



CHAPTER 6

ORGANIC CERTIFICATION

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ORGANIC CERTIFICATION



6.1. Organic certification

6.1.1. What is organic certification?

Organic certification is a system through which the conformity of products with precise technical organic standards is determined and confirmed. Organic certification includes producing, storing, processing, handling and marketing of organic products.

In some countries, government oversees certification and commercial use of the term organic is legally restricted. Farmers and food processors must undergo an organic certification process to label and sell their products as organic. Every certified organic product can be confirmed through a certificate and corresponding documentation that guarantees organic integrity. In Namibia, the term organic is not regulated (although at the time of compiling this chapter there were processes underway to protect the term organic for horticultural crops).

The confirmation of the organic integrity of products can be done by (further explanations under Section 6.2. Certification Systems):

- First-party supplier (self-certification)
- Second-party buyer (participatory certification)
- Third-party independent body (an entity in the business of certification)

Certified organic producers are subject to the same agricultural, food safety and other government regulations that apply to non-certified producers.



Certification of organic produce through a Participatory Guarantee System relies on the active participation of a group of people

6.1.2. Organic Standards

Organic standards are the rules and regulations that define how an organic product must be produced and processed. Any food labelled as 'organic' for human and animal consumption must meet these standards as a minimum. Organic standards cover all aspects of food production, including production (crops and livestock), processing and sales.

Organic standards ensure that you can be confident that you are buying a genuine organic product that has been produced and processed in line with a particular set of standards.



Certified organic herbs and vegetables produced locally in Namibia

The Namibian Organic Association (NOA) uses the International Organic Standards for Production and Processing developed by the International Federation for Organic Agriculture Movements (IFOAM - Organics International).

6.1.3. What can be certified?

Organic standards cover a range of organic products, but details may vary between standards depending on market demand.

- **Crops:** A plant that is grown to be harvested as food, livestock feed or fibre or that is used to add nutrients to the field. This includes vegetables, herbs, fruit, arable crops, rangeland, seeds and propagating material such as cuttings, rhizome, etc.
- **Livestock and livestock products:** Animals that can be used for food or in producing food, fibre or feed. Free range livestock must be managed on organic rangeland
- **Processed agriculture products:** Items that have been handled and packaged (e.g., chopped carrots) or combined, processed and packaged (e.g., yoghurt, muesli, pizza, jam)
- **Wild harvesting:** Plants from a natural site that is not cultivated
- **Aquaculture:** Animals and aquatic plants that are cultivated under controlled or semi-natural conditions (e.g. fish, mussels, prawns, sea bass, sea bream, microalgae, macroalgae (seaweed) (wild collection is possible for macroalgae)

The following fall outside the scope of organic certification:

- **Venison,** which derives from wildlife that is not under organic management practices but is truly free range, therefore it cannot be certified against organic production principles. Wildlife roams across different farms and lands used for different purposes and cannot be managed for their grazing or browsing practices

- Aqua- and hydroponic systems are currently not recognised as organic production systems. An integral part of organic crop and livestock production for land-based farming is that it occurs in living soil as this is how nature functions – organic production is about feeding the soil, not the plant. The interaction with the soil microbiome ensures that plants can live out their full potential and furnish food. Hydroponics and aquaponics can, of course, function and produce food in a pesticide- and herbicide-free environment

6.1.4. What is the purpose of certification?

Organic certification is intended to assure consumers that a product marketed as 'organic' was produced, processed and handled according to organic production standards.



Certified organic raspberries produced locally in Namibia

Organic marks or seals on products enable consumers to identify what products are in fact organic, setting them apart in the market and giving customers the confidence that they need to make informed purchasing decisions.

It if is not certified organic, you cannot be sure it is organic.

6.2. Certification systems

An organic claim is any claim that describes a product as 'organic', or the ingredients used to make a product as organic (e.g., '100% organic', 'made using organic ingredients' or 'certified organic').

Different methods exist to verify organic claims, depending on consumer requirements, legislation and producer preferences:

- First-party pledge
- Second-party verification
- Third-party certification

6.2.1. First-party pledge (self-claims)

'Self claims' are where the producer makes unsubstantiated organic claims about a product, usually using the word 'organic' on the product label. Some consumers trust self-claims, typically when they have a personal relationship built through friendship or word-of-mouth with the producer. Consumers may also be aware of the details of organic production and are empowered to make informed purchasing decisions.

