Session 3.2: Geographical Indications control systems

Overview

This session will cover the basic elements needed to develop a GI control system for OLPs including the objectives of the control system, the content of the control plan and its links with the GI specifications, what producers must consider when choosing a control body and critical aspects of GI checkpoints.

Session **learning objectives**

This session has as its key objectives:

- To provide the learner with a better **understanding of the mechanisms of GI controls, including the certification process**
- To discuss the **traceability requirements of an OLP GI system**
- To discuss the **key elements of a control plan**

Session **learning outcomes**

By the end of the session participants will be able to:

- Explain the link between the GI specifications and the control plan
- Identify checkpoints to be included in the GI control plan
- Articulate the importance of implementing a GI control system for branding and marketing of an OLP
- Identify control body/ies which can implement their control plan for the purpose of verifying compliance with the GI specifications

Part 1: Geographical Indication control systems – Some basics

Having an effective GI control system enhances the credibility of the OLP GI system and provides some guarantees about the product on the market in relation to:

- Protection of producers against frauds and counterfeiting
- Protection for the consumers as the GI guarantees traceability, labelling and true information on the quality and origin of the product
- Integration of food safety and quality standards in domestic policy and codified in domestic law

Geographical Indications control systems are developed specifically in relation to the product and must be differentiated from other standards that can cover products such as organic standards (which relates to other production\ processes) or system controls based on the organisation of the enterprises such as ISO 9001 or ISO 14 001.

The key to successful GI control systems is being able to document what must be done to maintain the quality system associated with the OLP and its specifications ('Saying what I do") and then being able to check that producers are conforming to the documented controls ('Doing what I say').

The control system developed for an OLP must be easy to implement by the producers and by the control body.

There is a close relationship between the specification and the GI control plan and therefore it is important that the control system adopted reflects what is possible to be assessed/audited.

Part 2: Geographical Indication control schemes

A GI control system fundamentally has the following **objectives**:

- To implement **impartial and objective controls** for the product
- To provide **assurance to consumers** that the products covered by the GI have specific characteristics, quality and origin and are authentic
- To give producers or group of producers a **sense of responsibility in terms of establishing and managing the GI system** to enhance their competitiveness on the market

When establishing control systems for products using a GI framework, value chain stakeholders must be cognisant of some **basic principles**:

- There must be a group of producers that will lead the process of setting the parameters of the GIs controls
- Control or certification's bodies/organisations will be required to provide a service of external auditing of the GI system
- The cost of participating in the GI scheme must fit with stakeholders' budget
- The GI system, inclusive of controls, can be used as a valorisation strategy for the product and should not be seen solely as a marketing tool.
- The key is to avoid using too many labelling strategies on the market. GIs are powerful tools which allow consumers to identify the true identity of the product. While labelling can provide useful information about the product, too many labels can be confusing, especially if they do not add any additional value to the product nor result in increased profits for producers nor social/economic gains for the community.

The **control plan**

- There is one control plan for each product and each Geographical Indication
- The control plan must be approved by the group of producers and / or a competent authority
- Translating specifications to a control plan will entail:

- First having developed specifications for the product
- Identifying the producers / GI stakeholders along the value chain who will be using the GI and who must comply with the GI controls
- Articulation of the key control points which must be checked by the control body

- Producers are always cautioned to be careful when developing over detailed and overloaded specifications as this translates into a complex control system which may be too costly for producers to adhere to.

Content of the **control plan**

The control plan will generally consist of the following elements:

- Definition of the methods of control
- Mention of the control body/authority
- Information on the frequencies of the controls - how many producers will be controlled and how many times a year
- What sanction will be applicable for non-conformity
- If required, mention of official laboratories and if they need to be accredited
- Definition of the panel testing

Link to Specifications

The control plan is based on the GI specifications documented, by consensus, by the group of producers. Recall from Session 3.1 of this module the following about specifications:

- They document all the elements that can be considered in relation to the product and its processing
- Avoid all subjective language when scripting the specifications e.g. “the product is the best”
- Avoid including those elements that will not add any value to the product and the specifications
- Only include elements which can be controlled
- The key elements of the specifications and check points should allow for the control plan to be economically feasible for all producers

Learning exercises

Question 1: Can I integrate in the GI control plan a checkpoint indicating that my product is the best even through producers not able to provide evidence about this claim?

