

GUIDANCE MANUAL FOR ORGANIC COLLECTION OF WILD PLANTS



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Preface	3
Part A: Basic Principles	5
1. INTRODUCTION	5
1.1 Definition of “Wild” Collection.....	5
1.2 Project Structure.....	6
2. ORGANIC CERTIFICATION PROCEDURES	8
2.1 Organic	8
2.2 Inspection.....	8
2.3 Certification	9
3. CRITICAL POINTS	10
3.1 Sustainability	10
3.1.1 Quantities	10
3.1.2 Training	10
3.2 Risk of Contamination	11
3.3 Traceability/Transparency	11
3.4 Quality Issues.....	12
Part B: Internal Collection Rules	13
1. COLLECTION	13
1.1 Collecting Areas.....	13
1.2 Collected Plants	14
1.2.1 Plants suitable for organic collection.....	14
1.2.2 Information about the Collected Plants and Collection Methods	15
1.3 Collectors.....	16
1.3.1 Approved Collectors List	16
1.3.2 Training	17
1.3.3 Contracts.....	17
2. DRYING AND PROCESSING AT THE COLLECTORS’ HOMES	18
2.1 Hygiene/Risk of Contamination	18
2.2 Organic and conventional quality	18
2.3 Transport from the Collector to the Purchase Station.....	19
Part C: Purchase, Processing and Sales	20
1. PURCHASE AND PROCESSING	20
1.1 Purchase Procedures	20
1.2 Storage and Handling.....	21
1.3 Processing	22
2. MARKETING/EXPORT	23
Glossary	24
Annex	25

Preface

This manual for organic wild collection is intended to give guidance for the implementation of the general requirements for organic wild collection as set in the Regulations (EEC) 834/07 and 889/08. This manual applies to operators, who organize the collection of plants or parts of plants from the wild and wish to market these products as organic. It defines the structural and documentary requirements to comply with both the European organic regulation and also the USDA National Organic program, though some procedures might differ lightly.

It can be used by as yet uncertified wild collection project operators as a guideline on how to comply with the organic regulations or by already certified organic wild collection projects as a basic document for evaluation of their existing system and identification of aspects of their management that might need to be improved.

Structure

The manual is structured in three Parts:

Part A of this manual deals with introduction, definitions and basic principles of organic wild collection.

Part B explains the contents of the project operator's Internal Collection Rules. Each operator dealing with wild collection needs to set up a kind of Internal Manual or standard operation system, which describes the internal procedures and Rules for the collection. Each project operator applying for certification should provide this basic description as for example by filling in the IMO forms IMO II 15.1.g, (*Annex 1*).

Part C: describes the requirements from the purchase centre to the Sale/Export of the organic product

In chapters B and C the following diagram indicates which part of the supply chain is concerned in the respective chapter. The supply chain symbolises the flow of products. In reality of course it can have additional elements or some of those mentioned below might not be independent operators. The supply chain starts with the collection and ends with the consumer.



Each chapter of Part B and C of this guidance manual contains the following information:

Minimum requirements

These are minimum requirements for organic certification; i.e., in principle they must be implemented for organic certification. If certain particular requirements can only be implemented gradually, it is still up to overall assessment of the organic certifier to assess whether organic certification can be granted. Minimum requirements marked with a * must already be fulfilled at the first inspection.*

Implementation



Describes how the above mentioned principle is to be implemented

1: Describes a document, which should be prepared and kept by the operator. Examples of how these documents should look like are found in the annex.



Describes a formal document, which is issued by a third party such as relevant authorities, head of the community, external experts etc..

Comments and Suggestions

Ad XY: In this section some comments and suggestions are given. This may include examples of procedures that have already proven to work well or explanation regarding the background of a certain minimum requirement.

Annex

In the annex a set of documents are given as sample templates. The documents can be freely adapted to fit one's own needs, but they cover the minimum requirements for organic certification.

Part A: Basic Principles

1. Introduction

The organic market is regulated by various legal or private organic standards and regulations; i.e. in many countries worldwide, all production steps of a product that shall be marketed as “organic” need to fulfil certain criteria for organic production. Compliance with these rules has to be verified and certified by an accredited certification body.

Most organic products on the market originate from cultivation, which has to comply with the respective organic production requirements. But a considerable number of organic products are not cultivated, but collected where they grow naturally.

For such wild collection products the principles of the organic regulations apply as much as for “cultivated” crops. However, the different situation concerning the risk of contamination, ownership of the land, vast size of the collecting areas and sustainability implies that there are some differences regarding requirements for organic certification of wild collected plants. Therefore, most organic standards contain a small chapter of organic wild collection.

The following manual explains the minimum requirements for organic wild collection according to the organic regulation of the European Union (Regulations (EEC) 834/07 and 889/08) and the US standard (USDA NOP), if also gives additional requirements for the Swiss private label “Bio Suisse”.

1.1 Definition of “Wild” Collection

“Wild” Collection

1. The collected plants grow naturally in an area, which has not been treated with prohibited inputs (according to the respective organic regulation) for at least 3 years.
2. The collection areas are not owned by the company itself (public land) and/or are of vast size.
3. The collected plants must grow and regenerate naturally without any agricultural measures
4. Certified are *plants* grown in an approved (by an accredited certifier) area. The area (*land*) itself is not certified.

Ad. 2.: Generally, neglected old plantations of perennial plants such as orchards etc cannot be considered as “wild” as usually the ownership is clearly defined and the plants did not grow spontaneously. The owner has a clear interest to increase the production of such a plantation consequently the risk that he uses prohibited inputs is higher than with land that belongs to someone else. Additionally for an area which is vast and badly accessible it is far less likely that someone actually uses prohibited inputs such as fertilisers or pesticides to increase the yield of the wild growing plants.

