

WORKING GROUP 2:
The revision of General Regulations to reflect the needs of smallholders

PROBLEMS :
Inspection frequency and sample size

- How to deal with unannounced inspections and the revision cycle
- When frequency of inspection goes up so does cost
- Sample size increase will also drive up costs

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Solutions :

Inspection frequency and sample size

- Sample size should be connected to results of previous audits
- Accept documents or bigger sample size and single inspection where the CB is not local
- Connect farm and QMS uninspected audits to decrease costs
- Balance market inclusion against food safety risk
- Wait for CIPRO program to report DATA before making changes again

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PROBLEMS :
Legal entities and option 1

- Types of legal entities are unclear
 - CBs interpret this in a different way
- There is confusion about the different options for smallholder certification (Option 2 or Option 1 multi-site)

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Solutions :

Legal entities and option 1

- More understandable definitions of multisite and legal entity
 - **Written for farmers !**
- Define agronomic, administrative and geographical rules for multi-site
- Get common agreement with Accreditation bodies for definitions of legal entities

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PROBLEMS :

Credibility of option 2 with retailers and Accreditation bodies

- Credibility of option 2 is in doubt by some retailers and some accreditation bodies

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Solutions :

Credibility of option 2 with retailers and Accreditation bodies

- Measure MRL interventions to prove credibility of option 2
– possibility to reduce second tier of inspections
- Judge quality of QMS not just YES/NO

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PROBLEMS :
Internal auditor qualifications

- Shortage of internal auditors
- Internal training is not regarded as sufficient by CBs
- Qualification requirements high and very inflexible especially for Africa

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Solutions :

Internal auditor qualifications

- Define qualification flexibly and in more detail
- Good example is the Japanese Agri-standard which also accepts experience
- Internal auditors have to have similar competencies to CBs to do “part of their job”
 - **Good training**

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PROBLEMS :
Amount and type of data required for registration

- Too much data and lots of unknown data is required to register for Globalgap
- Some producers register the same product and entity with two CBs to overcome problems with certification

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Solutions :

Amount and type of data required for registration

- Difficult to get full data on producers make registration possible just with name and location
- Find unique legal identifiers (VAT No – Grower Number, field code etc..)
- Reflect on mass balance impact, systems, and cost impact to monitor and implement this

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PROBLEMS : Fees and farm size

- High costs of fees in some large extensive farmer groups
- High risk and low risk commodities are treated the same way

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Solutions : Fees and farm size

- Introduce a maximum level of fees for big farmer groups
- System could be adapted to extensive low risk situations ?
 - Requirements on QMS, group size, crops, ownership – take a risk based approach
- Extensive groups would join Globalgap if measures were more favourable
- Invest in smallholders – double the numbers and result in greater income from fees

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PROBLEMS :
Who owns the certificate ?

- Confusion over who can be the owner of an option 2 certificate

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Solutions :

Who owns the certificate ?

- It cannot be the farmer
- Only the group can own the certificate and a farmer can only be registered on the certificate
- An exporter can own the certificate if it is a legal entity and runs the QMS
- If the exporter owns the QMS this can be withdrawn if the farmer leaves the exporter scheme – so no option 2 certificate for the group.

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Others comments

- Forget about comments on NO answers in recommendations
- QM checklist based on general regulations
 - Group and certifier criteria in one
 - Create two single chapters instead
- The flow diagram for the risk assessment for new sites is incorrect (2.2.1 AF)
 - The control point criteria should take this in to account
 - Revise AF 3.2.4 on first aid

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Which other conditions could support group certification

- Consumers
 - Difficult to take an active role as Globalgap is unknown to them
- Public extension services
 - Supporting certificate preparation especially on QMS
- CBs
 - Develop and offer comprehensive Combi-audits (AFRI-CERT example)
- Standard Owners
 - Harmonisation and benchmarking

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Which other conditions could support group certification

- National technical working groups
 - Establish when a country reaches 400 certificates
 - Local interpretations funded by donors

- Donors
 - Create neutral discussion space
 - Support the formation of the NTWGs
 - Create an arbitration body to resolve smallholder based disputes