training workshops have helped with building the training capacity in Kenya and neighbouring countries and increased the integrity and credibility of consultation and training given to farmers.

In addition, smallholders’ products are brought to “collection centers”, serving 20-30 smallholders, which are enclosed but naturally ventilated sheds where the product can be graded and labeled on tables prior to transfer to packing centers at Nairobi Airport.

Typical Infrastructure required for responsible small-scale production

- Safe storage for small quantities of crop protection products
- Waste chemical disposal pit
- Handwashing facilities during harvest
- Personal Protective Equipment
- Knapsack sprayer

¹⁴ The European Commission and the ACP Group of States placed management of the PIP in the hands of the sector’s interprofessional association, [COLEACP](#). This decision demonstrates their will to enable the sector itself to define its own expectations and to focus the programme on the private sector.

The PIP programme became operational on 11 July 2001, based on a five-year funding contract in the amount of € 28,807,000.

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Costs of Compliance

Various attempts at calculating the cost of compliance have been made but it seems that until there is some greater consensus at discerning the most viable model of certification it is not possible to arrive at an accurate or definitive estimate for smallholders. The optimum size of group, in terms of cost effectiveness, undergoing certification in the case of smallholders has not yet been achieved. The soil, water and residue analysis for example may be duplicated many more times than actually necessary or required by the EurepGAP protocols. Collaboration between groups being certified is one option to consider to help bring various fixed costs down.

A particularly interesting development is the establishment of Africert, a Nairobi based certification body that has been accredited to ISO Guide 65 for the EurepGAP scope in Fruit and Vegetables. This represents a significant achievement for a locally owned and run certification body without the back-up and infrastructure of a multinational organization. The two most important benefits of a local certification body are 1) the potential for a decrease in certification costs to the farmer and 2) the availability of local inspectors and/or auditors. It brings the certification cost to the farmer down, because they don't have to pay high accommodation and travel fees for auditors or inspectors from South Africa or Europe. The benefit of having a local inspector on farm is often underestimated, but is extremely valuable, especially in a country like Kenya where control points are implemented in a different way to say, Europe.

Perspectives of Government

Quite understandably the initial views of the Kenyan government were that the requirements of the EU, and the "two hundred EU conditions" of the private sector, which EurepGAP is sometimes known for, would be a hindrance to the sector's growth. It views EurepGAP somewhat differently now. It sees that it will help them develop greater access to European markets and as well as assist in establishing new ones in the Middle East and elsewhere. The Government is also eager to see Good Agricultural Practices applicable to the domestic market. Agriculture Minister Kipruto arap Kirwa stated in early 2005, "Tourists from Europe, US and many other countries are conscious of hygiene, and we would want produce for the domestic market to adhere to the conditions because they are simple to practice."

In fact Kenya's advanced position on standards in relation to other producers will give it a competitive edge in its ambition to open new markets for its produce.

This "evolutionary" appreciation of private sector standards appears to be mirrored elsewhere in the world where EurepGAP standards are beginning to impact. Some observers believe that one conclusion of this evolutionary process is that private

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sector standards may be wholly or partly adopted to form part of the future regulatory framework of exporting developing nations.