In that case the “normal” (cultivation) farm inspection system applies, which takes the low-key production system into account. In cases where the situation is not clear, it is up to the certification body to decide if a project can be considered as “wild collection”.

Ad 3.: Plants that are not indigenous but are collected in the wild (naturally regenerated) are considered as “wild”.

Ad 4.: In organic agriculture fields (*land*) and *crops* are certified “organic”. In wild collection projects only the *plants* are certified organic. The land needs to be *approved*, but is not *certified*. This is an important difference to organic agriculture, as land used as collection area cannot automatically be used for organic agriculture without a conversion period.

1.2 Project Structure

All sites where wild plants are collected, stored or processed need to comply with the organic regulation and must be inspected by the certification body.

All parties involved define their cooperation by contracts.

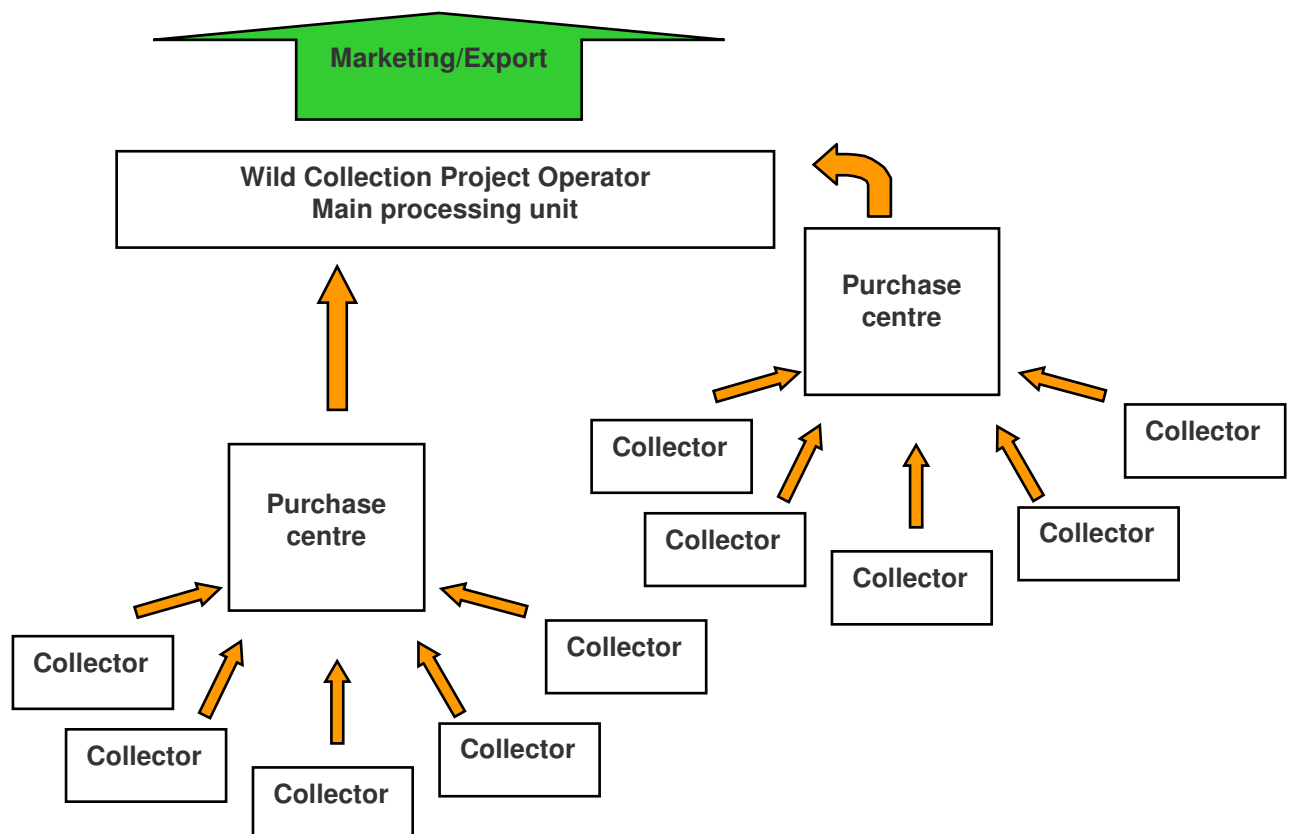
All collecting areas must be known to the certification body. Purchase locations and main processing and trading locations are inspected by the certification body every year. Collectors' homes are spot-checked.

Organic certification takes place all along the complete supply chain. Each step from the collection to the shelf needs to be known to the certifier. To achieve the necessary transparency all wild collection activities need to be organised in a well structured "project". Such projects usually consist of three major parties: The collectors, the purchase centres and the main processor/trader, which is the actual wild project operator (see **Model a**) below). The main processing/trading unit is usually responsible for the organisation (and organic certification) of the project. The purchase centres mostly belong to the main company, but can also be independent dealers with contracts both with the main company and with the organic certifier. The collectors are contracted by the main company (or the purchaser). Simple processing like drying or cleaning is often done at the collectors' homes or the purchasing centres. Further processing, packing and trading is done at the facilities of the project operator and such central processing units are regarded by the certifier as organic handling units.

Sometimes there are no separate purchase centres but all goods are directly transported from the collectors to the project operators' facilities (see **Model b**) below).

Both the Model a) and b) are possible ways on how to organise wild collection projects.

