

IFOAM-Organics International Consultation Survey to Review Group Certification Requirements

Welcome to this survey on organic group certification requirements.

This survey is organized by IFOAM-Organics International. It follows from a study conducted and published by FiBL on the status of group certification implementation (study available [here](#)).

This survey is composed of 20 questions related to 6 technical topics identified as the most relevant for the further development of the regulatory framework for group certification. It is a technical survey designed to be answered by people who understand how group certification works and have ideas on how it could be improved. This would include for example experts from producer groups, traders or consultants who closely worked with producer groups and ICS implementation, organic inspectors and certification staff, or competent authorities with experience in oversight of producer group certification. Please do not answer this survey if you are not familiar with group certification.

The outcomes of the survey will be discussed at an international multi-stakeholder workshop in May 2019, and ultimately serve to advocate for improvement of organic accreditation requirements and regulations globally, including the new EU organic regulation.

Thank you for sharing your opinion!

* 1. Please provide your contact details:

(this information will be kept confidential in the publication of the results)

First and Last Name

Organization

Country

Email Address

2. Would you like to receive further communication about the results of this consultation?

Yes

No

* 3. Please select which type of stakeholder you (mainly) represent when answering this survey:

4. Please select WHERE the stakeholders you (mainly) represent when answering this survey ARE BASED:

5. As an organic trader or processor in the EU, US, or other importing country where organic group certification is not currently practiced, please specify which of these apply to your situation:

If the type of stakeholder you indicated in question 3. was "Producer Organization", please skip this question by clicking "Next" below.

1. Maximum size of the group

The FiBL study has observed that there is a trend towards very large groups (up to groups of several ten thousands farmers in one group/ICS). Experts have expressed several concerns about group certification of that scale. It was noted that there are some Regulations that implement a strict maximum ICS size policy (e.g. the Indian Organic Programme NPOP with a limit of 500 farmers/groups).

6. Which of the below concerns do you share?

Please rank from "I don't think that this is a problem at all" (0) to "This is a major problem"(3).

	0. I do not think this is a problem at all	1.	2.	3. I think this is a major problem	No opinion
It is too difficult to manage an effective ICS and ensure farmer compliance in a very large group	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The sampling formula (for re-inspection visits of certification bodies) based on the square root approach of group members makes the sample in very large groups proportionally too small to ensure effective oversight by the CB. <i>E.g. in a normal risk group with 500 farms, 23 farms would be inspected (= 4.6%). In a normal risk group of 20'000 farms, 142 farms would be inspected (0.7%)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is a "Too big to fail" effect with very large groups which makes it very unlikely for CBs to apply serious sanctions (suspension or de-certification) to the whole group.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other problems/concerns (please specify and rate each concern(s))

7. What would you think of a requirement setting a maximum number of producers in a group? For example, the following:

“Large groups need to organize their producers and Internal Control System in defined Sub-Groups with a maximum of 1000 producers each, with similar production systems and in close geographic proximity. The ICS management can be central, but there must be assigned ICS staff and accessible ICS documentation for each sub-group sites.”

Note: In a larger group, the external certification body would need to visit all subgroups, re-inspecting the minimum number of growers of each subgroup (square root sampling approach). Slight flexibility (up to +20%) for homogenous group/subgroups in very close geographic proximity, with written justification in the report.

- This is a good proposal
- This is a good approach but the number should be different → Please comment in the comment space below.
- There should be no maximum group/subgroup size, and the current requirements are sufficient.
- There should be no maximum group sizes, but for groups above a certain size the sampling formula should be different to the current square root approach

Comments or other suggestions:

2. Control of larger farms in the group

The IFOAM Accreditation Requirements 8.3.2. require that “large farming units” are inspected as individual units. The EU Guidelines for group certification restrict group certification to “small farmers”, but permits “larger farms” to be part of the group, subject to annual external inspection. The FiBL study highlights that CB’s interpretations as to what is considered a small or a large farming unit and how such units are controlled vary considerably. It is common practice that the CB inspects such “larger farms in the group” using the simplified checklist and criteria for smallholder group farms, while some CB have a threshold above which they use full individual farm inspection procedures. This raises concerns about the quality and consistency of control of bigger farms inside a group.

