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**EOCC position on the implementation of group certification schemes in organic production**

*Several EOCC members have experiences in group certification in third countries for many years. With the revision of the EU-Regulation on organic production, group certification schemes shall be also made possible within the European Union. The topic has been discussed during the recent EOCC General Assembly in Toulouse/France in April, 2016. As a correct implementation of such schemes is highly relevant for consumer protection and fair competition on the organic market, EOCC wants to contribute through this paper to an optimal framework for group certification.*

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As the voice of about 50 control bodies and authorities in Europe and beyond, the *European Organic Certifiers Council* (EOCC) is aware that group certification schemes shall be also introduced for organic production of smallholders in the member states of the European Union.

EOCC wants to highlight that the setting of relevant, implementable framework conditions for group certification is essential to avoid disturbances and unfair competition on the organic market.

EOCC believes that both for EU and third countries, the existing practices set in Section 8 of the „*Guidelines on imports of organic products into the European Union*<sup>1</sup>“ should be taken into account, as well as the document EA-6/04 „*EA Guidelines on the Accreditation of Certification of Primary Sector Products by Means of Sampling of Sites*<sup>2</sup>“.

For EOCC, it is in particular relevant that the group has a legal entity as well as full responsibility for the organic product certified. No individual certificates shall be issued to individual members of the group.

To ensure transparency, legal requirements should enforce that only one single organic production system should be certified per group and that there is no option for producers to become members of different groups. Groups must have a well implemented and documented internal control system.

While it is very difficult to find a definition for a “small farmer” which is applicable for the different socioeconomic contexts of the EU member states, it might be useful to stick to the definition of the „*Guidelines on imports of organic products into the European Union*“ (Section 8, C.4). EOCC believes that the responsibility of defining who is a small farmer and who is not shall not be left to the certification body.

EOCC is happy to contribute further to the aspect of group certification in future. Before detailing further requirements, EOCC could contribute through a review of current implementation practices of its members to ensure organic integrity in future.

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<sup>1</sup> [http://ec.europa.eu/agriculture/organic/documents/eu-policy/guidelines\\_for\\_imports\\_en.pdf](http://ec.europa.eu/agriculture/organic/documents/eu-policy/guidelines_for_imports_en.pdf)

<sup>2</sup> <http://www.european-accreditation.org/publication/ea-6-04-m-rev00-july-2011-rev>