

# MANUAL FOR THE ORGANIC CERTIFICATION OF WILD COLLECTED PLANTS



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# PREFACE

This manual forms part of a series of manuals that provide guidance on obtaining organic certification for small-holder groups. Additional information on organic certification is contained in those manuals and in particular the introduction should be read in conjunction with this manual.

This manual for organic wild collection aims to provide guidance for the implementation of the general requirements for organic wild collection. The aspects covered in this manual set out what is needed to be put in place in order to comply with both the European organic regulations and also the USDA National Organic program. It should be noted though that these requirements can differ from one certification body to another.

This manual can be used by collectors and operators, who organise the collection of plants or parts of plants from the wild and wish to market these products as organic. It can also be used by uncertified wild collection project operators as a guideline on how to comply with the organic regulations.

The name "collectors" is used throughout the manual and refers to those that collect the plants or parts thereof. In other usages collectors are also referred to as "harvesters" or "primary producers".

This manual is comprised of three sections.

**Section 1** - Introduction and deals with the key aspects related to organic certification

**Section 2** - Describes the minimum requirements of the Internal Control System

**Section 3** - Deals with the requirements for the purchase and export

## SECTION 1 – OVERVIEW OF KEY ASPECTS

### 1. INTRODUCTION

The organic market is controlled by legal or private organic standards and regulations. This means that all production steps of a product that are to be sold as “organic” need to meet certain criteria for organic production. To show that these do that the production steps need to be inspected and verified by an accredited certification body. This is often referred to as **compliance**.

Most organic products on the market originate from cultivation on farms. However more recently a number of products which are not cultivated but are collected where they grow naturally are also being sold as organic, such as Devil’s Claw. The same principals for “cultivated” apply to “wild collection” although there are some differences regarding the requirements for the certification of wild collected plants.

#### 1.1 DEFINITION OF “WILD” COLLECTION

- ***The plants must grow naturally in an area, which has not received prohibited inputs for at least 3 years***
- ***The plants must grow and regenerate naturally without any additional agricultural methods***
- ***The plants that are certified are grown in an approved area. The area is not certified***

Plants that are not indigenous but are collected in the wild can be considered as “wild”.

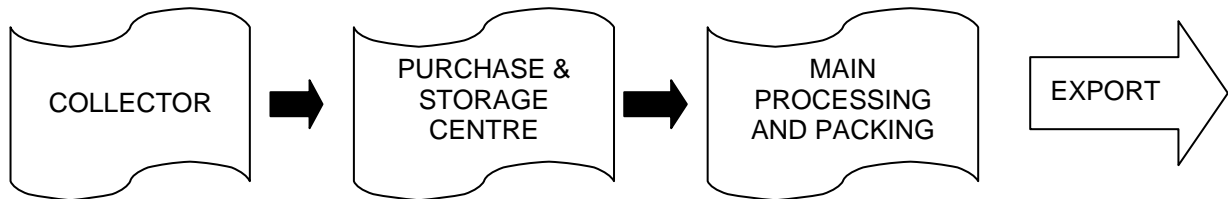
#### 1.2 SUPPLY CHAIN

The supply chain refers to all points in the supply of the product from when it is collected to when it is sold. Organic certification needs to take place at all points where a different process is carried out along the supply chain. Each step from the collection to the counter needs to be known to the certifier.

- ***All areas where plants are collected, stored or processed need to comply with the organic regulation and must be inspected by the certification body***
  - ***The responsibilities of all parties involved are defined by contracts***
  - ***All the locations of the different activities will be inspected every year by the certification body including the collectors’ homes***
-

### 1.3 COLLECTION STRUCTURE

In order to be transparent and be well organised each collection and supply chain needs to be well structured and clearly defined. The following diagram illustrates a basic structure of part of the supply chain.



The structure can vary from operation to operation but it is important that whatever the structure it should be appropriate to the local conditions. Usually however there are three main actors or parties involved and their role is briefly described below.

#### ***Collectors***

The collectors' main responsibility is to collect the plants and often includes carrying out simple processing such as slicing and drying which is often done at the collectors' homes.

#### ***Purchase & Storage***

This is where the collectors' will bring what they have collected to be weighed and stored. It is a good idea that some form of quality control is also undertaken at this point. It is also important that good record keeping is maintained.

