

IRM-ORGANIC

IRM-ORGANIC - Training on improved risk management tools for organic inspectors

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Author's Background

Ulfi Bartels works as the team leader for processing / trade / import in the German certification body GfRS since 2006. She is nutritionist and has audited a wide range of processing, trade and import operators in Germany and in other member states of the European Union. She coordinates the EU-Leonardo project IRM-Organic, which is implemented by the Quavera Alliance (www.quavera.org), a network of certification bodies across Europe and North America.

Jochen Neuendorff is the managing director of GfRS. He works since 1989 as an inspector and has a wide experience in organic inspection and certification as well as in certification programs for food and feed safety. He coordinated a number of research and development projects dealing with the effectiveness and efficiency of organic inspections, for example a gap analysis and improvement proposals for the implementation of the EU-legislation on organic farming in Germany, a project on the risk-management of pesticide residues in organic foodstuff and another project dealing with risk-management for imports from third countries.

Summary

Within the framework of the EU-Leonardo-project IRM-Organic, an analysis of the inspection methods for risk-orientated inspection instruments and the description of the existing training concepts of control bodies in Austria, Germany, Italy and Poland were carried out. Coordinated by R. Setti and R. Maresca (CCPB), additionally expert interviews were conducted in Austria, Italy Germany and Poland. Furthermore, an international online survey with more than 500 participants from more than 20 countries was realized. A SWOT-Analysis was elaborated.

S. Bruckner from AGRIZERT, another project partner, compiled a description of the content and methodology of courses for inspectors in private food and feed certification programs and in public food and feed control in Austria, Italy, Germany and Poland.

Based on the above-mentioned data a curriculum for train-the-trainer-courses for risk-oriented inspection for improved fraud prevention in Austria, Germany, Italy and Poland was elaborated. The courses concentrated on control methodology oriented towards major risk areas; the concept of critical control points and checks of international trade-exchange of organic products including their traceability. Each course was evaluated and used for the development of the final train-the-trainer curriculum.

Background

Controls according to Reg. (EC) No. 834/2007 shall assure consumer confidence into products from organic farming in all member states of the European Union. In most of the member states, the controls are implemented by private control bodies, accredited to the European standard ISO 17065 and supervised by competent authorities of the member states. All control bodies are required by ISO 17065 to implement a targeted competence management which includes regular trainings for their inspectors according to the needs identified by regular performance reviews addressing the individual deficiencies identified.

During recent years, the organic marketplace has grown considerably in most of the EU member states, and its structure became more complex. More large and specialized farms started to produce organically, and more and more processed organic products were put on the market. Trade exchange of organic products becomes more common between the EU member states. Today, organic inspectors therefore require detailed and sophisticated knowledge on critical points in the organic production chain. Combined with knowledge on international trade exchange and on methodologies for improved risk based inspection approaches towards farmers, processing facilities, importers, feed mills and traders of products from organic farming.

The European Court of Auditors has published a special report on the control system for organic products identifying several areas for improvement, for example in the traceability of organic products. In addition, a number of fraud cases in the EU concerning products from organic farming occurred. Typically, these fraud cases concerned different member states and cross border sales, taking advantages from different national approaches towards controls. Fraud prevention recently becomes a major issue on EU level. Recently, the European Parliament Committee on the Environment, Public Health and Food Safety (ENVI) adopted a resolution based on a report "on the food crisis, fraud in the food chain and the control thereof". The current proposal of the EU-Commission for a revised EU-legislation on organic production and the new action plan also focus on improved risk-oriented inspections along the organic food chain for better fraud prevention.

The European Union and some member states have implemented some projects to improve the effectiveness and the efficiency of the organic control system. These results have received broad interest of control bodies in several member

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states. Unfortunately, the national projects were not available in different languages, not prioritized, not adapted to the specific realities of the different EU member states and not transferred into a tailor-made, targeted training concept which fits into the requirements of ISO 17065..

At this point IRM-ORGANIC became active by supporting an exchange on state of the art-inspection methods and techniques in different European countries. With these findings an improved training approach for organic inspectors was realised.

Main Chapter Results

Current status of inspector trainings in organic certification

In the organic certification system, organic inspectors are the first in line to track down fraud cases. Therefore, it is essential that organic inspectors are provided with appropriate tools to identify cases of suspected fraud. As ISO 17065 states the competence management of organic inspectors is up to the control bodies, the project decided to use a train-the-trainer concept to provide knowledge which can then be applied to the specific needs of the different control bodies.

