Brief Introduction to Requirements for Organic Group Certification according to the European Regulation (EC) 834/07*, NOP, JAS, and CERES Policy

1. **Group certification:**
   - Is a necessary tool to allow smallholders access to organic markets
   - Requests a high level of commitment and knowledge by the organisation or certificate holder
   - Is possible for crop production, animal husbandry, or beekeeping.

2. **Normative framework:**
   - In 2003, the EU commission issued a “guidance” for group certification according to the EU-Regulation on organic farming. Group certification can be considered “equivalent”, not “compliant” with Reg. (EC) 834/07*.
   - In Nov. 2008, the US National Organic Standard Board (NOSB) published a recommendation for "Certifying Operations with Multiple Production Sites". As long as there is no final NOP rule on this topic, this is the guideline for group certification under NOP.
   - CERES has been informed by the Japanese Ministry of Agriculture (MAFF) that group certification is allowed for organic grower groups according to JAS.
   - The International Federation of Organic Agriculture Movements (IFOAM) published a set of normative and training documents.
   - CERES, considering these different approaches, has worked out its own policy; the present document is a summary of the same.

3. **What are smallholders:**
   - We have established our own guidelines for defining what a "smallholder" is. Depending on the type of crops, the limit is between 1.5 and 30 hectares.
   - Bigger farms can be part of the group but must be inspected individually.

4. **What is a producer group:**
   - Producer groups can be cooperatives, associations, or similar organisations; but also, processing or trade companies can organise their suppliers in a producer group. The certificate holder must be a legal entity.
   - Producer groups must be located within the same geographical region, have the same kind of product, similar production systems and record keeping. The NOSB recommendations insists on a common input supply, if off-farm inputs are used.
   - A producer group needs an internal training program, so that all members understand properly the rules of organic production. Regular meetings must be held.
   - If the group is spread over a large region, it must be subdivided in smaller groups.
   - Group certification makes sense only for groups of 15 or more members; nevertheless, also smaller groups should feel encouraged to set up their own internal control system, independently from the percentage of external control by the certifier.

5. **Internal control:**
   - The group signs contracts with all members.
   - All members must be registered with their basic farm information, including any non-certified crops.
   - As a basic requirement, all producers must be controlled at least once per year by the internal inspectors.
   - Internal inspectors must be adequately prepared for performing their job.
   - Conflicts of interest must be avoided when selecting internal inspectors; they must neither inspect their relatives nor in their own village.
Internal inspections must be documented through reports, signed by the producer and the inspector; these reports must be properly filed.

Internal inspectors must dedicate enough time to each inspection.

Reports must describe all relevant features of the operation

Non-conformities must be recorded and followed up

An updated grower list must be kept, including all relevant information (names, village, farm size, yield estimate, produced quantity dates of internal inspections, status of each farmer, etc.).

6. Internal regulation and approval:

The group must have an internal regulation, including, among others, corrective actions and sanctions for non-conformities.

The internal regulation must be written in a local language which is understandable for all group members.

Results of internal control must be reviewed and summarized in the organic management plan; non-conformities must be reported to the certification body.

An internal approval body must evaluate the reports, supervise the inspectors, pre-approve growers, and give follow-up to the implementation of corrective measures.

7. External control:

The number of producers controlled by the external inspector is determined by the square root of the number of all growers, multiplied by a risk factor:

\[ y = r \cdot \sqrt{x} \] (y = producers controlled by our inspector, r = risk factor, x = number of all group members); the minimum is 10

The risk factor “r” can vary between 1 and 4: very uniform groups with a low-input crop, good internal control system (ICS) and low rate of nonconformities, will have a low risk factor, and vice versa.

The sample for external evaluation must, of course, be representative for the whole group.

8. Records:

In addition to the ICS records mentioned above:

The group must present a detailed organic management plan.

Farmers must keep a minimum of records; in case of illiteracy the records kept by the ICS can be regarded as a substitute for records kept at the farm level (provided they contain the necessary details).

Records on purchased, stored, processed, and sold quantities must be kept at each step, from the producer to export or final sale.

Besides, JAS requires "grading" records. The internal inspections are part of the grading system, but besides that, before selling products with the JAS logo, the grading manager must check for each individual batch, whether it complies with the JAS standard.

9. Certification:

The group can only be certified if the ICS works properly; this includes, among others, that internal inspectors must detect non-conformities, and the approval body must react properly and follow up on corrective actions. The group must be aware that severe infringements by one member can put at risk the whole group's certification.

New producers can be included in the organic farmers list only after approval by the certifier.

*Note: Inside the EU, the Regulation must be applied in its strictest sense. Products from third countries outside the European Union are considered "equivalent". Please refer to the CERES homepage for our Policy 4.1.1, which, combined with Regulations (CE) 834/07 and (CE) 889/08 and our other policies, make up the "CERES equivalent standard".

Please be aware that this is only a selection of essential requirements of the organic standards, meant as an introduction. The operator, of course, must learn about and meet all requirements of the respective standard.