The new EU Regulation is more explicit in restricting group certification to small farms (maximum 5 hectares or below a turnover of 20,000 €/year; details see EU Regulation 2018/84A; Article 36). No clear rules on the possible inclusion and control of larger farms in the group are proposed yet. Other sustainability schemes like UTZ/Rainforest have developed guidance on the control of large farms in producer groups to address the above concerns.

8. Do you see a value in allowing the inclusion farms that are larger than “small farms” in group certification (e.g. for consistent volumes; medium farms face similar problems)?

- Yes, it is important to allow also medium and large farms as part of the group certification (with annual external inspection)
- No, medium and large farms should not be part of the group at all.

Additional comment:

9. What should be the size threshold above which a medium farm inside a group should always be re-inspected by the external control body every year?

10. Do you believe that there should be a size threshold above which a large farm inside a group should not only be annually externally re-inspected (smallholder control procedures), but inspected and certified according to individual farm control procedures?

- Yes
- No

If yes, which threshold/criteria would you suggest for this, and why?

11. Do you have any other comment regarding group member sizes and related inspection/certification procedures?

3. Farmers training and Conflict of Interest

Continuous training for producers in organic production and product quality management is an essential part of the ICS. The FiBL Study revealed that, according to most expert opinions, this is the most important service to growers and essential for the long-term success of an organic group. However, training of farmers is so far not a group certification requirement in most regulations and hence not systematically evaluated during external inspections, although it is a major ICS cost factor.

More to that, training of farmers by ICS staff (who often do farm advice and internal inspection) is sometimes perceived as a conflict of interest (in analogy to the ISO 17065 required separation of advice and certification for CBs). The currently often required separation of extension/farm advice and the internal inspection was subject to intense discussions. Many experts pointed out that it might lead to insufficient training and advice services in groups, given financial constraints and how hard it is to find qualified staff with technical knowhow in organic production. More training and support of farms can be a better guarantee of compliance than an inspection, so many experts recommend that there should be a clear indication that farmer training is part of the ICS' role and that the concept of "conflict of interest" should not apply to the separation of advice and inspection within the ICS.

12. Do you think that internal inspections would be less thorough if the field officer who conducts the internal inspections also provides training and advice?

Yes

No

Comment:

13. In view of the above, what would you think of the proposed below requirement (proposed wording is inspired by the UTZ standard requirement on training):

"Training shall be provided to the group's producers on all topics of organic production relevant for them. There must be an annual training plan, based on a needs assessment which includes findings from risk monitoring, internal as well as external inspections. Training is carried out by competent personnel or experienced farmers and records are kept for each training. Individual advice given to farmers is recorded in farmers notebooks or digitally.

Field officers may provide advisory services during the internal inspection, this does not per se constitute an unacceptable conflict of interest."

This is a good proposal

The approach is good, but the requirement should be amended. If so, how? → Please comment in the comment field below.

No requirement on farmers training are needed

Comments or other suggestions:

4. External Farm Re-inspections

During the external inspection, the certification body re-inspects the required minimum number of farms (IFOAM 8.3.4.7) to verify the functioning and efficiency of the ICS. Since only a small percentage of farms is re-inspected to assess compliance of the whole group with ICS, it is very important that these farm audits are of adequate length and quality and are efficient at identifying non-conformities.

The FiBL study has revealed that the length and in-depth of inspections is a major competitive factor between certifiers, as it affects the total number of audit days and hence certification costs. There is an observed trend for external farm inspections in group audits to be very brief as a result of CB market competition, which threatens the efficacy of group certification. Some certifiers ask their inspectors to do 10-20 external inspections per day, which corresponds, with travel times to an average of just a couple of minutes per farmer.

In other schemes, this problem has been addressed by introducing more prescriptive requirements for external inspections by CBs. For example, UTZ has successfully introduced a restriction that a maximum of 6 farms on average can be inspected per day (including travel times), which is now implemented by all certifiers. The same rule is also implemented in the Turkish organic regulation. GLOBALG.A.P has a minimum timing of 3 hours per inspection, which may be reduced to 2 hours in justified very simple cases.

