

Ad Hoc Expert Meeting on Facilitating Access of Small Organic Farmers in Developing Countries to Supermarket Shelves
Geneva, 10–11 December 2009

Comparative study on the GLOBALGAP Fruit and Vegetables Standard and the EU Organic Agriculture Regulation

Discussion paper commissioned by the UNCTAD secretariat

Executive summary

Demand for organically grown produce in supermarket shelves as well as in the food processing and catering industry has been rapidly expanding in recent past. In fact, currently this is the most dynamic growth segment of total global demand for organic produce. As many of the buyers in these markets are either members of GLOBALGAP or apply the GLOBALGAP requirements, there is increasing interest to demand that organic producers also meet the requirements of GLOBALGAP (aimed at ensuring consistent application of Good Agricultural Practices with a particular focus on health and safety of fresh produce). This results in double inspection and certification requirements and potential loss of market for many organic farmers, particularly small-scale farmers.

Exporters working with contracted small farms face difficulties with having to comply with multiple standard requirements. For some, the certification costs tend to be higher than compliance costs. All of which impacts the farm-gate price paid to the farmers. Against this background, developing a joint scheme, which ensures compliance with organic production and GLOBALGAP requirements, would help all parties concerned.

This paper compares the standard and certification requirements of the GLOBALGAP standard applicable to fruits and vegetables with those of the EU Organic Agriculture Regulation. To address those issues covered by GLOBALGAP but not the EU Organic Agriculture Regulation, the paper suggests creating an add-on module on hygiene, contamination and social/labour issues for certified organic products to facilitate market entry where GLOBALGAP is required.

The views expressed in this study are largely those of the author and do not necessarily reflect the views of the UNCTAD secretariat.

1	Table of contents	
1	TABLE OF CONTENTS	2
2	INTRODUCTION	3
3	STANDARDS COMPARISON	5
	Overview of the systems	5
	The Comparison	6
	The Outcome	8
4	CERTIFICATION	14
5	MARKET	19
6	PRACTICAL TOOLS AND SOLUTIONS	21
	Benchmarking	21
	Add on module of hygiene, contamination and working conditions	21
	Other proposals for improvement	22
7	DISCUSSION AND CONCLUSIONS	25
8	ANNEXES	28
	Sources for the study	28
	Information from the GLOBALGAP homepage	29
	TECHNICAL ANNEX - Side by side comparison of the GlobalGAP standard and the EU organic regulation - as separate paper	

Acknowledgement

This study was prepared by Eva Mattson, GroLink AB, commissioned by the UNCTAD secretariat. The views expressed in this study are largely those of the author and do not necessarily reflect the views of the UNCTAD secretariat.

2 Introduction

Background

Demand for organically grown produce in supermarket shelves as well as in the food processing and catering industry has been rapidly expanding in recent past. In fact, this is currently the most dynamic growth segment of total global demand for organic produce. As many of the buyers in these markets are either members of GLOBALGAP or apply the GLOBALGAP requirements, there is the need for organic producers to meet the requirements of both one of the main organic standards and GLOBALGAP. This results in double certification requirements.

Especially small farms do not have the necessary means to cover multiple certification requirements (for many small producers, certification costs tend to be higher than compliance costs). Against this background, one wonders whether through a matching exercise between a key organic and the GLOBALGAP standard and their associated certification requirements it is feasible to facilitate more widespread use of GLOBALGAP certification for small organic farmers and thus facilitate their access to large markets.

Objective of the study

The study aims at providing background information to and guiding the discussion of a group of experts (representing the key stakeholders) on whether there is merit in cross-referencing the EU Organic Standard and the GLOBALGAP Fruit and Vegetables Standard to facilitate the process (or even avoid) and reduce the costs of double certification. If considered worthwhile, the expert group should also identify the most suitable ways forward, both in terms of further analysis and procedural steps, to adequately involve all stakeholders and interest groups.

The study

The study compares the EU Organic Standards and the GLOBALGAP Fruit and Vegetables Standards with the focus on certified smallholder farmers organised in groups. A number of documents regarding the GLOBALGAP system and especially regarding certification of smallholders have also been studied. There has been a series of interviews with representatives of certification bodies, supermarkets, wholesalers and others to investigate the market demand for certification of food safety also for certified organic products and if GLOBALGAP is a feasible solution for that need. This study also proposes a range of possible actions to make the food safety certification easier and less costly for groups of smallholders to access.

Language

In the study the wording “EU Organic Standards” and “EU-regulations for organic production” are used. They mean primarily the two main regulations: Council Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008. In some cases, the

Commission regulation (EC) No 1235/2008, which is covering the import to the EU of organic products, is included in the used terms.

General information on GLOBALGAP and smallholders

There are many reports on how smallholder farmers are influenced by GLOBALGAP certification. The reader who wants a general description of GLOBALGAP in developing countries and its related strengths and weaknesses is referred to studies like:

Private Standards, Small Farmers and Donor Policy: EUREPGAP in Kenya (2008) John Humphrey

<http://www.ntd.co.uk/idsbookshop/details.asp?id=1052>

Standard bearers, Horticultural exports and private standards in Africa (2009). Edited by Adeline Borot de Battisti, James MacGregor and Andrew Graffham

<http://www.iied.org/pubs/pdfs/16021IIED.pdf>

On the agrifood website several interesting publications can be found.

http://www.agrifoodstandards.net/en/resources/global/fresh_insights_0_key_findings_and_policy_recommendations

General information on organic and certification of smallholders

One study which can be of interest covering organic agriculture and smallholders is Giovannucci, Daniele (2005) *Organic Agriculture and Poverty Reduction in Asia*. IFAD Office of Evaluation. International Fund for Agricultural Development IFAD, Rome, Italy. The report can be found at:

http://www.ifad.org/evaluation/public_html/eksyst/doc/thematic/organic/asia.pdf

Another report which especially describes the route to certification for a number of producers is Experiences with Certification in EPOPA by Eva Mattsson, Gunnar Rundgren and Bo van Elzakker.

3 Standards comparison

Overview of the systems

Box 1: Overview of GLOBALGAP and EU Organic Standard

	GLOBALGAP	EU Organic Standard
Scope	Food safety	Organic integrity
Ownership	Private	Governmental
Structure	There are three documents used for certification of fruits and vegetables. Starting with "all farms base", continuing with "crops base" and ending with "fruits and vegetables". The documents are modules which fit well together.	Two documents, one Council regulation and one Commission regulation. The Commission regulation is the platform and the Commission regulation is further elaborating on all areas covered in the Council regulation. The Commission regulation is split in two parts, one for normal conditions and one for exceptional circumstances. The same topic can be spread over three different places in two documents.
Size of documents	57 pages in total with 236 control points for certification of fruits and vegetables. 74 major musts, 125 minor musts and 37 recommendations	111 pages legal text where about 60% of the text would be applicable to fruit and vegetable production
Definitions of words used	153	36
Language	Clear and relatively straightforward	Legalistic and complicated
Style of requirements	Detailed and specific. Almost always well formulated	Hugh variation, some requirements are very detailed others general or vague.
Main mode of working	Emphasis on policies, procedures, records and trainings. Audits for checking fulfilment of requirements	Expectations that the involved actors are capable and all requirements are fulfilled. Requirements for documentation and records. Audits for checking fulfilment of requirements
Competence	Is ensured through regular training. This has to be documented and trainers can show proof that they are experts	The actors involved in the system are expected to be competent for their tasks
Who is the competent actor to take a certain	An expert with documented training	The farmer with or without the necessary skills

decision		
Certification by	Accredited certification bodies	Accredited certification bodies
Number of farmers and certified areas in the system	92 000 growers. Around two-thirds of the growers are certified in groups.	Worldwide over 1 million operators with 32 million ha (a smallholder group is counted as 1, not with the number of farmers in the group). In the EU over 200 000 operators with around 8 million ha.
Products sold	Supermarkets	All kind of sales channels
Labelling of products	Business-to-business scheme that does not result in labeling on consumer packaging at the point of sale.	Yes, for use on consumer packaging, special logo.