Model a)



Model b)



2. Organic Certification Procedures

2.1 Organic

In many countries the term “organic” is legally protected. Only products that are produced according to certain standards may be sold as organic. There are different organic regulations in different countries (e.g., EU, USA, Japan) which are often not mutually accepted.

The **EU Regulations** (EEC) 834/07 and 889/08 are applied for all products sold as organic in the EU member states. The Regulation EEC 2092/91 was the first organic regulation and came into force in 1991; it was replaced on 1st January 2009 by EEC 834/07 and 889/08.

The **USDA National Organic Program (NOP)** came into force at the end of 2002. It is the relevant regulation for organic products for the USA.

The third important market for organic products is Japan. The **JAS organic standard** was introduced in 2002. More and more countries worldwide are introducing their own organic standards so it is important to know with which standard(s) the production of organic products needs to comply.

In addition, there are many **private organic standards** that have often existed long before the regulatory ones. A private standard is usually based on one of the regulatory standards but has often additional requirements. Products produced according to those standards are usually labelled with the respective logo (Bio Suisse Bud, Demeter, Krav etc..).

The compliance with a certain standard is controlled by accredited certification bodies.

The **IFOAM Basic Standards** are the basis for all organic standards. It is the framework behind all organic standards.

In general most organic standards are quite similar and deal with the same aspects. Still there might be some crucial differences between them and it may be important to be aware of the requirements if certification according to different standards is required. This guidance manual follows the requirements of the Regulation (EEC) 834/07 and 889/08 stating differences for NOP and the private standard of Bio Suisse.

2.2 Inspection

As a standard procedure, a full inspection of each operational unit will take place once per calendar year by an accredited certification body. This means all collection areas, all purchase stations, warehouses and storage places and all processing facilities need to be visited.

Additionally the certification body needs to be granted full access to all documentation. If the bookkeeping is done externally the original documents should be ready for the inspection.

During the season, inspection personnel might visit the collecting area several times, accompany the collectors during their work and do some spot inspections at the collectors' homes.

The certification agency is authorized to perform unannounced spot checks or announced additional inspections of the whole company or parts of it any time during the year.

2.3 Certification

Certification is the final assessment and approval of the evaluation results with regard to an operation's compliance with the set standard. Certification is strictly separate from inspection and is always done by the certification office.

If the activities are found to be in compliance with the applicable standard except minor shortcomings, organic certification will be granted. Requirements may be included for the correction of the stated minor non-conformities within a set time period as a condition for continued certification.

The operator receives a certification notification from the certification body, the inspection or evaluation report as well as an operation certificate. If analysis have been conducted, the operator receives the test results in due time.

The certification notification states the certification status of certain quantities of named plant species in a defined area". Wild grown plants can only be classified as "organic" or "conventional", there is no "organic in conversion" status for such plants. The certification does not entitle the operator to sell any other plants from the same region as organic nor does it declare the whole area as "organic".

In case the operator is not able to comply with the minimal requirements, he will receive a notification of non-compliance together with an indication of necessary corrections. When correction of the non-compliance is not possible, a notification or denial of certification may be included in this notification.

3. Critical Points

3.1 Sustainability

In many countries the excessive collection of wild plants often combined with loss of habitat has led to a severe decrease of certain plant species and some plants have become endangered or they disappeared all together.

Therefore one major concern of organic wild collection projects must be the sustainability of the collection. It is the projects responsibility that neither the methods of collection nor the quantities harvested impair the plant species' ability to regenerate. The plant population must not decrease because of the collection (Regulation EEC 834/07 Article 12). Additionally the collecting activities must not damage the habitat or endanger other plant species or wildlife in general.

3.1.1 Quantities

In some countries there are collection permits systems, which define the quantities of a certain plant that can be collected in a certain area. In other countries no such system exists, or the system in place does not take sustainability into account. In this case the project operator should make sure the collected quantities do not cause any decrease of the plant population.

The estimation of how much of the plant material may be taken out of one area must be based on a resource assessment at least for sensitive plant species. Preferably this is done year by year by a botanist in cooperation with the collectors who know the area best. But it can also be based on long term collection experience in the region. But it must not be only based on market demand.

Collection on request

It is strongly recommended to have agreements with the collectors on how much of which plant needs to be collected. Otherwise each collector just collects as much as he can and then he might sell only half of it because the project operator cannot buy the rest.

It is also strongly recommended that the project operator agrees with his clients on quantities before the collection season starts. Thus only the requested quantities are collected and no plants are collected without a chance of actually being sold. This is especially important for plants, which cannot be stored for a longer period of time.

Several companies in the same area

If there is no collection permit system in place, it needs to be taken into account, that often several companies collect in the same area. Agreements with the other companies about the collected quantities should be sought.

This subject is under evaluation and development: more research is needed. In a new edition of this manual this chapter has to be updated and additional clarification is needed according to the local circumstances. Collaboration with other projects, like BIOTRADE Initiative is recommended at this point.

3.1.2 Training

Of greatest importance for the sustainability of the collection is the knowledge of the collectors. The project is responsible for ensuring that the collectors are trained in sustainability topics. The collectors need to understand how much of each plant can be collected so that the population of the plant does not decrease. The method of collecting must have the least possible impact on the plant, plant population and the ecosystem in general. Each collector must know exactly how to collect which plant.

Training manuals are under development at SIPPO/IMO incorporating the local knowledge from the participating companies and their collectors, with inputs of the national research and service centres.

3.2 Risk of Contamination

The buyer of organic products expects the product to be free of residues. To assure this the area where the collection is done must not be treated with any forbidden substances according to the applied organic standard and should be free of potential sources of contamination. Drift from close sources of contamination should be avoided; respectively the distance to contamination sources needs to be big enough. The following points describe some potential sources of contamination which must be considered while choosing a certain area as collection area for organic wild plants.

