



**EUROPEAN COMMISSION**  
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Directorate B. Relations with other institutions; Communication and Quality  
**B.3. Agricultural product quality policy**

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**Guidance document**  
**for the evaluation of the equivalence of organic producer group certification**  
**schemes**  
**applied in developing countries**

This document has been conceived as a working document of the Commission Services. It has been elaborated in co-operation with the Member States. It does not intend to produce legally binding effects and by its nature does not prejudice any measure taken by the Commission or by a Member State within the implementation prerogatives under Article 11 of Council Regulation (EEC) No 2092/91, nor any case law developed with regard to this provision.

## **A. Objectives of a group certification system**

1. To overcome the economic difficulties in relation to the inspection of small operators in developing countries (as defined by OECD<sup>1</sup>).

## **B. Principle**

2. A substantial part of the inspection work is carried out by internal inspectors in the framework of the internal control system set up by the group.
3. The external inspection body verifies and evaluates the effectiveness of the internal control system and certifies the group as a whole.

## **C. Scope : who can be considered as a group ?**

4. In principle only small farmers can be members of the group covered by group certification. Larger farms (i.e. farms bearing an external certification cost that is lower than 2 % of their turnover) can also belong to the group but have to be inspected annually by the external inspection body. Processors and exporters can be part of the structure of the group, but have to be inspected annually by the external inspection body.
5. The farmers of the group must apply similar production systems and the farms should be in geographical proximity.
6. A group may be organised on itself, i.e. as a co-operative, or as a structured group of producers affiliated to a processor or an exporter.
7. The group must be established formally, based on written agreements with its members. It shall have central management, established decision procedures and legal capacity.
8. When intended for export, the marketing of the products must be carried out as a group.

## **D. The internal control system**

9. The internal control system of the group is a documented internal quality system that includes a contractual arrangement with each individual member of the group.
10. Internal inspectors are designated by the group and carry out internal controls. They must receive suitable training. The internal quality system sets out rules to avoid or limit potential conflicts of interest of the internal inspectors.

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<sup>1</sup> <http://www.oecd.org/pdf/M00038000/M00038051.pdf>

11. The internal inspectors carry out at least one annual inspection visit to each individual operator including visits to fields and facilities.
12. The internal control system keeps appropriate documentation including at least a description of the farms and the facilities, the production plans, the products harvested, the contractual arrangement with each individual member and internal inspection reports.
13. The internal control system shall include the application of sanctions to individual members who do not comply with the production standards. It shall inform the external inspection body of the irregularities and non-compliances found, as well as of the corrective actions imposed with agreed time for completion.

#### **E. The external inspection body**

14. The external inspection body evaluates the effectiveness of the internal control system, with the final aim to assess compliance with the production standards by all individual operators.
15. It has a contractual agreement with the group
16. It carries out at least one annual inspection of the group. The inspection shall include an inspection visit of a number of individual farms with the aim to inspect for compliance with the standards and to evaluate the effectiveness of the internal control system.
17. Each year the external inspection body shall define and justify a risk-orientated sample of farms subject to their annual inspections. The number of farms subject to annual external inspection shall in any case not be lower than 10. For a normal risk situation, it shall not be lower than the square root of the number of farms in the group. For medium or high-risk situations, the external inspection bodies shall define a risk factor of at least 1.2 to 1.4 respectively.

The farms visited by the external inspection body must be predominantly different from one year to the other.

Minimum number of farms to be inspected by the external inspection body			
Number of group members = n	Normal risk factor	Medium risk factor	High risk factor
	1	1.2	1.4
Minimum	10	12	14
n	Square root of n	1.2 square root of n	1.4 square root of n

Factors to define the risk should include :

- a) factors related to the magnitude of the farms

- size of the holdings
- value of the products
- difference in value between the organic and the conventional products

b) factors related to the characteristics of the holdings

- degree of similarity of the production systems and the crops within the group
- risks for intermingling and/or contamination

c) experience gained

- number of years the group has functioned
- number of new members registered yearly
- nature of the problems encountered during controls in previous years and results of previous evaluations of the effectiveness of the internal control system
- management of potential conflicts of interest of the internal inspectors
- staff turnover.

18. Larger farms, processors and exporters shall be inspected annually by the external inspection body.
19. In case the external inspection body finds the internal control system to seriously lack reliability and effectiveness, it shall increase the number of farms subject to their annual inspection to at least three times the square root of the number of farms in the group.
20. The external inspection body shall have a documented sanctions policy vis-à-vis groups. In cases it finds the internal control system to lack reliability and effectiveness, the external inspection body shall apply sanctions to the group as a whole, including, in case of serious deficiencies, the withdrawal of the certification of the group.
21. In their report to the relevant supervising authorities, the external inspection body shall refer to all the elements of this guidance document.