



# **TWO EXPLORATORY CASE STUDIES OF ALTERNATIVE CERTIFICATION IN THE UK**

## **D 21, PART C**

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**This part of the Deliverable D 21 reports on two exploratory studies in the UK.**

**The first study explores the acceptance of output based monitoring of animal welfare by producers and inspectors and the potential for improving the certification system through such initiatives. The second study evaluates the potential contribution of participatory guarantee schemes for small scale growers. Both studies explore the potential for improvement of organic certification in terms of acceptance to farmers and likely impact on direct and indirect costs leading to an overall assessment.**

## DISCLAIMER

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## Table of content

<b>1</b>	<b>Introduction.....</b>	<b>3</b>
<b>2</b>	<b>Acceptance of output based monitoring of animal welfare as a way to achieve improvements.....</b>	<b>4</b>
2.1	Introduction.....	4
2.2	Example studied of using animal based indicators in inspection and certification.....	5
2.3	Approach.....	6
2.4	Results.....	7
2.4.1	The farms surveyed.....	7
2.4.2	Farmers' awareness of animal based welfare measures.....	8
2.4.3	Influences on the time and cost of inspections.....	9
2.4.4	Acceptability of the assessment and the assessors to farmers.....	10
2.4.5	Use of targets as part of farm management.....	11
2.4.6	General suggestion to improve certification for the farmer.....	12
2.4.7	Cost effectiveness of certification.....	13
2.5	Discussion.....	13
2.5.1	Differences between dairy and poultry farmers.....	13
2.5.2	Differences between farmers' and inspectors' attitudes to animal based welfare measures.....	14
2.5.3	Potential for target based measures of progress.....	14
2.5.4	Acceptability of the assessments by farmers.....	16
2.5.5	Time and cost implications.....	17
2.6	Conclusions and recommendations.....	18
2.6.1	Acceptance to farmers and the control body.....	18
2.6.2	Impact on direct and indirect costs.....	19
2.6.3	Improvement potential.....	21
<b>3</b>	<b>Alternative Participatory schemes for growers in the UK.....</b>	<b>23</b>

3.1	Introduction .....	23
3.2	Approach .....	24
3.3	Three alternative schemes for growers in the UK .....	24
3.3.1	The Wholesome Food Association (WFA) .....	24
3.3.2	Climate Friendly Food (CFF) .....	25
3.3.3	The Green Grower Scheme proposal .....	27
3.4	Evaluation of the three schemes.....	28
3.4.1	Cost .....	29
3.4.2	Level of membership.....	30
3.4.3	Non-compliance .....	31
3.4.4	Consumer perception.....	31
3.4.5	Future Prospects.....	31
3.4.6	Relationship to organic certification according to EU regulations .....	32
3.5	Conclusions .....	33
3.5.1	Acceptance to farmers .....	34
3.5.2	Likely implications on costs of certification.....	34
3.5.3	Improvement potential .....	35
<b>4</b>	<b>References .....</b>	<b>37</b>

**List of tables**

Table 1: General characteristics of the farms surveyed..... 8

Table 2: Cost calculation for animal based measures (per farmer and year).....20

Table 3: Comparison of certification fees with levels of turnover for a 10ha vegetable farm (after Jespersen et al (2010)).....29

**List of figures**

Figure 1: Symbol of the Wholesome Food Association.....25

Figure 2: Symbol of Climate Friendly Food and their Gold Award.....26

## List of abbreviations

BWAP	Bristol Welfare Assurance Programme
CB	Control Bodies
CCP	Critical Control Points
CSA	Community Supported Agriculture
CFF	Climate Friendly Food
Defra	Department for Environment, Food and Rural Affairs, London
DG SANCO	Department General for Health and Consumer Protection of the EC
EC	European Commission
EU	European Union
FTE	Full time equivalent
GO	Garden Organic
HACCP	Hazard Analysis Critical Control Points
ICS	Internal Control System
IFOAM	International Federation of Organic Agriculture Movements
ISEC	International Society for Ecology and Culture
ISO	International Organisation for Standardisation
NGOs	Non-Governmental Organisations
OELS	Organic Entry Level Stewardship scheme (English Organic Agri-environment Scheme)
OGA	Organic Growers Alliance
PGS	Participatory Guarantee System
SA	Soil Association
SACL	Soil Association Certification Ltd
WFA	Wholesome Food Association

## EXECUTIVE SUMMARY

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This part of the Deliverable D 21 reports on two exploratory studies of alternative approaches to inspection and certification in the UK which were agreed as additional elements of WP 2 of the CERTCOST Project. Both sections explore the potential for improvement of organic certification in terms of acceptance to farmers, and likely implications in terms of direct and indirect costs leading to an overall assessment.

The subject of the first study was how to encourage organic operators to aim for continuous improvements of their organic systems in line with the organic principles, following on from the conclusion of the CERTCOST review of the regulatory framework (Padel 2010). The work presented is based on a small survey of 18 farmers (keeping dairy cows or laying hens) using semi-structured interviews and two group discussions with inspectors and control body staff. It aimed to evaluate the feasibility of using animal based indicators in certification, in terms of both acceptability to the farmer and potential to facilitate improvement on farms by identifying problems and setting improvement targets.

Encouraging high standards of animal welfare is part of organic principles, but the principles do not provide any further guidance of how compliance with this aspiration is to be assessed. Animal scientists advocate a move to animal-based measures to monitor welfare. Improvement approaches are used in control for food safety controls and research has focused specifically on aspects of welfare and health in organic herds. Elements also exist in some group certification for small holders

For such an approach to be successful farmers need to believe in the validity of the assessment and 'internalise' the concept of using them to monitor progress. Some farmer readily accepted change but for others more preparatory work to introduce new concepts would be required. The main issues of concern to farmers were the inspector credentials, time taken and avoiding overlap with other schemes.

It is concluded that using the animal based welfare assessment on farms clearly has potential. In more general terms, the study highlights that improvement standards or

elements could be incorporated into some aspects of organic certification and the idea that should be further investigated, particularly for areas where the organic farming principles are aspirational. In developing any new alternative procedures a better understanding of the farmers' perception and expectation is required to increase their likely acceptance of any new suggestion, as well as understanding the expectations of the consumers and control authorities.

The second study describes and evaluates alternative schemes for growers. In the early days fees for growers were kept deliberately low, but more formalised control procedures led to increases in fees and several growers opted to leave organic certification. Subsequently, two alternative schemes developed providing small growers some form of recognition for their alternative practises. A third case evaluated is the proposal for a new scheme for community and hobby gardens and potentially also small growers developed by two leading organic organisations in the UK.

Based on this experience it can be concluded that participatory group certification schemes also operate in the EU and remain of great interest in particular to small growers. The possible recognition of such schemes for organic inspection should be further investigated, in particular with respect to consumer understanding and the impact on competition between organic operators certified in the different schemes.

# 1 INTRODUCTION

This part of the Deliverable D 21 reports on two exploratory studies of alternative approaches to inspection and certification in the UK which were agreed as additional elements of WP 2 of the CERTCOST Project. The two studies were:

- To evaluate the acceptance of output based monitoring of animal welfare by producers and inspectors and assess the potential for improving the certification system through such initiatives
- To assess the potential contribution of participatory guarantee schemes for small scale growers

Both parts used a largely qualitative approach, based on interviews with farmers and other stakeholder involved. Although the approaches used in these two exploratory studies were different, the same criteria have been used in the final sections drawing together the conclusions of each study.

The aim of the first study was to begin exploring whether the certification system can be used to encourage continuous improvements of organic systems in line with the organic principles. This was investigated using the practices of one UK control body which is monitoring animal welfare during inspection through animal-based parameters that are assessed by the inspector. The study aimed to establish how this approach is perceived by farmers and whether it represents the potential to move towards a situation where aiming for continued improvement can become part of the organic control system.

The second study looked into participatory schemes for small growers by describing and evaluating two existing schemes in the UK that have provided small growers some form of recognition for their alternative practices. The third case evaluated is the proposal for a new scheme for community and hobby gardens and potentially also small growers developed by two leading organic organisations in the UK. This part is closely related to Part A where elements of alternative certification systems were analysed.

Both sections explore the potential for improvement of organic certification of the respective cases in terms of acceptance to farmers, and likely implications in terms of direct and indirect costs leading to an overall assessment of the potential for improving organic certification.

## 2 ACCEPTANCE OF OUTPUT BASED MONITORING OF ANIMAL WELFARE AS A WAY TO ACHIEVE IMPROVEMENTS

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### 2.1 Introduction

Encouraging high standards of animal welfare is included in the internationally agreed organic principles (IFOAM 2005) and this is reflected in the European regulation for organic food. Article 3 of Regulation (EC) 834/2007 refers to “*management systems that enhance the health of soil, water, plants and animals, respect high animal welfare and are aimed at producing products of high quality*” (Art 3a & b of EC/834/2007). Specific principles for farming (Article 4) require that operators continuously develop and optimise their system, but this is not inspected as part of the control system.

The review of the regulatory framework for organic farming in Europe (Padel 2010) highlighted that the current certification requirements and rules for different types of operators in the EU Regulations focus almost exclusively on minimum (pass/fail) thresholds and do not emphasise the aspects of system improvement and goal achievement stated in the objectives and principles. In contrast ‘improvement standards’ emphasise the need for improvement, and require management skills and training capacity to be put in place to improve some aspect of the management of an operation. Food safety standards (HACCP and ISO 22000) include elements of progress or improvement. ISO 22000 requires an organisation to demonstrate its ability to control food safety hazards in order to consistently provide safe end products that meet both the requirements agreed with the customer and those of applicable food safety regulations, irrespective of whether this is certified through an external auditor (Færgemand and Jespersen, 2004). The HACCP principle of preventing problems through adopting better food hygiene is based on experience from the space programme that minimal requirements alone did not provide sufficient certainty that food products for astronauts are safe; food safety thinking had to become part of the whole business culture. Improvement approaches are also used in some group certification for small holders (see also Chapter 3 of Part A).

