

# FOR A EUROPEAN ORGANIC REGULATION ADAPTED TO THE REALITIES OF SMALL PRODUCERS IN THE SOUTH

**SUMMARY** | This position paper carried by Agronomes et Vétérinaires Sans Frontières - AVSF and ETHIQUABLE takes stock of developments in European Regulation (EU) 2018/848 on organic certification, which applies to small producer groups in southern countries from January 2025. The year 2025 is a strategic one for many cooperatives, which are undergoing their first audits under the new legislation. This text analyses the concrete effects on cooperatives observed on the ground and puts forward proposals to make organic farming more inclusive and ensure a future for the participation of small producers from the South in organic sectors.

## Main findings :

- **Increased requirements with perverse effects:**  
The new rules (more inspections, systematic sampling, creation of legal structures for mixed cooperatives or cooperatives with more than 2,000 members), motivated by the need to ensure the reliability and credibility of control systems, which are supposed to be less stringent in developing countries, have the following consequences:
  - An explosion in costs,
  - Increased administrative burdens,
  - A high risk of destructuring of cooperatives and de-certification for fragile organisations.
- **Implementation without support:**  
The lack of information, time and technical assistance threatens the inclusion of small producers and compromises the stability of organic supply in the South.
- **A counter-productive dynamic:**  
By increasing the number of controls without appropriate support, the regulation could lead to many cooperatives abandoning organic certification, a loss of diversity of players in the global organic sector to the benefit of large structures, and shortages in the organic supply, particularly of organic coffee and cocoa.
- **The risk of circumventing a regulatory advance:**  
The new regulation finally recognises collective certification, in particular by requiring that the certificate now belong to the producer groups and not to the export companies. This right of ownership, recognised on paper, may in fact meet with resistance and attempts by organic companies to circumvent it.

## Key proposals :

1. **Postpone the date of application of Regulation 2018/848 in non-EU countries until 31 December 2026** to allow for an impact assessment to be carried out, for the rules to be simplified as part of a reform of the implementing regulation, and therefore for real and inclusive compliance.
2. **Reduce certification costs** by :
  - Limiting over-interpretation of risk by certification bodies,
  - Supervising the service providers in charge of analyses and the price of their services,
  - Calling for greater transparency in certification costs.
3. **Create an independent observatory** to monitor the effects of the regulation, detect abuses and maintain the competitiveness of small groups.
4. **Include producers in the regulatory dialogue**, by involving small producer networks such as SPP Global, and NGOs on the ground, to adapt requirements to local realities.
5. **Effectively guarantee the ownership of organic certificates by producers**, ensuring that they are effectively applied and that they cannot be circumvented by dominant companies.

The new European Organic Regulation (EU) 2018/848 introduces major changes for small producers in the South, particularly in collectively certified groups.

This regulatory recognition of collective certification is a major step forward. But its implementation, from 1 January 2025, is raising serious concerns: increased costs, more stringent requirements, major restructuring and a lack of support. The stakes are high for 2025: this is the year in which cooperatives will undergo their first audits under the new regulations.

By analysing situations on the ground with our partners, we are identifying the risks of exclusion for many small-scale producers, and putting forward proposals for organic farming that is both more credible and genuinely inclusive.

## REFORM OF THE ORGANIC REGULATION: BELATED RECOGNITION OF FARMERS' REALITIES IN THE SOUTH, A REAL RISK OF EXCLUSION

EU Regulation 2018/848 on organic production and labelling of organic products, adopted in 2018, came into force on 1 January 2022 for the Member States of the European Union, and has applied since 1 January 2025 to third countries. It now provides a framework for the collective certification of groups of small producers, a practice that is very widespread in the countries of the South, but which until now has had little definition in European regulations.

According to the 2019 report by the Research Institute of Organic Agriculture (FiBL), 2.6 million small-scale producers in Latin America, Asia and Africa benefited from collective certification via some 5,900 groups. This represents around 80% of the world's organic farms and supplies the European Union with strategic products such as coffee, cocoa and tropical fruit.

These groups fall into two main categories, each representing half of the organic farmers under collective certification:

- Autonomous groups (cooperatives, associations) that directly manage their own internal control system,

- Groups managed and controlled by processing or exporting companies, which are responsible for their management and internal audits.