From the evaluation of the training courses for organic inspectors implemented by control bodies of the participating countries (Austria, Germany, Italy, Poland), it emerged that the training courses show deficiencies with regard to matters relating to risk-oriented inspections and the prevention and detection of fraud.

SWOT-Analysis

A SWOT analysis (Strengths, Weaknesses, Opportunities, and Threats) of the existing trainings implemented by control bodies in Austria, Germany, Italy and Poland was carried out. The results of this analysis were the following:

Strengths are the capacity for innovation of the organic control bodies, flexible and targeted approach to the acquisition of skills according to ISO 17065, the relatively fast harmonization of skills amongst inspectors and the subsequent improved prevention of fraud cases.

Weaknesses are the high costs for the acquisition of new competences, the risk of bureaucratisation and the lack of support from competent authorities.

Opportunities are the intelligent application of ISO 17065 and the improved cooperation between control bodies and third party institutions.

Threats are the nationalization of the organic controls due to the new EU-requirements of the revised Regulation on official controls and the subsequent formalization of competence requirements for organic inspectors.

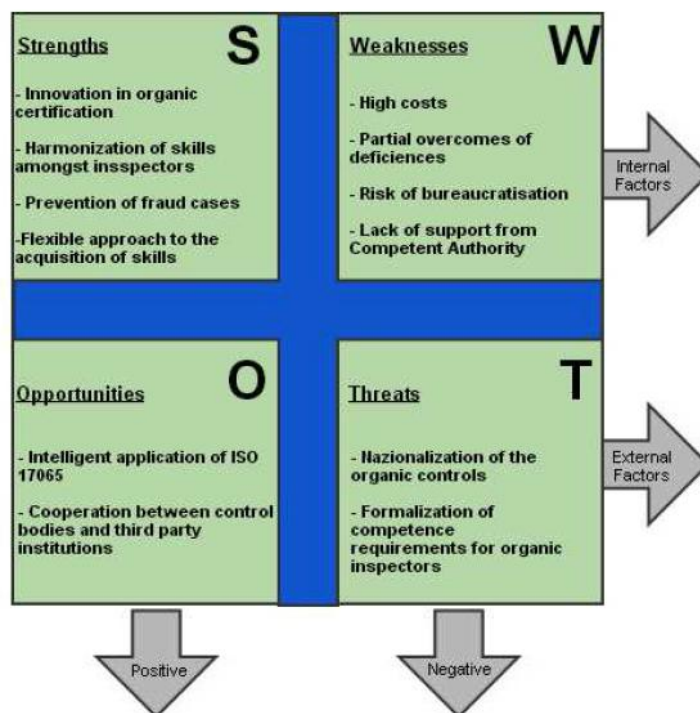


Figure 1: SWOT-Analysis

Description and analysis of training concepts in private food and feed certification systems and in public food and feed control in Austria, Germany, Italy and Poland

Existing training concepts (initial qualification, initial training as well as further training) for the official food and feed control in Germany, Austria and Italy and several private certification programs (British Retail Consortium (BRC), Forest Stewardship Council (FSC), GLOBALG.A.P., GMP+ Feed Safety Assurance (GMP+ FSA), International Featured Standard (IFS), Marine Stewardship Council (MSC), Programme for the Endorsement of Forest Certification Schemes (PEFC), Renewable Energy Directive certification (REDcert), Qualität und Sicherheit (Quality and Safety, QS) and UTZ certified) were reviewed and compared.

As far as determined in this research, the official control systems and private certification schemes do not conduct targeted specialist trainings on past fraud cases and practical consequences for the daily work of inspectors.

Future prospects: Expert interviews and online survey for organic inspectors

In order to obtain the views of sector experts and to identify relevant learning contents and training methods for organic inspectors, experts of the organic sector in different member states of the European Union were interviewed. The groups interviewed were classified in (1) organic operators (e.g. farmers, processors, traders) and their representatives, (2) the control sector (e.g. control bodies, control authorities, competent authorities, accreditation bodies) and (3) users of organic certification (e.g. consumer protection association, other NGO (environmental, animal welfare), scientists). The outcomes obtained with these interviews established, that while organic inspectors are currently trained in legal requirements and common deviations and irregularities, the organic sector still needs to improve the inspector's trainings in risk orientation and fraud prevention.

Based on the interview results, an online survey was prepared to integrate the views of organic inspectors working for organic control bodies. According to experts' opinion, elements which should be emphasized in future trainings include the transfer of knowledge on fraud scenarios and risks, the management of organic critical points and corresponding safeguarding measures and issues related to traceability and the integrity of the organic product flow (cross checks, traceability checks and sampling). The organic inspectors taking part in the online survey generally shared this opinion.