The Comparison

This study encompasses a detailed side-by-side comparison of the requirements of GLOBALGAP and the EU Organic Standard. The following documents have been used for the comparison:

GLOBALGAP

- Control Points and Compliance Criteria, Integrated Farm Assurance – All Farm base
- Control Points and Compliance Criteria, Integrated Farm Assurance – All Crops base
- Control Points and Compliance Criteria, Integrated Farm Assurance – Fruit and Vegetables

EU Organic Standards

- Council Regulation (EC) No 834/2007 on organic production and labelling of organic products
- Commission Regulation (EC) No 889/2008 laying down detailed rules for the implementation of Council regulation 834/2007

The comparison has been done with the GLOBALGAP documents as the reference document. There are no references to where in the EU-regulations a certain issue can be found, not because it is not interesting but because it is a time consuming work which had taken more time and resources than available for the development of this report.

The example of Kadoka pineapple grower group

Standards comparisons often get quite dry and technical. In this comparison there are two in style and content technically different standard systems put face to face. To try to get it a little bit more alive and closer to the farming reality an example is presented of a fictitious organic smallholder group growing organic pineapples. There are few of these groups in Uganda and Tanzania, and the one presented here is a combination of several to not expose one individual group. Some of the facts are also invented, but it still gives a picture of what the conditions can be for a certified organic group.



Pineapple farmer



Contour planting

Box 2: Kadoka pineapple grower group

The group consists of 134 farmers with fields between 2 to 10 acres. So far the yield has been around 1000 tons of pineapple a year. Some pineapples are air freighted to Europe and some are further processed in the country. The group is certified organic as a smallholder group with an internal control system for 3 years. There are no treatments at all against pests as the pineapples have been without any pest problems so far (there are other examples where a preparation with a plant extract mixed with wood ash has been used, a permitted input in organic production). Small amounts of cow manure and sometime also chicken manure are spread by hand in the pineapple rows. The main source of nutrients is grass mulch which partly is harvested on the farms and partly bought. There is one house per family in the village, no electricity and no healthcare. One hour drive away along the road which gets very bad in the rainy seasons there is a bigger village with electricity and basic healthcare, but no internet connection. The field officer/internal inspector is living there. One more hour drive away is the capital of the country with an airport. The export company running the project has its office and processing facilities in the capital.

The full comparison is attached in a separate document. Here is just one page to illustrate the form of comparison.

Box 3: Example from the side by side comparison of GLOBALGAP and EU Organic Standards

	GLOBALGAP			EU-organic	Organic pineapple group in East Africa	Comments
CB. 2	PROPAGATION MATERIAL					
CB .2. 1	Quality and Health					
CB. 2.1.1	Is there a document that guarantees seed quality (free from injurious pests, diseases, virus, etc.)?	A record/certificate of the seed quality is kept and available and states variety purity, variety name, batch number and seed vendor.	Recom.	Not equivalent	Not done. Most pineapple suckers are taken from own plants but some are brought in from other areas.	

CB.2. 1.2	Are quality guarantees or certified production guarantees documented for purchased propagation material?	There are records to show that propagation material is complying with national legislation or in its absence, sector organisation guidelines and fit for purpose, i.e. quality certificate, terms of deliverance, signed letters or supplied by a nursery that has GLOBALGAP (EUREPGAP) or GLOBALGAP (EUREPGAP) recognised certification	Minor Must	No equivalent. There are requirements for seed from organic production but no requirements on quality of the seeds. There is a general understanding that all EU and national legislation applies including legislation on seeds	Most pineapple suckers are taken from the own plants but some are brought in from other areas. The use of suckers is documented but without statements on quality etc.	
--------------	--	--	------------	--	--	--

The Outcome

The main outcome of the comparison is that there are some areas which are covered by both systems but with less detail in the organic standards but there are also many areas which are only covered by GLOBALGAP. There are several overarching differences between the two standards systems: the scope, the style they are written in, the ownership, the way of ensuring fulfilment of the standards and several other areas. But both standards handle agricultural production and there are several areas where the same issues are covered and the requirements are the same.

None of the certification systems are well adapted to smallholder farmers in developing countries. GLOBALGAP is developed for bigger producers and plantations while the organic regulations are developed primarily for use in the EU.

The comparison with the fictional smallholder group Kadoka shows that with a low input organic certified group there are many of the Control points/ Compliance criteria in GLOBALGAP which are either easily fulfilled by the group or the requirements are not applicable at all. The difficulty to fulfil GLOBALGAP requirements is not in the practical actions in the field but in the amount of documents and records required.

Legal requirements

One of the problematic areas in the comparison is that the EU-regulations for organic are written as a part of the legal system in Europe, where areas like working conditions or registration of pesticides are covered by other EU legislation, therefore those areas are not covered in the EU Organic Standard. When certification bodies are inspecting to the EU-regulation outside the EU they are probably not so concerned with fulfilment of EU legislation if it is not related to obvious and upsetting issues like bonded labour or exceptionally bad food hygiene.

Training and competence

GLOBALGAP is requesting documented trainings and experts while the EU organic legislation expects the producer and the workers to be competent enough for their tasks without any requirements in the standard. It is the task of the employer to keep personnel trained for their duties. In Europe, there are schemes for farm advice which are well

developed, still not always with persons with competence in organic production. The certification bodies are requested to have competent personnel under ISO 65, which both the EU-regulations for organic and GLOBALGAP are asking for.

Documents and records

In the organic regulations there is the requirement for documentation on the farm, including field maps and the farming actions. There should also be a general documentation of the farm. The certification bodies are required to write audit reports, document certification decisions and the follow up of them. In the box below paragraphs are gathered which cover requirements for documentation and records in the two EU-regulations for organic production.

Box 4: Requirements for documentation in EU-regulations for organic production

834/2007

Article 11

General farm production rules

Where, in accordance with the second subparagraph, not all units of a holding are used for organic production, the operator shall keep the land, animals, and products used for, or produced by, the organic units separate from those used for, or produced by, the non-organic units and **keep adequate records** to show the separation.