Until the establishment of the new regulation 2018/848, only the individual certification model was considered in the regulation, an approach applicable in Europe but ill-suited to small producers in the South, most of whom cultivate only a few hectares.

In 2008, however, the European Commission published guidelines for assessing the equivalence of third-country certification schemes<sup>1</sup> recognising producer groups as the unit of certification (rather than the individual farm).

Based on these recommendations, the Certification Bodies required the cooperatives to set up an Internal Control System (ICS) with the appointment of internal auditors. Each producer's plot had to be visited at least once a year. The situation of each producer had to be documented, with precise data on cultivation practices, the area cultivated organically and the organic production capacity, in order to justify complete traceability from the plot to export and to exclude all purchases from outside certified farms. External audits, carried out by the certification body, used this internal system to validate compliance, while checking that documentation was consistent and properly maintained. This system was recognised by the European authorities, but the details were left to the discretion of the certifiers.

The new regulation seeks to fill this gap by establishing a clear framework for collective certification. It aims to give official recognition to these collective certification practices and to strengthen their credibility with consumers, in response to recurrent criticism of the reliability of organic certification in third countries.

It should be noted that when the new regulations were being prepared, certification in non-European countries was regularly criticised as being less reliable than that for European farmers. Preconceived ideas and false information about the certification of producers in the South were widely circulated. Yet these attacks were largely unfounded: producers in the South are inspected by bodies accredited by the European Union and apply the same specifications as in Europe.

The campaign led by banana producers in the West Indies in 2017 is a good illustration of this. It suggested that the certification bodies recognised by the European Union were less demanding in the countries of the South than in Europe. It claimed that phytosanitary products banned in Europe were authorised elsewhere. In reality, these were extracts of neem and other tropical plants, accredited for use in tropical countries where their use is appropriate.

<sup>1</sup> [Guidelines for imports of organic products into the European Union - 2008](#)

In the regulatory review process, the priority given to 'credibility' has often been defended by European importers, to the detriment of the inclusion of small producers. The pressure to tighten control requirements, while responding to questions from consumers and the media, runs the risk of significantly increasing costs and excluding the most vulnerable organisations.

By 2025, all producer groups under collective certification will have to comply with these new requirements. **Against this backdrop, it is vital to assess the obstacles encountered and the systems that are actually operational.** This is what we have undertaken, by analysing feedback from our partners in several southern countries. This analysis enables us to measure the concrete effects of the reform and to put forward recommendations to defend organic certification that is credible, fair and inclusive.

## NEW REGULATIONS: WHAT'S NEW

### Certificate ownership

Organic certificates must be issued in the name of the formally constituted group of farmers who are the rightful owners. Marketing companies are no longer allowed to retain ownership of these certificates, as has been common practice until now. This practice, which is often justified by the fact that organic certification is financed by the purchaser and which aims to impose exclusive purchasing rights on producers, is now prohibited.

### Eligibility criteria for collective certification

Before the new regulations came into force, there were few thresholds for the size of producers who could be part of a collectively certified group. From now on, only groups of small producers will be eligible for collective certification. To qualify, each member of the group must meet at least one of the following two criteria:

- The total surface area of the producer's farm must not exceed 5 hectares.
- The cost of individual certification exceeds 2% of its total turnover and its production turnover is less than €25,000.

If a producer who is a member of the cooperative does not meet any of these criteria, he must undergo individual certification and bear the cost.

**The turnover threshold of €25,000 needs to be revised to reflect current market trends.** Coffee and cocoa

prices, which had been stagnating for years at between USD 3,000 and USD 4,000 per tonne, have now risen to USD 10,000 per tonne. This increase means that producers are better paid. It would be inconsistent to exclude small producers from collective certification on the grounds that their incomes have increased thanks to this price improvement.

### Limiting the size of groups

Under the new legislation, a certified producer group cannot have more than 2,000 members. If a cooperative has more members, it is obliged to split up its organisation by creating new legal entities, each housing a maximum of 2,000 producers. Each legal entity must have its own internal control system and hold a single organic certificate.