Producers occasionally make incorrect organic claims based on their ignorance about organic production, e.g., 'free-range' is often confused with 'organic'. Unfortunately, some producers or businesses make false claims intentionally to attract premium organic prices. Where organic laws exist, producers cannot legally use the term 'organic' or 'bio' without certification.

6.2.2. Second-party verifications

Certification through second party processes is usually conducted through Participatory Guarantee Systems (PGS). IFOAM - Organics International (2008) defines PGS as “locally focused quality assurance systems that certify producers based on active participation of stakeholders and are built on a foundation of trust, social networks and knowledge exchange.”



Farm assessments for local organic products are conducted by NOA and NOA members.

PGS represent an alternative to third-party certification, which is helpful in local markets and short supply chains. Participatory certification shares a common goal with third-party certification systems in providing a credible guarantee for consumers seeking organic produce. The difference is in the approach. As the name suggests, the direct participation of farmers and other stakeholders such as consumers and traders in the certification process is an essential element.

A PGS is typically started where there is a need for organic assurance by farmers and consumers. This form of organic assurance is more accessible and affordable to (small-scale) farmers.

PGS can furthermore complement third-party certification with a private label that brings additional guarantees and transparency. PGS enable the direct participation of producers, consumers and other stakeholders in:

- The choice of organic standards that will be used for the assessment
- The development and implementation of certification procedures
- The certification decisions

