



INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS

Thursday, October 23, 2008

Docket No. AMS-AMS-08-0083

RE: Recommendation on Certifying Operations with Multiple Production Units, Sites and Facilities under the National Organic Program

Dear NOSB members,

IFOAM thanks the Certification, Accreditation, and Compliance Committee (CACC) for their new recommendation on "Certifying Operations with Multiple Production Units, Sites and Facilities under the National Organic Program," dated August 25, 2008. IFOAM also thanks the National Organic Standards Board (NOSB) for inviting public comments on this important topic.

IFOAM congratulates the CACC for bringing a reasonable recommendation forward that recognizes the variety of farms and farm organizations that exist worldwide. The continued acceptance of group certification is critical for the growth of the organic sector and for securing and improving the livelihoods of thousands of smallholders in developing countries. IFOAM is pleased that the focus of this recommendation is on producer groups and believes that if multi-site certification is to be extended throughout the supply chain in the future, this will require the development of additional, sector-specific criteria.

IFOAM's objective is to ensure that the group certification construct is perceived as fair, legally valid, technically defensible and can be implemented, in order to guarantee its continued and consistent acceptance within the USDA National Organic Program. To that end, IFOAM respectfully submits the following comments:

- IFOAM congratulates the CACC for their work on the Role of the Internal Control System (ICS), the Internal Control System Personnel and Addressing Potential Conflicts of Interest. About the Internal Control System Personnel, IFOAM would like to make the NOSB aware that the reality is often that technical and/or marketing committees may be nonexistent, especially in small groups. Hence IFOAM appreciates that the composition of the ICS team is written as a recommendation rather than as a binding requirement.

- IFOAM is pleased that this new recommendation does not make a distinction between initial and renewal inspection, and fully supports the emphasis placed on the importance of the Accredited Certifying Agent (ACA) inspections of Production Units for compliance and of the ICS to determine their competence in implementing the Organic System Plan and management of personnel and group members.
- IFOAM does not support the minority opinion that all new entrants to a producer unit should automatically qualify as a high-risk location. IFOAM recommends that the assessment of which members classify as high risk be left to the ACA. There may be a number of situations where the practices of new entrants prior to their adjunction to the group, as well as the special training and tight oversight provided by the ICS to these members, reduce the risk considerably and do not justify their inclusion in the high-risk category. There may be adverse effects of automatically including all new entrants in the high-risk sample, as this may discourage a proper risk assessment for the rest of the group as the certifier may try to avoid identifying additional high-risk members in cases where the number of new entrants is high.
- B. Prerequisites for a Producer Group Operation to Seek USDA Organic Certification: IFOAM supports the criteria chosen by the CACC to determine which groups can be collectively certified and appreciates that the recommendation does not attempt to fix an upper limit for the size of the groups, but instead recommends that the number of members or subunits included in a given Production Unit should be based on the feasibility of effective oversight by management personnel. However, on the aspect of centralized processing, IFOAM would like to clarify that this requirement should be interpreted in a flexible way, allowing for small amounts of post harvest processing to be done on the farms. As an example, small scale coffee producers should be allowed to continue doing the pulping and drying on their family farm before the products are centralized.
- Criteria for the clustering of ‘members’ or ‘sub-units’ into a Production Unit: IFOAM hopes that the intention of the CACC with the sentence “members will need to organize into production units” is not to suggest a strict

requirement that would require all groups to necessarily be constituted of **several** production units. Especially for small groups of e.g. 20 members, IFOAM believes that it should be possible to have all members belonging to the same (unique) production unit if this makes sense in view of the other clustering criteria. Moreover, IFOAM would like to clarify that “sharing a common input supply” is one of several good criteria for deciding on the clustering of members into a production unit, but that there should not be a requirement that all members of a production unit **must** share a common input supply. Although it is recommendable that group members work from a common list of inputs in the Organic System Plan, it is not feasible or desirable to require small farmers to share a common supply of all inputs including manure, compost, mulch or plant preparations.

- **3. Training requirements:** IFOAM fully agrees that the success of an ICS is greatly enhanced by consistent and continuous training for all members and all ICS personnel. IFOAM can agree with the CACC statement “For most organizations, internal personnel will carry out the majority of training of members, but at least one training per year by an external specialist is **recommended** for ICS personnel”. IFOAM believes that this language is prudent, considering that there may be other legitimate ways to train the ICS personnel other than external training visits. IFOAM would like to mention that representatives of several leading organizations in social and environmental standard setting and accreditation, organized under the ISEAL Alliance, discussed the issue of training requirements for group certification schemes during a workshop in September 2008. They came to the agreement that training can take many different forms but should be based on a prior training need assessment.
- **Inspection: Sampling and Risk Analysis:** IFOAM appreciates the overall reasoning for sampling, the attention given to risk factors in the determination of the sampling procedure, and the conclusive remark on the relevance of the Internal Control System to detect non-conformities. IFOAM recognizes the efforts made by the CACC to reach agreement on sampling guidelines that are not over prescriptive for certification bodies and that accommodate for various group conditions. IFOAM recommends including one or more examples or references of acceptable methodologies to determine minimum sampling size. One such methodology is the widely used ISO 62 square root

approach, combined with risk factors. The ISO 62 square root approach is a standard practice in group certification, not only in the organic sector, but also in fair trade, GlobalGap, and other social-environmental schemes. The square root approach, combined with risk factors, is appropriate to ensure the selection of a statistically significant sample in a given population. The square root approach also leads the ACA to conclude that problems observed in the sample are likely to be present in the rest of the members, thereby providing the ACA with a justification to impose corrective action requests or sanctions on the group as a whole. Upon request, IFOAM can provide further examples showing the relevance and effectiveness of the square root approach.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read 'A. Caudle'.

Angela B. Caudle de Freitas  
IFOAM Executive Director