### Risk analysis and audits

The new legislation provides a precise framework for the physical audit of plots of land and imposes:

- At least one physical inspection of the cooperative per year
- An inspection, including a site visit, of at least 5% of the cooperative's members, whereas previously farms were visited by the auditor, according to a sampling based on a risk analysis<sup>2</sup>
- Samples of organic production from at least 2% of the members of the producer group, taken by the certification body for analysis of traces of pesticides.

### High-risk products

When the European Union considers a sector to be high-risk, special rules apply. Two physical checks a year are required, including one unannounced. In addition to the analyses carried out in the field at the time of the audit, samples must be taken at the time of export to carry out analyses of pesticide residues.

### The Internal Control System (ICS)

The Internal Control System has become a mandatory structure, strictly defined by the regulations. The main changes concern:

- The obligation to appoint an Internal Control System coordinator,
- The prohibition on entrusting technical advisory tasks to internal control inspectors, whereas in practice agricultural technicians in cooperatives often performed both control and technical advisory functions.

<sup>2</sup> The sample size is generally the square root of the number of co-op members. For a co-operative of 1,000 producers, for example, 32 visits

had to be carried out according to the square root rule, compared with 50 today.

# ASSESSING THE IMPACT OF THE NEW REGULATIONS ON OUR BUSINESS AREAS

## 1. Ownership of organic certificates finally given to producers: a right of ownership recognised on paper but limited in practice

The main advance introduced by the new legislation is the obligation to issue the organic certificate in the name of the producer group, thus guaranteeing them full ownership. If this provision is actually applied, it would represent significant progress. This change in the regulations was publicly welcomed by IFOAM Latin America in 2019.

Until now, many companies - local or European - have financed the certification of producers while keeping the certificate in their name. This practice makes it possible to lock in the company's investment, preventing producers from selling organically to other buyers and placing them in a de facto exclusive relationship, which is not healthy for cooperatives.

It may come as a surprise to see producers agree to not having control over their organic certificate, even though the organic nature of their production depends on their work and practices, not those of the buyers. This seems all the more unthinkable in France and in Europe, where it is inconceivable that farmers could accept such a confiscation of the organic certificate and the resulting exclusive relationship.

In the countries of the South, the balance of power between farmers and buyers is not the same. In the field, it is not uncommon to come across producers who are not even aware of their status as organic producers certified to European standards, having been instructed by their buyer not to use chemicals. This is common practice in South-East Asia, but can also be found in Guatemala and other Latin American countries. Such situations of contract farming with producers who have little involvement in certification are common in countries where the use of chemical inputs is not widespread.

---

*In Guatemala, in the Cahabon region, we met producers who supply an exporter of organic cardamom, as well as another exporter of other spices. The production comes from the same farm, but the producer is registered in two Internal Control Systems (ICS).*

*In the Preah Vihear region of Cambodia, some producers supply an organic cashew exporter, an organic cassava processing plant and a third exporter specialising in rice. In all, there are three SCIs, some of which use the same plots of land, as the producers rotate their crops. Some of these producers are members of a producers' cooperative, but this cooperative is not certified organic.*

---

By enshrining this right, the reform paves the way for greater decision-making autonomy for farmers' organisations. For groups that have hitherto been dependent on single partners, this development could mark the start of a genuine process of economic and commercial emancipation. **It is imperative that, in the consultation phase opened by the Commission in 2025 on possible changes to the regulation, the principle of producer groups owning their organic certification is maintained.**

Many operators could call for this principle of producer autonomy to be called into question. Already during the preparatory phase of the law, organic operators were opposed to changes in the legislation on this point, preferring effective control of companies to the independence of producers.

IFOAM Europe<sup>3</sup>, for example, published recommendations in 2019 in favour of contract farming (which links a buyer to a multitude of individual producers), believing that it offered better results than certification carried by autonomous producer groups. It emphasised the greater investment capacity of private operators (exporters or processors) to implement internal control systems (ICS) and manage regulatory aspects.

The organisation warns that excluding these producers, who are managed by private operators, would lead to shortages of certain products, as this practice is so widespread (for example, organic cotton and sugar in India).