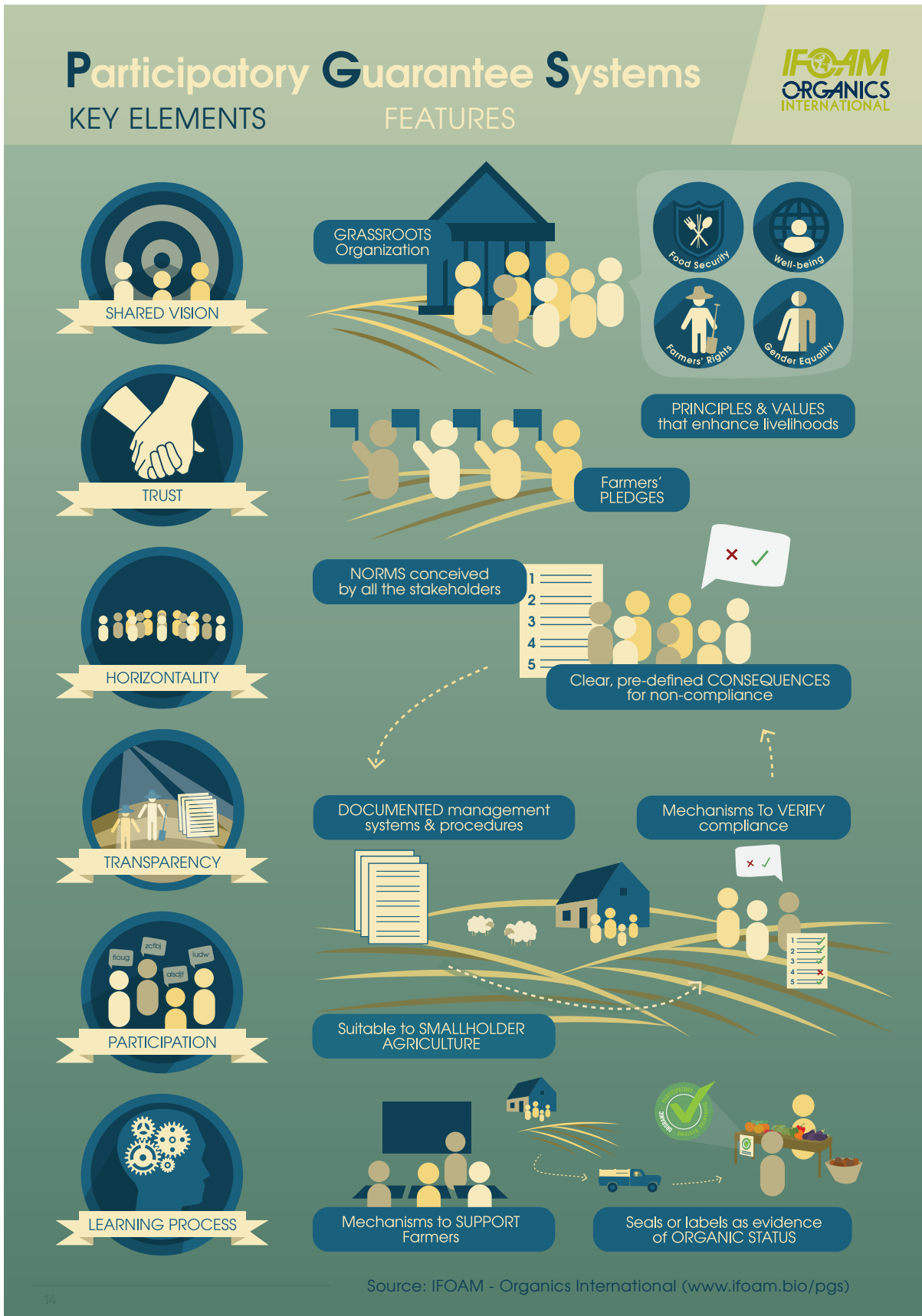
6.2.3. Third-party certification

In third-party certification, the farm or the processing of the agricultural produce is certified by national or international organic standards by an ISO-accredited, independent organic certification agency. Third-party certification is the norm in long-value chains such as for exporting produce.

The most important markets governed by public regulations concerning the production and sale of organic products and covered through third-party certification include:

- The European Union, with its “Council Regulation on Organic Production and Labelling of Organic Products” (EC 2018/848 and EC 889/2008)
- The United States, with its “National Organic Program” (NOP)
- Japan, with its “Japanese Agricultural Standard” (JAS)
- Canada, with its “Canadian Organic Standards” (COS)

Examples of important private organic labels include Bio Suisse (Switzerland), Demeter (biodynamic agriculture, worldwide), Naturland (worldwide), the Soil Association (United Kingdom) and KRAV (Sweden).



Key elements and features of the Participatory Guarantee System. ©IFOAM – Organics International PGS Toolkit

Source: <https://www.ifoam.bio/our-work/how/standards-certification/participatory-guarantee-systems/pgs-toolkit>

6.2.4. Group certification



Farm assessment with a group of small-scale farmers and interested stakeholders

Since individual third-party certification is typically a costly process, small-scale farmers are enabled to gain organic certification through a group certification based on an internal control system (ICS). This allows small-scale farmers to access organic markets as a group. Internal control systems are established by the farmers or an export company and implement a documented quality assurance system at a group level with detailed inspections of each individual by the ICS. The accredited third-party certification body then verifies that the ICS is providing credible control of the members, through sampling inspections of individuals as well as by verifying the competence of the internal inspectors of the group.

6.3. Organic Conversion

6.3.1. Converting to organic production

Farmers who wish to engage in organic marketing must go through a conversion period to achieve organic certification. 'Conversion' refers to the physical and biological processes the farmer and the farming system must undergo to comply with organic standards. During this period, organic production methods must be used, but the resulting product cannot be sold as organic. The length of this conversion period depends on the type of organic product being produced. When production is already 'organic by default' (i.e., no agro-chemicals have been used in the last three years prior to conversion) or virgin land is used to start organic production, conversion can usually be achieved in a shorter period as the record of previous land management can be recognised.

The conversion process begins with personal conversion – attitude and approach. Conversion to organic farming is knowledge-intensive and is a process that requires a high level of commitment to succeed. More specialised and intensive farms will generally take longer to convert. These systems require more time and effort to rehabilitate the soil, improve soil health and re-introduce diversity. It is recommended to initially convert part of the farm to trial organic methods. This may allow for better mitigation of the financial risk of lower yields during the period of conversion while soil health is rebuilding. This would be 'parallel production' (see Section 6.2. Organic Standards) and is only allowed as part of a conversion plan. The conversion

period allows farmers to gain experience with new production methods, different equipment and the potential output of the system.

