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EU guidance on grower group inspections

Big relief for small holder projects as EU follows recommendations from IFOAM seminar

A new EU guidance document for grower group certification is likely to be agreed this month. The document sets the rate of external inspections, but says little about evaluation of the Internal Control System (ICS). In relation to the sampling method, *i.e.* how to determine how many of the producers that have to be inspected by the external inspectors, the draft follows the recommendations from the IFOAM seminar on small holder group inspections held last February (see TOS, issue no 26, page 7-11).

The document first accepts the principle that ‘a substantial part of the inspection work is carried out by internal inspectors in the framework of the internal control system set up by the group. The external inspection body verifies and evaluates the effectiveness of the internal control system and certifies the group as a whole.’

The strict language in earlier versions, which severely limited the possibilities of using the ICS for exten-

sion purposes as well as inspections due to a perceived conflict of interest, has been taken away. The draft now states ‘The internal quality system sets out rules to avoid or limit potential conflicts of interest of the internal inspectors.’ The draft says that the external inspection should ‘evaluate the effectiveness of the internal control system, with the final aim to assess compliance with the production standards by all individual operators.’ However, the draft says nothing about how these evaluations should be carried out apart from conducting sample inspections. At the IFOAM workshop many of the participants thought that other methods distinct from sampling farms are more efficient.

The number of farms subject to annual external inspection must, in all cases, not be lower than ten. For a normal risk situation, it should not be lower than the square root of the number of farms in the group.

For medium or high-risk situations, the external inspection bodies shall

Minimum number of farms to be inspected by the external inspection body

	Normal risk factor 1	Medium risk factor 1.2	High risk factor 1.4
Number of required inspections	\sqrt{n}	$1.2 \times \sqrt{n}$	$1.4 \times \sqrt{n}$
If $n = 10000$	100	120	140
Minimum no. of inspections	10	12	14

Note: n = number of group members; \sqrt{n} = the square root of n