



ALLIANCE FOR SUSTAINABLE & HOLISTIC AGRICULTURE (ASHA)

Food • Farmers • Freedom

To:

February 27, 2019

Dr Krishan Chandra,
Director,
National Centre of Organic Farming,
Ministry of Agriculture & Farmers' Welfare,
Ghaziabad.

Dear Dr Krishan Chandra,

Sub: Requesting NCOF to initiate and set up alternative/additional certification regimes to cater to the diversity of organic farming situations in India – reg.

Namaste. One of the key discussions in the brainstorming workshop that you kindly organized in NCOF on February 6th 2019 was about alternative or additional regimes of certification for organic farming in India, given the felt need for catering to a large and growing number of organic farmers, who have a diversity of conditions in which they are operating. As decided in that one-day meeting, we are now submitting proposals from ASHA (Alliance for Sustainable & Holistic Agriculture) for additional regimes of certification that the Ministry of Agriculture & Farmers' Welfare/NCOF should initiate and support. We urge you to please hold widespread consultations on these proposals before concretising any such new mechanisms and putting them in place for implementation. Thank you.

Sincerely,

Kavitha Kuruganti
Co-Convenor, ASHA

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LOCAL GUARANTEE & AUTHENTICATION SYSTEMS (CERTIFICATION) FOR ORGANIC FARMING IN INDIA

Background

Certification serves a twofold need. On the one hand, it adds to consumer confidence in authenticity of the product, and consequently, on the other hand, it enables organic farmers to get better market. In a more evolved system, the quality assurance or authentication regime can also be something that spurs more holistic farming by farmers, by integration of numerous elements of sustainable agriculture, other than just giving up synthetic chemicals and GMOs in farming.

Certification is of farming (inputs used, practices adopted, production obtained etc.) in organic farming, and not the product. However, two existing certification systems, third party certification of farmers either as individuals or as groups (under the Ministry of Commerce's NPOP), and PGS certification system limited to at least five organic farmers organising themselves into a Local Group (LG) located nearby (under the Ministry of Agriculture and Farmers' Welfare), leave out many farmers out of certification regime either on account of cost or group size considerations besides some operational bottlenecks. Hence, there is a need to provide additional/alternative Certification/ Guarantee/ Quality Assurance Systems so that all honest organic farmers meeting the official standards, have an access to a diversity of affordable and accessible certification systems and consumers have access to authenticated organic products. Such a diversity of certification regimes is meant to cater to the fact that there is a diversity of organic farmers in the country.

It should be noted that various certification regimes have their own strengths and weaknesses and certification itself need not be construed as a foolproof authentication system. The lack of integrity in any regime is usually caught in testing for residues of insecticides and any prohibited additives in the product.

Underlying Principles for Diverse Certification Systems

Before we move to the actual proposals of alternative mechanisms for quality assurance/compliance guarantee, we first emphasise on the principles that such an organic certification regime has to adhere to, including the fact that diversity of regimes should co-exist.

1. **Affordability:** Free / Nominal / Affordable cost, accessible to marginal and small farmers, who form the largest category of farmers in India (this then also means that there will not be any significant additional costs passed on to consumer either).
2. **Decentralised and Inclusive:** The overall regime should be decentralised, and it should reflect and be inclusive of the diversity of organic farmers'/farming conditions in the country.
3. **Minimal Record Keeping:** Minimal record keeping for each stage of the value chain – only that information which is needed for a given stage in quality assurance should be asked for or expected to be found.