6.3.2. Parallel versus split production

Under organic standards, growing the same product using organic practices and using conventional practices on the same farm is referred to as parallel production. It is only allowed during the implementation of a conversion plan. Apart from the time during which a farming operation is undergoing conversion, organic standards prohibit the production of the same crops (or livestock) organically and non-organically on the same farm (i.e., parallel production) where the crop (or livestock) products are not visibly different. For example, you could not grow an organic crop of 'cocktail tomatoes' and a conventional crop of 'cocktail tomatoes' on the same farm. Differentiation between organic and non-organic crops will be challenging and there is an increased risk of contamination, substitution or co-mingling between organic and conventional products. It would, however, be possible to grow organic 'cocktail tomatoes' and conventional 'large Oxheart tomatoes' (or any other type that is clearly distinguishable).



Organically produced cocktail tomatoes in Namibia

Under a **split production** system, clearly identifiable parts and products of the farm are certified organic, while others are not. For example, farming citrus conventionally but rooibos organically is possible under a split production system. This requires strict separation and risk mitigation. While some standards allow for split production, some split production systems may not be accepted by each certification system.

6.4. Organic certification procedures in Namibia for local markets

6.4.1 Certification procedures

In Namibia, certification of organic produce for the local market is conducted through a PGS implemented by NOA. This system is based on the PGS and Standards of IFOAM – Organics International. The Namibian PGS, operated by NOA, received official recognition from IFOAM – Organics International in March 2013. This means that IFOAM endorses the NOA PGS because it operates by the Key PGS Elements and Features, as defined by IFOAM – Organics International, and the integrity of its certification is verified vis-à-vis the Principles of Organic Agriculture.



Namibian producers can apply for the certification for livestock and livestock

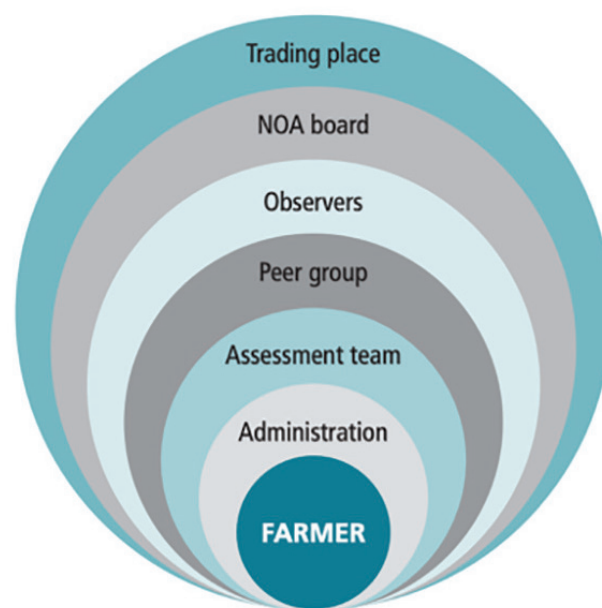
products, rangeland, field crops, vegetables, fruit and herbs, and for the processing of these products, as well as wild harvesting for local sales. Products destined for the export market are certified by third-party certifiers, not by the NOA PGS.

6.4.2. PGS organisational structure

The main actors that participate in and support PGS directly are the NOA Board, NOA assessment team, NOA members (consumers, traders or other parties) and farmers or processors.

- The NOA Board, which donates its time voluntarily, carries final responsibility through ratification of the proposed decisions of the NOA assessment team and authorises the use of the registered NOA trademark
- The NOA Board is responsible for the integrity of the system, while the NOA assessment team is responsible for a thorough and transparent assessment process
- The NOA administration team, which NOA employs, organises basic logistics regarding documentation, pre-assessments and assessment visits
- The assessment team is a core group of members who have received formal training based on the IFOAM/Independent Organic Inspectors Association (IOIA) International Organic Inspection Manual
- The team is responsible for conducting pre-assessments and on-farm assessments, compiling assessment documentation and making recommendations to the board

- All NOA members are invited to act as observers and contributors to ensure transparency. They may be organic or non-organic farmers, market representatives or consumers. They may join in the discussions but they do not participate in decision-making
- PGS relies on peer group farmers as well as consumers to participate in the peer review system to ensure transparency and credibility



NOA PGS organised structure

Source: <https://www.alimenterre.org/system/files/ressources/pdf/1002-fao-innovative-markets-sustainable-agriculture.pdf>

6.4.3. Certification procedures in Namibia for local market access

Producers and or processors are guided through the following procedures to sell their certified organic products to Namibian local markets.

