

# Can certification encourage organic operators to become better organic operators?

Padel, S<sup>1</sup>

*Key words:* Standards, continuous improvement, certification, assessment, outcome

## Abstract

*The paper explores whether an organic control system could include elements of an improvement standard as compared to the current minimum requirement standards. It is based on a review of rules of organic certification and of literature. The discussion explores whether an approach of agreeing individual improvement targets between operator and certification body could allow the consideration of some areas of the organic principles that are currently not audited in the form of minimal certification requirements. Such a system would allow the determination of whereof whether an operator is on the way to making improvements and strengthen operators' responsibility.*

## Introduction

Since the 1970's the organic sector has been characterised by a system of private standards. The control system evolved from a review through fellow organic farmers and other organic pioneers to a formalised certification system which is now part of the standards and governmental and international regulations. Organic agriculture was one of the first food sectors to engage with a system of third party inspection/certification. The European Regulations for organic food specify certification requirements for competent authorities and control bodies as well as setting principles and rules for operators. However, organic farming plays a dual role in society: responding to specific demand for organic products as well as providing public goods such as contributing to the protection of the environment, animal welfare and rural development. In discussions a distinction is often made between '*certified organic*' which is assumed to be driven largely by the needs of the market and '*genuine*' or '*true organic*' driven by a conviction in organic principles. One of the reasons for this distinction is that current organic standards and certification systems do not cover all values and aspirations that the sector associates with organic principles (see Padel *et al.* 2009 for more details).

Based on a review of the rules that guide organic and product certification and of literature carried out as part of the Certcost project (Padel 2010) the paper explores whether an organic control system, consisting of standards and certification procedures, could include elements of a progress standard for continuous development and thus encourage certified organic farmers to become better organic farmers.

---

<sup>1</sup> Organic Research Centre, Elm Farm, Hamstead Marshall, Newbury, RG20 0HR, UK  
E-Mail susanne.p@organicresearchcentre.com, Internet www.organicresearchcentre.com

## Short overview of the current certification system

Organic certification systems compare the production system of an operator with auditable statements that are based on the production rules to verify and certify compliance with the standard. Control bodies thus provide a product certification system in line with those covered by ISO 65 and many are indeed accredited to this norm. The control event consists of an inspection form filled out by the operator, and an on-site visit by an inspector, in some cases including analysis of soil or other samples. After a review of all documentation the certification body (CB) issues either a certificate of compliance or records non-compliances. In the later case a second or even third inspection may follow, sometimes unannounced.

Penalties and sanctions are issued if an operator falls below the minimal standards. Different non-compliances attract different penalties or sanctions ranging from requirements of corrections to the loss of the organic license for a large proportion of or the whole operation. Cases of severe fraud leading to the operators been taken to court exist but are very rare. One important reason for farmers using non-approved inputs is likely to be lack of knowledge. Given the length and complexity of today's organic standards this is not totally surprising. For lower levels of non-compliance control bodies may provide some information on how to improve, but to avoid conflicts of interest inspectors do not give advice.

The criteria to which the operator is inspected are mainly minimal requirement for being organic, i.e. zero-tolerance criteria similar to failing a driving test or an exam. Further achievement is not rewarded and thus not encouraged. These criteria mainly relate to the use of inputs (e.g. prohibition of synthetic nitrogen fertilisers and pesticides, feed materials, GMO) and some prohibition of specific production practices, such as battery cages for hens, tethering of cattle, or various livestock mutilations. Other values included in the principles such as achieving an agro-ecological balance or fairness are not part of the standards and certification.

## Discussion of possibilities for improvement

Organic standards clearly place the responsibility for ensuring that production practises comply with the rules with the operator. This is similar to general food law that defines a food business operator as responsible for ensuring that appropriate food safety procedures are in place and adhered to (Article 3 (2/3) of EC/178/2002).

The European Regulation (EC) 834/200 also states improvement aims. For example, the objectives require "managements systems that *enhance* the health of soil, water, plants and animals, *respect high* animal welfare and are aimed at producing products of *high quality*" (Art 3a & b of EC/834/2007). This striving for improvement is made more specific in the principles of farming (Article 5) and also applies to organic processed products that should "be produced in such a way that organic *integrity* and vital qualities of the product are maintained" (Recital 19, EC/834/2007).

Organic operators and control bodies voluntarily aim for continuous improvements, for example in relation to reducing environmental impact, improving animal welfare, regional products and aspects of fairness and in some cases this is used to differentiate products in the market (Padel *et al.* 2010).

However, the minimum certification requirements and rules for different types of operators in the EU Regulations do not emphasise these improvement aspects. For

some areas covered by organic principles this is not easy because no reliable indicators of specific outcomes exist or generic suitable practices have not been defined. For example, a report for DG SANCO concluded that the absence of a harmonised, recognised and reliable measuring instrument for comprehensively assessing animal welfare across species, farming systems and supply chain stages represents a major obstacle for the introduction of any common animal welfare labelling system (EC-SANCO 2009). In animal welfare the emphasis in developing assessment protocols has shifted from looking at housing requirements to considering the welfare outcomes by observing the animal. Protocols developed by the EU funded Welfare Quality project require an assessment time of up to one day for one livestock species alone which is unlikely to be possible as part of a normal organic inspection system that typically lasts between 3 and 17 hours.