4. **Online data base system kept minimal:** Local offline data systems as much as possible until the system reaches the higher levels.
5. **Individuals as well as Collectives within this regime:** This regime should cater to individual farmers as well as group of farmers.
6. **Safeguarding consumer interest:** should be robust enough to inspire consumer confidence and should not appear to be a blank cheque to cheats.
7. **Administration of the regime consistent and transparent:** Consistency, clarity and transparency in the operationalisation of the system, so that harassment, corruption, discretion etc., don't creep into the enforcement of the system and accountability is inbuilt into the system.
8. **Traceability and Transparency as core principles:** Such a regime should have traceability and transparency as required for each stage of the value chain.
9. **Penalties, after upholding principles of natural justice:** There should be deterrent penal action but also procedures for upholding principles of natural justice.
10. **Closest possible mechanism to kick in:** Mechanisms of physical verification and screening of anything in this regime – a farm, any records that are supposed to be maintained, an institution which has stood as a guarantee for quality assurance etc., should be localised and accessible as much as possible. The first entities to kick into action should be the closest ones to the certified entity.
11. **Non-discriminatory and Voluntary:** It should not be discriminatory against organic farmers and hence it should be voluntary. *Once the entire regime evolves incrementally, at that point of time, India may consider asking all organic farmers to come under one quality assurance system or the other.* If and when it is made mandatory, then it must be made mandatory at the same time for non-organic farmers to show compliance that the residue levels in their produce are within prescribed limits.

In the light of the above, following entities may be allowed to appraise the applicant farmer/non-farmer entity at other stages of value chain, based on which issuance of certificate is done by the department of agriculture, and the farmer is free to choose who he/she approaches for this purpose.

OFFICIAL/GOVERNMENT ENTITIES

1. **Panchayat:** Panchayat nominates a team of 3 villagers including one elected member for appraisal. Copy of its report/recommendation should be put out publicly in the Panchayat office or school/health centre in case there is no formal panchayat office, so that it enables others to intervene in case of discrepancy.
2. **Local Agriculture/Horticulture/Animal Husbandry Department Official(s):** The appraisal by these officials can also be visualised as a two-step process with frontline official doing the appraisal and the next level official approving the appraisal visit report, after which the Certificate can be issued.
3. **Local Agriculture Universities and by local KVKs:** Scientists of the local Agriculture University (and its research stations, research centres and agriculture colleges) or KVK etc can also act as appraisers.

PRIVATE ENTITIES

4. **‘Master Organic Farmers’:** Appraisal by a certified organic farmer, of say, five year standing, would suffice for certification.
5. **NGOs:** Any NGO having a recorded history of establishing/promoting organic farming and with experience of at least 5 years may be empanelled as an Appraisal agency, with additional details submitted of individual staff members who can be issued ID cards as Appraisers, if they are qualified to take up an appraisal. Any other registered organisation can also be empanelled based on the same criteria.
6. **Resident Welfare Associations:** RWAs / consumer groups can be empanelled as Appraisers provided they vouch that they have been purchasing from the farmer for at least one year and are qualified to take up an appraisal.

Aggregators, Farmer Collectives and Post-Production Entities As Applicants in this Regime

All the next level of entities which are into aggregating, processing and packing can be put through a similar appraisal system as outlined for farm level appraisal. These applicants are free to choose from the above set of appraisers. If processing involved is complex, then usual third party certification may be made mandatory.

Post appraisal process

- **Agriculture Department Official at Block Level to Generate Certificate:** Once an appraisal report, in a format that is on the lines of PGS appraisal form and as per same standards of organic farming comes in, the most proximal agriculture department entity/official has to take up online data entry, generate a certificate along with unique ID and issue the same to the applicant in a time bound fashion. This entity will also maintain required offline records. This officer is not to sit in judgment over the correctness of appraisal and has to only satisfy that appraisal is by authorised person/body. In case data feeding and certificate generation does not happen in given timeframe, farmer has the option of seeking support of the designated Agriculture Department Official at district level for generating the Certificate.
- **Unique IDs to be generated:** The certification system should generate the IDs in such a fashion that the numbering system used can indicate which stream of appraisal did a farmer emerge from, into the certification system.
- **Farmer to submit information on production:** The farmer will have the additional responsibility of filing data on crops sown and output obtained for each, each season, at the block office, through registered post or in person, as per farmer’s choice, which will lead to some record that minimises any fraudulent mixing up of organic produce with inorganic.
- **Transparency:** Any relevant stakeholder will have a right to check the offline records that are prescribed to be maintained by each party in the organic supply/value chain.
- **Database requirements:** The data base accessible in the public domain will be required to have only essential basic details for the public/consumers, as well as for the nodal agency (NCOF and/or concerned division in the MoA&FW) to verify the certification status of any farmer. The publicly available data should not put onerous responsibilities on farmers or other facilitating entities. This is only for monitoring the overall growth trends of organic