IFOAM Europe now accepts the legislator's decision to allow producer groups to own the organic certificate. It stated this in the webinar of 13 July 2023. But many organic operators remain hostile to this new rule.

During this first year of application of the new regulation, we have observed that the private operators who previously held organic certificates are not adopting clear strategies to comply with this rule. At best, they are creating producer organisations that they are seeking to control, without establishing transparent commercial agreements that would respect the real autonomy of the

---

<sup>3</sup> [https://spp.coop/wp-content/uploads/2020/01/FR\\_IFOAMEUOI\\_Certification\\_Groupes\\_Apports\\_20191121.pdf](https://spp.coop/wp-content/uploads/2020/01/FR_IFOAMEUOI_Certification_Groupes_Apports_20191121.pdf)

organisation and its ICS. It therefore remains to be seen whether the certification bodies have any real desire to ensure compliance with this rule, which advocates an autonomous organisation of certified organic producers.

## 2. Between lack of support and rising costs: the risk of cooperatives de-certifying, or even abandoning organic certification

In the absence of sufficient time and clear information from the European Union - incompletely relayed by the certification bodies - hundreds of producer organisations are at risk of not being compliant at the next audit. This critical situation is the result of a lack of knowledge of the new regulatory requirements, or even a lack of understanding of them, and the absence of appropriate support mechanisms. The repercussions could be considerable: a wave of de-certifications would directly threaten the supply of European importers and compromise their ability to meet part of consumer demand. A counter-productive effect, contrary to the stated intentions of this reform.

---

*"Many organisations are waiting for the first audits to find out more about how to achieve compliance, so that they can check whether they have done the right thing. There is therefore a high risk of non-compliance this year. We have to hope that the auditors will show a degree of flexibility during this period of transition."*

*Chairman of a platform of organic producer organisations in West Africa*

---

On the other hand, compliance with the new regulatory requirements means higher certification costs for producer organisations. For some organisations, the burden is so great that their future in organic farming is uncertain.

The situation is even more critical for co-operatives that bring together a large number of producers but collect small volumes or a variety of products, some in marginal quantities. Below a certain volume, certification becomes economically untenable, forcing some cooperatives to exclude producers or abandon certain sectors.

## 3. Initial audit feedback: inflation in certification costs

In 2025, the first audits will be carried out in accordance with the new regulations. Generally speaking, cooperatives are seeing a significant rise in costs, with audit fees doubling on a like-for-like basis, not to mention the increase in internal administrative costs.

Legislation imposes more controls and, depending on the interpretation of the level of risk, encourages certifiers to step up the volume even further. These additional services have a direct impact on certification quotes.

---

*In Togo, the IKPA cooperative received a quote of €19,500 for a renewal audit, an unannounced audit and analyses, compared with €9,000 the previous year for the same scope. The cooperative Atsemawoe, in the same country, increased its budget from €7,000 to €14,500.*

*In Burkina Faso, COOPAKE, which markets several products (cashew, hibiscus, sesame, mango), now has to make three audit visits a year, including one unannounced visit, compared with just one previously, because of the diversity of its production. Here too, costs have doubled.*

---

In Latin America, the increases applied by EU-accredited certifiers are generally less steep, but can be as much as 50%.

These situations are also multiplying in Asia, confirming a global trend towards higher costs for cooperatives in the South.

## 4. The increase in audits, sample analyses and longer lead times is already destabilising the organic sectors in the South.

The new regulation requires certification bodies to carry out pesticide residue analyses on at least 2% of members, following a predefined list of substances to be analysed, in accredited laboratories. However, these analyses often cannot be carried out locally due to a lack of infrastructure, and have to be performed in laboratories outside the country, which increases costs and delays.

In Peru, the large number of organic producers has meant that several laboratories have been set up in Lima to carry out pesticide residue analyses within 5 days. This is a comparative advantage that landlocked countries do not have, where sending a sample of an agricultural product is standardised (requesting a phytosanitary certificate) and involves administrative complications and exorbitant costs.

At the same time, the legislation provides for reinforced procedures for so-called risk situations: more sampling, longer audits.