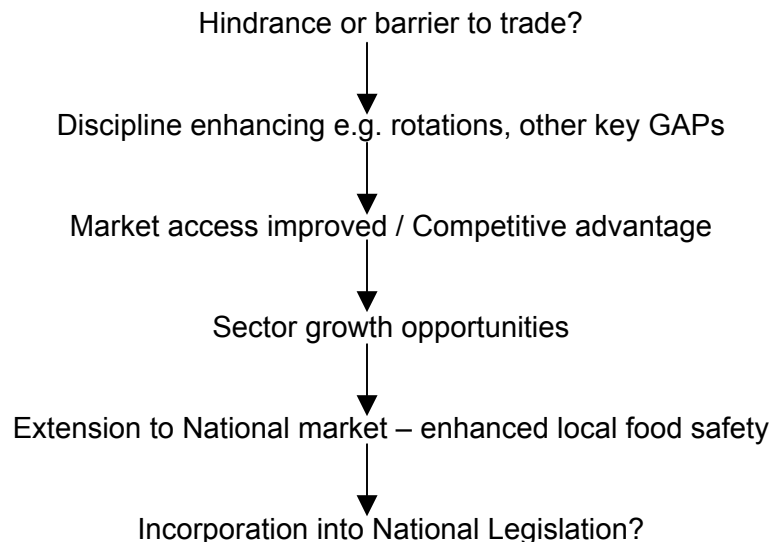
EU regulations require the existence of competent authorities in the export sectors of third countries. EU Regulation 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules, which comes into effect on 1st January 2006, makes specific reference, under several articles, on options for the provision for a proper recognition of private and institutional control systems. The implications of this are just beginning to emerge in the context of public and private sector standard operators in third countries and require some further analysis.

Emerging Implications of EU Regulation 882/2004:

For example, coordinating efficiently and effectively private/institutional control systems as provided for under Articles:

- 5: Delegation of specific tasks related to official controls
- 23: Approval of pre-export checks and reduced frequency of controls by EU Member States
- 31: Registration/Approval of business establishments in 3rd countries.

Phases in Appreciation of International Standards



EUREPGAP'S POLICY IN RELATION TO BENCHMARKING

EurepGAP benchmarking was conceived very early on in the development of its verification systems, i.e. by 1998. From the outset the rationale for its introduction was to provide a tool to bring together like-minded sector schemes, to recognize existing standards and not to duplicate or impose unsuitable new requirements.

EurepGAP's stakeholders have worked to produce an equivalence system that has at its heart a high degree of rigour and transparency. This is critical to maintain the confidence of all those involved who expect it to be both fair and effective.

EurepGAP is very committed to offering the Benchmarking option of certification. There are two principal reasons for this. Firstly is that it has already proved of strategic importance in bringing about the harmonization of private sector standards that share similar goals and philosophies to that of EurepGAP. For example we now see a growing "family" of GAP schemes in important producing nations in Europe, Asia, Africa and Latin America that now bare relation to each other and share a high degree of equivalence.

Secondly it also provides encouragement to producers and other key stakeholders to "put their own stamp on things". By voluntarily taking ownership in this way, experience shows that adoption of certification is made much less of a burden to the producer.

A major benefit for these schemes is that they can find international buyer recognition and establish a core set of standards for producers rather than have to operate with a plethora of different requirements. With the increasing pace of globalisation of both production and retailing this aspect of the benchmarking model has more and more relevance and appeal amongst the key supply chain actors.

However benchmarking will always remain as just one certification option under EurepGAP and will not be suitable to producers everywhere. Our case studies show that it works best where there is an existing strong cohesive force within a reasonably mature production industry rather than embryonic or fragmented export sector. It also requires a coordinated multi stakeholder approach with both public and private sector participation being necessary. Being voluntary in nature there is also a sizeable critical mass of interested producers required before the option can effectively support the costs of development and promotion to the production sector and beyond.

Therefore the structure of the industry, its relative stage of development, the importance of International trade to it and availability of supporting infrastructures should strongly influence the decision whether to develop a national or regional code suitable for attaining equivalence to EurepGAP.

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EurepGAP therefore would encourage groups to take these factors into consideration before developing a benchmark scheme. EurepGAP does not have a policy to promote or recommend the benchmarking option over any other form of certification option. It is a decision for governments, producers and exporters themselves to take bearing in mind local circumstances and requirements. The EurepGAP Secretariat can make themselves available to advise on possible approaches and options depending on the specific circumstances.

DISCUSSION AND CONCLUSIONS

EurepGAP certification is possible by various routes, this is because national circumstances vary greatly and there is unlikely to be a single global “one size fits all” approach. Group certification is unequivocally the most appropriate route for small-scale farmers who benefit in a variety of ways characteristic of group dynamics. The existence of a risk analysed, but practically trained-in, Quality Management System is a prerequisite before attempting certification.