1. **Organic production or processing**
Producers or processors ('applicants') need to understand the scope of the IFOAM - Organics International Standard for Organic Production and Processing and implement the requirements in their entity.
2. **Contact NOA**
Interested applicants contact NOA and request PGS assessment documents.
3. **Submit application documents**
Applicants must become a NOA member if they are not yet a member. The applicant completes the relevant PGS assessment form for crops, vegetables, livestock and/or processing and submits them to NOA, including all relevant supporting documents.
4. **PGS assessment fee & pre-assessment**
The Assessment Team undertakes a pre-assessment, based on a remote documentation review to resolve potential issues in advance or to gather necessary information. Upon approval, the applicant pays the assessment fee to NOA. An affordable fee structure makes organic certification for the local market accessible to all applicants.
5. **Physical farm assessment**
NOA schedules a physical farm or site visit with the applicant to ensure that the production and/or processing comply with the IFOAM - Organics International Standards. Transparency is a foundation of the PGS, and therefore all NOA members are invited to join the assessment as observers. Members attending the assessment are privy to all submitted documentation for perusal.



Steps to certification under NOA's PGS

6. **Certification decision by NOA Board**
Following the on-site visit, the NOA Board makes a certification decision based on the recommendations of the Assessment Team.
7. **Receive organic certification certificate**
The NOA Board informs the applicant of the PGS Assessment outcome, non-conformities, conditions and/or recommendations in writing. Each assessed farm receives a certificate indicating all products assessed according to the IFOAM - Organics International Standards. Permission is granted to use the NOA PGS mark with appropriate wording upon the successful resolution of non-conformities, if applicable. After finalisation, the decision is made public and pertinent assessment documentation is open for scrutiny, ensuring transparency.

6.4.4. Conversion period

If the PGS assessment outcome is positive, first-time applicants will proceed to complete a two-to-three year conversion period. Producers or processors can sell their products under the **“Namibian Organic in Conversion”** label after the first year of conversion is complete. Full organic status is achieved after the conversion period, when products can be sold under the **“Namibian Organic”** label. Retrospective recognition of organic management is possible. It is possible for the conversion period to be shortened or waived for virgin land or for land that can be proven to have been under organic production for a minimum of three years.

6.4.5. Annual assessments

Farmers and processors will undergo an assessment every year. Based on a risk assessment, NOA is able to exempt low-risk, longstanding organic operations from annual assessments, giving these operations a 2-year validity on the certificate.

6.4.6. Labelling of organic products

The NOA PGS Mark indicates to consumers the status of the organic integrity of the products. **“Namibian Organic”** means the production fully complies with IFOAM – Organics International Standards.



“Namibian Organic in Conversion” means that the production is managed according to the standards for at least one year but is still in the two- to-three year conversion period.



Namibia's organic farmers who produce food according to the organic production standards, but are not yet compliant with the processing standards, may use the **"NOA Brown Organic Mark"**. This mark identifies that the ingredients are organically certified, but the processing procedures and facilities are not yet compliant.



6.5. Organic certification for export markets

6.5.1. Organic export markets

Third-party certification is needed to access international organic markets. This is done based on organic standards defined by the country/region in which the product is marketed.

In the major organic export markets of the European Union (EU), the United States of America (US) and Japan, organic certification is legally regulated. This means that the certifier, the certification process and the products must comply with minimum legal standards.

In the EU, the EU sets the legal standard, and inspection and certification are carried out by private certifiers. Many European

countries have one or more private standard holders with their own set of (more specific or detailed) standards. These are based on the EU minimum legal standard but might include extra requirements. Specific markets require these additional certifications for products, while the EU organic standard is always required as a basis to qualify for certification to private organic standards in the EU.

In the US, the NOP develops, implements and administers the national production, handling and labelling standards for organic agricultural products. The NOP also accredits certifying agents (foreign and domestic) who inspect organic production and handling operations to certify that they meet United States Department of Agriculture standards.