889/2008

Article 3

Soil management and fertilisation

1. Where the nutritional needs of plants cannot be met by measures provided for in Article 12(1) (a), (b) and (c) of Regulation (EC) No 834/2007, only fertilisers and soil conditioners referred to in Annex I to this Regulation may be used in organic production and only to the extent necessary. Operators shall keep **documentary** evidence of the need to use the product.

Article 5

Pest, disease and weed management

1. Where plants cannot be adequately protected from pests and diseases by measures provided for in Article 12 (1)(a), (b), (c) and (g) of Regulation (EC) No 834/2007, only products referred to in Annex II to this Regulation may be used in organic production. Operators shall **keep documentary** evidence of the need to use the product.

Article 71

Communications

Each year, before the date indicated by the control authority or control body, the operator shall notify the control authority or control body of its schedule of production of crop products, giving a breakdown by plot.

Article 72

Plant production records

Plant production **records** shall be compiled in the form of a register and kept available to the Control authorities or bodies at all times at the premises of the holding. In addition to Article 71 such records shall provide at least the following information:

- (a) as regards the use of fertiliser: date of application, type and amount of fertiliser, plots concerned;
- (b) as regards the use of plant protection products: reason and date of treatment, type of product, method of treatment;
- (c) as regards purchase of farm inputs: date, type and amount of purchased product;
- (d) as regards harvest: date, type and amount of organic or in conversion crop production.

In the GLOBALGAP requirements, there are many more detailed and thorough requests for documentation and records. Below is a list of what is requested by the producer. Four pages of GLOBALGAP Crop base requirements have been gone through of in total 57 pages. The frequency of requests for documentation and records seems to be similar in all three studied documents of GLOBALGAP. Documentation and records are of course needed in all kind of systems. The question which can be raised is if such detailed requirements really are of help to ensure that the product is hygienic and without un-allowed pesticide residues.

Box 5: Examples on what is required in form of records and documentation in the GLOBALGAP Crop Base document

Required records

- Production records
- Record/certificate of seed quality
- Records to show that propagation material is complying with national legislation
- Current records of the monitoring system for in house nursery propagation, must include recording of mother plants or field origin of crop. Recording must be periodic at regular established intervals.
- Seed/annual rootstock treatments, name of product and target
- Plant protection product treatments
- Records or sowing /planting methods, rate and date. Records must be kept and available.
- Records on specific GMO modification in case of GMO trials
- Documented records of planting, use or production of GMO
- Crop rotations verified through planting date or plant protection date
- Records to demonstrate that consideration has been given to the nutritional needs of the crop, soil fertility and residual nutrients.
- Records to show that the technically responsible person making the choice of fertiliser is an external adviser who can demonstrate official qualifications

Required documents

- Documented identification and traceability system that allows products to be traced back
- Document that guarantees seed quality
- Documented quality guarantees or certified production guarantees for purchased propagation material
- Special attention to origin of bought in rootstocks through documentation
- Documentation in the case that a producer is growing GMO
- Documented records of planting use or production of GMO
- Documented evidence of information to clients of the GMO status of a product

When reading the GLOBALGAP requirements, they contain so many actions which have to be documented that it is difficult to get an overview of all issues requested. Through the study and the interviews it has been obvious that most producer groups need a consultant to set up a suitable quality management system. That is also true for many organic groups, but it is obvious that the situation is more complex for GLOBALGAP certified groups. All groups which are certified as groups need a quality management system with quite some documentation to fulfil the certification requirements. This in itself is a major undertaking for a group, both to get established and to keep up to date. The quality management system together with an extensive number of policies, procedures and records puts a heavy burden on the groups.

Farm inputs

Farm inputs as fertilisers and plant protection products are well covered in both standards systems. In organic production almost all chemical pesticides are prohibited (some copper preparations are allowed) while a number of other plant protection products are allowed. The range of biological treatments is growing especially in more intensive production. The EU-regulations on organic has a requirement to primarily rely on preventive methods. When a crop is under threat plant protection substances listed in the regulation can be used. There is a list of the inputs, which can be used in EU Organic Standards.

Box 6: Plant protection rules in EU Organic Standards

Council Regulation (EC) 834/2007

Article 12

Plant production rules

(g) the prevention of damage caused by pests, diseases and weeds shall rely primarily on the protection by natural enemies, the choice of species and varieties, crop rotation, cultivation techniques and thermal processes;

(h) in the case of an established threat to a crop, plant protection products may only be used if they have been authorised for use in organic production under Article 16;

For fertilisers the same kind of requirements is used; there has to be a need for nutrient and there are lists of what kind of fertilisers can be used.

GLOBALGAP is very detailed on farm inputs and especially the handling of chemical pesticides in all steps of the production from treatments of seeds and root stocks to post harvest treatments. This represents the majority of the total number of control points and compliance criteria in GLOBALGAP. All plant protection products registered for the specific crop in the country where it is used or exported to are allowed.

In the comparison it can be seen that in more general points, on plant protection products as an example, the same issues are covered by both standards systems. Examples are registration of plant protection products, documentation of sampling procedures or avoiding contamination by plant protection products. But there are also many of the more detailed requirements regarding fertilisers and plant protection products which are only covered by GLOBALGAP and not by the organic regulations. The use of inputs is quite different in the two systems so that the level of detail of the standard is suitable for the farming systems it covers. In organic production where few inputs are used and chemical pesticides are prohibited areas like maximum residue levels, handling of empty pesticide containers or obsolete products is not an issue while on the typical GLOBALGAP certified farm it needs to be extensively covered.

Workers health, safety and welfare

GLOBALGAP has requirements for workers health and safety. A risk assessment regarding safe and healthy working conditions forms the base for the handling of these issues. Workers that are handling any kind of chemicals should be competent to do so and training is required to keep workers competent. There has always to be one person present on the farm with First Aid training. Other areas included in the GLOBALGAP requirements are an accident procedure, protective clothing and worker welfare. The worker welfare chapter is

covering basic housing, drinking water, places to store food, meetings between management and workers and listing of all workers. In the EU-regulation for organic production none of these areas is covered. Inside the EU the majority of these issues are covered through other legislation and possibly in many countries outside the EU too. In the certification of organic production some of these issues are covered by private organic standard systems.

Waste and pollution

One important area shared by both systems is the requests that the farm activities are not contaminating surrounding ecosystems. Most of the requirements in GLOBALGAP on waste and pollution are recommendations.



There is one major must which is requiring that the farm and the storage should be clean and without litter or waste. Clean and neat farms are not covered in the EU Organic Standards. One reason for the standard is the risk of contamination of oils from rusting machinery and similar. The Swedish organic standards owner KRAV has a “scrap/garbage” standard to get farmers to clean up their farms. This has not been without controversies but has also cleaned out some of the worst garbage heaps on the farms.

Order of empty containers

Irrigation water

Irrigation water is an area of concern for GLOBALGAP mainly from the angle that water could contaminate the crop but also that the use of water is legal, sustainable and effective. The EU organic regulations have a requirement on the sustainable use of water but don't handle the contamination by irrigation water.

Crop rotation

In GLOBALGAP it is recommended to use crop rotations while in the EU organic standards the language is stronger. In organic production, crop rotation is an inherent element of the management of the farming system. There is no absolute demand for a crop rotation in organic farming but the absolute majority of crops are grown in rotations.