The optimal size of these groups in the early phases should be relatively small to ensure manageability, but it would be advisable to increase the size in subsequent seasons to recognize increasing competence and reduced risk. This would allow for an overall lower sample size thus enabling reduced certification costs. There is also, it seems, room for greater collaboration amongst producer groups undergoing certification to reduce rather than replicate fixed costs such as training and analysis.

By definition, there are no “impossible-to-implement” clauses in EurepGAP protocol as numerous small-scale farmer groups have achieved certification in Sub Saharan Africa. However, whilst the most basic facilities required for responsible small-scale production are not significant in a Northern context, they are not easily accessible by poverty stricken farmers in developing countries. Increasing numbers of these subsistence farmers have turned to, or are being encouraged to grow export cash crops, perhaps because, on the one hand, their land is continually being sub-divided over each generation to such an extent that it becomes too small to be self-sustaining, and, on the other hand, prices in classical commodity markets have become unattractive. The additional income generated from these cash export crops is also much needed for the most basic household purposes.

Of some concern is the apparent lack of underpinning support for the implementation of Good Agricultural Practices in developing countries evidenced by the gradual erosion and disappearance of official agricultural extension services in many developing countries. This would seem at odds with the apparent policy goals of Governments and Global Institutions to involve small scale farmers in the export sector thereby retaining them in rural communities rather than facing displacement to overpopulated urban areas.

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It is unlikely that the market mechanisms alone would be sufficient to bear all the one-off costs of training and capital investment that are required to make the very large numbers of smallholders/subsistence farmers compliant with Good Agricultural Practices. In this context the role of the development partners in providing technical assistance has been, and continues to be of great importance. However the future development of subsistence farmers into the export markets needs to be coordinated and discussed with the commercial supply chain partners so that there is a planned and orderly entrance to prevent oversupply or attempts to sell products that do not meet the market requirements. This dialogue could usefully involve a range of stakeholders in the public and private sector.

EurepGAP would also welcome any dialogue to explore how private-public sector standards could achieve a greater degree of harmonization and complementarity. This could be of particular interest to developing nations where there is potential for enhanced food safety control measures (say for the home market) without the necessity to incur large investments or where there is potential for cost reduction to meet official market entry requirements for exports. UNCTAD and FAO may be able to assist in facilitating such a discussion between relevant parties.

These linkages would be a most innovative step towards achieving the shared goals of both the public and private sectors to facilitate sustainable development and trade.

Responsible exporters play a key role both in market development and linking small-scale producers with the marketplace. Exporters also provide the crucial interface between retailers and the production base. In some case the supply chains are more complex with importing companies and distributors also playing important functions in many markets.

The evidence in Kenya shows that exporters, despite being in competition with one another, can act together in a most effective way on standards interpretation and implementation *on the ground* and this is beneficial for the overall development effort as well as for the parties concerned.

In a development context the Kenya experience is reason to be optimistic. It has shown that a broad collaborative approach is now contributing to the further growth and development of the market and this is directly benefiting the indigenous population.

ANNEX 1. EUREPGAP MEMBERSHIP

EurepGAP Membership

There are three membership categories in EurepGAP: Supplier, retailer and associate memberships. The supplier members are any organisation directly growing, producing and/or handling food products. The retailer members are for retailers and final distributors/food service only, whereas the associate members are those service sector organisations like consulting, certification, plant protection and/or fertilizer industry, etc.

There are several benefits of being a member of EurepGAP:

- right to participate in and contribute to the various working parties
- discounts on EurepGAP seminars, brochures and conferences
- display of the member organisation's logo and name in the public list of members
- internet link from the EurepGAP website to the member organisation's
- input into the continued improvement of the EurepGAP documents
- first hand information on developments in the sector
- participate actively in review phase and comment on benchmarking proposals

Is membership a prerequisite to become certified?