farming in the country, and basic details of certified farmers. This could have the farmer's name, contact details, years of practice of organic farming and appraiser, village/block/district/state details, crops sown and extent. An internal dashboard can have additional details that can be fed by the local agriculture office, which may include quantities and value of organic produce, farmer-wise, for instance.

- **Certification regime to have sample testing:** Regular sampling and lab-based testing should be incorporated into this system. Cost of samples and testing is to be borne by the government. Such sample testing as part of the certification regime is the responsibility of the agriculture/horticulture/animal husbandry department. Sampling procedure should have inbuilt safeguards against undue harassment.
- **Accountability of Appraisers:** For paid appraisers, there is a responsibility to submit appraisal reports to the concerned block level agriculture office with a copy to the applicant farmer in a time bound fashion (within 15 days after appraisal visit), after taking up the appraisal within the prescribed time limit (30 days after accepting an application). In no case should any appraisal report be later than harvest time for the farmer, because of which her/his sales get affected.

TRACEABILITY

Traceability is to be maintained by putting batch numbers along with unique ID of the entity immediately preceding the retail package. At each stage of the value chain, there should be offline records maintained of sourcing, utilisation in each batch, and sales records, with supplier IDs and Batch IDs clearly maintained.

EMPANELMENT AND CAPACITY BUILDING FOR APPRAISAL, IF REQUIRED

As and when, channel 5/6 above in page 4 and such like channels of certification are introduced, a State Empanelment Committee might be needed. These SECs may be hosted by designated State Resource Centers. The recognition of, and coordination with SRCs will be done by NCOF.

The State Empanelment Committees (SECs) for Organic Farming Certification can have the following constitution:

- Upto 3 experienced organic farmers from different regions of the state
- Upto 3 experienced NGOs (in the field of organic farming) from different regions of the state
- State-level officials from Departments of Panchayati Raj/Agriculture/Horticulture etc.
- Representative from a state agriculture university
- Representative from a consumer organisation

SECs can be hosted or convened by an experienced civil society organisation or well-known organic FPO which has the ability to manage this role, which can be termed the **State Organic Resource Centre for Local Guarantee Systems for Organic Agriculture**.

The responsibilities for the SRC could include:

- Providing specified number of trainings through certificate courses for Organic Farming Appraisal;
- Empanelling Appraisers under different categories, through SEC decision making processes, pro-actively and by seeking applications, after laying down criteria and screening

against the same while at the same time ensuring adequate empanelment in each district (issuance of ID cards to appraisers);

- Publicising the list of appraisers that are empanelled with latest and accurate contact details in numerous ways possible other than a website;
- Payments to the private sector appraisers once the appraisal reports are submitted;
- Scoring of the private sector Appraisers and blacklisting of any appraisers based on field level reports, inquiries made, non-adherence to guidelines etc.
- Maintaining any other database required at the state level for the purposes of basic documentation and monitoring work of all the appraisers.
- Grievance redressal – of farmers and appraisers

At a later stage of implementation of this regime, District Resource Centres for Local Guarantee Systems can be set up, which will host or convene the District Empanelment Committees. Financing of this scheme will come from the Government.