In Japan, the JAS organic standard falls under the certification system established by the Japanese Agricultural Standard Act, regulating organic agriculture and labelling practices in the country.

6.5.2. Choosing a certifier

The primary responsibility of a certifier is to ensure that organic integrity is maintained throughout production and handling. The following factors should determine your choice of an appropriate certification body:

- Range of products that the certifier covers
- Certification cost, including travelling expenses
- Range of services offered by the certifier
- Accreditation of the certifier
- Experience in your geographical area

6.6. Frequently asked questions

Is 'free range' the same as 'organic'?

No. Organic agriculture is based upon a systems approach and is aligned with standards that can be verified and are recognised internationally. The term 'free range' in relation to farm animals has no legal definition or recognition, and as there are no requirements for evidence, there is the possibility for fraud and misuse of the term.



Free range eggs, common on the market, are not the same as organic certified eggs

Why are certain chemical inputs not allowed under organic? What dictates which are allowed and which are not?

Organic agriculture is based on the principles of Health, Ecology, Fairness and Care, which guide food production under a system in which ecological processes are emulated to produce food in a sustainable way that is not detrimental to the environment or to human health. It is also under these principles that organic agriculture encourages the use of on-farm inputs, rather than reliance on inputs that have been transported from far away and therefore have a high carbon footprint. Chemical inputs are usually costly to produce

and to transport, are not sustainably produced and are detrimental to the long-term health of the environment and humans.

The prohibition of chemicals is guided by the questions of how and where a chemical input is being produced and the impacts of its production (both environmental and socio-economic), how far it needs to travel to get to the end-user, and what short- and long-term impacts the chemical itself has on human health and on the environment.

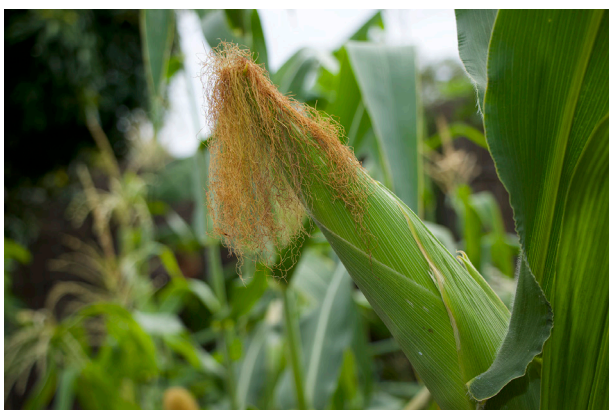


Biodiversity is encouraged to flourish in organic systems, which includes beneficial insects as a natural pest control method

Why are genetically modified organisms (GMOs) not allowed under organic agriculture?

With organic agriculture's principles of Health, Ecology, Fairness, and Care in mind, the technology and the system within which GMOs (produced through genetic engineering) is implemented across the world do not align with organic farming and food production. Genetic engineering is a particular kind of seed breeding that takes place in laboratories and involves the altering of the DNA of the seed. It is an expensive process and so the seeds are protected by intellectual property rights. This

makes them expensive for farmers to buy, and farmers are forbidden by law to save them for replanting the following year. This disrupts local farming systems that are dependent on a model of saving, sharing, gifting and exchanging seed, and it creates a well-documented reliance on large agrochemical companies to supply seed year after year. In addition, these seeds only perform well when used in combination with a prescribed set of fertilisers and herbicides. The most infamous of these is 'Round Up' (containing glyphosate, which is being increasingly banned around the world due to its proven linkages to illnesses and disease, including cancer). This chemical farming system, in which genetically modified seeds are used, is also bad for the environment.



Maize is one of the most commonly grown GMO crops in the world

Can I have only part of my herd certified organic while they roam with non-organic animals?

Yes. If all animals (including non-organic animals) are managed organically and there are detailed records documenting management practices, organic and non-organic animals can be managed together on organic land. There needs to be reliable marking of all animals to be able to distinguish between organic and non-organic animals. Animals that are not clearly marked will need to be sold as non-organic. For more information on organic livestock management, please read Chapters 7, 8, 9 and 10 of the NOA Organic Production Manual.



Most Namibian livestock is already managed very close to organic principles, and it often only takes a few changes in management practices for a farmer to go fully organic