Hygiene

In GLOBALGAP there are several requirements for hygiene. Hygiene issues are covered at all steps of production from the farm to the finally packed product.

There is a request for a hygiene policy and procedure. It has to be followed up with instructions covering a range of areas like hand cleaning, limitation of smoking and eating in

certain areas. The location of toilets and instructions for the use and quality of water are other important areas as well as workers should be able to demonstrate that they have competence in hygiene issues. The range of issues covers areas from bacterial infections, chemical contamination to physical contamination in packaging by knives, lunchboxes and mobile phones as an example. It is obvious that there are practical experiences of a wide range of issues which can go wrong as a base for the GLOBALGAP standard. The hygiene requirements are several times formulated in a way that reveals that they are written for bigger farms with workers but many of the issues are applicable also to smallholder farmers.

In the EU organic regulations there are no specific requirements on hygiene issues except a prohibition to use human effluents. This is one of the major differences between the two standards systems. The author has never come across an organic standard which is covering hygiene issues. This is expected to be covered by legislation and company standards. The often close contact between the producer and consumer in classical organic production has supported the buyers/consumers' trust in organic production. The close contact has probably also an impact on organic producers to keep quality and hygiene of the production. There can be a different situation when organic products are transported around the world and sold in the supermarkets without any contact between producer and consumer, in the same way as for almost all products exported for long distances.

Language in the two standards

Both standards systems have their problem with the language used. As an example GLOBALGAP is using "documented record". The words "document" and "record" also replace each other in the GLOBALGAP text. The word "record" is defined, but "document/ed" is not. In the EU organic regulations, the wording is "documentary records". One might wonder when a record is not documented.

Another example of problematic wording is the GLOBALGAP request for a "clear policy", which makes the reader wonder what qualifies as "unclear policies" in other cases. In the GLOBALGAP texts there are attempts to make some of the requirements stronger with adding an extra qualification like a "written policy" instead of only a policy.

One of the major problems with the EU Organic Standards is the long-winded language. An example is:

"In the case of a unit involved in the preparation for its own account or for account of a third party, and including in particular units involved in packaging and/or re-packaging of such products or units involved in labelling and/or re-labelling of such products, the full description of the unit referred to in Article 63(1)(a) shall show the facilities used for the reception, the processing, packaging, labelling and storage of agricultural products before and after the operations concerning them, as well as the procedures for the transport of the products."

This is not exactly easy to follow. For the producer, who has to fulfil one or both of the standards systems, all these issues make it difficult to handle the certification.

4 Certification

The certification requirements for GLOBALGAP and organic production have not been compared line by line. There are many issues which have been brought up in the interviews, which have been identified when going through different documents.

Implementation and interpretations

In the interviews of the certification bodies and the inspectors with experience of both organic and GLOBALGAP certification it became obvious that the strictness in implementation of all details in the two standard systems differs. GLOBALGAP with detailed requirements is actually requiring strict implementation. This can lead to difficulties when using GLOBALGAP in developing countries where experts, calibration systems, internet connections or electricity can be sparse. For example, it has taken quite some effort to get a water container with a tap underneath to be interpreted as running water. This shows how problematic it can be to adapt GLOBALGAP requirements to local conditions. Another example is that the requirement of artificial lightning in the chemical storage facility results in that this facility in an African village, which is much nicer than the farmer houses, still needs to be equipped with a torch as electricity is scarce and unstable. In sub-Saharan Africa, 92 per cent of rural households have no access to electricity.

For the EU Organic Standards the certification bodies are often themselves interpreting the legislation. Inside the EU the national competent authorities are also making interpretations, almost none of these are publicly described. Very few questions are brought to the EU Commission for interpretation or guidance as this might lead to an unwanted decision or reveal unwanted facts about certain production methods. For GLOBALGAP it seems like FOODPLUS has taken a firm grip on interpretations, the GLOBALGAP is also written so that there is less space for variation in what can be understood from the text.

GLOBALGAP and organic benchmarking

Benchmarking is the process when a standards owner, in this case GLOBALGAP, recognises another body's standard as being equivalent to its own. For GLOBALGAP, this has been described by the interviewed certifiers as a process coming closer to a request for identity, rather than equivalence. One of the key requirements is that the compared standard has to comply with all Control Points and Compliance Criteria, i.e. a strict interpretation of equivalence.

In the organic sector there are two tools developed for the assessment of equivalence. With the plethora of organic standards and regulations recognition of each others systems is a major problem in trade with organic products. The EU Commission has just developed standards for import of organic products from outside the European Union. There are two lines of acceptance either with certification bodies working in compliance with the EU-regulation or working in equivalence. In reality the equivalence route will be the main way. The EU-regulation also mentions two tools for deeming equivalence between different standards. The EquiTool is a Guide for Assessing Equivalence of organic standards and technical regulations developed by the International Task Force on Harmonization and Equivalence in Organic Agriculture (ITF), a joint initiative of UNCTAD, FAO and IFOAM. It has a quite different approach compared to the GLOBALGAP benchmarking system. The base for deeming equivalence is to formulate reference objectives and using those as a base

for equivalence. EquiTool also sets criteria for variation of requirements and have resolution mechanisms to solve outstanding issues. The other equivalence tool is Codex Alimentarius Guidelines CAC/GL 34: Guidelines for the Agreements Regarding Food Import and Export Inspection and Certification Systems.

Residue analysis

The GLOBALGAP requirements state that all products are analysed once a year for residues and heavy metals. The testing is costly and is not possible to avoid even if the risk for such residues is small and no chemical pesticides have been used. The producer with a more varied farming system who wants to sell a more diversified range of crops typical for organic production thus has high costs for analyses. GLOBALGAP thus favors monocropping and its consequent loss of agro-biodiversity.

Chain of custody/ handling and processing

In all organic standards and legislation the requirements for following each step in product handling and processing are strong. The threat to the organic integrity through intentional or unintentional mixing with conventional products is seen as a risk and has therefore been thoroughly handled. This doesn't say that it is without problems and fraud but compared to almost all other labelling schemes organic production is strong in this area. GLOBALGAP contains a recall procedure and a request for products to be traceable. But there is no chain of custody certification in GLOBALGAP. The primary producers are certified, for groups there are also requirements for their internal handling of products, but the further handling of a GLOBALGAP certified product is not covered by the system. The GLOBALGAP certified products are not labelled with GLOBALGAP on the product. The reason is that it is not an end consumer labelling but a business-to-business scheme, in which it is more difficult to trace products through the chain of custody.

Certification of groups of smallholder farmers

Both GLOBALGAP and the EU regulation for organic production have separate documents for the certification of smallholder farmers in groups.

The EU Commission has a specific guidance document on certification of smallholder groups. This document was adopted by the EU Commission and is not binding for the Member States but they have committed themselves to it, and it has been used and followed for several years. GLOBALGAP also has a document covering the conditions for certification of producer groups. Much of the requirements are the same in the EU-organic and the GLOBALGAP producer group document. The main difference is that the requirements on qualifications are much higher and more elaborate in GLOBALGAP. This is both for the internal farm inspections and the internal auditor taking decisions on the outcome of the internal inspections and evaluation of the internal quality management systems.

