



EC Inspection and Certification System in Third Country

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ECOCERT IN AFRICA



■ Key Figures

- ECOCERT's intervention in Africa since end of 90's.
- Around 50 permanent staffs involved in ECOCERT operations.
- 5 regional offices : Burkina Faso, Madagascar, South Africa, Tunisia and Morocco.
- Inspections conducted in more than 30 countries.

The regulation on organic production



- **Each organic operator shall :**

- Inquire about general regulation : the standard for farming, processing, labelling, etc...
- Notify his own activity
- Commit the operation to a Control Body (CB), competent for certification of organic production, according to the EC regulation 834/2007.

Certification steps



■ 1 Application :

- The operator describes his activity (production and / or processing and / or exportation operation).
- Control body does the application review :

Applications have to be turned down in one of the following cases:

- Non-compliance with the applicable organic production standards,
- Identified risk for the health of the consumer,
- Production practice questioning human respect,
- Geographical location that presents technical impossibility, or a risk for the inspectors,
- Previous fraud or crime connected with organic business by the operator or its representatives
- Major financial insecurity of the applicant.

Certification steps



- **2 Commitment to the organic production process :**
 - Based on a risk assessment methodology, the Control Body sets up a specific quote to the operator for the inspection visit(s) (annual and random), certification(s) and possible analyses expected for the current year.
 - number of years in organic program
 - training about organic practices
 - others activities
 - 100% organic or dual activity /products in conventional part
 - pesticides used in conventional part
 - equipment dedicated to organic part. Equipment shared with others farmers or from outside ?
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 - First time applicants sign a service contract including their commitment to organic production.

Certification steps



■ 3 Evaluation / Inspection :

- Upon receipt of the contract and payment of the total or a part of the estimation costs, the Control Body assigns an inspector who fixes an appointment for the initial visit.
- Inspections consist in an evaluation of the contracted operator's compliance with the organic standards requirements.
- Grower groups:

In the case of grower groups a percentage lower than 100% of the production units may be externally inspected. The implementation of an internal control system (ICS) is compulsory and will be evaluated by the CB during inspection.

Certification steps



▪ **3 Evaluation / Inspection :**

➤ Unannounced visits:

Based on a risk assessment, complementary unannounced visits may possibly be conducted in addition to the first evaluation.

➤ An inspection report is written and handed to the operator indicating all findings of the inspector and listing all non-compliances as found by the inspector and if performed, analyses results.

➤ The inspection report is cosigned

Certification steps



■ 4 Certification :

- After inspection, the report is reviewed by the Control Body staff in charge of certification.
- The certification decision will be taken on the findings of the inspection report and also based on all information available from third parties such as other Control Bodies or authorities or other operators.
- The conclusion based on this review is sent to the operator along with the inspection report. Conformities, non-compliances, improvement actions or sanctions are clearly stated in the report review. There might be cases for which the certification is granted only after a complementary inspection visit.

Certification steps



■ 4 Certification :

- When the report review is accepted (duly signed by the operator), improvement actions requirements are met, the Control Body will eventually take a certification decision, either positive (leading to the issuance of an attestation or certificate of conformity listing the products and their classification as organic, non-organic according to the EC regulation or any other standards) or negative ending with a certification denial.
- The CBs have a sanction catalogue composed of several levels of sanctions, from simple remarks to the suspension of Certificates (It depends on the gravity of the non-compliance). This enables to treat all non-conformity situations.

Certification steps



■ 4 Certification :

- In order to guarantee the independence and impartiality of the certification system, the Control Body may set up a Committee. This committee may be in charge of :
 - Supervision of the company's certification policy,
 - Supervision of the certification process,
 - Expressing its view on changes in the certification procedure,
 - Management of so-called second appeals according to the determined procedures,
 - Advising the certification staff with regard to special issues and the granting of derogations to operators,
 - Advising on the opportunity to develop technical standards for new categories of products, services or quality systems.
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Certification steps



■ 5 Follow up :

- The years following the initial certification, the follow-up procedures include both annual announced as well as unannounced inspections based on a risk assessment determined according to the previous year's inspection results, the compliance with certification conditions, any changes of the certification requirements and/or the range of products applied for certification.
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- The operator must notify the Control Body at once of any modification in the production system or the range of products to be certified. Documents related to the organic operation must be filed for at least five years, they are subject to inspection. Follow up visit will among others focus on the corrective actions taken after the previous year's certification

Certification steps



■ **6 Appeal :**

➤ An operator can file an appeal related to the certification with regard to his/her operation and products to the Control Body (certificates - license – improvement actions and sanctions) or any decision he/she is involved in. This will be processed by the certification Manager.

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➤ In case of non-satisfaction follow-up of an appeal, the operator can file a second appeal to the Supervisory Committee which will make a final decision.

African specific perspective



- **Lack of knowledge on the EU regulation and thus of its requirements :**
 - Use of prohibited products / Inputs
 - Lack of training
 - Lack of documented ICS
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 - Lot of non-compliances

- **Concerning Grower Groups “Internal Control System” is misunderstood**

- **Lack of documents, records : contracts, invoices, delivery notes, certificates of suppliers, staff training records,...**

African specific perspective



- **Cotton GMOs : unavoidable contaminations ? Very difficult to know**
- **For one operator inspection areas are far away from each other**
- **Difficulties to well localised fields : imprecise field description**
- **Corrective actions asked to the operators are misunderstood**
- **Conversion period**



Questions ?

Thank you for your attention