A precondition of working towards continuous improvement is the availability of suitable ways to assess the achievement of set objectives, so that progress over time can be tracked. In the area of animal welfare accepted indicators are still lacking. A report from DG SANCO concluded that the absence of a harmonised, recognised and reliable measuring instrument for comprehensively assessing animal welfare across species, farming systems and supply chain stages represents a major obstacle for the introduction of any common animal welfare labelling system (EC-SANCO 2009). Animal scientists are advocating a move away from using resource based indicators of welfare (such as amount of space per animal also currently used in organic inspections) to include more animal-based measures (such as the presence of visible skin lesions) (Whay et al., 2003). Although there is a general consensus among animal welfare scientists that such animal based measures give more information about the impact of farm practices on the welfare of animals, following this route presents many challenges, including the practicalities and repeatability of performing what are necessarily, to a certain extent, subjective measures (Rowe et al, 2011).

Organic standards currently refer to the observance of high animal welfare but do not provide any further definition of how compliance with this requirement is to be assessed. The main clearly measurable requirements in organic standards and certification for livestock are related to housing size and design, access to pasture and stocking densities, organic origin of stock and feed materials, and restrictions on the use of veterinary inputs. The potential of a range of indicators based on resource use, management, and the animals themselves, for use in organic farming standards and certification, was discussed by Leeb (2011). This paper drew attention to the need to consider each indicator's validity, feasibility, reliability and capability to identify problems.

Van Beuningen and Knorringa (2009) studied ways of fostering an attitude of improvement among smallholders but the issues raised appear highly relevant to farms of all sizes. They identified a need for actors in the "outer circle" (which in this case would include the certification body) and the farmers in the "inner circle" to agree on common objectives and progress indicators. They advocated a bottom-up approach, taking the farmers' needs as a starting point.

The work presented in this chapter is based on a small survey carried out with farmers and inspectors, aimed at evaluating the feasibility of using animal based indicators in certification, in terms of both acceptability to the farmer and potential to facilitate improvement by identifying problems.

## 2.2 Example studied of using animal based indicators in inspection and certification

The Soil Association, a standard owner and control body (CB) in the UK has begun monitoring welfare using five clearly defined Animal Based Welfare Measures for each species. The measures introduced were a subset of indicators developed for the Bristol Welfare Assurance Programme (BWAP) (Leeb et al., 2004; Main et al., 2007). The measures have been used on dairy cows and laying hens for the last three to four years. The control body is also involved in developing measures of other

livestock and measures for pigs and sheep have already been introduced as part of another project<sup>1</sup>.

Training of Inspectors in the BWAP methods began in 2006. Inspectors attend a two day practical training course before using the measures for assessment on certified farms.

Previously welfare was assessed through the inspector filling in a 'free text' comments box on the inspection form with a general paragraph on their personal opinion on the welfare of the animals in descriptive terms.

The inclusion of animal based measures allows a more objective report to be made, providing some quantitative information about the impact of environmental and management conditions on the animals themselves. During the inspection visit the inspector assesses twenty animals selected at random. For dairy cattle, the measures assessed are lameness, swollen hocks, skin lesions, cleanliness and body condition. For poultry, the measures are feather loss, comb colour, abnormal beaks, soiling of feathers and normal behaviour (dustbathing and ranging).

Given that the BWAP was developed by welfare scientists, it is assumed that the chosen parameters are relevant to assessing welfare. Currently, the results of the animal based assessment are taken into consideration in decisions on compliance with standards, in conjunction with some resource based measures, such as space allowances and other specific aspects of the housing system or design. Approaches to disease control and care of sick and injured animals have to be documented in a 'Health Plan', and evidence of the number of treatments given is also recorded as part of the inspection report. The CB has not yet introduced quantitative thresholds that must be met for any of the animal based parameters (e.g. a threshold prevalence of lameness which automatically incurs a non-compliance), but this may happen in future.

A prerequisite for the introduction of general thresholds is the validation of the assessment methods. The past four years have allowed the inspectors to gain an understanding of, and experience with, the animal based assessments, and introduce the idea to producers. They have also provided data which could be used to guide the setting of thresholds. The assessment tools could also allow benchmarking between operators, which in turn could aid progression in welfare standards.

### 2.3 Approach

The main approach consisted of semi-structured interviews to discover farmers' perception of and views on using welfare assessment as part of their organic certification as well as the experiences and views of inspectors and staff of the control body.

Interviews were carried out with ten dairy farmers and eight farmers who kept laying hens. They were recruited by telephone from two lists of 117 farmers with dairy cows and 120 farmers with poultry, provided by the CB. These lists excluded farmers who

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<sup>1</sup> The Soil Association is now involved in a national project, '*AssureWel*', a joint project of the Soil Association, Bristol University and the RSPCA funded by the Tubney Charitable Trust with the aim to explore how welfare outcome assessment can be introduced into the certification systems. For further details see <http://www.soilassociation.org/assurewel>

had recently taken part in a research project using the Welfare Quality® animal welfare assessment protocol, since it was considered that this would have a strong influence on their views, and there could be confusion between the two different assessment protocols. The first farmers contacted who could be reached and were willing and able to take part in an interview were recruited.

Dairy farmers were located in four UK counties where dairy farming is common: Devon, Somerset, Gloucestershire and Shropshire. All ten interviews with dairy farms were carried out face to face. Because the poultry farmers appeared more evenly distributed throughout the country, farmers with laying hens were recruited across the whole of the UK, making it necessary to rely on a telephone interview in five cases as no suitable appointments could be made. Each interview was conducted by one of two researchers with the person(s) on the farm who would normally have contact with the inspector on the day of the control visit. An overview of the farms recruited is presented in Table 1 below.

The interview guide included questions on the structure of farms, and the time and costs associated with preparing for and carrying out the certification inspection (as had also been used in the data collection for Task 2.2 (Business costs of organic certification, see Part B of this report). It also covered the farmers' awareness of changes to the inspection routine, and their perception of welfare monitoring as part of the control. Finally interviewees were given the opportunity to make suggestions on how certification could be improved and made more cost effective from their point of view. In addition, two group interviews with CB staff were carried out. The first one took place prior to the farmers' interviews with ten people including those responsible for standard development, inspection and certification. The second meeting was conducted after the farmer interviews with three inspectors, and covered the inspectors' experiences of inspections, particularly the animal based welfare measures.

All interviews were recorded using digital equipment and transcribed in summary. The analysis focused on identifying common themes and contrasting views in the answers using a simplified coding approach.

The study did not involve any assessments of the welfare on farms.

## 2.4 Results

### 2.4.1 The farms surveyed

The farms recruited covered both mixed and specialist enterprises with the majority of dairy farms being specialised and the majority of farms with laying hens being mixed farms. The mixed farms in both groups also kept other livestock species but these have not been subject to monitoring by animal based measures<sup>2</sup> in the inspection process for the same length of time, and were therefore not specifically

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<sup>2</sup> The control body is also involved in developing measures of other livestock and measures for pigs and sheep have already been introduced. The Soil Association is now involved in a national project, 'AssureWel', a joint project of the Soil Association, Bristol University and the RSPCA funded by the Tubney Charitable Trust with the aim to explore how welfare outcome assessment can be introduced into the certification systems. For further details see <http://www.soilassociation.org/assurewel>

covered in the interview. Five dairy farms also had a beef enterprise, three of them also kept sheep. Two of the poultry farms grew arable crops and a small area of horticultural crops. General descriptive data for the sample of farms are shown in Table 1. The median is used as the summary measure due to wide dispersion, and skew in some parameters.

Three of the fifteen people taking part in the dairy interviews and six of the nine taking part in the poultry interviews were female. Farmers keeping dairy cows had been farming for a longer period (on average 28 years), whereas several of the poultry farmers were new entrants to the sector. Dairy farms covered the typical size range of organic herds, while most of poultry farms had relatively small flock sizes. In Table 1 median and range are included as well as mean and SD due to the skewed nature of the data for some descriptors.

**Table 1: General characteristics of the farms surveyed**

	Dairy			Poultry		
<b>No of farms</b>	10			8		
	Min	Max	Median	Min	Max	Median
<b>Farm size (ha)</b>	61	285	223	4	276	37
<b>Herd/flock size</b>						
<b>No of milking cows</b>	50	250	130			
<b>No of laying hens</b>				16	300	85
<b>Stocking rate</b>						
<b>LU/ha</b>	0.7	1.7	1.6			
<b>Layers/ house</b>				16	100	62
<b>Annual production</b>						
<b>l/cow</b>	3000	7800	6100			
<b>Eggs/ bird</b>				40	300*	200
<b>Years farmer in conventional farming</b>	2	60	30	0	20	1
<b>Years farmer in organic farming</b>	2	36	11	3	25	5
<b>No of staff</b>	1	6	3	1	3	2

#### 2.4.2 Farmers' awareness of animal based welfare measures

In response to the question “*Have you noticed increased attention being paid to the animals in inspections?*” the dairy farmers appeared to be less aware of the inclusion of animal-based parameters in inspection, compared with the poultry farmers. Only half of the dairy farmers said that they had noticed a change over the years, such as an increase in the time the inspectors spent looking at the animals. Two dairy farmers referred directly to quantitative monitoring of lameness and swollen hocks, but a more common response was “*They’ve always looked at the animals*”. The inspectors

suggested that the farmers had already become accustomed to the animal based welfare measures being part of the certification process in the last few years, and did not compare the time taken before and after these measures were introduced.

In contrast, six of the eight poultry farms said they had noticed an increased emphasis on outcome based animal assessment. They were aware that the inspectors were looking at feather pecking, cleanliness of birds and the expression of certain behaviours. The two poultry farmers who had not noticed any increase were of the opinion that *'our inspector has always been very thorough'*.

Only half of the dairy farmers reported that they had received any feedback from the inspector on the welfare of the animals. They saw what was said as complimentary, but rather general, e.g. *"He said we passed with flying colours"*; *"He couldn't find a thing wrong"*. No farmers in either group referred to the feedback having led to any changes in management.

All poultry farmers stated that animal welfare was paramount on their own farms, but the knowledge that inspectors were assessing individual birds did not influence their management.

No direct assessments of welfare were made on the farms involved as part of this study, but all farmers had a good opinion of the welfare of their own animals.

