

GLOBALGAP

Report on Smallholder Taskforce Consultations – Small Holder Ambassador

This report summarizes the activities of the Smallholder Taskforce appointed by GLOBALGAP in 2008 to bring on board the views of small holders into the Standard formal processes. To-date, there have been two phases of public consultations by the smallholder taskforce. These are:

The Public call for comments in 2008 that culminated in a smallholder conference in Frankfurt in April 2008 after submission of comments. This process received about 60 written submissions from various parts of the world. These written comments were further enriched by discussions from smallholder groups and other stakeholders during the April 2008 workshop. 31 of these proposals were found to have some relevance to the GlobalGAP standard, and were then analyzed by the smallholder taskforce.

This process is grateful to Mr Johannes Kern (former smallholder ambassador), Ms Ruth Nyaga, Dr Andy Grafham, Mr Steve Homer, Mr Kofi Biney, Mr Kevin Maart, and Mr Babacar who reviewed the submissions. Also, Ms Kerstin Uhling of GLOBALGAP and Mr Andreas Kreuzmair of EDEKA made important inputs into this process.

The first round of consultations collected views from a wider stakeholder point, including farmers, NGOs, donor organizations and even government institutions. This was useful in getting a feeling of the wider community on the Standard. However, it became clear that there was a need for targeted collection of information from smallholder farmers who are involved in export trade, and therefore either implementing or in some way affected by the Standard. From the beginning of 2009, several fresh produce export associations in Africa were consulted on their views on the standard, and since several of them were involved in the previous consultations, they were also informed of previous comments. These associations are:

**African Fresh Produce Associations involved in current GLOBALGAP
Smallholder Taskforce Consultations**

	Organization	Country
1	Fresh Produce Exporters Association of Kenya - FPEAK	Kenya
2	Kenya Flower Council – KFC	Kenya
3	Ethiopia Horticultural Producers and Exporters Association - EHPEA	Ethiopia
4	Horticultural Promotion Council of Uganda (HPOU)	Uganda
5	Uganda Flower Producers and Exporters Association (UFPEA)	Uganda
6	Horticultural Exporters Association of Uganda (HORTEXA)	Uganda
7	Horticultural Promotion Council of Zimbabwe (HPC)	Zimbabwe
8	Rwanda Flower Producers and Exporters Federation (ARPEF)	Rwanda
9	Zambia Export Growers Association (ZEGA)	Zambia
10	Tanzania Horticultural Association (TAHA)	Tanzania
11	Tanzania Exporters Association (TANEXA)	Tanzania
12	Horticulture Development of Malawi (HODOM)	Malawi
13	Federation of Associations of Ghanaian Exporters (FAGE)	Ghana
14	Horticulturist's Association of Ghana (HAG)	Ghana
15	Sea-Freight Pineapple Exporters of Ghana (SPEG)	Ghana
16	Papaya & Mango Producers & Exporters Association of Ghana (PAMPEAG)	Ghana
17	Southern African Confederation of Agricultural Unions (SACAU)	South(ern) Africa
18	Apexhom - Mauritius	Mauritius

In principle, smallholders in Africa recognize the need to adhere to international market standards because this enhances trade confidence with their buyers. In particular, GLOBALGAP has been shown to enhance market access, especially for producers in several parts of Africa where official control (Government) systems are under-developed and hence less assuring. Also, farmers who practice the standard attain better farming efficiencies than their counterparts, as has been shown in various recent studies.

The main concerns on GLOBALGAP by small scale farmers are the high cost of certification, and complexity of implementation. On the cost, it is true that the main part (at least 85%) of cost of certification is audit fees paid to CBs, with the rest being Standard fees. In order to enhance more compliance amongst smallholders, it will be necessary to initiate discussions with CBs on how credible but cost effective audit structures can be implemented. On complexity, apart from reducing CPCCs, GLOBALGAP will need to work with farmers associations and other organizations to translate/simplify implementation of the Standard.