In 2021, the European Commission's recommendations called for a sample to be tested for each export of these high-risk products before the export certificate (COI) was issued. In view of the difficulties involved in implementing this requirement, new recommendations dating from early 2023 have simplified it. Today, the certification body can carry out a pre-shipment inspection of a percentage of the export flow. Many certification bodies, either out of caution or to demonstrate their determination to apply the regulation rigorously, continue to check 100% of the container flow of products at risk. As the human resources available for taking samples are limited, certifiers have a sample taken by an accredited third party (such as a research consultancy), which drives up the cost of certification. The results of the analysis are used to issue the export certificate (COI), which often means that containers have to be parked at the port, which is very costly (\$150 per day after a free period of 7 to 10 days), particularly when maritime transport is under pressure.

In addition, there are other analyses carried out by importers when containers arrive and by processors as part of their control plans.

As a result, products from small producers in the South are subjected to more analyses than those from French or European agriculture.

These new requirements, imposed before export, sometimes slow down exports considerably, with direct consequences on the cooperatives' cash flow and on the quality of the goods, affected by extended storage times.

---

*"To be able to export, it now takes an extra month and a half to receive the results of the audits and analyses, to justify any minor non-conformities, to obtain the certificate, to apply for and receive the export certificate (COI) and finally to be able to export".*

*Head of certification support for a fruit and spice producers' cooperative in Madagascar*

---

There is also a lack of human resources trained in the interpretation of residue analysis results throughout the certification chain, including the certification bodies. The interpretation of a non-quantified detection of a molecule, considered by the laboratories as uninterpretable, will easily lead to the downgrading of the batch. The whole process of appealing against such a decision takes several weeks, even months, putting some cooperatives out of business.

## 5. The risk of excluding cooperatives in the South from the organic sector

### Costly reorganisation of internal control systems

The new regulations require an in-depth reorganisation of Internal Control Systems (ICS). Cooperatives must now :

- Maintain more comprehensive, centralised documentation,
- Recruit staff dedicated exclusively to inspection, separate from technical assistance to producers.

Although these changes are aimed at improving the separation of functions, they generate very high indirect costs that are difficult for small organisations to bear.

### By restructuring cooperatives without any link to the realities of farming in the South

The current regulation also imposes major restructuring on organisations with more than 2,000 members or which collect both organic and conventional products.

These organisations will have to create and formalise sub-structures of less than 2,000 producers, grouping together only certified organic producers, each with its own internal control system.

The threshold of 2,000 members per group may seem high at first glance. However, in the context of agricultural sectors in developing countries, this figure is quickly reached. Many producers cultivate very small plots of land or deliver very modest volumes to cooperatives. The proportion of cash crops, which are the main focus of organic certification, is relatively low in peasant farming systems, either because of the structure of the land or because of the diversification of crops on the same plot.

This is particularly true of the shea industry in the Sahel, where each producer contributes just a few dozen kilos to her cooperative each year. So a large number of members does not necessarily mean a large production. In the South, it is more a case of a large number of producers with limited individual collection volumes.

### The risks of artificial restructuring: endangering cooperatives and driving the most vulnerable producers out of the organic sector

In addition to the administrative procedures and costs involved, such reorganisations weaken social cohesion within cooperatives. The creation of distinct sub-groups weakens the collective dynamic, the economic trajectory and the investment projects of cooperatives.

Many co-operatives are reacting to the new regulations by taking steps to minimise the increase in costs, by excluding producers who bring in the least product or by tightening up the number of products marketed as organic. In other words, to stay below the 2,000-member threshold while maintaining a certain volume of production, some organisations are choosing to certify only the most productive members, thereby sidelining the smallest producers, who are the most vulnerable.

*"Our organisation has more than 3,000 producers, but we don't have the human and financial resources to create two organisations with two separate internal control systems, as stipulated in the new regulations. We are therefore going to reduce the number of members to 2,000 and give priority to producers in the most productive areas."*

*Head of a shea producers' organisation in Burkina Faso*

## 6. The application of the new regulation in a context of low organic prices calls into question the commitment of small producers in the South to organic farming.