The case of qualifications for internal inspectors has been brought up in the interviews. The internal inspector needs to have a post high school exam and also additional training in the GLOBALGAP system. In reality the work of the internal inspector is often not seen as qualified enough for someone with that kind of education and it has therefore been difficult to recruit internal personnel who fulfil the requirements. Some examples have been on persons that have passed the exams but did not get any other job and therefore have taken the job as internal inspector but performed badly.

The ISEAL Alliance has taken the initiative to make one document on the certification of smallholder groups in cooperation with organisations from the organic sector, the fair trade sector, UTZ certification, Rainforest Alliance and 4C with the objective to use the same criteria for certification of producer groups for all systems and by that reduce the pressure on smallholder groups related to certification. Neither GLOBALGAP nor the EU Commission has been involved in the development of the common criteria but can of course sign on later.

To set up the quality management system is difficult for the groups, no matter if a group is certified under the organic or GLOBALGAP standard. Consultants are often involved in the development of the systems, but they are either funded by donors or by export companies. After some years the management of the group gets more used to the system and possesses the know how to handle the quality system.

Internal inspections

There is the same request for one internal inspection per year for both the EU-organic and the GLOBALGAP requirements for smallholder group members. The difference is that for GLOBALGAP all the three checklists have to be gone through and all the major musts need to have a comment by the inspector. Most organic internal inspection formats are much shorter with 2-4 pages to fill in. In a study (Mithöfer et al. 2007: 5) on Kenya, the time spent on monitoring in GLOBALGAP projects was 3.5 hours per week per acre for farmer groups, compared to only 0.1 hours per week per acre for large contracted farmers. The time spent doesn't only cover internal inspections but it can be assumed that these take a considerable time.

GLOBALGAP actions to support smallholders

GLOBALGAP shows on its homepage that there are several activities to facilitate a smoother certification of smallholder groups, see annex 2. A smallholder ambassador has been appointed, which is representing smallholders in the organisation. A Smallholder Task Force has recently been created that aims at reflecting different stakeholder views and experience related to GLOBALGAP implementation in smallholder agriculture worldwide and to consider options for the next revision of the standard (for more information see Annex 2).

GLOBALGAP held a workshop on group certification and the related challenges for smallholders in April 2008. The workshop report stated that "The biggest challenge is to maintain food safety while being pragmatic at the same time." The report lists issues of concern and makes proposals for changes both as regards the general GLOBALGAP regulations and the control points/compliance criteria. There is a request for a more risk based system. Furthermore, the problems with costly annual residue testing and unannounced inspections, which tend to be very costly, were also brought up. There is also a request to change the requirements for the smallholder groups' internal personnel to be more based on practical experience and proven competence. Furthermore, the workshop proposed implementation guidelines to make the GLOBALGAP requirements understandable by smallholder producers. The proposals in the report seem to be relevant and if implemented would facilitate a better access for smallholder groups to certification. From a round table session, held on 15-17 October 2008 in Cologne, Germany it can be understood that there is an ongoing project to rewrite the GLOBALGAP criteria with easier and simpler language. It was also stated that there should be innovative and well adapted ways for smallholders to

comply with the standard, without compromising the level of compliance with the standard. When looking at the GLOBALGAP requirements one year after the workshop and half a year after the round table discussion there have not yet been any changes in line with the proposals from the workshop nor any new documents published which are more adapted to smallholders.

Size of smallholder groups

It has been difficult to find out the structure and size of GLOBALGAP and organically certified groups. According to the interviews with five of the international certifiers active both in organic and GLOBALGAP certification, both the number of certified groups and their members are small. The certifiers mentioned a maximum of 50 groups with 5-150 members each. There also were statements by the interviewed certifiers and the inspectors that with all the formal requirements for documentation by GLOBALGAP it is very difficult to handle a bigger number of group members. In organic farming, much bigger groups are common, up to several thousand members in the same group.

Costs for inspection and certification

GLOBALGAP has a producer registration fee which is 3 Euro for farms with less than 0,5 ha of certified crops, 10 Euros for 2-15 ha of certified crops while operations with larger certified areas pay 30 Euro. As understood from the interviews each smallholder farmer is counted as an individual. This makes the costs higher for a group of smallholders compared with a bigger individual farm. This is probably also one of the reasons why the number of members in the double certified groups is lower compared with many only organic groups, it is expensive to have a lot of farmers in the group. This kind of fee system can also push structural change that farms are getting bigger and bigger.

For both organic and GLOBALGAP certification there are also inspection and certification fees which often are seen as high especially in the initial stage. As the inspection formats for GLOBALGAP are more extensive than most normal organic inspection formats it is likely that that the GLOBALGAP inspection takes longer time and therefore is more costly as many certification bodies charge work per hour or day.

Certification bodies

There is a number of certification bodies which do both organic and GLOBALGAP certification, around ten of them are based in Europe but work internationally. There are also around five certification bodies based in Latin America, three in Africa and three in South East Asia. There seems also to be cases where one certification body is doing organic certification and another is doing GLOBALGAP certification of the same group. The elaborate GLOBALGAP requirements prolong the inspection time and thereby make it also more expensive both in assessing the group management and reinspecting group members compared to inspection of organic groups to the EU Organic Standards.

Accreditation of certification bodies

For a certification body to be able to do certification to GLOBALGAP it is requested to be accredited under ISO 65 by an accreditation body which is a member of the International

Accreditation Forum (IAF), an international association for national accreditation bodies. This seems to be too restrictive. IAF members are only present in 50 countries including in only three out of Africa's more than 50 countries. IAF has not accepted accreditors which are sector specific with several countries of operation as members. The International Organic Accreditation Service (IOAS) has therefore not been accepted as a member. The IOAS offers accreditation to IFOAM Norms, ISO 65, Canadian Organic regime and EU-organic equivalence programme and is by far the most important accreditation body for organic production. Many of the certification bodies accredited by the IOAS are outside the European Union and several are in developing countries. If more certification bodies could achieve accreditation for ISO 65 for both scopes it would be cheaper for the certification bodies and maybe also for the operators. In addition, ISO 65 was developed for certification of products, not processes such as organic production or GLOBALGAP requirements. The UNCTAD-FAO-IFOAM ITF developed a set of international requirements for organic certification bodies (IROCB) as a minimum performance standard for organic certification bodies to be used as a basis for accepting certification and accreditation decisions for exchange across organic guarantee systems.

5 Market

A general statement by all interviewed traders (representatives from supermarkets and wholesalers) is the concern about the quality of fresh products and the intention to sell safe products (often in line with due diligence requirements), in particular under conditions of globalization where produce may come from far away locations produced under unknown conditions. But there are also statements that the main problem concerns chemical pesticide residues and that this concern is not an issue for organic produce.

There is a general recognition by almost all persons interviewed that GLOBALGAP requirements seem to be problematic for smallholders to fulfil.