Specifically, the following comments from smallholders were considered relevant to GLOBALGAP standard, and are hereby submitted to the Sector Committee for consideration:

List of Specific Concerns Expressed by Smallholders on GLOBALGAP Standard

Issue (GG Reference)	Taskforce/Ambassador Notes to SC(GG)
Traceability: Concern was raised on whether traceability (at consumer point) should extend to group or individual farmer level. GR-III 1.9 & 1.11, AF7.1 & CB1.1	The CPCC implies farm level trace. In some countries some form of group trace is allowed while others want farm level trace. Needed -simple systems for product segregation even when in one batch.
First Aid: Requirement for trained first aiders & first aid kits in vicinity of work - can we relate requirements to level of risk? (AF3.2.4 & AF3.3.4):	The issue expressed by SS farmers was on sharing of trained first aid personnel. Also, the need to consider the legal-list of first aid equipment in some countries, and scale the Standard first aid check-list to level of Risk

<p>Worker housing - requirements: They seem to be based on plantations. Need to scale down to small scale-basic requirements (AF3.5.5):</p>	<p>a need to discuss the reasonable criteria for a basic worker house (small scale-owner used?)</p>
<p>Calculation of water requirement for crop - expensive equipment needed. What will happen if becomes mandatory in a future revision of the standard? CB6.1.1:</p>	<p>This is at present a recommendation, but considering the complexity of its determination, would become an issue if ever elevated to mm.</p>
<p>Risk assessment (MRL, new land)</p>	<p>This applies to areas in GG that require Risk Assessment prior to criteria development. The proposal was to consider Area based risk instead of individual farm based risk. New land also needs to be clarified - especially where there has been similar use before seeking GG certification. Could MRL be group based if homogeneity in group practices is guaranteed at QMS level? The same applies to chemical stores risk assessment.</p>
<p>Reducing the Number of CPCCs: reducing checklists to avoid repetition and not-applicable CPCC. Determination of what is audited at group (QMS) and individual farm level</p>	<p>There are some compliance criteria repeated at both QMS and the CPCC. With a view to saving audit time at individual small farms level (hence saving costs), documents, records and infrastructure that could be audited only at QMS level can be determined.</p>
<p>GLOBALGAP fee table - difference in fees charged for small-scale producers versus those with >15ha of land</p>	<p>This is a proportions issue, whereby the participants felt that smallholders paid a higher proportion of fees per unit area than large farms, and proposed a proportional fee structure. Since GG fees account for 5-15% of total audit fees, the bigger issue here is cost of audits. This may be outside GG (an issue of charging structure of individual CBs) but it is currently the main concern by small scale farmers.</p>

<p>Worker housing - toilets can they substitute for field toilets? AF3.5.5:</p>	<p>The small scale team supports this proposal as it makes a reasonable request for change to the content of the standard that would make compliance easier for smallholders with housing close to their fields. However, field toilets would still be required in cases where fields and houses are more than 500m away from each other. The evaluation team will take account of the issue of distance between housing and field sites in preparing the proposal for submission to the relevant GLOBALGAP Sector Committee. Cross reference will also need to be made in the GLOBALGAP standard between AF3.5.5 and CPCC for field toilets such as FV4.1.8.</p>
<p>Environment and conservation CPCC - Smallholder cannot comply with some of these CPCC (AF5.1.2-AF5.3.1):</p>	<p>CPCC AF5.1.2-AF5.3.1 are currently rated as recommended, so non compliance with these controls will not affect certification. However, these CPCC would become a challenge for smallholders if they are rated as minor musts in a future revision of the GLOBALGAP standard.</p>

Way Forward:

Even though not all smallholder organizations have yet submitted their views (and those who have done so still requested for time to compile further specific comments), it is considered that most of the smallholder concerns on the standard are amongst those summarized in the table above. For purposes of input into the Standard Revision Process now underway, the Ambassador will now be visiting several of these smallholder organizations involved in export trade to discuss their challenges further. This will be accompanied by a process of establishing NTWGs in these countries as a long lasting means of their consultations with GLOBALGAP. These organizations will meet in September 2009 during the Nairobi Tour (GG) to finalize a compilation of issues on the standard, which will be discussed with GLOBALGAP at the meeting, and forwarded to Sector Committees for consideration.

In this June SC meeting, the Ambassador is expecting comments from members on the submission as a way of keeping the dialogue with smallholders going on, pending a final submission in September 2009 for full deliberations during the November Sector Committee meeting.

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