Answer: No. This statement is purely subjective. GIs do not protect best products, but products with objective quality, specificities and origin.

Question 2: A check point is integrated in the draft control plan; however, the producers are not able to evidence it. Should they include this control point the control plan?

Answer: No. Any checkpoint that is impossible to obtain evidence for must not be integrated in the control plan.

Question 3: Are all producers forced to set up a traceability system?
Answer: Yes. Traceability is one of the key elements of the GI system.

Question 4: Should this traceability system be harmonized among stakeholders?
Answer: No. In practice, each producer or enterprise can have its own traceability system. The only obligation is that all producers must comply with the specifications and the elements of the control plan. Producers are free to implement their own traceability system within these parameters. Sometimes some GI producer groups decide to collectively organise and implement the traceability system among them.

Question 5: Are organoleptic or sensory tests compulsory?
Answer: No. Organoleptic or sensory tests are compulsory only if the GI product in its characteristics present organoleptic or sensory specific features.

Part 3: Geographical Indication control approaches

A primary consideration when developing a GI control system is who will set up and manage the controls. Should it be a public authority, the producers or the producer group as a single entity. Consideration must also be given to the best control system to match the needs and capacity of stakeholders. Both private and public implemented controls can be considered.

Levels of controls

There are three levels of controls to consider when developing a GI control system:

1. A self-control or auto control system established and managed by producers themselves and operators of the value chain.
2. An internal control system which is not compulsory. Such as system will depend on the provisions established in the relevant legal framework. This internal control can be implemented by GI associations or a group of GI producers or outsourced under the responsibility of the GI producers' group.
3. An external independent control system which will involve checking the control systems being utilized by users of the GI logo to ensure compliance with the control system for the product. This level of control is mainly provided by a certification body or sometimes by public organizations such as a bureau of standards if appropriately accredited or legally competent.

External controls can be carried out by different types of actors such as public bodies; private organisations, technical teams/commissions. All external control entities must have the specific competency to undertake conformity assessment for GI control schemes as well as having specialised expertise related to the product.

Choosing a control body

When the legal regulation foresees the intervention of certification body, such a body must be accredited by an internationally recognized body like ISO 17,065 and selected by the producer group during the drafting of the specifications. The independence of the control body is important for monitoring and enforcing the control system and this will provide a layer of transparency to the GI management system.

The control body would provide an accreditation certificate indicating whether a producer is in conformity with the GI plan for a specific product and therefore qualified to continue to use the GI label.

Contents of the control plan

The control plan will typically comprise the following elements:

- Reference to the product specification
- Definition of the scope of application of the control plan
- Explanation of the organisation of controls in terms of the staff involved in the certification process and the process to enable the procedures to be certified
- Definition of the modalities of control. For each checkpoint, you need to know what type of control you will have to implement: auto controls and / or internal controls and / or external controls
- Explanation of the sanctions/penalties for failure to comply
- Information to provide to Control/Certification bodies:
    - Information about the contact, the address and the existence of other certifications.
    - Information about the production process - plant production, animal production, processing activities, storage details, placing product on the market. This information will depend on the content of the specification.

For each producer, a first certification audit must be undertaken before they can be authorised to use the GI.