Today, a number of co-operatives are questioning the very viability of their commitment to organic farming, caught between the explosion in certification costs and the fall in premiums traditionally granted to organic products. This questioning of the organic model is taking place against an already tense backdrop: very high world prices for cocoa and coffee are narrowing the price gap between organic and conventional products. In practical terms, buyers are not prepared to compensate for the current additional costs of high prices by increasing the purchase price of organic products.

With the exception of co-operatives well established in fair trade sectors with committed buyers, the majority of organic producer groups are now faced with inadequate profitability. The legislator's stated aim - to develop organic supply and demand - is out of step with the reality on the ground. Worse still, the new regulations could not only exclude the most vulnerable producers, but also lead to a shortage of organic products from developing countries (particularly coffee and cocoa).

*"Lately, we've lost between 5 and 10% of our members because there are too many constraints with organic in a market where there is no longer any difference in price between organic and conventional produce. If there are any producers left today, it's thanks to the organic fair trade premium, which in our case is still very attractive, but it depends on the buyer."*

*Director of the SCEB cooperative in Côte d'Ivoire*

*"In our network, some cooperatives produce organically, others conventionally. But the cooperatives risk losing their motivation to go organic: prices between organic and conventional are close, access to the market is*

*difficult, and new constraints are appearing, such as reorganisation below the 2,000-member threshold and 2% sampling."*

*Head of certification support for the PMUAC cooperative union in Cambodia*

## 7. A step forward for the credibility of organic farming, a step back for small producer cooperatives

The new organic regulations are designed to strengthen the credibility of certification in developing countries, by imposing stricter requirements in terms of internal controls, audits and pesticide residue detection.

But by basing these requirements on increased costs, without a compensation mechanism, it risks increasing consumer prices and, in so doing, dampening demand.

In the longer term, it could also reorientate sectors towards more entrepreneurial models, to the detriment of farmers' organisations. This is despite the fact that farmers' organisations are in the best position to respond to the challenges of organic farming, with diversified production systems, varieties adapted to local ecosystems and labour intensity rather than input intensity.

It is therefore essential that the legislator reaffirms the central role of small producers in certified organic farming, by adapting the rules to guarantee their sustainable inclusion within the supply chains.

# FOUR PROPOSALS FOR CREDIBLE AND INCLUSIVE ORGANIC CERTIFICATION

## PROPOSAL 1: Postpone the date of application of regulation 2018/848 in third countries.

It is clear that the majority of small producer cooperatives are not ready to meet the requirements of the new regulation. Delegated acts, such as implementing regulation 201/279, have given rise to debate as to how they should be interpreted by certification bodies. We can consider that there is now a consensus on interpretation, which we can date from the issue of the *IFOAM Guidance & Explanation of Group Certification Requirements* in July 2023<sup>4</sup>. Before this consensus was reached, contradictory interpretations

<sup>4</sup> <https://www.ifoam.bio/third-webinar-new-eu-organic-regulation-2018848>

were all too common. The actual phase of dissemination of the regulation for groups of operators did not begin until the second half of 2023, and there are still many different interpretations today. To avoid a wave of de-certifications and possible supply disruptions, it is essential to postpone the date of application of the regulation until 31 December 2026. This extension would give the organisations concerned the time they need to comply, while meeting consumers' growing expectations for transparency and reliability.

## **PROPOSAL 2: Control certification practices and costs**

The increase in certification costs is currently the main risk factor for the exclusion of some small producer organisations. It is therefore becoming urgent to correct the most rigid or inappropriate rules that generate these additional costs.

We note that many importers apply systematic checks for pesticide residues, particularly in countries considered to be at risk. In addition, most producer cooperatives in Latin America apply a control plan with frequent pesticide residue analyses.

Requiring certification bodies to take samples from 2% of producers for analysis of pesticide residues is not relevant under the conditions mentioned in the previous paragraph. These analyses duplicate the control plans that already apply. This generates unjustified additional costs.

It seems necessary to reserve this 2% levy from producers for groups of operators who cannot justify the existence of a control plan based on residue analyses carried out by themselves or by their buyers.

Greater transparency must be demanded of inspection bodies with regard to audit and analysis fees, to allow fair competition and price negotiation.