Human settlements

Obvious sources of potential contamination are human settlements. Fuel combustion from traffic, heating and industry, any kind of industrial emission, general pollution of the water by waste deposits and sewage etc. pose a general threat of contamination for the surrounding area. Additionally, certain areas near human settlements may be regularly sprayed with insecticides (e.g. against mosquitoes). The bigger the town or the agglomerations, usually the higher and wider spread are their emissions. Obviously no plants may be collected in or near human settlements. To estimate the distance of the collecting area to the next town, topographical issues, main wind direction and intensity and kind of the pollution need to be taken into consideration.

Agriculture

Some plant species, which are collected in the wild, are also found on agriculturally used areas. Collection on and near conventional (not certified organic) fields must be excluded as the fields may be treated with fertilisers and pesticides, which are not allowed according to organic regulations. Aerial spraying of pesticides can be another source of contamination of collecting areas near agriculturally used areas.

Therefore collecting may only take place on land where no agricultural activities other than extensive pasturing take place

Industry

Any kind of industry, especially metallurgic or chemical industry, bears a risk of contamination near collecting areas. Main wind direction, topographical conditions and height of the chimneys need to be taken into consideration as well as the nature of emissions if the border of the collection area is defined.

Mining, depending on the technique and exploited ore or mineral, may also be a source of major contamination of water, soil and air.

Land fills and rubbish dumps

Rubbish dumps may threaten the water by various toxic substances. Small “wild” dumps may contaminate the soil in their surroundings by leaking toxic substances.

Roads/traffic

Big and busy roads are a source of heavy metals (Cadmium, lead) and other toxic substances. No collection may take place near busy roads.

Radioactivity

Near nuclear power plants or industry handling radioactive material (including mining or depositing of it) a clear assessment of the radioactive contamination needs to be conducted. It needs to be taken into account that radioactive particles are distributed very far by air (e.g. “Chernobyl”)

3.3 Traceability/Transparency

Another main principle of the organic certification is the traceability of the products. Basically it has to be possible to trace back each batch of goods to the area where it was collected. Therefore detailed documentation of each step in the chain of custody is necessary.

All activities of the operator, including all details of purchase and processing need to be known to the certification body.

Samples of documents are available in the annexes to this manual.

3.4 Quality Issues

The actual quality of the products is not subject to the organic certification. In future upon request IMO will be able to include a check of quality issues into the inspection procedures (e.g quality assurance systems like GACP (Good Agricultural and Collection Practice), HACCP). Generally the quality of products must meet the market requirements and internal standards need to be adapted to the respective standards.

Part B: Internal Collection Rules

Part B defines the requirements for organic wild collection on the level of the collection. The chapter deals with the issue of the Internal Collection Rules. The internal collection Rules may be seen as some kind of internal organic quality handbook or standard operational procedures. All collection activities and procedures of a project are based on the Internal Collection Rules.

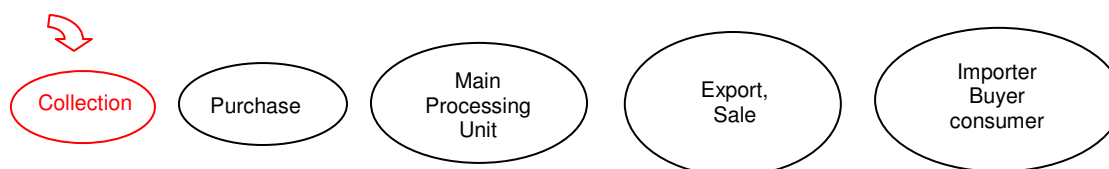
Each company needs to compile their own Internal Collection Rules. All the points described in part B of the manual need to be included in the Internal Collection Manual.

The Internal Collection Rules need to be approved by the certification body. Each company is free to include additional requirements, which are not subject to organic certification (e.g. quality issues).



The IMO form IMO II 15.1.g (see Annex 1) needs to be filled in and kept up to date by each project operator as a basic description of the project for the certification body. They are designed to simultaneously serve as complete Internal Collection Rules.

1. Collection



1.1 Collecting Areas

The area where organic plants are collected needs to be defined and needs to meet certain requirements. But the area itself is not certified as e.g. an organic field is certified. Only the products growing wild in the defined area are certified organic.

Organic wild collection can only take place in well-defined collecting areas. The borders of the collecting areas need to be known by all collectors.

The collecting areas must not have been treated with any non-allowed inputs (according to the relevant organic regulation) for at least three years.¹

The collecting areas need to be free of possible contamination sources.



1. Maps (see annex 2): In each purchase station a set of maps should be available on which the collecting areas should be clearly marked (outer borders). Good maps are needed so that it is possible to localise potential sources of contamination such as industry, roads, quarries, towns, waste deposits etc. (=>Bio Suisse: map scale at least 1:50'000).

- The outer borders of the collecting areas should be marked
- All purchase centres and processing facilities need to be indicated on the map
- All major sources of potential contamination should be clearly indicated on the map and excluded from collection

¹ Regulation EEC N° 834/07 Article 12



***2. Sites not suitable for collection** (“Inner borders”): Small-scale sources of contamination need to be defined and excluded from collection. A corresponding list needs to be available at each purchase station.



***3. Confirmation:** A confirmation by the relevant authority that the collection area has not been treated with any prohibited input (according to the relevant organic regulation) during the past three years may be required by the certification body.