No it is not.

The membership of EUREPGAP is independent from an approval as grower or as certifier. EUREPGAP is an open system, where anybody can apply and receive approval when complying with the objective criteria set out in the various EUREPGAP documents. Members show additional commitment to shape and improve the system as active partners. In return, members qualify for discounts in the EUREPGAP fee system for approvals.

EurepGAP Training

EurepGAP offers training, called Train-the-Trainer seminars or workshops. The focus of these workshops is to build global capacity in the form of approved EurepGAP trainers that can train interested parties of the public (farmers, consultants, government) in the requirements of EurepGAP. Only EurepGAP members can become approved trainers of the public. These workshops are conducted world-wide and trainers in several countries have been approved (the names of approved trainers appear on the EurepGAP website). During a Train-the-Trainer seminar the latest versions of the General Regulations and the Control Points and Compliance Criteria are explained.

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Training received by EurepGAP Trainers or by EurepGAP approved trainers ensures that the participants get up to date information as well as the correct interpretation of the standard, thereby maintaining EurepGAP's integrity.

Various Train-the-Trainer workshops have been held in Mexico, Brazil, Argentina, Kenya, Malaysia and Europe covering the scopes of Fruit and Vegetables, Integrated Farm Assurance and Coffee. This has led to several EurepGAP approved trainers that offer Train-the-Public courses in these and other developing countries.

Applicant standard owners and/or managers are encouraged to attend a Train-the-Trainer workshop as it will improve their knowledge of EurepGAP. Obtained knowledge will be helpful when completing the cross-reference checklist, which could result in a smooth benchmarking process.

EurepGAP Governance and Organisational Structure

It is imperative that a standard seeking equivalence be familiar with the operational procedures of EurepGAP and its structure. EurepGAP is governed by the Steering Committee and Technical Standards Committee. These committees are constituted of peer elected Retailer and Supplier members in the ratio of 50:50. The Steering Committee is responsible for Strategic Policy decisions with Industry implications as well as provides a Good Governance function (Fig 3).

FoodPLUS GmbH

EurepGAP members established the legal entity FoodPLUS GmbH to reflect the industry control of the standard. The core purpose of FoodPLUS as the global body for EurepGAP implementation are:

- To facilitate EurepGAP activities: standard development and operation
- To serve as legal owner of the EurepGAP normative documents
- To host the EurepGAP secretariat

EurepGAP/FoodPLUS is funded almost entirely by membership contributions and receives little or no public funding.

The organization is

- Not for profit
- Has a high degree of Independence through neutral ownership and governance procedures
- Democratic – elected representatives on governing committees

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- Strives for best practice in consultation on a global level