Of the interviewed supermarkets most have policies to require GLOBALGAP for fresh products, especially in the Netherlands, UK and some of the Nordic supermarket chains, but not in Germany. Some of the supermarkets that have a policy requiring GLOBALGAP have replaced the requirements for GLOBALGAP with organic certification, whereas others require both certifications. It has not been possible to find out to what extent the supermarkets that require GLOBALGAP certification are making exceptions when they don't find enough GLOBALGAP certified produce, (in particular when they have good and regular contacts with producers or for other reasons let products in without GLOBALGAP certification). The British supermarket Sainsbury makes a statement on its homepage highlighting that if it can't find sufficient GLOBALGAP certified products it will perform an additional check of production.

From Sainsbury homepage

It is a Sainsbury's requirement that all of our fresh produce is sourced from suppliers who are certified to GLOBALGAP standards.

GLOBALGAP is a private sector body that sets voluntary standards for the certification of agricultural products world wide by use of Good Agricultural Practice (GAP). The main aim of the GLOBALGAP standard is to reassure consumers about the quality of food production at farm level by minimising detrimental environmental impacts, reducing the use of chemicals and ensuring a responsible approach to worker and animal welfare.

There are some instances where our producers are unable to obtain certification to the GLOBALGAP standard. For example, when we source produce from additional suppliers due to adverse weather conditions at our regular sources. In this case, an audit will be carried out by a third party body, or by a representative of Sainsbury to ensure our standards are not compromised.

One of the interviewed wholesalers which is not requesting GLOBALGAP stated that they wanted to increase the efforts for guaranteeing food safety of organic fruits and vegetables but didn't see GLOBALGAP as a practical tool to use as many requirements are already covered in the organic certification and GLOBALGAP was seen as a rather bulky and cumbersome system. The wholesaler is looking around for other solutions. The general picture from the interviews is that most supermarkets require GLOBALGAP while wholesalers, smaller retailers and specialised shops are normally not. One of the specialised wholesalers states that they have a close contact with the smallholder groups and therefore get the information they need without additional certification.

When asking the wholesalers, one of them stated that they buy from around 60 smallholder groups which are organic and GLOBALGAP certified. Another said that there is quite a range of double certified products from smallholder groups. This picture does not correspond to that given by some of the major organic certifiers that reported a rather low number of double-certified groups. The issue has not been further investigated as it is not the focus of this study. Possible explanations can be that different certification bodies are used for certification of organic production and of GLOBALGAP. Other explanations can be that the figures from the wholesalers are wrong or that there is an infiltration of non-certified products sold as GLOBALGAP certified.

6 Practical tools and solutions

Benchmarking

The main idea behind this study is to investigate the possibility of benchmarking the EU-regulation for organic production with GLOBALGAP standards for fruits and vegetables. The result of the interviews with persons related to certification having practical experience on how GLOBALGAP/FoodPLUS is handling benchmarking gives a rather negative overall result with statements such as “no”, “no this is not possible”, “don’t even try, they are so formalistic”. GLOBALGAP has its own procedure for benchmarking. One of the key requirements is that the compared standard has to comply with all Control Points and Compliance Criteria. With this way of approaching comparison of standards the GLOBALGAP benchmarking is very much looking for identity, rather than equivalence and the outcome essentially boils down to a “copy all” of the GLOBALGAP requirements. The EquiTool, a Guide for Assessing Equivalence of organic standards and technical regulations or the Codex Alimentarius Guideline for Development of Equivalence are two tools which could be used for a possible benchmarking of EU-organic and GLOBALGAP but it is likely that the standards owners are not interested in such a process.

Add on module of hygiene, contamination and working conditions

As it is likely that benchmarking is not a possible solution other ways of progress have to be found. One possibility would be to add to the organic certification a module with the main outstanding issues from the comparison between the standards systems. In the studied GLOBALGAP criteria the majority of control points handle the use of fertilisers and pesticides including risks of contamination of products. In the detailed comparison there are several outstanding issues where the organic regulations don’t cover all details in the pesticide areas but the general risk level for residues in organic production is much lower. Organic producers have a quite strict control on which inputs they can use, they are inspected and certified every year and they have to keep records on used inputs. For the organic farmers it is of little importance if the sprayer is calibrated by a specialised company, that the inventory of agro-chemical inputs is up to date or that empty containers are rinsed three times.

The idea would be to take out all GLOBALGAP control points and compliance criteria covering fertilisers and pesticides through the whole chain of production. Likewise all points where the EU Organic Standards are deemed equivalent to GLOBALGAP. What is then left is around seventy control points covering hygiene, contamination and working conditions. It can be seen as a lot but there is quite some repetition, there are hygiene requirements at harvest and similar requirements for handling of products which could be merged into more general requirements. Having such a simplified document gives a range of possibilities and different paths. One step is to see if GLOBALGAP can accept such a document as an add-on module for already certified organic producers. Technically this is a benchmarking of all other requirements.

Another possibility is to further trim down the add-on requirements described above to more of the style of handling issues in organic regulations. This would probably end up in less than twenty requirements. The outcome could be presented to the supermarkets to replace the GLOBALGAP certification for fruits and vegetables with organic certification plus

certification to the add-on module. The supermarkets want products without problems and they don't want to get accused of forcing smallholders out of the market, so it might be a possibility. The idea has only been tested on two representatives from supermarkets but they have stated their interest in the idea. The add-on module would also save money by being much smoother and quicker compared to a regular GLOBALGAP certification.

Another issue with a separate module is if the same requirements and the same acceptance can be foreseen for both individual farmers and groups of organic farmers. It would strengthen the organic farming system if all kinds of producers could use the same system and that it is not only for smallholder groups.

The ownership and maintenance of an add-on module will have to be taken into consideration. There is no natural owner of such standard, GLOBALGAP or the EU Commission would probably not be interested, IFOAM is working with standards for standards, and private certifiers normally own their own standards when they don't use common standards and legislations. The issue of ownership would be possible to solve in one way or another, one possibility is the organic certifiers' forum, another possibility is a consortium of interested certification bodies.

Other proposals for improvement

There is also a range of improvements which would be of importance but of less extent to solve the overarching problems, where either GLOBALGAP/FOODPLUS, the certification bodies or the smallholder groups can do changes which would facilitate certification and market access for smallholder groups.

UTZ solutions, simplification and ICS guidance

UTZ Certified requirements are based on GLOBALGAP but have modified the requirements to better function in the certification work and especially with smallholder groups. The level of requests for documentation is more modest, the language is simplified and there is a division on what requirements can be fulfilled at the group-management level only and what has to be handled by the group members themselves. An example on the differences and similarities between GLOBALGAP and UTZ Certified standards for coffee can be found in the text box below. There is still quite some level of GLOBALGAP detail and style, but in general the UTZ requirements are much more adapted to the problems, risks and possibilities occurring for a smallholder group in a developing country. The specific internal control system (ICS) interpretations also help the groups to easier handle the requirements. In the GLOBALGAP system it is possible to let the group take over documentation, but it is not clear what documentation is accepted to be handled at the group level.