Ad 1: A suitable distance of the collection area from major contamination sources needs to be defined. Intensity and nature of contamination, main wind direction and topography should be taken into consideration.

Ad 2: Small-scale contamination should be made known to collectors as unsuitable for collection sources like small roads, “wild, uncontrolled” rubbish dumps, home consumption fields, etc. Those minor contamination sources are usually too small to be indicated on the overview map but the collectors need to know the definition of those “inner borders”, so that they are able to recognise the risk in certain locations. The sites not suitable must be listed as part of the Internal Rules and are preferably mentioned in the collectors’ contract (*see chapter.1.3.3.*).

Ad. 3: The confirmation that an area has not been treated for 3 years needs to be issued for example by the responsible authority, the owner of the land or an external expert who knows the situation in the area. Confirmations issued by the company itself are not accepted. If it is not clear who is responsible for issuing this confirmation, please ask your certification body. The certification body may request this confirmation once or annually depending on the contamination risk.

1.2 Collected Plants

1.2.1 Plants suitable for organic collection

The collected plants need to be naturally grown.

Organic wild collection has to be sustainable and must not endanger the ecosystem in any way.²

All legal requirements concerning the collection of wild plants need to be met.

***1. Plants, suitable for organic wild collection:**

- Only naturally grown plants
- Only plants which are common in the area
- No “Red List” species
- Only plants which are allowed to be legally collected
- Species with low reproduction rates can only be collected in very restricted quantities and only if compliance with these collection restrictions can be guaranteed.



***2. If collection permits** are legally required, they need to be available.



3. Confirmation of sustainable use: If there is no permit system, a confirmation of sustainability of a certain harvest quantity issued by an independent expert or the relevant authority can be required by the certification body for certain species.

² Regulation EEC N° 834/07 Article 12



4. Resource assessment: If there are neither collection permits nor experts nor relevant authorities, who can define sustainable collection quantities in a certain area, a **resource assessment** may be requested. The whole collection potential should be estimated and quantities suitable for sustainable collection should be defined for each plant/part of plant.

Ad. 1: Rare or vulnerable species are not allowed to be collected as also collection in small quantity can endanger the whole population. Even if a plant is not on a red list, it can be classified as vulnerable and not suitable for collection. by the certification body (e.g. in case of difficult regeneration, slow growth rate etc..)

Ad 2: The collection should comply with the law. Protected species must not be collected. All required collection permits need to be available.

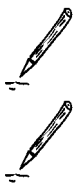
Ad 3: Careful monitoring of the plant population by experts may be requested by the certification body.

Ad 4: The method by which such a resource assessment is done, needs to be described in detail and to be submitted to the certification body. Concerning Resource management there is further guidance to be expected from SIPPO.

1.2.2 Information about the Collected Plants and Collection Methods

For organic certification a complete list of the collected plants needs to be available.³

Enough information about each plant should be available, to guarantee a sustainable collection.



***1. List of all collected plants/part of plants** including collected quantity must be compiled and kept readily available.

***2. Information about each collected plant:**

- Botanical name
- Local name
- Part of the plant collected
- Collection period
- Collecting area (in which of the collecting areas is the respective plant found)
- Habitat of the plant
- Collecting method: For each plant/part of plant a detailed description of the collecting methods should be available. It needs to guarantee the following:
 - Sustainability: For each plant/part of plant there is the need to be defined how much of each plant/of the whole population can be collected without endangering the whole plant population. Regeneration of the population should be possible.
 - The collection does not damage other plants nor encourages erosion
 - the best possible quality and the least losses of the collected plants: Only plants which fulfil the quality requirements may be collected

³ Regulation EEC N° 889/08 Article 70

Ad 1: Each year before the collecting starts a plant list has to be submitted to the certification body including the planned quantities in each area and for each species. (see annex 3)

New plants: If a company wants to start collecting a new species during the season, the certification body has to be informed and all under point 2 mentioned information should be available for the collectors and approved by the certification body.

Ad 2. The IMO form “Specification of the Collection of Goods”. (see annex 4) needs to be filled in for each plant unless the above mentioned information is given in another document in detail.

The most complete way to provide all necessary information about the plants to both the collectors and the certification body are “**Plant Monographs**” for each collected plant. An example may be found in the Wild Collection Manual developed by GTZ, IMO and SIPPO. (example see annex 5)

To ensure sustainability of the collection, a combination of the following measures is possible:

- Not to collect all plants (a certain percentage of the plants are left untouched)
- Not to collect all seeds, flowers, leaves or roots of a plant so that the plant can easily recover.
- To rotate the actual places of collection within the collecting area(s)

As a rough and general rule the following percentages are given for the plants/part of the plant that need to be left untouched:

- Roots, bulbs: 80% of the population
- Leaves (bushes, trees): 70% of the leaves
- Flowers: 30% of the flowers of each plant and additionally 20% of the whole population
- Seeds/Fruit: 20-30%

Please note that these percentages may differ considerably for certain species. To define the percentage both experienced collectors and botanists need to be consulted.

The aim with respect to quality should be that there is only collection of goods, which meet the quality requirements. Plants, which do not meet the quality requirements, are left untouched. If only plants/parts of plants of best quality are collected, there is automatically left more for regeneration.

1.3 Collectors

1.3.1 Approved Collectors List

To make sure that all the collectors are well trained and know the rules for collection, all collectors need to be registered.



1. Approved Collectors List: At each purchase centre a complete list of all contracted collectors (inclusive name, code number, address) has to be available for the respective collecting area. The list needs to be approved by the certification body. Purchase of organic products is only allowed from the listed collectors.