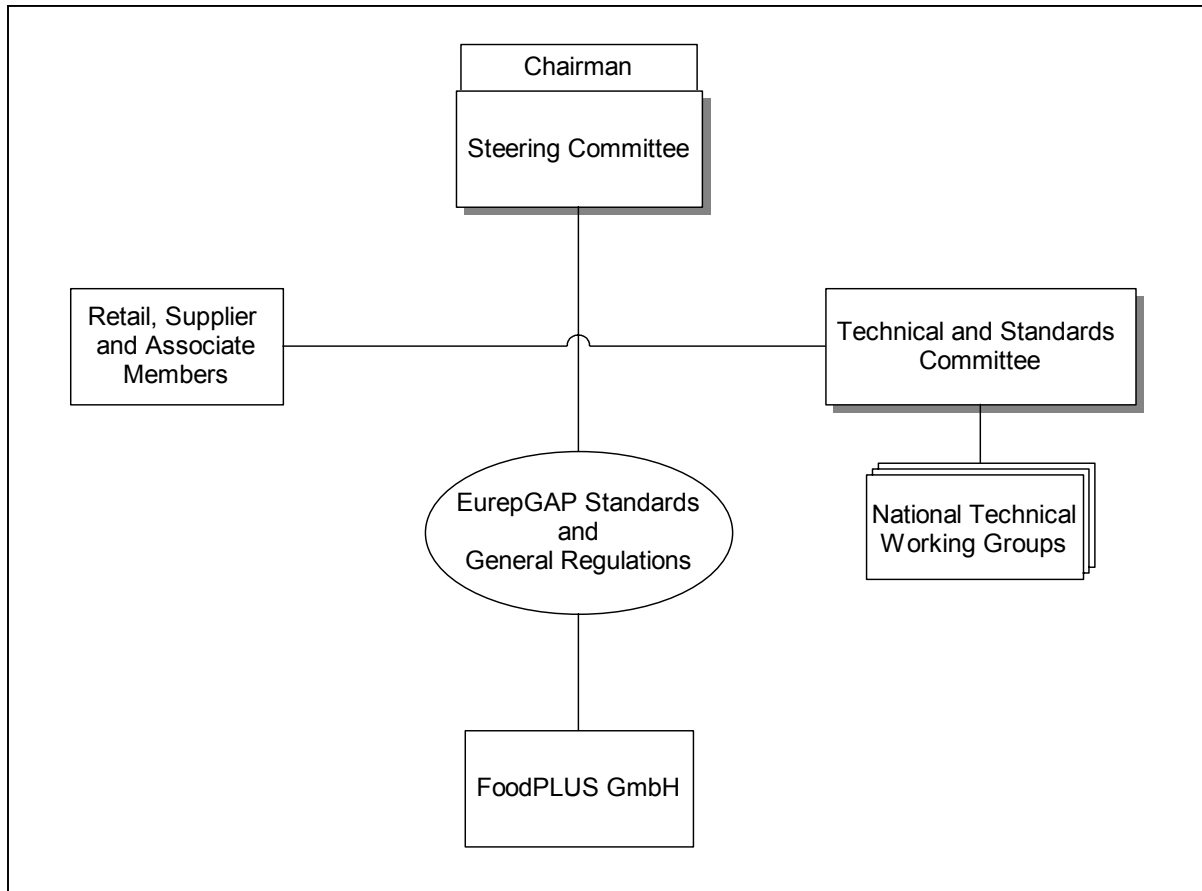


Figure 4. EurepGAP Governing Structure

As the Global Partnership for Safe and Sustainable Agriculture, EurepGAP intends to link its global implementation activities closer to the grower, while at the same time seeking to gain qualified input from national experts in their native language with respect to specific legal and structural conditions within the different areas covered by EurepGAP. This goal is achieved through the establishment of National Technical Working Groups (NTWG).

These groups work in close cooperation with the EurepGAP Secretariat and Technical and Standards Committees (TSCs) (see Figure 4) and support, as well as facilitate, the EurepGAP implementation and continuous improvement. Several NTWGs have been formed worldwide (e.g. Spain, New Zealand, Argentina, Greece, Brazil,

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Turkey and Kenya)¹⁵ and valuable information has been produced in terms of local interpretations and complete translations of the standards and General Regulations. Members of the NTWG must be members of EurepGAP, and as in the case of TSC and SC, only supplier and retailer members have voting rights. Associate members and guests have a consultative role. Decisions made by the NTWG in terms of local interpretation must be presented to the TSC for approval and when approved, those interpretations will only be valid for the country(ies) that forms the NTWG.

¹⁵ <http://www.eurep.org/fruit/Languages/English/workgroups.html>

ANNEX 2. STANDARD SETTING

It is clear that the Technical and Standards committee plays an integral role, but that the knowledge of experts are also involved to ensure incorporation of the latest up to date technical information as well EU legislation available.

The EurepGAP retailers, producers and associate members are also involved in an early stage to ensure global acceptance of the standard. It is important that the retailers and producers endorse the changes and producers and associate members will make sure that the changes are practical, can be implemented and are auditable.

The changes must not bring about any restrictions in trade, must be written to meet the need of the market-place and must contribute to advancing free trade in the broadest possible geographic and economic contexts.