All three inspectors agreed that they would use the findings from the animal based assessment to draw the farmer's attention to a situation causing concern if the occasion arose. One inspector always liked to use the assessment as positive feedback while another admitted that he had not used this opportunity: *"If there's not a problem you probably don't discuss welfare much, to save time"*.

All inspectors considered the new system of animal based measures to be helpful, allowing better standardisation between inspectors and an element of objectivity which made it possible to observe improvements over time, or to be alerted to the emergence of problems.

### 2.4.3 Influences on the time and cost of inspections

All farmers were asked *"how long does the inspection take?"* and *"what other costs are associated with certification?"*. The duration of the inspection ranged from 4 hours to 18 hours for the dairy farms, (18 hours was the answer for an enterprise where the milking cows and youngstock were on separate farms and there was also a beef enterprise). The replies from farmers with laying hens ranged from 3.5 hours to 1.5 days (again the longest time reported was for a farm with multiple livestock enterprises, in this case also including beef, sheep and pigs).

All farmers reported that inspectors usually spent about one third to half of the total inspection time with the animals (or outdoors), with a tendency for lower proportions for the poultry farms. The rest of the time was devoted to paperwork. No farmers quantified the time specifically dedicated to the welfare assessments. Two of the poultry farmers thought spending more time with the animals would be beneficial while one dairy farmer gave the caveat that, if animal based measures were to become a more important part of the certification process, this should not increase the length of the inspection.

All inspectors agreed that the animal based assessments had added time to the duration of the farm visit. One inspector tried to minimise the time the farmer needed to be with him, so sometimes carried out the assessment in the absence of the farmer, while another tried to carry it out quickly while walking through the animals with the farmer and asking him questions. Inspectors found it difficult to quantify the time because it was so dependent on factors such as animal numbers, farm layout, visibility and ease of access to the animals. The inspectors expected that time savings would arise from a new reporting system to be introduced by the control body in the near future.

Fees reported for certification for dairy farms ranged from £536 (€640) to £800 (€956) (mean £680 (€812), sd £134 (€160)), and for farms with laying hens from £260 (€311), to £618 (€738), (mean £515 (€615), sd £131 (€156)).

The main cost of certification, other than the fee paid, was seen by the farmers to be the time spent on preparation for the inspection and with the inspector on the day. Time spent preparing the records for the inspection varied from 1 hour per month to 14 days over the year but many people could not give an exact time, with answers ranging between '*a lot of time*' and '*pretty quick*'. A common situation was that a regular amount of time (often unspecified) was spent on keeping records which were used for many purposes including certification, and one or two days were dedicated to getting everything ready immediately prior to the inspection. The only occurrence of outside help in meeting certification requirements was enlisting the help of the veterinary advisor in drawing up the required Herd Health Plan on some dairy farms.

No farmers considered that, were an increased emphasis on outcome based assessment to be made, it would affect the time and money spent in preparation of animals or paperwork, with the exception of one dairy farmer who said "*If you had too many lame cows you'd do something about it*".

All three inspectors considered that the time they spent on the animal assessment was worthwhile, although they believed that it would be difficult to persuade assessors in other schemes, such as Farm Assurance, of this. "*Even if it just takes 30 – 40 seconds per animal, you have to do 20 and there could be 4 different species on the farm*". "*But once you're used to it, it just becomes part of the physical inspection*".

Further information on the costs associated with the certification process as a whole, gathered from a larger sample of farms, is presented in Part B.

### 2.4.4 Acceptability of the assessment and the assessors to farmers

All egg producers and the five dairy farmers who had noticed the change were supportive of the idea of spending more time during inspection on the monitoring of animals. Reasons for this, when given, were generally related to enhancing the reputation of organic farming, rather than improving the lot of the animals, for example, "*I can see that looking at these measures is protecting the brand*".

A minority of dairy farmers with negative attitudes appeared to question not just the outcome based indicators, but whether there is a need to focus on welfare at all, in organic certification. "*They need to see the animals are healthy and OK but need not go any further than that. It's none of their business*". For some, this seemed to stem

from the opinion that being organic automatically ensured good welfare. However, one dairy farmer referred to the importance of the consumer perception of good welfare on organic farms: *“Yes, certification has to include welfare; it's claimed that welfare (on organic farms) is better, or that's what people believe”*.

Although not asked directly, dairy farmers often raised questions about who should carry out the animal observations. Two questioned whether the inspectors had the skills to make such an assessment. A third farmer felt that a report from the veterinary surgeon, who sees the cows regularly all year, would be the best input to a welfare assessment. *“I don't think the inspector is the right person to be looking at welfare. Welfare issues are better done by the vet”*.

Farmers with poultry also remarked that the knowledge and background the inspector has is key to the process: *“The inspector should know something about the animals they are looking at. Not an arable guy for geese”*. Some dairy farmers questioned the repeatability of the assessments, particularly between assessors. There could be some grounds for this reservation, since interviewing the inspectors revealed that there was variation in the rigour with which the inspectors kept to the instructions for sampling and number of animals assessed.

The inspectors confirmed that their credentials for carrying out welfare assessment could be a difficult area with farmers. *“Yes, we're interrogated all the time about it. I just tell them what I've done and what I'm doing”*.

Six dairy farmers expressed reservations about a welfare assessment based on inspection of animals on a single annual visit, whoever carried it out (*“What's the point of a chap that just comes once a year?”*; *“The inspectors can get a snapshot if they know [enough about] stock but time will always be a limiting factor”*). Most farmers felt that observations on the animals still needed to be combined with analysis of health records to give an overall picture. On the other hand, inspectors felt confident that the method did give them a realistic picture of the herd.

The inspectors considered the training and framework for assessment as useful, especially when they started working with new species. They found it helpful to have numerical results to refer to if they wanted to raise a point. One reported: *“In certain, more receptive herds, it is having an effect”* (of increasing action to improve welfare).

There was some variation of views among dairy farmers on which organisations should be taking responsibility for improving animal welfare, and to what extent. Five dairy farmers said that the milk buyers had become increasingly involved in auditing or assessing animal welfare and one felt that this was sufficient. Another felt that welfare should be considered by *“the dairy or the CB but not both”*. A third dairy farmer saw no need for more control body involvement in this area. In contrast, the inspectors believed there was definitely a responsibility for certification to address welfare.

### 2.4.5 Use of targets as part of farm management

The farmers were asked *“What kind of [welfare and health] targets do you set for your farm business?”*

In response, all the dairy farmers mentioned using some type of targets; two mentioned only targets related to financial performance while four mentioned targets related to health and welfare of the cows. Three poultry farmers said they did not

work with targets for the laying hens, mentioning two different reasons: “*the enterprise is too small*”, and “*no problems with welfare*”, Two dairy farmers expressed the opinion that to be “*moving in the right direction*” was important, as illustrated by the following statements:

*“Drawing a conclusion on one day is not it. Isn’t it better to say there’s progress?”.*

*“Monitoring on a monthly basis shows how these (health) aspects are progressing. They [staff of the control body] might like to consider this.”*

Another considered that some aspects of progress could be difficult to document:

*“What are your aspirations, handicaps, what have you got right? Is the herd moving in the right direction? How can you record that?”*

Poultry farmers sometimes set themselves animal welfare related targets for their other species, but not with the poultry as they perceived no health problems with them. Some farmers in both groups had targets which were not formally recorded but “*more of an idea to work towards*.” The herd health plan required for certification and farm assurance was mentioned by five dairy farmers but generally as a nuisance to prepare rather than a useful document. Inspectors commented that.

*“Lots of farms don’t have a review of the plan and don’t make targets”.*

*“The poor plans are “generic, tick-box, just descriptive, not proactive”.*

This suggested that testing or seeking for improvements in welfare based on the animal based measures might be more effective.

### 2.4.6 General suggestion to improve certification for the farmer

At the end of the interview the farmers were given the opportunity to respond to a general question “*How could the certification process be made more beneficial to you?*”

A common response was frustration that the inspectors could not give advice on how to put things right. Some farmers understood that “*there’s regulation about it*” but others could not understand why this was the case. They saw the inspectors as a good potential source of information because of the number of different farms they visit.

*“It’s no good getting advice from the Certification Officer on the phone, you need to be able to get advice from the inspectors who are out on the farms seeing how it is done”.*

Staff of the CB were clearly aware of the need to ensure that inspectors do not give advice, but felt that the positive elements mentioned in the inspection report can be well received and seen as reflection of the improvements achieved since the last inspection.

Overlap with other schemes was seen both as having the potential to improve efficiency, but also causing duplication. For example, five dairy farmers had their Farm Assurance inspection on the same day as the organic inspection. Farmers where the two inspections were conducted separately commented on repetition, caused by having to complete the paperwork for two different schemes. Whether the assessments were combined or occurred on separate days was often determined by

the milk buyer. The inspectors also commented that there was scope for more synchronisation of schemes.

Six out of the eight poultry farmers said they used their organic paper work for other schemes, most commonly OELS (Organic Entry Level Stewardship Scheme) and for cross compliance monitoring by Defra (Department for Environment, Food and Rural Affairs, London), to ensure eligibility for support payments. Some farmers felt that repeated inspections, for example by Soil Association and Defra, were unnecessary duplication (“*CB inspection is much better than the Defra one*”; “*Defra should trust organic farmers more*”).

### 2.4.7 Cost effectiveness of certification

The question of “*How could certification be made more cost effective?*” raised three main themes, consistent with those reported from a larger population, in relation to the certification process as a whole, in Part A.

Many of the poultry farmers felt that certification costs were too high in view of the small scale of their enterprise and would prefer fees determined as a percentage of turnover or sales. Small scale poultry farmers also felt that a reduction in “*red tape*” [bureaucracy and procedure] enabling them to supply their local outlets would increase the cost benefits of certification, by giving them better marketing opportunities, since it was very difficult for small suppliers to market through large scale outlets.