Example of records for plant production

There must be a register, which is always made available to the control authorities or bodies. Pertinent information which must be kept in the register include, as examples:

- **Fertilizer use**: date of application, type and amount of fertilizer, parcels of land where fertilizer was applied
- **Plant protection records**: reason and date of treatment, type of product, method of treatment
- **Purchase of farm inputs**: we need the date, the type, the amount of the purchased product and sometimes also the labelling
- **Harvest data**: we need the date, the type and amount of organic or conversion, crop production

Organoleptic tests

Organoleptic tests are not compulsory and are only implemented if it is relevant to a specific product and if there are some special product conditions defined within the specifications. If such a test is required then there is need to identify and constitute a competent testing panel, the details (for example naming the panellist, providing a checklist) of which would have been provided in the code of practice for the GI product.

GI controls **checkpoints**

The following provides information on checkpoints which may be applicable when an external control body is used. This is not an exhaustive list and will be dependent on the product.

Checkpoints for the general and documentary organization will include:

- Respect and adherence to the general conditions of certification - commitment of the stakeholder's, management of new applications.
- The method of controls for this checkpoint includes: assessment of the statutes and internal regulation of the GI producer group, its organisation and management rules, agreement on the certification by the certification body, accession agreement
- Documents managed by the group of producers.
- External control methods will include - monitoring and follow-up of official documents, quality control documents; procedural documents produced by certification body; updated list of authorised operators or stakeholders that will use the Geographical Indication.

Training and the information on training which producers have received. Checkpoints will include:

- The certification body will control the dissemination of quality documents by the association to the producers.
- Methods of control – verifying the dissemination of informative documents, registration documents, traceability documents, and sometimes also trainings; checking the qualification of the staff that is used within the GI association to implement internal controls. In this case, the external control will check the competency of internal controllers.

Understanding the elements of a control plan

A control plan is built around three main parts:

1. The criteria related to product specification and the key point to master
2. The monitoring plan - which action will be implemented in order to check the point to master or to check if the criteria comply with the product specification, who is responsible for the control, how many times a year, and the corrective action required if there is non-compliance
3. Documentation of the results of assessments and required action etc.

GI Certification

Issuing a GI certificate of compliance is not compulsory and will depend on the relevant existing legal framework. Certificates are issued by the control/certification body for compliant products and producers based on the test and audit results.

Conclusions

- To implement an effective GI control system, there must be a clear understanding of the product and market dynamics
- The producer group must lead the development and implementation of the control system
- The control/certification body does not lead the implementation of the GI controls
- Building a strong relationship between the producers and the certification body is critical
- Producers and the producer group must be vigilant with regards to ensuring all authorised users of the GI designation are compliant with the GI specifications and control plan. In so doing they can maintain a sustainable GI system for their product

Learning exercises

Question 1: CIs a certification body mandatory in relation to the GI control system?
Answer: There are two possible answers. It depends on the jurisdiction.
No: A certification body is not mandatory in relation to GI controls.
yes: If the legal framework provides that compliance to the GI controls must be verified/ assessed by a control/certification body.

Question 2: Is the GI group entitled to provide internal controls?
Answer: There are two possible answers.
No: If it is not requested by the legal framework and if the GI group does not have the required competency.
yes: If the members of the GI group decide to do so and if the legal framework requires internal controls. The requirement for internal controls can also be delegated to a competent body.

Question 3: In the overall GI control plan can I include some controls which will be relevant in the marketplace?
Answer: The answer is yes. If the producers want to check the presentation of the GI products in the marketplace, they can include controls for this aspect.

Question 4: Can I use other certification schemes as part of my GI control system?
Answer: Yes. The GI control system can exist with other certifications such as organic farming or other quality certifications.

Question 5: In the case of several certification schemes, can the various bodies pool resources for their audits?

Answer: Yes, it is possible to pool resources and share the audits if the GI control checkpoints can be harmonised.

Question 6: During the audit undertaken by the control/certification body some documentation which can be used as evidence of conformity is missing. Is it a condition of refusal of the GI certification?

Answer: No. In the procedure of control, the producer can send the missing documents after the audits.