2. A responsible person should be assigned for each collecting area

Ad 1: For whole families, which are active collectors, it is sufficient, if only the main responsible person of the family is registered on the Collectors List. But it should be known how many members of the family collect. The registered member of the family should ensure that the other family members collect in compliance with rules set in the contract.

All collectors should have a unique code number so that there is no mixing up of identities. If a collector cancels his contract, the code number should not be given to another collector to avoid confusion.

It is suggested that for all trained and contracted collectors a **Collector’s Card** is introduced. This is a simple identification card with the name and photo of the collector, which proves that he has been trained and is obliged to follow the organic rules for wild collection. Purchase of organic goods is only allowed from collectors with a valid collector’s card.

1.3.2 Training

The purchasing company should ensure that the collectors are well trained to provide for both sustainability of the collection and quality of the products.

It is the responsibility of the purchasing company to ensure that the collectors duly carry out the agreed procedures.

***1. Training:** The collectors need to be trained in the Internal Collection Rules before collection starts.

2. Date and content of the training should be documented for each collector.

3. Responsibility: The company needs to be able to ensure compliance with Internal Collection Rules and needs to have a system of sanctions for collectors who do not comply.



Ad 1: A key point to entrance a sustainable collection is the knowledge of the collectors. Collectors can be trained as a whole group in a formal training seminar or individually. Training should be regularly repeated and its effect surveyed. For all new plants the collectors have to be informed and trained again in detail.

Training needs to follow the principles laid down in the Internal Collection Rules.

Ad. 2: The date of the training must be noted on the collectors list or on the collectors' card (*see chapter 1.3.1. and annex 6*)

Ad 3: In case of big and complex projects it can be requested by the certification body that the project formally assigns a person for the monitoring of the organic wild collection system. This person is responsible to check, if all involved parties implement the Internal Collection Rules correctly.

1.3.3 Contracts

Each collector needs to confirm by signing a contract with the project operator that his collecting activities comply with the respective organic regulation.

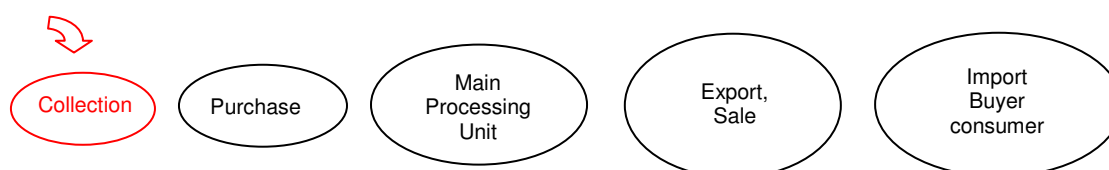
All collectors need to sign a Collector's Contract with the purchasing company. The contract has to include at least the following points: (see annex 7)

- 1. Collection rules:** The collector has to agree to comply with the collection rules defined by the company. A summary of the collection rules should be included in the contract.
- 2. Access:** The collector agrees to grant access to all his facilities used for collected products (drying, storage, etc) and to provide information about the collection areas to the certification body.
- 3. Sanctions:** The collector agrees to accept the sanctions set by the purchasing company in case the collector breaches the agreement.



The Contract must be signed by all collectors. The detailed collecting methods can be separately documented e.g. as part of "Plant Monographs" (*see annex 5*), which should be available for all collectors at any time at least in the purchase stations. The same applies for the maps of the collecting areas.

2. Drying and Processing at the Collectors' Homes



2.1 Hygiene/Risk of Contamination

The risk of contamination of the collected plant material after the harvest has to be minimised.

No chemical pest control may be used while any products are stored.

*1. At the collectors' homes the collected goods must be dried/stored only on clean material. Trays for drying need to be made of untreated wood or other material, to avoid risk of contaminating the drying goods.

If drying and storage takes place at the collectors' homes, the relevant locations should be accessible for spot inspections by the certification body.

It is recommended that the purchaser provides the collectors with the needed post harvest equipment in order to achieve the best possible quality and to minimise the risk of contamination by equipment, which is not suitable. (e.g. contamination during drying by chemically treated wooden trays)

It is also recommended that the purchaser distributes clean bags to the collectors to make sure that they do not use any contaminated materials (e.g. old fertiliser bags etc.)

The drying and storage place should be well aerated to avoid fungal diseases. It also needs to be well protected against any kind of animals (e.g. insects, rodents, birds etc.) The use of synthetic products during storage is only allowed if treatment is absolutely necessary and products may only be used when the store is empty. The waiting period before using the treated facility again needs to be adequate. The use of all products has to be documented.

2.2 Organic and conventional quality

The same plant can only be collected and handled in organic OR conventional quality.¹

*1. The collector is not allowed to handle the same good in conventional (= not certified) and organic quality ("Parallel Production").

Ad. 1. This paragraph has to be part of the Internal Collectors' Contract (*see chapter 1.3.3, annex 7*) so that it is made clear that the collector may not collect the same products in conventional quality to sell it to another company.

(*For the definition of "Conventional" see Glossary page 20*).

¹ According to Regulation EEC N° 834/07, Article 11

2.3 Transport from the Collector to the Purchase Station

The risks of contamination, commingling and loss of quality should be minimized during transport to the purchase location.

*1. All bags and containers in use should be clean and made out of material, which bears no risk of contaminating the goods.