Farmers also suggested adopting a risk-based approach in which fewer, or shorter inspections and therefore lower fees would apply to farms that consistently have no major non-compliances (similar to Suggestion 2 in Part A of this report) confirming that a risk-based approach is likely to be accepted by organic operators. Another suggestion of some farmers was greater reliance on self certification (operators returning forms regularly) combined with unannounced spot inspections: This was seen as a way of protecting the credibility of the organic brand by some farmers but strongly resented by others. The inspectors expected a negative response to this suggestion from farmers and did not think that spot checks would give much advantage in terms of reliability of animal welfare assessment, although they would give a more realistic impression of everyday “*housekeeping standards*”. Inspectors considered that the majority of welfare issues could not be covered up with notice of the inspection, unless animals were actually removed or concealed.

The discussion will cover first the specific issue of the animal based welfare measures themselves, contrasting first the dairy and poultry farmers, and then all farmers with the inspectors. Then the potential for introducing progress based standards will be discussed, using animal welfare, assessed by animal based measures, as an example.

## 2.5 Discussion

### 2.5.1 Differences between dairy and poultry farmers

There appear to be clear differences between the attitudes of the dairy and poultry farmers. The dairy farmers seemed less aware of the welfare parameters being

assessed and more averse to the idea of welfare assessment during inspection. This might result partly from the contrasting backgrounds of the two groups of farmers. The dairy farmers were from a more traditional farming background, had been farming for longer and had more conventional farming experience prior to converting to an organic system. Being longer-established in farming might have increased their resentment of being assessed (in many cases this was seen as being “judged”) by those perceived as “outsiders” and “amateurs”.

In contrast, the poultry farmers had generally become involved in farming more recently than the dairy farmers and tended to have begun immediately, or more quickly, in organic production. Also, animal welfare in poultry production has recently received a great deal of media attention in the UK. This may have made the egg producers, who were more often in touch with the public through direct product sales, more alert to the importance of demonstrating a high standard of welfare. The welfare of dairy cows has also received public attention, but to a lesser degree, and the dairy farmers’ contact with the consumer tends to be more distant (with the exception of those with farm shops). Half the dairy farmers mentioned an increased concern from their milk buyers about welfare, but perhaps felt less responsible themselves to promote good welfare to the customers.

### 2.5.2 Differences between farmers’ and inspectors’ attitudes to animal based welfare measures

In general the inspectors had more confidence in the value of the welfare assessment methods than the farmers. This is likely to be because the CB was involved in the project which developed the measures, whereas direct consultation of farmers did not take place (University of Bristol, 2004; Whay et al, 2003).

More discussion between the farmer and the assessor on how the assessments are made might be beneficial, giving the assessors opportunity to demonstrate their understanding of the measures while acknowledging the farmer’s expertise. There is also potential for the inspectors to make more use of the results of the assessments in discussion with the farmer. However, this would all take time on the day of the inspection.

A point often raised by the dairy farmers was that the welfare issue was already sufficiently addressed by the milk buyers, and hence some were opposed to further requirements to assess welfare by the CB. This contrasts markedly with the belief of the control body that it has a responsibility to ensure “good or better welfare [than conventional]” on the organic farms and to have evidence to support such claims.

### 2.5.3 Potential for target based measures of progress

In contrast to the current certification system which involves examining in detail whether minimum requirements have been met, a system aimed at monitoring progress would help to determine where a farm is on the way to making improvements and tackling problems (Schmid 2010).

Such an approach would allow the setting of individual goals for each operator, taking the specific circumstances into account. Although not part of a certification scheme, an example approach to improving health and welfare piloted on Austrian pig farms and dairy farms in seven European countries has included welfare

assessment, feedback and benchmarking as a means of communication between farmers and advisors, and the setting of goals for improvement by farmers (Leeb, 2011). In this situation, farmers have been involved in the whole planning process and setting their own goals and good uptake has been achieved. Farmers gave positive responses to the use of animal based welfare indicators in this project.

Progress measured against the farmer's current position might be perceived as less critical or threatening than measuring the farm against a fixed welfare standard, or other farms. Although farmers often seem interested in "benchmarking" many aspects of their farm against others, in one survey dairy farmers did not rank "having less lame cows than other farms" as a particularly high motivator (Leach et al, 2010). However, they were strongly motivated by "pride in a healthy herd". This subtle difference illustrates the variation in response that can be elicited by the way a questions or information are presented or worded, and the way farmers perceive they are being judged, or judging themselves. At present, farmers are seldom receiving positive feedback on welfare. Recognising and drawing attention to good aspects of herd management should help to build a better relationship between farmer and assessor. Spending a little more time on communication with the farmer on these issues, as would be required if farmers were to be included in the assessment of the current position and the setting of goals could be a good investment.

The general principle of target-based progress standards does have potential but it appears that the concept of working towards targets, even for measures other than welfare, will be unfamiliar for some farmers. Proof of "*moving in the right direction*" was suggested by two farmers as a possible improvement in the approach the CB takes to health and welfare assessment. Some of the dairy farmers clearly monitored their businesses closely. However, other farmers did not seem to set themselves goals for any aspect of the business. This was somewhat surprising; it might be because they were satisfied with their level of performance, or because lack of monitoring meant they were unaware of performance. Some organic farmers, particularly the small scale poultry farmers, may not be strongly driven by performance or profit goals, either because they have made a lifestyle choice to undertake this type of farming, or because the poultry are a minority enterprise and other parts of the business receive more attention. These differences in attitudes within and between the small numbers of dairy and poultry farmers involved in the present study are reminders that farmers will be starting from different points of opinion, awareness and willingness to change.

As stated by van Beuningen and Knorringa (2009), a common language is needed to develop and use progress standards. Farmers and assessors need to agree on the indicators of progress and the size of steps in improvement that are aimed for.

This would imply that the criteria for monitoring have in the first instance to be agreed between the operator and the CB, but do not necessarily have to be widely recognised. It is likely that the process of agreeing targets and monitoring will strengthen the operators' responsibility for achieving the desired outcomes and lead to improvement.

#### 2.5.4 Acceptability of the assessments by farmers

Whatever the parameter to be improved, farmer acceptance of the methods of assessment is vital to success in setting standards and achieving progress. The farmers need to believe in the measures, and to 'internalise' the concept of using them to monitor progress, as advocated by van Beuningen and Knorringa (2009). The assessment methods introduced by this control body were initially developed by dairy cattle welfare experts and veterinary surgeons in conjunction with control bodies (Whay et al., 2003; Main et al., 2007) and then selected, adapted and applied by one particular control body. Farmers were not consulted prior to the inclusion. In this study of animal based welfare measures, the farmers interviewed raised the same issues of validity and feasibility, which were mentioned as vital by Leeb (2011), when describing how a herd health planning approach was developed. Although these attributes were considered by the scientists involved in the development of the animal based welfare measures (Main et al., 2007) it appears that not all farmers are convinced that they have been adequately addressed. Using animal based measures in certification did not start from the farmers' needs, and the top-down approach of development involving scientists and the control body, in contrast to bottom-up as advocated by van Beuningen and Knorringa (2009) may act as barrier to acceptance by farmers. Including stakeholders in the development of new approaches from the start would be expected to lead to better acceptance and compliance (Rushen et al, 2011). Consultation with farmers is being included as part of a subsequent project which is working towards more incorporation of these measures, and development of the concept of "Progress standards" (AssureWel website accessed 27/1/2012)

A very important aspect of acceptance of validity by the farmers appeared to be credibility of the assessor. This incorporated issues of qualifications, competency and repeatability, a concern identified and tested by Mullan et al. (2011). These authors demonstrated that, following training, assessment of welfare outcome measures was relatively independent of observer attitudes to animal welfare. March et al (2007) showed that inter-observer reliability of scoring lameness in cattle improved with training. Some farmers considered the vet to be better qualified to carry out such assessments.

Although the inspectors seemed confident with and in the assessment methods, and welcomed the structured framework they provided, they will have to convince farmers that they are qualified to assess welfare, if progress targets based on their reports are introduced. Each of the following suggestions was made by at least one farmer in this study, although with reservations in some cases. For some farmers, explaining in more detail the distinction between welfare and health parameters would be helpful; they believe the latter should be assessed by the veterinary profession. With others it may mean more discussions and demonstrations of how the welfare parameters are defined and how the assessment is carried out. Methods involving other people in the assessment, for example the veterinary surgeon, could be considered. Alternatives which may be more relevant to supporting improvements are assessment by the farmer, or by peers, for which training would be helpful.

The relationships between who sets goals, the level of the goals, and the effect of the goals on ultimate performance is complex, and has been studied widely in the field of organisational behaviour, but less so in a specific agricultural context. Erez et al (1985) found that participative goals led to higher performance than assigned goals, although Latham and Steele (1983) failed to demonstrate this clearly. Exploring this conflict, Locke and Latham (1984, 2002) found that the way in which an assigned

goal is explained and presented is influential on performance. There can also be confounding between the way the goal is set and the level of the goal. Some authors (eg Latham and Steele, 1983) found that participatory goal setting increased the level of the goal, while others found the opposite. For example, Anderson et al (2010) reported that, although performance based bonus plans for sales do achieve sales increases, data from a US retail firm showed that when sales managers, rather than higher level supervisors, were involved in setting goals, the goals were lower and the sales achieved matched the targets more closely. This suggested that the lower level managers set targets which provided less of a challenge and were more likely to be met. Such “building in slack” is well recognised in accounting (Antle & Eppen, 1985).

Aside from the question of the goals themselves, van Beuningen and Knorringa (2009) saw a need to “*internalise an attitude of improvement*”. Our results clearly show that more needs to be done to introduce to farmers both the relevance and importance of welfare assessment and the concept of output based measures as part of certification. Such preparation is necessary before these concepts and methods are likely to be accepted as part of any strategy to achieve improvement in welfare, be this through internal targets or externally imposed thresholds. Greater emphasis on welfare in certification may meet a challenge from farmers who already feel their welfare is good (which may or may not be true) and therefore see no need for either assessment or improvement.

It should be noted that there was concern from both farmers and inspectors that too many organisations becoming involved in welfare would impose differing welfare and inspection requirements and, most crucially, there were fears that this would overload the farmer with tasks and paperwork, rather than benefiting the animals.