Example of comparison between GLOBALGAP and UTZ Certified

	GLOBALGAP Control point	GLOBALGAP Compliance criteria		UTZ Code of Conduct for Coffee	UTZ Guidance	UTZ ICS Guidance
CB .5 .2 .1	Are recommendations for application of fertilisers (organic or inorganic) given by competent, qualified advisers holding a recognised national certificate or similar? Do producers who use outside professional help (advisers and consultants) regarding the use of fertilisers satisfy themselves that the people on whom they rely are competent to provide that advice?	Where the fertiliser records show that the technically responsible person making the choice of the fertiliser (organic or inorganic) is an external adviser, training and technical competence must be demonstrated via official qualifications, specific training courses, etc., unless employed for that purpose by a competent organisation (i.e. fertiliser company).	5. A. 1	The responsible person (producer, certificate holder or external advisor), who chooses the fertilizers, is able to demonstrate competence to estimate the quantity, time of application and type of fertilizer (organic and inorganic) to use.	This can be done by official qualifications, attendance certificates and/or training courses, etc. For situations where only organic, traditional and home made products are used, the competence can be demonstrated in practice.	The responsible person can be an assigned person for the group.
CB .5 .2 .2	Where such advisers are not used, are producers able to demonstrate their competence and knowledge?	Where the fertiliser records show that the technically responsible person determining quantity and type of fertiliser (organic or inorganic) is the producer, experience must be complemented by technical knowledge (e.g. product technical literature, specific training course attendance, etc.) or the use of tools (software, on farm detection methods, etc.).	5. A. 2	The responsible person (producer, certificate holder or external advisor) has a documented fertilizer program in place. This is to ensure that fertilizers are applied judiciously, preventing the amount applied from exceeding the needs of the crop and the storage capacity of the soil. The responsible person demonstrates that consideration has been given to nutritional needs of the crop and soil fertility.	The program contains: - analysis of interpretation of fertilizer type and the quantity - application periods and methods - age of the crop and the yield level Adequate techniques to recommend fertilizer can be: - by using the production forecast - by using a soil analysis	The documented fertilizer program can be done at the ICS level.

Group certification criteria

GLOBALGAP has developed its own group certification criteria. As described earlier the main components are the same as in group certification criteria for organic smallholders developed by the EU Commission or the ISEAL Common requirements for the certification of producer groups. One possibility for GLOBALGAP and the EU would be to adopt the ISEAL criteria. For a group which is certified by more than one system it is problematic to have to fulfil two different sets of requirements for the structure and handling of the group itself. In the ISEAL criteria the requirements for qualifications for the internal inspectors are more feasible for smallholder groups. But it has also to be remembered that the EU Commission has not yet referred to or adopted the ISEAL document. The EU guidance on group certification and the ISEAL Common requirements are quite similar in content and with few differences.

Merged inspection protocols

One innovative consultant has unlocked the excel files with the GLOBALGAP inspection formats (they are made in a keyword protected format). This makes it possible to develop adapted protocols for the internal inspections. It can be sorted out what has to be checked at the member/farmer level and what can be inspected at the group-management level. This gives fewer questions to be asked and fewer papers to be filled out. As the internal

inspections take quite a long time this saves time and money. It is also possible to merge the GLOBALGAP formats with other certification formats, e.g. for organic and do the internal inspection in the same format. Specific reports can be printed for different systems but the data is kept in the same system. If this is accepted by the standards systems and certification bodies have not been investigated, but it leads to a situation, in which the group management has a better ownership and control of the internal system.

Merged inspections

The simplest form of making double certification easier and cheaper is to make two inspections at the same time, in this case both organic and GLOBALGAP. As the GLOBALGAP inspection forms are provided only in format locked for editing it is not possible to openly do a similar merging of inspection forms, as described above for the internal inspection forms. There are a number of international certification bodies doing both kinds of inspections.

Merged quality management systems

Another area which can be simplified is to have one internal control system or quality management system. It is actually causing extra work to have two different systems with two manuals and sets of documents and the risk for mistakes is increasing when there is a double layer system.

Risk based system

The difference of risk for pesticide contamination or risk for hygiene problems varies a lot depending on which crop is grown or if the production is organic or not. There is the possibility to add a risk assessment to GLOBALGAP so that the audit system is more thorough, for example, for heavy sprayed cherries or green beans compared with organic carrots.

Merging smallholder farms into one farm unit

One way of more easily fulfilling the requirements is to merge all smallholder farms to one farm unit. The farmers then have the role as workers. This solution gives less documentation and there is no need for internal inspections. It is used both by organic and GLOBALGAP certified producers. But the farmers lose the influence and status as individual farmers and this approach can therefore not be recommended.

7 Discussion and Conclusions

The two standard systems are different in many respects, including scope, style, method of working and in parts of the actual content of the paragraphs. The organic regulations are more general, whereas GLOBALGAP goes into much more detail in the main areas of concern, in particular pesticide residues and contamination of the products. The GLOBALGAP standard is created with the primary purpose of ensuring food safety, whereas the organic is to guarantee consumers that the products they buy are fulfilling the requirements of organic production methods (i.e. no or little use of agro-chemicals and application of integrated production methods). One aspect the two are sharing is that it is quite difficult to get an overview of what they are covering. The organic regulations because of bad structure of the text with the same topic handled in several places and a legalistic style of writing, GLOBALGAP because it goes so much into detail on some issues and also with the structure of having both control points and compliance criteria handling the same issue. The intention is to elaborate the control points more in the compliance criteria, but sometimes there are overlaps and deviations. The result for both systems is that they are unnecessarily difficult to handle for the producer.

For areas like fertilisers and plant protection products both standards system are covering the area but the EU organic regulation is more general while GLOBALGAP goes much more into detail.

Areas that are not at all included in the EU organic standards are hygiene, workers health, safety and social and labour issues. The way the comparison is done takes GLOBALGAP as the reference, implying that areas which are only covered in the EU Organic Standards are not identified.

Organic standards and certification schemes have sometimes been accused of mistrusting the farmers and their ability to handle organic production. In comparison with GLOBALGAP, the organic regulation expects the producer to meet the standards and if not competent they would have to solve that problem. The GLOBALGAP attitude is one of a certain distrust insisting on documented evidence of the farmers' ability and knowledge about applying specific production methods. What is done on the farm has to be verifiable by the certification body through massive recording, using experts, having trainings and proof of competence. One of the differences between the two systems, which causes different approaches, is that the GLOBALGAP system is designed for farms using chemical pesticides and fertilisers, often at a quite high frequency whereas organic systems rarely use more potent substances resulting in a very different risk scenario between the two systems. The GLOBALGAP system is also directly created for production sold to the supermarkets where the products often come from distant producers on whom little is known about. In the organic production system, from the start there has often been close contact between the farmer and the consumer. Today there is a whole range of scenarios from direct sales on the farm to sales in supermarkets. The latter is increasing and this is why there is less contact between producer and consumer today.

Regarding certification the two standards systems have more in common. Their system for certification is similar, there are specific group certification criteria but also differences in that GLOBALGAP has stricter qualification requirements for internal inspectors, much more

elaborate internal inspections and a more narrow interpretation of benchmarking. Conversely, the chain of custody certification is much more developed in organic certification.