A downside effect of such regulations may be that certifiers would tend to do the maximum number of inspections in all circumstances for competitive reasons, and not to apply due diligence. Still, this may be considered a better scenario than the current wide discrepancy in the level of diligence between certifiers.

Another concern might be the cost implications of setting such maximum. However, the approach is apparently working even in mainstream cost-effective certification schemes like UTZ and GLOBALG.A.P.

14. Do you think that the current lack of guidance or oversight of the duration & thoroughness of external farm re-inspections jeopardizes the overall group audit quality?

Yes

No

Comments:

15. Considering the above, what would you think of the following requirement:

"For the re-inspection of the minimum number of group members (square root of number of farms in group/subgroup times risk factor), the following restrictions shall apply: maximum 6 farm re-inspections per inspector and per day (on average over the whole group)."

- This is a good proposal
- The approach is good, but the maximum should be set a different level - Which maximum would be adequate? → Please comment in the comment field below.
- This aspect should be regulated differently → Please comment in the comment field below.
- This aspect should not be regulated at all.

Comments or other suggestions:

5. Group Certification and Sanctions

IFOAM Accreditation Requirements 8.3.5.1 & 2 require certification bodies to hold the group as a whole responsible for compliance and to have a clear sanction policy in case of non-compliances by the group and/or its members. This is considered as a key incentive for the group to ensure compliance of each of its members, as non-compliances of a few could jeopardize the entire group's certification.

However, the FiBL study, through interviews with experts and accreditation bodies has revealed that there are concerns and inconsistencies about how certifiers deal with a weak or deficient ICS and cases where external farm inspections find critical non-compliances (e.g. use of prohibited inputs) which had not been detected by the ICS. This might be a competitive factor of CBs, as the ultimate sanction (de-certifying the whole group) implies losing or alienating clients. Many times, certifiers will choose other sanctions than suspending certification for the whole group: for example, they will ask for the removal of the identified non-compliant members from the group, and/or they will increase the sample size. This however does not guarantee that the rest of the group members are sufficiently compliant.

Therefore several experts are now calling for more detailed guidance/requirements on group sanctions to help minimize the effects of competition between certification bodies and to maintain the long-term efficacy and credibility of the group certification concept.

16. Even a functional ICS may occasionally fail to detect a critical non-compliance in their internal inspections of group members, as no audit can be a 100% guarantee. However, if the percentage of farms with undetected non-compliances is too high, this reveals a systemic failure of the ICS. In your opinion, what would be an acceptable percentage of group members with such undetected critical non-compliances (expressed in a % of the total number of farms) in a functioning ICS?

17. Do you think that there should be a defined threshold related to the number of critical non-conformities found in the external farm re-inspection sample (e.g. X % of all farms externally inspected), which would need to **lead to documented investigation and additional re-inspections**?

Yes

No

and if yes, what should it be and how should it be calculated?

18. Do you think that there should be a defined thresholds related to the number of critical non-conformities found in the external farm re-inspection sample (e.g. X % of all farms externally inspected after investigation) which would need to **be considered systemic failure of the ICS and lead to suspension/de-certification**?

Yes

No

and if yes, what should it be and how should it be calculated?

19. Do you have other comments, ideas or suggestions related to the aspect of sanctions?

6. Transparency of Group Certification

The FiBL Study has highlighted that there is a lack of transparency and available reliable data with regard to group certification. Many certificates do not indicate how many farms are included in the certificate. Also, this information is not consistently communicated to the authorities and data collecting institutions. Outside the IFOAM-Accredited group of certifiers, the certificate often does not state whether it is group certificate or an individual farm.

20. Considering the above, what would you think of the below requirement?

“The public operator certificate of a grower group indicates that this is a group certificate and the total number of farms certified in this group.”

- This is a good proposal
- There is no need for this requirement.
- This proposal should be amended as follows → Please use the comments field below.

Comments or other suggestions:

Thank you for completing the survey!

Thank you for your contribution. Your input will be anonymously included into the report that will be discussed in the multi-stakeholder workshop on this topic, which will take place in May 21 & 22, 2019, at the IFOAM-Organics International Head Office in Bonn, Germany.

21. Do you have any other comment to add to the topic of group certification?