Finally, it is essential to set up an independent observatory to monitor the conditions under which organic certification is applied. Its remit would be to monitor changes in the cost of certification in different areas, identify any abusive practices, assess the impact of the regulations on producer groups and propose regulations where the quasi-monopoly of certification bodies prevents any real competition, particularly in landlocked regions.

## **PROPOSAL 3: Open dialogue with producers to ensure more inclusive regulation**

The implementation of the new regulations was cruelly lacking in consultation and discussion with the main

stakeholders in collective certification: the producer groups themselves. In the debates and processes for defining the rules, which were dominated by a high degree of technicality, it was the certifiers and import companies who were most involved in the exchanges with the legislator. To our knowledge, only IFOAM Latin America and the SPP Global network, made up of more than 120 certified organic producer organisations, have put forward alternative proposals, which have not been taken into account.

The hasty, improvised implementation of the project, with no technical support or financial backing, is now leading to numerous difficulties on the ground.

It is imperative that the European Commission puts in place a mechanism to monitor and evaluate the implementation of the regulation, and that it opens a genuine dialogue with producer organisations. This feedback should enable the regulatory requirements to be adjusted in line with the realities of the industry.

In this process, it is essential to involve NGOs on the ground, which have a more objective view. Certification bodies that focus mainly on developing countries have more detailed knowledge of the certification of groups of operators and can play a leading role in the consultative process.

## **PROPOSAL 4: Compulsory ownership of an organic certificate: a lever for autonomy that must be rigorously defended and applied**

The obligation to award the organic certificate in the name of the producer group does not in itself guarantee real independence. But it is a major step forward, and one that it is essential to preserve and consolidate, despite the lobbying of many players hostile to this development.

It is essential to take action to ensure that this rule is strictly applied, so that organic certificates are systematically issued in the name of the groups. This is a key condition for strengthening their autonomy and enabling them to freely choose their commercial partners, outside the exclusive relationships they have had to endure until now.

The organic production regulations for groups of operators are less stringent in the case of India, an equivalent third country. In the case of organic cotton and sugar produced by small individual producers who are certified organic via a processor, the processor can still carry out internal controls and take over the organic production certificate.



## ABOUT:

### **Agronomes et Vétérinaires Sans Frontières (AVSF)** [www.avsf.org](http://www.avsf.org)

AVSF, a french association for international solidarity, has been working for over 40 years with farming communities and organizations in developing countries to solve the food issue. The association puts the skills of agricultural, livestock and animal health professionals at their service: technical and financial assistance, training, market access, etc. AVSF advocates fair remuneration for producers and transparent partnerships with all players in value chains. To guarantee product quality and a fair distribution of profits, AVSF works with a number of fair trade, organic and agroecological certifications. Agronomes et Vétérinaires Sans Frontières runs 89 cooperation programs in 22 countries of Central and South America, Asia and Africa, alongside 478 farmers' organizations for whom farming and livestock breeding remain a fundamental element of food security and economic and social development. AVSF is recognized as “utilité publique” in France.

Contacts: Romain VALLEUR [r.valleur@avsf.org](mailto:r.valleur@avsf.org) • Pierre DUBUIT [p.dubuit@avsf.org](mailto:p.dubuit@avsf.org)

### **SCOP ETHIQUABLE** [www.ethiquable.coop](http://www.ethiquable.coop)

ETHIQUABLE is a cooperative that has been involved in fair trade since 2003. It works hand in hand with over 110 cooperatives of small producers in 29 countries, including France, to support peasant and organic farming. A social economy company, Ethiquable is structured as a SCOP, where employees are the decision-makers. Its unique model promotes fair remuneration of producers, transparency of supply chains and products traceable to their origin. Each product embodies a fundamental approach: supporting local know-how, preserving ecosystems and promoting agroecology, and offering mass-market consumers products with authentic flavors, stemming from a genuine human and ecological project. Since 2021, ETHIQUABLE has been making its chocolates in its own chocolate factory in Fleurance (Gers). Open to the general public, you can discover the secrets of chocolate making and the issues surrounding the production of fair-trade and organic cocoa.

Contact: Christophe Eberhart [ceberhart@ethiquable.coop](mailto:ceberhart@ethiquable.coop)