The question therefore is whether the improvement of organic operators in line with the objectives and principles of the organic regulation can be achieved in a different way. Van Beuningen and Knorringa (2009) differentiate between zero-tolerance (i.e. minimal requirements) and improvement standards. The latter require management skills and training capacity to be put in place in order to improve the management of an operation. Food safety standards (HACCP and ISO 22000) are examples of progress or improvement standards. The HACCP principle of preventing problems through adopting better food hygiene is based on experience from the space programme that minimal requirements alone did not provide sufficient certainty that food products for astronauts are safe; food safety thinking had to become part of the whole business culture. Both imply that the operator identifies critical control points and develops procedures that deal with the specific risks and improve practices. Similar improvement approaches are used by some group certifications for small holders and in geographical indications schemes.

Could these principles be used as part of the control system to improve animal welfare or reduce environmental impact of a specialised production system such as protected cropping? In the past, ideas for the improvement of organic operators through targets have been explored in the context of conversion planning, sustainability benchmarking and most recently in relation to animal health planning. To make this part of certification, SMART (Specific, Measurable, Achievable, Realistic and Time bound) objectives would have to be formulated so that progress can be audited. A livestock farmer could, for example, agree a target with his control body that the number of cases of mortality or lameness has to be reduced.

Further work is needed to develop this idea further using concrete examples. In the UK, the Soil Association is developing draft standards for protected cropping and is considering a so-called 'cascade approach for sustainable nutrient sourcing'. A matrix sets out the attributes of a range of typical fertility inputs with the aim to outline best practice allowing growers to move towards this in a stepped approach over time. And in the area of livestock the AssureWel' project of the Soil Association, Bristol University and the RSPCA explores how welfare outcome assessment can be introduced into certification systems and whether their inclusion in the regular monitoring could provide opportunities to reduce other details in the standards.

## Conclusions

In contrast to the current certification based on detailed minimal requirements, the alternative proposed would help to determine where a farm is on the way to make improvements and tackle problems (Schmid 2010).

A progress oriented approach would allow the setting of individual goals for each operator, taking the specific circumstances into account. Monitoring criteria therefore have, in the first instance, to be agreed between the operator and his control body but do not necessarily have to be widely recognised. It is likely that the process of agreeing targets and monitoring will strengthen the operators' responsibility for achieving the desired outcomes and lead to improvement.

Progress standards will probably not fully replace existing minimal requirements but a mixed approach with some improvement elements and a reduced number of minimal requirements could be envisaged. Further work is needed to explore whether this idea could increase the effectiveness and efficiency of control and would fulfil the expectations of standard setters, control bodies, operators and of consumers.

## Acknowledgments

This publication was generated as part of the CERTCOST Project, agreement no. 207727 (<http://www.certcost.org>), with financial support from the European Community under the 7<sup>th</sup> Framework Programme. The publication reflects the views of the author(s) and not those of the European Community, which is not to be held liable for any use that may be made of the information contained.

## References

- EC-SANCO (2009): Feasibility study on animal welfare labelling and establishing a Community Reference Centre for Animal Protection and Welfare Part 1: Animal Welfare Labelling. DG Sanco Framework Contract for evaluation and evaluation related services - Lot 3: Food Chain (awarded through tender no 2004/S 243-208899). European Commission Health & Consumer Protection Directorate-General, Food Chain Evaluation Consortium (FCEC) led by Civic Consulting, Brussels.
- EC (2007): Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91. Official Journal of the European Union, L 189: 1-23.
- Padel, S. (ed.) (2010): The European Regulatory Framework and its Implementation in Influencing Organic Inspection and Certification Systems in the EU, Organic Research Centre - Elm Farm, Newbury.
- Padel, S., Röcklinsberg, H. & Schmid, O. (2009): The implementation of organic principles and values in the European Regulation for organic food. *Food Policy*, 34: 245-251.
- Padel, S., Zander, K. & Gössinger, K. (2010): Regional production' and 'Fairness' in organic farming: evidence from a CORE Organic project. 9th European IFSA Symposium, 4-7 July 2009 WS4.3 – Fair and regional: New trends of organic and sustainable food systems. International Farming Systems Association, Vienna (Austria).
- Schmid, O. (2010): New ways of regulating organic food and farming in Europe. 4th European Organic Congress, 21-22 June: The future for regulating organic food and farming in Europe - Evaluating the present and pointing out future directions. IFOAM EU-GROUP, Rome, Italy.
- van Beuningen, C. & Knorringa, P. (2009): Inclusive Improvement: Standards and Smallholders. Taking Stock and moving on HIVOS/ISS, The Hague.