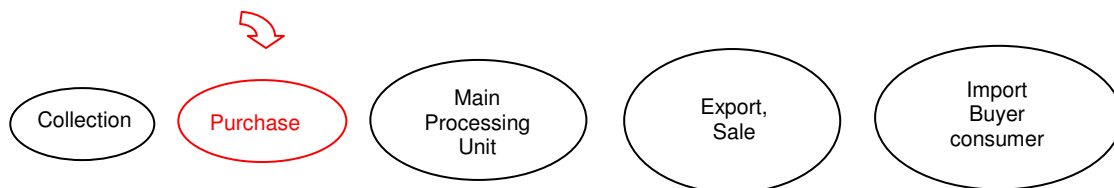
*2. Organic and conventional products may not be commingled during transport.

The internal rules guide the collection activities until the products are sold to the purchase station. With the change of ownership the procedures and rules of chapter C apply.

Part C: Purchase, Processing and Sales







Part C describes the compliance criteria in the supply chain from the purchase centre to the Sale/Export of the organic product.

1. Purchase and Processing



1.1 Purchase Procedures

The buyer needs to survey the quality of the collected goods and to document all relevant data to be able to trace back the product flow to the collecting area.

1. It has to be checked, if the delivering collector is listed on the Approved Collectors List. Organic purchase can only take place from collectors, who are listed on the collectors list.
-  2. If incoming goods are not in compliance with the requirements or if it is suspected that the collector does not comply with the Internal Collection Rules, the products must be refused or put in quarantine. This should be documented (reason of complaint, concerned collector, date etc).
3. Within the purchase centre all products should be **labelled** at all times with collecting area, “organic”, name and code of the certification body (certified by IMO SCES 004), harvest year, product and lot number (if applicable) (*see annex 11*)
-  4. At every purchase centre a **purchase register** has to be kept. Date, quantity, collector, collecting area, product, processing state (fresh, dried) need to be documented for each purchase (*see annex 8.*)
-  5. During purchase collectors have to receive a **receipt**, which indicates the purchased product, quantity and name of the collector and organic quality; these documents have to be kept at his home.
-  6. If the purchase centre is an independent operator, he needs to be contracted by the main wild collection project operator.
-  7. At the end of the year each purchase station should send the consolidated purchase quantities for each product to the certification body (*see annex 8b*)
-  8. Purchase procedures must be written down and known to all personnel.

Ad 2: The documentation of complaints or refusals etc. can be integrated into the purchase records.

Ad 3: From the purchase onwards all bags and containers should be labelled at all times.

Ad 4: The purchase register needs to be kept in detail as it enables the company and the certification body to survey the collection. Therefore it has to be kept in detail so that it is visible, which quantities are taken out of which area, which collectors have problems complying with the quality requirements etc..

Ad 7: The purchase quantities are needed to evaluate how much plant material is actually taken out of a certain area. These numbers have to be sent to the certification body automatically at the end of the season (*see annex 8b*)

Ad 8: The purchase procedures have to be written down and are preferably placed somewhere in the purchase centre for everyone to see.

1.2 Storage and Handling

During all handling of organic products the organic quality and compliance with respective documentary requirements of the applicable organic standard must be ensured.

Therefore all procedures need to include the following minimum requirements:

***1. General handling requirements at all stages of product flow:**

- Identification (labelling) of the product in all steps according to the quality (organic, non-organic) during all stages of product flow (see annex 11)
- strict separation according to quality (organic, non-organic)
- no prohibited methods (fumigation of containers, irradiation/ionization, etc.)
- Transport documentation

2. Requirements during storage

- Documentation: Stock records
- Organic warehouse (part) must be labelled as “organic”
- Facility pest management with synthetic products only in empty warehouses
- Sanitary records need to be kept



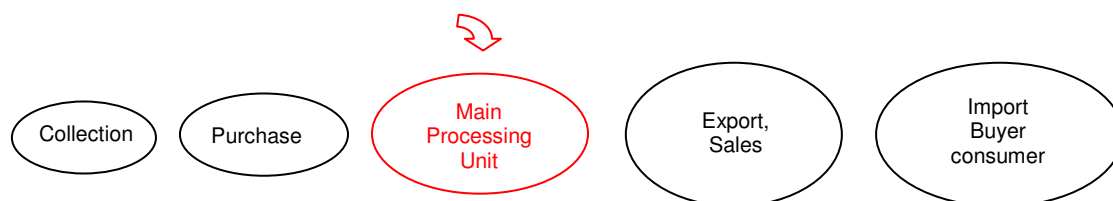
Ad 1: This usually implies that on the product or an accompanying document the organic quality is indicated with the word “organic” (or local translation). In some cases, an additional color code system or special bags for the organic produce may give the best results.

In order to be able to identify the origin of the product in case of complaints by the importers, the organization should be able to trace back each lot of exported product and to identify the area of origin. For security reasons, projects are advised to install a system of traceability by lot-numbers, which enable the project to be traced back to each product until the area of origin. Such a system implies that whenever smaller lots are consolidated into bigger processing lots, this should be carefully documented.

Ad 2: If organic and non-organic produce is stored in the same warehouse, physical separation is required.

Facility Pest management: Appropriate measures for prevention of pest infestation must be applied. The use of synthetic products during storing is only allowed if treatment is absolutely necessary and products may only be used when the store is empty. The waiting period until the store is filled again with products has to be adequate. The use of any synthetic products has to be documented.

1.3 Processing



During all handling of organic products the organic quality of the product and compliance with respective documentary requirements must be ensured.

Main Processing Units are always subject to full external inspection by the certification body.



1. Check of incoming goods

Incoming goods need to be checked to ensure that they comply with the quality requirements. This checking should be documented.



2. Purchase from other organic operators

If the supplier of organic products is not on the same project, the buying company needs a copy of the valid organic certificate of the supplier.

If the supplier is certified by a different certifier, a National Certificate of Inspection, NIC (formerly national Transaction Certificates), from the certifier of the supplier is required.