Occupational Profile and competence targets for organic inspectors

The project developed a proposal for an occupational profile and competence targets for organic inspectors which are currently discussed by a newly established task force at the European Organic Certifier Council (www.eocc.eu).

The initial qualification for new inspectors and the on-going training and maintaining of the competence of already approved inspectors (experienced inspectors) have different competence targets.

New Inspectors

First of all, new inspectors must prove that they have the professional and technical knowledge of the sector they want to work in. The basic education (university studies, vocational training), work experience and/or audit experience for other certification schemes in the same sector can be taken into account on the fulfilment of this requirement.

The competence targets in the training of new organic inspectors are:

- getting to know the EU legislation on organic farming, if relevant other private organic certification schemes and the corresponding certification procedures of the control body

- getting to know the content and intelligent implementation of the inspection toolbox (for on-site visits of operators, documentation review, sampling, and analysis)

- getting to know relevant non-conformity and irregularity scenarios as well as fraud cases

- exploring audit techniques (communication techniques, assessment and evaluation, documentation of situations/facts and non-conformities)

New inspectors need a basic understanding for the certification schemes (s)he should work in, several private certification schemes and some authorities use online-trainings to practically impart formal and basic knowledge of the systems. At the subsequent face-to-face trainings by the control body, inspectors should also be trained in relevant irregularities and the intelligent use of the inspection toolbox. This could be achieved with working groups and other active learning tools.

Furthermore, new inspectors have to understand their role and tasks as an inspector. This can be achieved for example by including elements of DIN EN ISO 19011 in face-to-face trainings of the control body. To gain audit experience, new inspectors should at first accompany experienced inspectors in a defined number of inspections on-site. After that they should conduct a specific number of inspections under the supervision of an experienced inspector. An evaluation of their competence is required before they can perform organic inspections themselves.

Experienced Inspectors

Experienced organic inspectors have other competence targets to fulfil. These are:

- updates of EU legislation on organic farming, if relevant other private organic certification schemes and the corresponding certification procedures of the control body

- implementation and expansion of the skills of the inspection toolbox (for the on-site visit of operators, review of documentation, sampling, and analysis)

- extension of knowledge on relevant non-conformity and irregularity scenarios as well as fraud cases

- in-depth use of audit techniques (communication techniques, assessment and evaluation, documentation of situations/facts and non-conformities)

Experienced inspectors have to maintain their qualification by attending trainings regularly. Trainings can be organized by the control body or, in the case of additional modular trainings on special topics, also by specialized organizations. The trainings should be based on the results of the performance review of the inspectors as required by ISO 17065. Training methods which might be used include working groups, case studies, exchange of experience, audit simulations and final exams.

Another point for improving the inspectors' competence is the on-going auditing/inspecting, which is ensured by a minimum number of required audits/inspections in a defined time frame.

Performance reviews monitor the inspectors' competence. During witness audits, experienced inspectors of the control body or a competent authority accompany the inspector in an audit. Another element of a performance review could be a review of the inspection reports delivered by the inspector to the control body. The results of such performance reviews serve to identify the particular training needs and to define the contents of the forthcoming trainings.

Curriculum and pilot Train-the Trainer Courses for risk-oriented inspections

The curriculum contains a stepwise approach to support the acquisition of knowledge on risk-oriented inspection methods using different learning methodologies implemented in train-the-trainer courses. This approach shall enable a flexible approach to inspector trainings by different control bodies. The courses are open for trainers from control bodies and control authorities involved in the training of organic inspectors. They concentrate on inspection methodology oriented towards major risk areas, namely the risk-oriented preparation of inspections, the correct implementation and evaluation of a concept of critical control points at operator's level, the use of sampling and analysis, checks of international trade-exchange of organic products including their traceability and the implementation of ISO 19011.

Core messages and conclusions

In future, targeted and risk-based inspections will gain more and more relevance in organic production. Best-practice implementation of such inspection approaches requires improved competencies of organic inspectors. ISO 17065 requires a competence management targeted to previously identified deficiencies by accredited control bodies and is therefore an excellent basis. The train-the-trainer concept developed can be used to support the acquisition on knowledge of trainers from control bodies.

A bureaucratic approach to organic certification and a formalized approach to the qualification of organic inspectors weaken the effectiveness of risk-based inspections and the acceptance of the organic control system by the users and the operators.

Disclaimer

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