### 2.5.5 Time and cost implications

The results confirm that consideration needs to be given to the most time efficient manner of both including an assessment of welfare in the inspection visit and relating this to a progression element in the standards.

Reliable animal based measures are necessarily time-consuming to apply, due to the necessity for samples to be large enough to be representative (Mullan et al 2009; Main et al, 2010). Farmers and inspectors agreed that further use of animal based measures is likely to increase the time needed on the day of the inspection.

To incorporate a progress element in the standard, time would be needed for:

- 1) increasing the farmer’s understanding of the assessments,
- 2) carrying out the assessments, whether this is done by the farmer, the inspector or in consultation between them and
- 3) discussing the findings and agreeing the targets.

There is already a great deal of time pressure on an inspection visit, felt by both farmers and inspectors, and at present welfare is not always seen as a necessary topic for discussion, particularly if the status is not causing concern. A longer time required for the inspection visit is likely to result in higher certification fees charged by the control body. Results presented in Part B already show that inspection time of the CB in the UK is relatively long compared to other countries. So extending the time further could represent a barrier to the acceptability of this approach.

Farmers did not consider that increasing emphasis on welfare would lead to increases in the time spent in preparation for the inspection, neither did they expect increases in any other costs. However, in cases where interventions are required to reach the standards set, there are likely to be cost implications.

### 2.6 Conclusions and recommendations

The example presented in this chapter illustrates that control bodies are actively developing the process of organic certification and are aiming to address the perceived disconnect between the high aspirations of organic standards and some of the minimum threshold criteria which currently comprise the majority of organic certification requirements.

In the area of animal welfare, scientists are advocating a move away from assessing resource use to assessing the welfare of the animal, and the scheme presented here represents the attempt of one control body to develop standards and certification requirements in this direction. In this particular case the CB introduced animal based indicators to assess health and welfare but wanted to experiment with using the measures and exploring their potential to lead to improvements first before making changes to their standards.

Such output based animal welfare assessment clearly has the potential to be used for introducing an element of progression in organic standards that encourages operators to make improvement through the setting of farm specific goals and their monitoring during inspection. Animal based measures could also become part of more traditional certification systems and be used in addition to or replacing other minimum threshold requirements currently used to verify standard adherence. The study presented here was not able to assess in any way the reliability of using the animal based parameters to assess welfare in the certification process. However, these results should help to inform any bodies interested in introducing some measurement of progression about the groundwork that would be needed, the current acceptability of the idea and the challenges that would be faced.

In the following section, the results are summarised by considering the criteria that were used for the evaluation of suggestions in Part A of this report: acceptance by various stakeholders, cost implications and the potential for improvement of organic certification. Under each heading, first the use of animal based measures in certification has been considered, followed by the potential to use these as part of progress standards. The main focus is the perspective of farmers and the standard owner and control body, because the study was based on interviews with farmers and the staff of a control body and standard owner.

#### 2.6.1 Acceptance to farmers and the control body

Based on the results of this small exploratory study it can be concluded that some farmers are readily accepting animal based measures as part of the annual inspection visits, whereas others are more critical. More preparatory work by the control bodies would need to be done to introduce the farmers to the concept and to the specific measures to increase the wider acceptance. The main issues of concern

to farmers were the inspector credentials, time taken and avoiding overlap with other schemes.

To use these measures effectively as part of a progress standard, the farmers need to believe in the validity and to 'internalise' the concept of using them to monitor progress. For this it would be worthwhile considering alternative or complimentary methods of carrying out the animal based assessments, including joint assessment by farmer and inspector, and exploring whether farmers could also be trained in carrying out such assessments (see also Suggestion 7 in Part A). Involving the veterinary surgeon, who has more regular contact with the animal would be another possibility. Also the inspection report could be used to demonstrate progress towards a target as reflection of the improvements achieved since the last inspection. The requirement to discuss and agree goals with the CB would need to guard against the risk of the farmer deliberately setting too easily achievable goals.

In this case, the initiative to develop the approach came from the CB and the interviews with the inspectors confirm acceptance of the approach by inspectors. Acceptance by other stakeholders was not directly investigated. Staff of the control body were not particularly in favour of using progression elements in standards and certification to develop different levels of certificates (such as Bronze, Silver or Gold awards) because it was felt that this could potentially be too confusing to consumers. Other research within the CERTCOST project (see Janssen and Hamm, 2011) indicates generally low levels of awareness of consumers about the detailed requirements of the standards so these concerns may be well-founded. The study was also unable to further investigate the attitudes of other stakeholders such as competent authorities and accreditation bodies. A brief review of the EN 45011 norm does not appear to indicate fundamental contradiction to using progression elements in the standards, but further work would be needed to evaluate this.

### 2.6.2 Impact on direct and indirect costs

Assessing animals in a robust manner takes time, even if, as here, only a sample of animals is assessed. Including a progressive element in the inspection visit would also require time to ensure that the farmer understands the assessments and ideally is involved in some way in carrying them out, as well as discussing the findings and agreeing future targets.

Inspection times on the farms surveyed varied from 3.5 hours to 18 hours and the farmers were clearly concerned about any additional time required during inspection, but the farmers were positive about spending more inspection time with the animals rather than with paper work. The farmers were not able to give any estimate of how much additional time using animal based measures would add to the visit.

Inspectors were also concerned about the time implication of additional inspection elements, but again were not able to give any accurate figures on how long it takes them, because of the variation caused by farm size, layout and where the animals are on the day of inspection. Some believed that other changes could be made that would lead to reduction of the control time.

Avoiding repetition and overlap between the requirements of different external bodies will require organic certification bodies to communicate with other organisations

which make demands on the farmers and explore possibilities for combined visits or exchange of information.

**Table 2: Cost calculation for animal based measures (per farmer and year)**

ITEMS	Assumptions	COSTS (€/ FARM /YEAR)
<b>Inspector training</b>	2 day training course, €500/day, cost divided between 40 farms allocated to one inspector	25
<b>Carrying out assessment</b>	20 animals at 1 minute per animal, jointly carried out by farmer and inspector, 40 min @ €60/hour	80
<b>Increasing farmers awareness</b>	Farmers attend 1 training day on the use and relevance of measures (once every 5 years) @ €500/day	100
<b>Discussion of findings and agreeing targets</b>	Half an hour each for farmer and inspector @ €60/ hour	60
<b>TOTAL COSTS PER FARM (ONE LIVESTOCK SPECIES) OF USING ANIMAL BASED MEASURES AND INCORPORATING THEM IN A PROGRESS ELEMENT</b>		<b>265</b>

An attempt has been made to estimate the costs of introducing animal based indicators as part of the inspection visit and developing this into a progression element of certification. This is presented in Table 2 in a similar way to the estimates which have been presented in Part A of this report. Cost assumptions for training days and hourly rate are the same as those used in Part A. The example is based on the assumption that the time required for the animal based assessments is approximately one minute per animal for one species; this is quite a conservative estimate, and depends on the size of the herd or flock and the facilities in which they are assessed. Locating the same number of animals in a larger group can take longer. It is assumed in this costing that the number of animals assessed will remain the same, at 20. There is a fine balance to be struck between the feasibility of the exercise and representativeness of the sample. Twenty animals is considered a minimum number and assessors reported that this number did enable them to pick up problems and detect the results of management changes. Costs would increase if more animals are assessed. The results suggest that the current systems used by this CB cost approximately €100 per operator. Additional costs to move this to a progress element would arise from the involvement of the farmer through a one day training course and the time needed to discuss assessments and progression targets between the farmers and the inspector. The farmer will also need to spend time after the inspection day on considering and implementing management changes to enable him to reach the targets, but the amount of time is impossible to estimate as it will be specific to each situation.

### 2.6.3 Improvement potential

Using the animal based welfare assessment on farms clearly has potential since farmers were generally in favour of more time and attention being paid to the animals during inspection, and its wider introduction should be considered. The fact that “Herd Health Plans” are often viewed as a “tickbox exercise”, and not acted upon or updated suggested that testing or seeking for improvements in welfare based on the animal based measures might be more effective. Farmers themselves recognise that the Herd Health Plan can easily become a “useless document”, and therefore are likely to appreciate a more animal based indication of health and welfare.

The farmer interviews also suggest there is potential for target-based assessments, since several farmers were averse to an assessment of welfare based on a single visit on a single day. One dairy farmer particularly mentioned goals and progress of the business being an important aspect which certification should take into consideration, but was not sure how these could be captured or recorded.

Careful consideration needs to be given to the number of measures used and the number of animals assessed regularly because this has major implications for the time spent and the cost involved, but also for the reliability of the results (Mullan et al, 2009). Considerable work has been and is still being carried out by the Soil Association and its partners in the Assurewel<sup>3</sup> project, the results of which will provide valuable input into how this could be used more widely. Animal based measures clearly have the potential to be used in certification, especially if they are used to replace other control elements and thus overall time impact can be kept to a minimum.

Output based measures also clearly have the potential to be used as part of a progress element on farms to achieve an improvement in animal welfare by setting specific targets, and one farmer directly suggested that this is what CBs should do. However, this is a new idea for many farmers. Some, but not all, farmers interviewed actively used welfare targets to manage their herds, but for some this idea would be a fairly new concept. Offering training for the farmers in using animal based measures and involving the farmers themselves or their peers in carrying out the assessment were two suggestions that were made. Previous research indicates that this approach works well if farmers have ownership, i.e. fully accept the measures used and are involved in setting goals, although there is a risk that they may set easily achievable goals.

Farmers’ acceptance would be more easily achieved by a ‘bottom-up’ initiative that starts with farmers’ needs and involves them from the start. However, it is likely that such an approach would struggle more to be accepted widely as a rigorous assessment of animal welfare. At present, farmers are seldom receiving positive feedback on welfare. Pride in a healthy herd is an important motivator for farmers (Leach et al, 2010) Positive feedback recognising good aspects of herd management should help to build a better relationship between farmer and assessor, and pave the way for more challenging exchanges if these are necessary.