*3. Ingredients and Processing aids must be declared (IMO form 2.1.5, annex 19)

- All agricultural ingredients must be organic (some exceptions → clarify with certification agency);
- only allowed non-agricultural ingredients and processing aids;
- detailed and complete recipes inclusive all processing aids (see annex 8) need to be kept.



*4. Separation and identification

- Separation and identification (labelling) according to quality (organic, non-organic) during all stages of product flow;
- all processing steps are duly documented (see annex 9).



5. Flow charts:

- All processing steps should be presented in a flow chart. Additionally plans of all facilities need to be available.

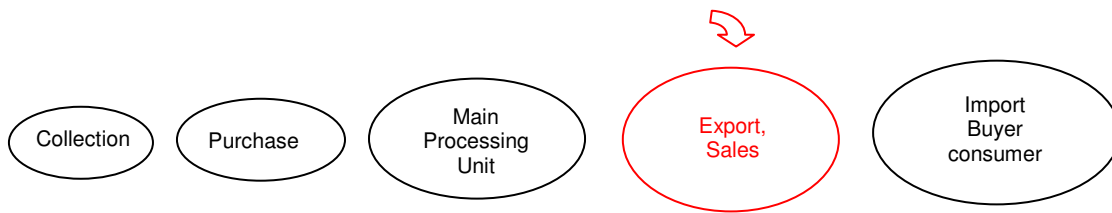
This chapter only deals with processing done at the project's main processing unit (either purchase center or main processor), which is always subject to full inspection and certification by the certification body. Depending on the contract, either the party that owns the product or, e.g., the contracted processor is responsible for ensuring that the organic requirements are met (contract needed with processor).

Ad 3: Many wild collection projects produce simple products that are only dried or processed mechanically. In this case the points 1, 2 and 4 are important. Sometimes, however, some processing aids or ingredients may also be needed during processing and it must be ensured that all ingredients/processing aids meet the organic standard. There is a list¹ in the organic standard of ingredients and auxiliaries, which may be used for organic processing.

Ad 5: What is done where and in which order: Using symbols and arrows the whole procedure from the incoming goods to the export needs to be drawn up in a chart.

¹ Regulation EEC N° 889/08 annex VIII

2. Marketing/Export



According to the Regulation (EEC) 834/07 and 889/08 all export activities are also subject to inspection by the certification body. NOP does not require the export to be inspected.

It has to be possible to trace back all organic products to their origin. Therefore all incoming and outgoing goods need to be documented in detail.



1. **Sales records:** All sales should be recorded. (See annex 12)



2. For exports to the European Union and Switzerland **certificates of inspection, CI**, (formerly called Transaction Certificates TC) are needed for each export lot.



3. **Purchase from other organic operators**

For products brought in from a supplier certified by another certification agency, a national CI is needed when applying for the certificate of inspection.

Ad. 1: All sales need to be documented. Sales of organic products which are sold as conventional, have to be recorded, too. The whole product flow needs to be transparent and traceable. Not only a summary of the sales but also the original invoices/receipts need to be kept.

Ad. 2: For every organic export the exporter needs to submit the filled in EU application form (*see annex 13*) together with the original invoice and the bill of lading or CMR to the certification body on the day of shipment. If the documents are correct and complete, an inspection certificate (CI) is issued and sent to the importer (with a copy to the exporter). The importer in the EU needs this document to clear the goods at the customs.

Ad 3: For products bought from different organizations/suppliers of organic produce, all products that are exported as organic must be certified organic and all suppliers known to the organic certification body. When applying for the above mentioned certificate of inspection for products which are certified by a second certification agency, a “national CI” issued by this second certifier has to be provided for the products concerned.

Glossary

The terms mentioned below are used as herein defined:

- Collecting area:** Defined area where the collection of wild plants, which will be certified “organic” may take place. The collection area needs to be indicated on a map. (*see also Part B chapter 2.1.*)
- Conventional:** opposed to “organic”. All products and all cultivation measures, which are not certified organic by an accredited certification agency, are considered as *conventional*.
- Conversion period** Usually in organic agriculture a field needs to undergo a monitored “conversion” period of 2-3 years before it is certified “organic”. One major difference of wild collection projects to organic cultivation is that there is no such “conversion” period for wild collected products. This means if the products are collected in compliance with the organic regulation they can be sold as “organic” from the first year onwards.
- Cultivated:** plants which are not grown spontaneously but sowed or planted by someone are considered “cultivated”. This manual does not deal with the certification requirements of cultivated plants.
- Organic:** organic means certified organic by a accredited certifier. Everything which is not certified, is known as “conventional”
- Parallel production:** The collection of the same plant species of both conventional and organic quality by the same collector.
- Purchase centre:** The facility where the collectors take their collected goods. Both storing and simple processing may take place at purchase stations.
- “Wild collection”** (*see Part A, chapter 1.1*)
- Wild collection project operator:** A trader, who is responsible for the whole project and defines the internal collection rules and applies for organic certification.
- Facility Pest management:** measures to prevent or fight pest infestation in storage and processing facilities

Annex

All documents in the annex can be used as samples on how a certain set of documents could look like. But each operator can adapt the documents according to his own needs.

1. **Internal Collection Rules (IMO II 15.1g)**
2. **Maps**
3. **Plant list**
4. **Information about plant (minimum)**
5. **Plant monograph**
6. **Collectors list**
7. **Collector's Contract**
8. **Purchase records**
- 8b **Purchase Summary**
9. **Processing records**
10. **Recipe**
11. **Labels**
12. **Sales records**
13. **TC Application form**