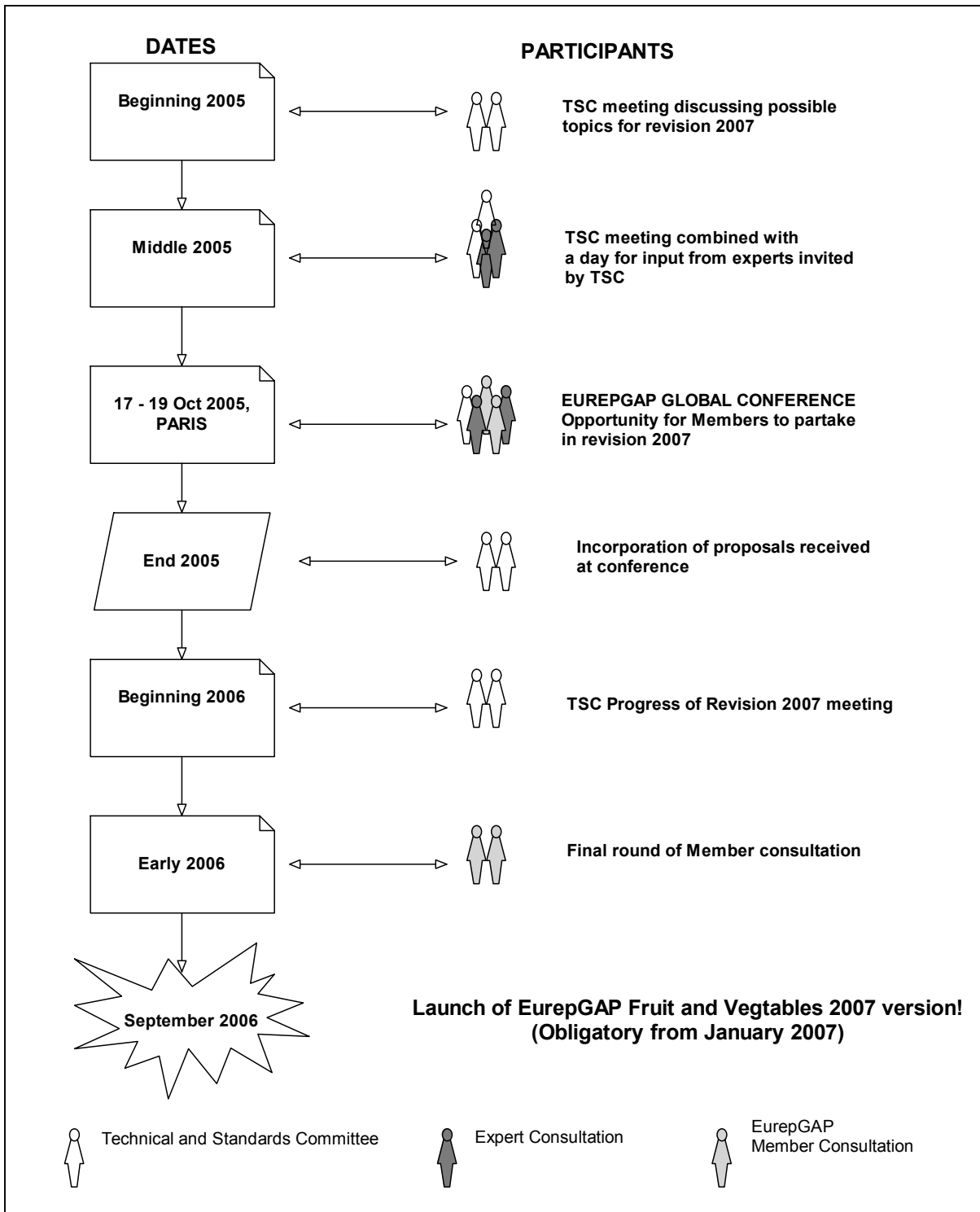


Figure 5. Revision Process for the Fruit and Vegetable 2007 version