Based on this it is concluded that progress standards will in the short term probably not replace existing minimal requirements, but provide an interesting idea that should

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<sup>3</sup> <http://www.soilassociation.org/assurewel>

be developed further. In particular, the combination of improvement elements (in areas where the organic farming principles are more aspirational) with a reduced number of minimum requirements should be further investigated.

Output based animal measures and their use as part of a progress standard have the potential to improve organic certification and address the perceived disconnect between the objectives and principles of organic farming and what is verified in the control system. This exploratory study indicates some reservations on the side of farmers in accepting new measures and a new approach to certification. This highlights that it in developing any new alternatives not only do the expectations of the consumers and control authorities need to be considered, but a better understanding of the farmers' perception and expectation is also required to increase their likely acceptance of any new suggestion.

## 3 ALTERNATIVE PARTICIPATORY SCHEMES FOR GROWERS IN THE UK

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### 3.1 Introduction

The problems relating to the high cost of certification relative to the size and turnover of smaller holdings have long been recognised in the UK, in particular by the Soil Association and its certification company (Soil Association Certification Ltd. SACL). The Soil Association introduced private organic standards in 1967 followed by a certification scheme in 1973 initially for farmers. It now operates as part of the EU certification system (GB organic certification 05) but exceeds the requirements of the EU Regulations in several areas of activity (for details see [www.organicrules.org](http://www.organicrules.org)).

In the early days fees for small-scale growers were kept low as an acknowledgement of the cost burden to what can be quite small businesses. Competition with other UK control bodies led to a sharp upwards revision of fees as larger farmers threatened to move to other bodies because they were subsidising the grower and lower small producer fees. Fees for small growers and producers effectively quadrupled over a period of 2 to 3 years in the 1990s.

To address the concerns of some licensees, SACL introduced a group certification scheme in the mid 1990s in which groups of small producers located close together geographically (within a area 10 miles [16 km]) were inspected on the same day thus reducing the overheads associated with a single inspection (such as inspector time, travel and subsistence). The scheme was closed to new applicants around 2000, because the size of groups applying became too small to be cost-effective. Existing groups were allowed to continue and some are still active today.

The operation of these groups required a measure of co-operation between the individual producers. This ensured that records were internally consistent and were all ready for the allotted day of inspection. One member of the group would normally take the role of co-ordinator and liaise with the control body. This implies a measure of internal control but these groups fall far short of the ICS model described in Part A

It was during this same period of time that the first significant alternative to organic certification made its appearance. Two alternative schemes are operating in the UK (Wholesome Food Association (WFA) and Climate Friendly Food (CFF)). Some

elements of the schemes resemble participatory schemes examined in Part A. A new scheme for organic gardening is currently been proposed by two organisations engaged in the organic sector. This additional work has examined some of the analysis and conclusions with particular reference to alternative schemes in the UK.

At first the approach to carrying out the work is briefly described, followed by a description of the schemes and a comparison of the schemes in relation to certification fees, membership structure and relationship to organic certification, before some conclusions are presented.

### 3.2 Approach

Initially research was undertaken by working through internet searches to access the websites of two established alternative certification schemes, the Wholesome Food Association (WFA) and Climate Friendly Food (CFF). A third scheme (with a draft title of Green Growers) is currently under development by two of the leading organic organisations in the UK: Soil Association charity and Garden Organic (formerly the Henry Doubleday Research Organisation).

Two interviews were conducted with the Managing Directors of the first two schemes to identify costs, uptake by producers, the incidence of non-compliances, and their expectations for the future of such schemes. For the third scheme the interview focussed on potential rather than uptake of the scheme and detailed notes were taken from a presentation given by the policy director and the GO Chief Executive of one of the two organisations.

The views of the Organic Growers Alliance (OGA) representing commercial growers were sought with particular reference to the Green Grower scheme. The majority of OGA members are relatively small in terms of production area and therefore under some pressure with respect to certification costs. The Chair of the OGA was interviewed, issues were discussed in committee meetings and general opinions canvassed from growers at events such as the Horticultural Symposium organised in 2011 by the Soil Association.

### 3.3 Three alternative schemes for growers in the UK

Three schemes were examined, two of which are up and running while the third is still being developed. The longest running is the Wholesome Food Association (WFA), the Climate Friendly Food (CFF) scheme has just completed a pilot stage and the Green Grower is undergoing a process of consultation with growers and other schemes.

#### 3.3.1 The Wholesome Food Association (WFA)

The Wholesome Food Association (WFA)<sup>4</sup> was set up in direct response to the problem of growers unable to afford organic certification. It started with a group of growers in North Devon in the South West of England who wanted to put an 'organic' symbol on their produce but could not afford the fees because they were only selling

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<sup>4</sup> <http://www.wholesome-food.org/>

small quantities. They created a symbol of their own and an approach that is essentially participatory in nature (see Figure 1).



Figure 1: Symbol of the Wholesome Food Association

The scheme operated locally in the first instance on an essentially *ad hoc* basis. It was extended nationwide with an organised structure in response to many enquiries from growers in a similar position to the original group. The group has no standards but simple and basic guiding principles, and the only specific rules list which pest and disease control inputs can be considered. They are much shorter than the standards of organic control bodies, but nonetheless embody very similar principles to the organic standards but with great emphasis on local production and consumption, respect for the environment and quality of life.

Every WFA symbol holder is expected to adhere to the principles. There are no formal inspection procedures but every member is expected to hold at least one Open Day per year. They are also expected to abide by the WFA's Open Gate policy which requires that land and production facilities must be available for viewing at agreed time by any other WFA producer, supporter, WFA director, any retailer/distributor or any of their customers.

The cost of membership and the right to use the WFA symbol is £27 (€31) per year and as such considerably cheaper than the cost of organic certification. The WFA makes it very clear that this is not organic certification and they explain the legal status of the term 'organic' and its relevance to ensuring integrity in longer supply chains. There is a strong emphasis on 'local' food in the principles.

There are currently 65 members listed on the WFA website as suppliers – most are growers although there are some livestock producers. The geographic spread includes Wales, Scotland and England but not Northern Ireland at present.

The organisation is a not-for-profit company limited by guarantee and the WFA has relied on considerable external support in its development. The International Society for Ecology and Culture (ISEC) provided administrative support for the transition from local group to national organisation, and support has also been provided by the Good Gardeners Association, the Soil Association and individual supporters.

### 3.3.2 Climate Friendly Food (CFF)

This is a more recent initiative that was set up in 2008 by an informal group of organic growers with an initial objective of focusing on carbon footprinting<sup>5</sup>. CFF has

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<sup>5</sup> <http://www.climatefriendlyfood.org.uk/>

made considerable progress in this area with the development of a series of carbon calculators for producers, retailers, gardeners and others. The development of this side of the organisation was separated as a sister project known as CFF Carbon Calculator in 2010 while CFF continues work on low carbon food certification<sup>6</sup>.



Figure 2: Symbol of Climate Friendly Food and their Gold Award

The second activity of CFF was to develop a system of certification that encouraged growers (participation is limited to small horticultural producers) to adopt more carbon friendly techniques rather than measure carbon reduction directly. This participatory certification scheme is just coming to the end of its pilot development stage. This has involved growers in the North West of England and in London. Support and endorsement has been received from a number of other organisations.

The cost of certifying with CFF varies with the number of full time equivalent (FTE) staff and starts at £35 (€41) for businesses with up 3 FTE staff rising to a maximum of £140 (€165) for businesses with 11 FTE staff or more. This is very affordable if the grower is only certified with CFF but several growers pay this fee in addition to organic certification.

CFF operates on a participatory guarantee scheme (PGS) basis using farmer-to-farmer inspection as recognised by IFOAM. Lessons have been drawn from how this operates overseas and specific input has been received from Certified Naturally Grown in the US. It is a key requirement of CFF certification that growers must be prepared to show another grower around their holding, be inspected by them, and show a pre-arranged selection of receipts and invoices. It is claimed that using growers to carry out these inspections means that any misrepresented practices are more likely to be identified.

Another key requirement is that growers must follow agro-ecological practices although it is stressed that the CFF certification mark lies outside of the EU Organic Regulations. The evidence for agro-ecological practice is provided either by being third-party organically certified by an accredited GB control body or by completing the IFOAM norms inspection form. This means that growers already certified as organic will have considerably less paperwork to complete, but pay certification fees to their control body in addition to the CFF fee.

In response to the question whether agro-ecological and organic are the same thing, CFF say that the answer is yes in terms of growing techniques, but they believe to have wider social norms than the traditional organic certifiers. The term agro-ecological is used because it is commonly used internationally and in the academic literature.

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<sup>6</sup> <http://www.cffcarboncalculator.org.uk/>

Climate friendly food offers different levels of certification for the same fee: Bronze recognises compliance with the agro-ecological requirement while Silver and Gold additionally recognise positive approaches to carbon reduction. Standards required to achieved the Silver and Gold awards are potentially stricter than current organic standards.

CFF state that their administration system is ‘user-friendly, open and transparent’ but new applicants can encounter a significant amount of paperwork especially if they are not already certified organic. Forms can be downloaded and returned electronically where they are uploaded to the online directory. An independent reference must be displayed in the directory until the first inspection has taken place.

The key form is the ‘Agreement to comply with IFOAM Norms’. In this the applicant sets out in some detail information on the holding, the approach to agro-systems, fertility management, pest and disease control, weed control, crop rotation and use of organic seeds among other aspects. This becomes the reference document for the inspection which is countersigned on completion and then uploaded.

#### 3.3.3 The Green Grower Scheme proposal

This scheme differs from the above schemes in that it is not yet operational and this may not be the final title. It has been included in this study because there are a number of elements that set it apart from the other two schemes despite having broadly similar aims and objectives. In the previous two cases the organisations concerned were established in response to perceived needs, whereas this scheme is being proposed by two established organic organisations with significant reputations and public profiles. The scheme is intended to use a set of guidelines that are entitled Organic Gardening Guidelines and published by Garden Organic.

The Soil Association’s has over many years attempted to retain small organic growers within the organic certification system, and has been under pressure from growers to come up with a solution ever since the group certification scheme closed to new applications (see above). In 2009, the Soil Association brought a proposal to a meeting of organic growers that set out a plan to pilot “*A new self-assessment scheme for very small growers over the next 12 months*”. The aim was to support such growers in producing to organic principles and to enable them to exchange/direct sell small amounts within their local community, alongside the recognition that they have done so as Soil Association members.

