Certification & Internal Control Systems

About the Farmer Toolkit

The OE Farmer Toolkit is a compilation of best practices - scientific research and farmers’ experiences - collected to provide crucial information on core organic cotton agricultural practices.

The information was compiled by the OE Farm Development team, and a list of sources and other publications on organic farming are available from Organic Exchange at www.organicexchange.org.

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Overview

Strict laws and regulations governing organic production and food products are enforced in local markets as well as other key markets like the EU, US or Japan. By definition, organic agricultural products are grown without the use of toxic and persistent pesticides or fertilizers, sewage sludge, irradiation or genetic engineering, and are certified by an accredited independent organization.

To be eligible to market their products as organic, farmers need to have their land and agricultural system audited, inspected and certified by a recognized 3rd party certifier. The farming operation must meet all of the production, record keeping, handling, storage and labeling requirements of the legal organic standard of the country where the product is grown and/or sold.

Key Steps to Certification

**Step 1. Convert to Organic Cultivation Practices**
Farmers begin the organic conversion process by deciding to adopt organic farming practices, which means eliminating the use of genetically modified seeds and synthetic pesticides and fertilizers on their fields and developing a farm plan.

The farm plan shows the steps that the farmer will take to grow the crops organically, and will cover the following:

• list of expected crops  
• map of areas to be farmed organically  
• list of organic practices to be use such as buffer strips, rotational crops, and composting  
• description of management system to track seeds and inputs  
• plan to manage pests or crop diseases  
• record keeping: maintain an audit trail that can provide information regarding the field where the product was grown, when the crop was harvested, where it was stored and when it was shipped.

Transitioning a field or farm to organic cultivation will typically take three years, depending on the standard. Most countries recognize the EU or USDA NOP standards. Farmers should be aware of their target market so that they know which standards to be certified against. The U.S. and EU require that the land is farmed following all of the organic principles for a full 36 months. Historically, transition or conversion crops attract a lower premium than certified organic crops. After the three-year transition period, and the successful completion of the organic certification process, the crops can be marketed as “organic”.

If crops are grown on virgin land (land not previously farmed) or land where an official body can testify that no synthetic chemicals have been used in recent years, the farmer may be eligible for organic certification within a year of adopting organic farming practices.
Step 2. Decide on the Organic Production Standard(s) to Use in Your Farming Operations

Farmers must decide which organic production standard(s) to follow in their farming operations. If they are growing organic crops that will be used in products sold in the United States, the farming operations must follow the USDA NOP rules for organic crop production. If the crops will be processed into products sold in Europe, the farming operations must follow the EC834/2007 standard or an accepted equivalent. If crops will be sold in Southern or Eastern Africa, the farming operations must also be consistent with the EC834/2007 standard.

Because organic cotton grown is used in products that may access multiple markets, we encourage farming projects to consider adopting practices that meet the requirements of more than one standard.

Step 3. Choose a Certifier

Farmers must select and hire an accredited certifier to review their farming plan, relevant business records, and farming practices. The certifier will also conduct an annual inspection of their fields. Note that a certification fee will be charged.

Step 4. Undertake the Certification Process

When the farm is ready for certification, the certifier will come to inspect the farming operations.

If the farming project includes many farmers, it may be worthwhile to seek group certification, which is more cost effective. Key elements required for group certification are discussed below.

When the certifier comes to inspect the farm, he or she will require a farm map and will want to see farm records of seed purchases, crop inputs, organic practices, etc.

The certifier will ask for yield estimates for organic crops that are in the ground and will compare these with actual yields obtained. The certifier will also inspect the fields and ask questions about the farming practices being used. They will do visual inspections of the crops and may take plant samples to determine if there is any contamination of the crop from the use of genetically modified seeds. They will also verify that appropriate buffer zones exist between organic and conventional fields, which may contain genetically modified seeds and/or use chemicals prohibited in organic farming. Buffer zones help prevent contamination of organic crops.

Certifiers may also take soil and crop samples to check for chemical residue. The farmer should check with the certifier that farm inputs such as organic manures, fertilizers, natural pesticides and seed are allowed before using them. The certifier will also check that the correct soil management processes such as rotations are being followed.

Once an inspection has been carried out and the certifier is satisfied that the standards are being kept, a certificate will be issued allowing the farmer to market his or her products as organic to the given standard(s). There will then be annual inspections to ensure that the farmer stays in compliance with all relevant standards and records are in order.
Group Certification and Internal Control Systems

Group certification is a method allowing groups of farmers to be certified together and to share certification costs as a group. This can help make certification more affordable and efficient for small-scale farmers.

Some of the key steps for group certification include:

**Step 1. Form a Group**
Organic farmers join together to form a group to manage their own compliance with the organic standards.

**Step 2. Develop Internal Controls**
The group develops an internal control system and appoints an internal inspector, from the group or co-op, to inspect the farms. The outside certifier will also inspect this internal control system. Many groups appoint two people from the farmers’ group to support documentation and procedures: the people will typically work with the internal inspector or field agent appointed by the project.

**Step 3. Annual Inspections**
The internal inspector annually inspects all the documentation for the group and may also perform random inspections. They will do the same with several individual farms in the group (usually 15-20% of the total). They then write a report based on the inspection. When the outside certifier comes to inspect the fields, they look at the internal control system to make sure it’s functioning correctly, inspect the documents and records, then inspect their own random sample of the farms (again, usually about 15-20%), to see if the organic farm practices are being carried out correctly. An organic certificate is issued to the group, which demonstrates that the standard has been adhered to, and that certification will apply to all of the farms. Certification needs to be renewed annually.

**Step 4. Develop Disciplinary Procedures**
The internal control system needs to have disciplinary procedures in place for members who do not adhere to the organic standards. These procedures can have members temporarily or permanently removed from the group. An internal inspector should work with individuals to make sure that the group’s organic certification is not jeopardized. A training program is necessary for both the internal inspector and the individual members of the group for this system to function efficiently. Training should include proper organic procedures and practices and accurate documentation and record keeping.

Using this system allows small-scale farmers to become certified who would otherwise be unable to afford organic certification.

There are many organic farming projects that have developed excellent internal control systems and received group certification: Agrocel, bioRe India, Vesudha project, Chetna Organic, OBEPAB, KATC, bioRe Tanzania.

Organizations such as bioRe Tanzania, KATC in Zambia, Mavideniz in Turkey and OEBPAB in Benin have adopted practices such as the hiring of staff to manage the internal control system and develop manuals and farmer training programs to help increase farmer knowledge of and compliance with organic production standards.
Resources
Europe and the USA both have different Organic regulations and different certification procedures have to be followed to allow export to both. The National Organic Program (NOP) provides the standards for organic production and certification in the United States, and the EU Regulation 834/2007 provides the regulatory basis for becoming certified organic in Europe. Other country specific organic production standards also exist. IFOAM, (the International Federation of Organic Agriculture Movements) sets basic standards for certification for the industry and seeks harmonization between government standards.

IFOAM
Provides a common system of organic certification standards, and a list of IFOAM accredited certifiers for products to be sold in the European market.
www.ifoam.org

National Organic Program (NOP)
Provides the requirements and guidelines for becoming certified organic in the United States, and a list of accredited certifiers for products to be sold in the United States market.
http://www.ams.usda.gov/nop/indexIE.htm

European Certifiers

India Certifiers
http://www.apeda.com/organic/agencies.html

Additional Resources:
Visit Organic Exchange (www.organicexchange.org) for more information including PowerPoints and Posters for farmer development and education.