Accountability & Liability Provisions

- Regular and random residue testing by agriculture department will be an integral part of this certification regime.
- Grievance redressal mechanisms including at the NCOF level, will bring in greater integrity into the regime.
- Cancellation of Certificate of a farmer/entity if it comes to light and gets confirmed through due inquiry processes that standards have been violated.
- Blacklisting of appraisers in case they fail to do their work diligently along with report to their departmental authorities for disciplinary action. Paid appraisers in addition will have to pay prescribed fines, if found guilty of fraudulent services.
- Generation of a Certificate by higher level body if the Block level office does not issue the Certificate within the timelines prescribed, after an Appraisal Report is submitted. Based on how many such higher-level certificate-issuing requirements crop up, particular errant officials at the block levels can be tracked and some departmental action initiated against them.
- Farmer/all entities in the organic value chain will be required to maintain daily stock/sale register and issue a sale certificate if asked for the purchaser.

OTHER REGIMES OF CERTIFICATION TO CO-EXIST

The above regime is of independent, third party-like quality assurance. Additionally, other regimes should also be recognised and supported by the Ministry of Agriculture.

“Self-certification”: Subject to the condition of maintaining the same set of records as are mandatory for certified farmers in the PGS regime, a farmer may also register as self-certified farmer.

“Autonomous PGS regime”: Option of autonomous PGS systems should also certainly exist. Here, coordinating or facilitating entities will make themselves accountable and liable for compliance of standards, and may or may not have an online data base system. However, basic information will be generated that will allow the government to monitor and track growth of organic farming in area, farmers, volumes and value.

Table showing various organic certification options that MoAFW / NCOF should facilitate in India

Name of the System	PGS-India	Third Party (in MoA&FW) certified farmers	Self-Certified Farmers	Autonomous/ Self regulated PGS
Agency managing the system	NCOF	NCOF	Farmer –Self, but registered in the data system	OF Groups, Collectives, FPOs, Coops, LGs, SHGs, Networks – any registered / unregistered collective
Agency Executing the System	Local Groups through Regional Councils	<p>Govt entities: Local Self Govts, Agri/Horticulture/AH Departments, KVKs, Agri Universities</p> <p>Private entities: SRCs along with SECs which will empanel experienced organic farmers, registered non governmental organisations into sustainable agriculture or consumer rights as appraisers</p>	Farmer – Self	Local groups / individuals functioning under the above – with diverse systems
Organic Standards	NSOP	NSOP	Standards based on / better than NSOP / IFOAM / Other equivalents	Standards based on / better than NSOP / IFOAM / Other equivalents

Records to be maintained at farmer/LG level	Basic ICS forms, Farmers Pledge, Peer Appraisal forms, Meeting related records	Appraisal Report, Stock and Sales Register	Basic ICS forms, Stock and Sales Register	Basic ICS, Farmers Pledge, Peer Appraisal Forms
Agency maintaining records	Local Groups, Regional Council and Online in NCOF Portal / Server	Block Agriculture Office	Farmer – self, offline	Local Groups and the Collective (may or may not be digitised / online)
Reports to be sent to NCOF	Online in NCOF Portal	Only data on farmer, location, extent, crops sown, quantities harvested.	No reports. But traceability maintained by others could throw up information on volumes and value of organic produce. Voluntary (NCOF portal can maintain an entry form for this)	Consolidated report based on an online/offline form (Only total numbers, area, crops, region etc and some profile information of the collective)
Logo	PGS India logo	NCOF TP Certified Farmer logo	Self-Certified farmers logo	Diverse PGS Logos
Who bears the cost	NCOF	MoAFW	Farmer (can get State Scheme supports as well)	Collectives / Farmers (can get State Scheme supports as well)

IN ALL THE ABOVE REGIMES, THE VERY USE OF THE TERM “ORGANIC” DENOTES THAT THE STANDARDS ARE UNIFORM, EVEN IF LOGOS ARE DIFFERENT, AND THAT TERM IS THE ASSURANCE THAT THE CONSUMER IS SEEKING, WITH THE LOGOS PROVIDING ADDITIONAL INFORMATION ON THE QUALITY ASSURANCE APPROACH ADOPTED.