The details of the scheme can be found on-line<sup>7</sup>. Certified organic growers at the meeting had a number of concerns including the possible implication that the scheme would be seen as an organic scheme and therefore a potential threat to their businesses and led to further consultations and revisions of the proposal. This resulted in revised proposals (Green Growers) that have been circulated in 2011. Significant changes have taken place as evidenced by the opening paragraph of the draft:

*“Both the Soil Association and Garden Organic wish to create a movement of informed and motivated people centred on a simple set of core sustainable growing principles. Within this document the*

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<sup>7</sup> [www.organicinform.org/viewarticle.php?articleid=630](http://www.organicinform.org/viewarticle.php?articleid=630)

*term sustainable can be taken to mean growing by the principles and practices laid out in The Organic Gardening Guidelines produced by Garden Organic.”*

The two organisations are clearly working more closely together and the criteria for assessing compliance have moved from production standards to gardening guidelines.

*“These guidelines are based on the guiding worldwide principles for organic agriculture as defined by IFOAM and are an interpretation of national standards within a gardening context.”*

The Organic Gardening Guidelines (OGG) of Garden Organic (2010)<sup>8</sup> operate a traffic light system that classifies operations and inputs into 3 levels of acceptability and 1 level of non-acceptability.

The systems uses ‘smiley’ symbols to delineate:

- Best organic practice – the first choice (green symbol with broad smile)
- Acceptable organic practice (green symbol with thin smile)
- Acceptable, but not for regular use (amber symbol with no smile)
- Never acceptable in an organic garden (red symbol with frown)

It is not the intention of this work to examine the standards of the respective schemes but this grading system is included here because of its repeated use of the term ‘organic’, the implications of which are discussed later.

The focus is primarily on the growing of produce at home, in schools, on allotments and other community spaces. It is seen as a means of highlighting good agro-ecological practice in these areas in a way that will educate members of the general public. It is not aimed at commercial growers but the possibility of members of the scheme selling small quantities of produce is seen as acceptable by the scheme’s sponsors. It is acknowledged that growers who sell larger quantities may wish to join the scheme.

Although the precise details have not been fully set out it is anticipated that prospective members of the new scheme will use self assessment to check their compliance with the OGG then sign a pledge to that effect. They would also sign up to (a) an ‘open gate’ policy where customers or others can visit and (b) their willingness to be inspected by other growers or an inspector.

There could be other benefits included in the fee such as the benefits from standard membership of both organisations, discounts on events, listing on a dedicated website etc.

### 3.4 Evaluation of the three schemes

In this Section the three schemes are compared, based on the material from both the review of the activities and the interviews and observation. The comparison is set out in a series of sub-sections covering cost, non-compliance, level of membership, consumer perception, future prospects and ‘official’ organic certification.

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<sup>8</sup> <http://www.gardenorganic.org.uk/pdfs/Organic-Gardening-Guidelines-2010.pdf>

### 3.4.1 Cost

The costs to the grower of the two existing schemes reviewed stand in marked contrast to the costs to the producer for organic certification reported by Jespersen et al (2011). Table 3 shows the certification fees of different CB in the UK in total as a percent of differing levels of turnover. These figures illustrate that at the level of an annual turnover of €5,000 the cost to the business of organic certification is over 10%, explaining the reluctance of smaller growers to engage with the certification process.

If the overall profit margin for the business is around 10% after all other costs except certification have been taken into account then organic certification at €500 will effectively take all the 'profit' on €5,000 turnover, 25% of 'profit' on €20,000 turnover and 10% of 'profit' on €50,000 turnover. The prices and percentage of turnover figures for the alternative schemes are likely to be much more attractive to smaller growers.

For the Green Grower no final fee has yet been published, but the fee is likely to be higher than the WFA fee and the lower end of the CFF range of fees. The cost of registering with this scheme is likely to be higher than the cost of producer membership of the Soil Association (£75 VAT : total €107).

The proposal includes the suggestion that a scaled approach to fees might be taken *“with a basic level for garden growers and a higher level for those engaging in some degree of local trade (although obviously still at considerably less than the cost of Organic Certification).”*

**Table 3: Comparison of certification fees for operators with different level of turnover**

UK CBs and alternative schemes	Total fee in €	Hours for control activity	Fee as a %age of €5,000 turnover	Fee as a %age of €20,000 turnover	Fee as a %age of €50,000 turnover
CB2	657	17.5	13.0	3.3	1.3
CB3	488	14.5	9.8	2.4	1.0
CB6	505	4	10.0	2.5	1.0
CB7	455	8	9.1	2.3	0.9
<b>Average of CBs</b>	<b>526</b>	<b>11</b>	<b>10.5</b>	<b>2.6</b>	<b>1.1</b>
WFA	31		0.6	0.2	
CFF (1-3 paid staff)	41		0.8	0.2	
CFF 4-7 paid staff	82		1.6	0.4	
<b>Green Grower estimate</b>	<b>117</b>		<b>2.3</b>	<b>0.6</b>	

For CBs 2, 3, 6 and 7 this is based on results for 10ha vegetable case study farm in Jespersen et al (2011)

Unlike the other two schemes Green Grower will offer significant benefits over and above the certification provision, such as membership benefits from the two

sponsoring organisations. In addition both organisations are commercial operations as well as having charitable status. It is expected that both organisations (Soil Association and Garden Organic) will aim to cover the running cost of the scheme by the fees, but may be willing to absorb at least some of the cost associated with the initial development of the scheme.

However, in terms of the costs of running the schemes both interviewees acknowledged that the alternative schemes depend on a considerable level of voluntary input. In financial terms, the WFA is not viable as a commercial entity. Total fee income from 65 members is £1,755 (€2015) which is clearly insufficient to support all the functions cited let alone salaries. No details of income from fees and running costs of the CFF scheme were supplied.

It appears that both WFA and CFF would not be viable at the present level of charges, if they were run as commercial organisations. Both schemes have received external support for their establishment phases.

There are no figures available for labour requirements to run a participatory scheme, but it is possible to generate an estimate using data from Jespersen (2011). The average number of operators per full time equivalent (FTE) member of staff in UK control bodies is 67 for a full control system as required by the Regulations. For a participatory scheme with 50 operators the author has estimated (informed by the interviews) that it would require approx 0.2 FTE to cover all administrative task of the scheme on top of time input from the members. Additional spot inspections could be covered by a further 10 days input per year or 0.04 FTE. Assuming a lower level salary (€25,000) for administration and the top end (€35,000) for inspection, the total labour costs for the year would be in the region of €6,500. There would need to be an allowance for consumables and overheads which could take total running costs up to a total of approx. €10,000, or €200 per grower of a 50 member scheme.

#### 3.4.2 Level of membership

The Wholesome Food Association (WFA) is the only organisation that has an open membership in the sense that anyone can apply and be accepted subject to appropriate checks. The current membership according to the website is around 65 and although there are clearly losses new members are applying suggesting that the WFA is fulfilling a continuing role. WFA membership is open to growers who are not certified organic with a recognised certification body. When asked about membership, the Managing Director said:

*“Membership is pretty static. More important than lack of resource, many of our members are single people or couples working marginal businesses. They rarely have a lot of capital behind them, sometimes none, so we regularly lose existing members to retirement, illness or most frequently businesses folding or shrinking. So although we get regular new members, their numbers serve only to keep overall membership fairly even.”*

Climate Friendly Food (CFF) has been running a pilot with a small number of growers but is now on the verge of opening out to general applications (see above). There is a clear interest in climate change but it is not anticipated that there will be a rush to join. According to the Director who was interviewed 50 members is considered to be a reasonable target for the first year of full operation possibly doubling to 100 in the second year.

The proposed Green Grower scheme differs from the other two established schemes in that this is aimed at hobby and community gardens and allotment holders as well as small trading growers. This could potentially lead to very high membership levels of hundreds and possibly thousands. The membership of Garden Organic as one of the organisations behind the scheme is over 25,000, with many of these members being active gardeners.

### 3.4.3 Non-compliance

In the interviews with representatives of CFF and WFA questions about the level of non-compliance and how it is dealt with were raised. Neither organisation has encountered non-compliance in the sense of 'breaking the rules' to any significant extent. The WFA cited one instance of a former member continuing to claim WFA status on produce after membership had lapsed – this was quickly and amicably resolved.

The CFF has been operating on a pilot scheme basis with a relatively small number of members who have an interest in the development of the scheme. The Green Grower scheme is not yet up and running so there is at present no information on non-compliance levels.

### 3.4.4 Consumer perception

It is a key component of any scheme that consumers should be able to recognise what a particular scheme stands for. This recognition and understanding should then guide and inform decisions to purchase. None of the organisations interviewed has carried out a direct survey of consumers in relation to their (proposed) schemes. The director of WFA noted "*We rarely get direct customer feedback, but have had some excellent feedback from members quoting their customers.*" CFF reported that the scheme enjoys considerable support from organisations engaged with the development process. Indirect feedback has been received from Growing Communities project in Hackney in that consumers engaged with the initiative "*understand the need for such a scheme and support it*".

It is argued by the proposers of the Green Grower scheme that it is the recognition of what gardeners and others are doing that will drive the demand for membership rather than consumer perception. It will allow them to "*be proud to be organic*" and to engage more positively with local education initiatives and community actions.

It is clearly too soon to tell how consumers will perceive the Green Grower scheme. The scheme is backed by two organic organisations that have public profiles in the area of organic farming/gardening and this association may be the primary reason for joining for many.

### 3.4.5 Future Prospects

All interviewees were asked about future prospects for their organisation and scheme. The WFA anticipates a steady state in membership terms while CFF expects membership to build up to quite modest levels in the first two years. It is not known

when (or even whether) the Green Grower scheme will be launched, but if it does it could become a considerable influence in this sector if successful.