It takes two to tango and in the case of a possible benchmarking of EU-organic to GLOBALGAP it is likely that the partners are unwilling to dance together. The two partners also have quite different favourite dances and styles, it could be waltz compared with square dance. Therefore this report has also looked into the possibility to concentrate on those issues in GLOBALGAP that the EU Organic Standards do not cover and suggests the creation of an add-on module as a possible approach to meet the supermarkets' request for proof of food safety of organic products. Certification of organic production could be improved with a section on hygiene, contamination and social/labour issues. Also in organic the risk levels will vary between leafy vegetables and baby corn to potatoes and carrots as examples and this can also be included in the proposed system.

There is also a range of other actions proposed for an easier access of organic smallholder groups to GLOBALGAP certification.

There appears to be a general recognition that GLOBALGAP is problematic for smallholder farmers (because the very sophisticated verification and certification requirements result in transaction costs that are only bearable at a certain farm size or production level). There are also some efforts made by GLOBALGAP/FoodPLUS to identify the problems for smallholder groups and bridge them. In the report from a workshop it is stated "The biggest challenge is to maintain food safety while being pragmatic at the same time." But it remains to be seen whether the organisation is capable of making the changes which could smoothen the way for smallholder producers, which were flagged by several events in the past. From the GLOBALGAP standards and statements it is clear that all producers have to fulfil the same requirements in detail, with documents, policies, records, experts, certificates etc. In practice, it is hardly the implementation of the specific requirements by smallholder groups that poses a significant problem, rather than the administrative documentation and testing requirements.

GLOBALGAP is a well organised system based on a very systematic approach. But in low risk situations when few inputs are used the GLOBALGAP system is over dimensioned and inflexible. Certification is a service and the costs for certification will always have to be paid resulting in higher price for the consumer and/or less income for the producer.

The strength GLOBALGAP sees in its own system is that there are no exceptions or modifications, the strictness is the same for all operators wherever they are or what they do. This approach is probably difficult for the organisation to change even where there is an understanding of the problematic implications of that approach.

The actors which could get GLOBALGAP to move into a more flexible position regarding accepting organic certification as meeting all or part of the GLOBALGAP requirements are the supermarkets which are the driving force and master of the GLOBALGAP system. The supermarkets want to get proof that products don't cause harm to consumers and might undermine the supermarkets' business and reputation. At the same time, they don't want to be accused of forcing smallholder farmers out of the market by requesting unnecessarily stringent certification. The interviewed traders want good tools in this area and GLOBALGAP's approach might therefore be adjusted.

To consider changes in the EU-regulations on organic agriculture that today are only covered by Global GAP is a remote option. Regulatory changes take a long time and the openness to the market needs and preferences is not well developed.

8 Annexes

1. Sources for the study
2. Information from the GLOBALGAP homepage on smallholders and group certification

Annex 1

Sources for the study

In this study a number of interviews have been conducted, almost all of them over the phone or Skype, but also a few in face-to-face meetings.

Supermarkets and wholesalers

In total five representatives of supermarkets, three wholesalers and two consultants with long experience in the area have been interviewed. All interviewed representatives of supermarkets and wholesalers had the position of quality managers. The countries covered were the UK, Germany, the Netherlands and the Scandinavian countries.

Certification bodies

Representatives of six international certification bodies active with both organic and GLOBALGAP certification were interviewed. Two representatives from other standards systems working with smallholder certification were also approached with questions. Two inspectors doing both organic and GLOBALGAP inspections were interviewed as well as two developing country certification bodies which provide training for GLOBALGAP certification.

Other sources

A range of other persons was consulted on information related to one or another aspect. The internet, especially the GLOBALGAP homepage provides a lot of useful information about the system. Contacts were also made with persons at the GLOBALGAP office.

All interviewed experts have been assured confidentiality of their identity and the specific information provided.

References

A useful description of GLOBALGAP and smallholder farmers is:

Humphrey, J. (2008) *Private Standards, Small Farmers and Donor Policy: EUREPGAP in Kenya*

<http://www.ntd.co.uk/idsbookshop/details.asp?id=1052>

Mithöfer, D.; Asfaw, S.; Ehlert, C.; Mausch, K. and Waibel, H. (2007) 'Economic Impact of EUREPGAP Standard on Small to Large Scale Producers and Farm Worker Welfare in Kenya', paper presented at Regional Workshop 'Good Agricultural Practices in Eastern and Southern Africa: Practices and Policies', Nairobi, 6-9 March

Standard Bearers - Horticultural Exports and Private Standards in Africa, edited by A. Borot de Battisti, J. MacGregor and A. Graffham, International Institute for Environment and Development (IIED), London, 2009, accessible at: www.agrifoodstandards.net

Annex 2

Information from the GLOBALGAP homepage on smallholders and group certification

Smallholders

GLOBALGAP has implemented the following three approaches to facilitate market access for small-scale farmers:

Group certification:

Smallholders can form a group and obtain a certification together. For many smallholders, group certification seems to be the only possible way of getting access to attractive market opportunities - nationally and worldwide. By doing this they can significantly reduce external certification costs such as inspection charges and overhead costs. In addition many requirements necessary for GLOBALGAP certifications can be centralised (e.g. pesticide controls), which allows farmer groups to benefit from the scale which the group brings. Group structures also make it easier to provide farmers with advice regarding the implementation of the standard. Peer pressure on the group members increases their motivation to comply and the operation of the Quality Management System is an integral part of the group as non-conformance with the QMS will negatively affect the certification result for the whole group.

Smallholder manual:

In cooperation with the Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ) and Gesellschaft für Ressourcenschutz (GfRS) GLOBALGAP has developed a smallholder manual. This will help farmers to establish their internal control system. It includes operational procedures and recording forms to be used as templates for farmer groups. Therefore it can be taken as a starting point for producer associations. Latest versions are continuously being tested in farmer groups worldwide and are publicly available. The first certificates have already been issued based on the smallholder manual. It acts as a role model for other public-private partnerships.

Feedback opportunities:

GLOBALGAP wants to incorporate the needs of smallholders into the application and further development of the standard. Therefore smallholders have more opportunities to give systematic feedback. In May 2007 GLOBALGAP started the Smallholder Ambassador/Africa observer project funded by GTZ and DFID. The objective of this project was to provide feedback from smallholders to the Sector Committees. In a second phase of the project Dr. Stephen Mbithi (Chief Executive Officer, Fresh Produce Exporters Association of Kenya) was nominated to continue the project developing practical input to standard setting/modification reflecting the situation of smallholders. Further information can be obtained from the independent website www.africa-observer.info

Since February 2008 a **Smallholder Task-Force** has been operational. It is calling for constructive proposals for the improvement of certification for smallholders. Its objective is

to incorporate all different stakeholder views and experience related to GLOBALGAP implementation in smallholder agriculture worldwide and to consider options for the next revision of the standard.

Topics for consideration are i.e.:

GLOBALGAP Control Points and Compliance Criteria,

GLOBALGAP General Regulations - especially certification options 1, 2 and possibly further options relevant to producer groups

The Quality Management System requirements of option 2 certification.