All three schemes are aware of each other and both WFA and CFF have been consulted on the Green Grower scheme. WFA is unsure of what the future holds given that SA and GO have far more resources. CFF see potential for joint administration between the schemes and noted that communication is on-going. CFF believe that the specific low carbon aspect of their scheme will continue to set them apart but find it difficult to predict the near future given that the Green Grower scheme is still under development.

### 3.4.6 Relationship to organic certification according to EU regulations

All schemes described address similar issues that are also subject to organic certification and make reference to the same or similar principles as many organic certification schemes.

The WFA scheme development could be interpreted as a response to increasing costs of organic certification for small growers and the closure of the Soil Association's group scheme to new entrants. Most organic growers in the UK have been aware of the WFA for the eleven years of its existence. Some have chosen to turn away from organic certification in favour of this cheaper and more local alternative.

Climate friendly food (CFF) was developed with the involvement of certified organic growers. Certified organic growers can join the scheme in order to add elements of climate friendly growing to their full organic certification, and some of them continue to work closely with the scheme but growers not certified organic can also join the organisation.

The organisations themselves (WFA and CFF) take the view that a split between small-scale locally focused growers and the larger field scale producers who feed into longer supply chains that often (but not always) lead to a supermarket shelf was a reality and that the existence of 'alternative' certification schemes could be seen as evidence for this. Both the WFA and CFF place considerable emphasis on local production and local consumption. In the case of CFF this is seen as very important to running a low carbon operation. WFA believe its emphasis on local is one of its key strengths that sets it apart from current organic certification.

Neither WFA nor CFF believe that 'official' organic certification was in any way threatened through their schemes and both use disclaimers that their schemes are not the same as organic certification. However, CFF took the view that organic certification ought to be looking at the introduction of specific requirements relating to carbon emissions and climate change. The wider supply landscape is unlikely to change in the WFA's view until:

*".....customers (who have been so carefully trained by the supermarkets) would have to change their demands quite radically, including an acceptance that, for example, it's neither necessary nor desirable to eat strawberries in December."*

Both schemes are careful to avoid creating the impression that they are 'organic' and are not perceived as a threat to organic certification by certified organic growers and OGA but this does not make any statement about the legality of their claims.

The work did not include a full comparison of equivalence of the standards with the requirements of the organic regulation, but the organisations themselves point to their standards being stricter. An example is the prohibition by the WFA of the use of household green waste compost containing a proportion of food waste. The CFF standards place greater emphasis on carbon reduction actions than is currently required in the organic regulation. The organic gardening guidelines are broadly in line with prevailing organic standards although organic growers have taken issue with one or two areas such as growing media.

The Involvement of one of the leading organic private standards owner in the UK in the Green Grower scheme strongly suggests that this is also not intended as an alternative to 'official' organic certification. The new scheme is mainly seen as a way of engaging with smaller growers who have ceased to be members of organic certification schemes because of the costs, but continue to adhere to the principles of organic growing and sell their products mainly on local markets but the legal implications clearly have to be considered.

The Organic Growers Alliance (OGA), a membership organisation of certified organic growers, has taken a keen interest in the development of the Green Grower scheme and has expressed the concern that such a scheme could be perceived as 'organic' and therefore on a par with certification offered by recognised organic control bodies. The concern mainly relates to the strong association of the scheme with a body that also owns an organic control body and with two leading organisations in the UK organic sector. There is a clear difference of opinion about how significant this might be between the proponents of the scheme and the OGA.

The OGA is not opposed to the Green Grower scheme but because of the concerns outlined above wishes to see the initiative rolled out in two phases. Phase 1 should only be applied in circumstances where no trading takes place and could be rolled out in the very near future. Phase two would need to deal with the issue of trading that in the view of the OGA requires much more debate and consultation, but this should not delay the introduction of phase one.

Ideally, the certified organic growers of the OGA would welcome the (re)-introduction of some form of group certification, so that groups of small growers within tight geographical boundaries can achieve full certification at reduced cost and be fully compliant with the Regulations.

## 3.5 Conclusions

The three examples covered in this section all focus on operators growing vegetables mainly for the local market. They all arose directly or indirectly in response to the problem of the cost of organic certification relative to the size and turnover of small-holdings as perceived by small growers.

One of the objectives of the Green Grower scheme is to provide an incentive to very small growers and community projects to demonstrate a sense of belonging in the organic movement without imposing the regime of annual third-party inspections. The scheme carries attributes of a PGS but is planned to also be "*a movement of*

*informed and motivated people centred on a simple set of core sustainable growing principles.*” If successful it will extend a measure of control into a number of areas not currently covered by organic certification e.g. community amenity spaces. This does not necessarily represent an improvement to the organic control system but could have wider benefits in spreading the principles of sustainable production. The scheme has encountered a measure of resistance from commercial growers that is continuing particularly with respect to trading and competition.

In contrast WFA has co-existed with the organic sector since its inception and has received some support along the way. CFF has very positive support from the OGA and a wide range of community organisations with which it has been working. This demonstrates that such schemes can co-exist with organic certification although the level of membership in these two schemes is relatively low but stable.

In the following section, the main conclusions are briefly summarised in relation to the acceptability of the schemes to farmers and control bodies, likely implications on costs of certification and the improvement potential for organic certification.

### **3.5.1 Acceptance to farmers**

The two existing schemes have been developed with involvement of or are accepted by organic farmers/ growers and the fact that there are growers outside organic certification engaging in other initiatives is widely accepted. They do not use the term ‘organic’ in relation to product, but refer to agro-ecological principles that are broadly similar to organic principles. The members of the schemes largely, but not exclusively, trade in a local market and claim to be stricter in certain points than organic standards, but a full examination of equivalence of the rules has not been carried out.

Members clearly like the fact that they are charged a much lower fee than for organic certification. Similarly, the potential membership of the Green Grower scheme is relatively high but much will depend on cost and how it is presented. If it is successful it will bring significant numbers into a form of certification although this will not be organic certification.

It is not the intention of the organisations developing the Green Grower scheme to use term ‘organic’ for the growing system or the crops produced from it. However, organic growers are concerned about the introduction of the scheme, because it might create the perception that anyone registered with a scheme developed by the Soil Association and Garden Organic and using the ‘Organic Gardening Guidelines’ would be regarded as ‘growing organically’, despite disclaimers to the contrary. This would create an unfair advantage for small growers registered with Green Grower scheme compared to small organic growers with full organic certification and could impact on the organic sector as a whole in the UK. It would therefore be desirable that the external perception of such a scheme should be further investigated before the scheme is launched, given its close association with two of the UK’s leading organic organisations. The use of alternative terms (e.g. ‘Sustainable Gardening Guidelines’ instead of ‘Organic Gardening Guidelines’) could be considered, to avoid the unnecessary or inappropriate use of the term “organic”.

### **3.5.2 Likely implications on costs of certification**

Fees for the three schemes (including the proposed Green Grower scheme) are lower than those for organic grower certification and are therefore more likely to be

seen as affordable by small scale growers (see Table 3 above). However, the two existing bodies rely on voluntary engagement and would not be able to cover all their labour costs from the current membership fees alone. A broad estimate shows that a participatory guarantee scheme could probably be offered for an annual certification fee of approx €200 for a stand-alone organisation; larger organisations might be able to cross-subsidise low fee schemes from other activities.

However, there was a possibility in the current Rural Development Framework and it is likely that this will also exist under the proposals that farmers and growers can be reimbursed for the costs of certification which would reduce the need for specialist schemes for operators with low turnover.

### 3.5.3 Improvement potential

All three existing schemes are similar to Participatory Guarantee Schemes described in Part A (see 3.1.4 Part A). For example, Climate Friendly Food based itself on other such schemes and was developed in consultation with the IFOAM initiatives on PGS. They illustrate that PGS type systems exist also within the EU, but because the control system is not recognised in the EU organic standards, they use different terms (wholesome food, climate friendly food) in relation to their certification activities. Very little is known about the consumer attitudes to such schemes beyond what is reported by the organisations themselves and this would clearly require further research before such schemes should be introduced more widely.

If a turnover threshold (*de minimis*) approach following the US model as set out in Part A (see 4.1.2.3) were introduced many of the issues that led to the formation of the WFA would be addressed. The equivalent to a \$5,000 annual gross turnover limit would be £3,220 or €3,820. This would also address some of the reasons for the formation of the Green Grower scheme. This could still leave a group of growers in a turnover band that would be impacted by full organic certification fees. These are growers who are not necessarily already in a scheme but would be ineligible for the *de minimis* scheme. They would therefore have to pay full cost for organic certification despite having a comparatively low turnover.

The operation of Climate Friendly Food and the Wholesome Food Association illustrate that three of the suggestions made in Part A (Section 4) could be implemented.

The possibility of exemptions for low risk small operators (Suggestion 2) is put into place by the all schemes in so far, if the assumption is accepted that small scale operators that only trade locally are low risk (but no information was provided from the scheme holder to back or refute this). All three schemes operate a form of reduced control: WFA – no formal inspections but visited in case of problems otherwise *ad hoc* peer review; CFF - initial peer inspection for all then open gate; the Green Grower outline proposal suggests open gate and spot inspection of a speculative level of 1% per year.

Although the procedure of requiring uploading forms could be described as an off-site way to interact with growers (see Suggestion 3 Part A) this is not fully consistent with the idea of using off-site and remote inspection procedures instead of additional inspections or the prescribed annual on-site inspection as suggested.

All three schemes are essentially based on the peer review systems (Suggestion 4) although the purpose is for verification itself as opposed to the assessment of risk factors in connection with organic certification that the suggestion itself embodies.

These two existing schemes also address some issues that are currently part of organic principles but are not (fully) covered by existing standards and certification, such as the embedding of production in the local community and the mitigation of climate change. Improvement in these areas is a standards issue but it would pose some interesting control questions if implemented.

Based on this experience it can be concluded that participatory group certification schemes also operate in the EU and remain of great interest, in particular to small growers. The possible recognition of such schemes for organic inspection should be further investigated, in particular with respect to consumer understanding and the impact on competition between organic operators certified in the different schemes. Their actual introduction would depend on the willingness of certification bodies to offer such schemes.

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Soil Association: <http://www.soilassociation.org>

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