#### ***Main processing & packing***

At this facility the product that has been supplied by the collectors' is bulked. Some further processing may also take place where after the product is repacked and made ready for export.

## 2. ORGANIC CERTIFICATION PROCEDURES

### 2.1 ORGANIC

In many countries organic is legally protected. This means that only products that are produced according to certain standards, which have been verified by an accredited certification body, can be sold as organic. The regulations regarding the import, processing, marketing and sale of organic products often differ from one country to another and the standards or procedures may not in some cases be accepted by all countries. In general though most standards are quite similar and deal with the same aspects.

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***However, it is very important when deciding on a certification body that one clarifies what regulations apply in the country to which one wants to export and that one can meet those criteria.***

The ***International Federation of Organic Agricultural Movements (IFOAM)*** provides the basis for all organic standards. The majority of the certification bodies are accredited to IFOAM. IFOAM therefore provides an overall regulatory mechanism for certification bodies and makes sure that standards are maintained.

***It is important when choosing a certification body that one ensures that they are accredited to IFOAM.***

There are three main important markets for organic products which have different regulations, these include :

1. In the ***European Union*** (EU) the import, processing and sale of organic products is regulated by Regulation (EEC) 2092/91 which came into force in 1991.
2. In the ***USA*** the USDA National Organic Program (NOP) regulates organic products and came into force in 2002.
3. In ***Japan*** the JAS organic Standard was introduced in 2002 to regulate the sale of organic products

However, many other countries are now introducing their own regulations and it is important to know which standards to comply with. In addition, there are also private organic standards that might apply to a particular company which may have additional requirements that have to be met.

The compliance with a certain standard is controlled by accredited certification bodies and products sold as organic will usually be labelled with the respective logo of the certification body.

## 2.2 INSPECTION

In order for a product to be certified organic a full inspection by an accredited certification body will need to take place at least once per year.

The inspection means that all the collection areas, purchase centres, storage and processing facilities will be visited by an inspector. The record keeping will also be checked to make sure that the books are a true reflection of the collection and sale of the product. Inspections are usually arranged before by the certification body, however it may be the case that unannounced spot checks may take place.

## 2.3 CERTIFICATION

Certification is the final step in the process towards organic certification. Certification is strictly separate from inspection and is always done by the certification office. The report of the inspector is submitted to the certification office and it is on the basis of this report that certification is granted or not.

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

In the case where organic certification is granted the applicant will receive a certificate which will define the quantity of the named plant, the area from where it can be collected and any other specific aspects which are relevant to the organic status.

***Note – The land is not certified it is the plant and no other plant may be sold as organic from the same area unless it is added to the certification schedule***

## 3. CRITICAL ASPECTS

There are a number of critical aspects that need to be considered as part of the organic certification process and will need to be addressed by the applicant in order to obtain organic certification for a particular product. Some of the more important aspects are dealt with below.

### 3.1 SUSTAINABILITY

There are many cases where the excessive collection of wild plants has contributed to a severe decrease in the population of certain plant species to the extent that they have become endangered. This is not just an environmental problem but also a social one in that it also reduces income generating opportunities for collectors who rely on the collection and sale of plants to generate cash income.

It is therefore very important to be able to demonstrate that the collection of a particular plant species is carried out in a sustainable manner. Put simply, this means that the plant population must not decrease because of the collection and that the collection activities should not have a negative impact on other plants or the environment in general. Ensuring this will also mean that collectors can continue to generate an income from the collection and sale of those plants in the future.

There are some aspects which should be considered that can contribute to ensuring sustainability and they are dealt with below.



### 3.1.1 Quantities

Establishing or setting the quantities that can be collected from a certain area is one way of ensuring sustainability. One way of doing this is to conduct resource surveys to establish how much of a particular plant exists and from this work out how much can be collected. This should initially be done by a botanist but local collectors can be trained to do this in the future. In some cases this is impractical due to the size and accessibility of the area as well as cost. In this case other ways need to be found to do this, such as long-term collection experience in the area. In other cases a cautionary quota can be initially set and monitored.

In addition the following should be noted :

- Collectors should be well informed prior to collection of how much they may collect and over what time period. This also ensures that all that is collected can be sold and will not be wasted.
- A clear agreement should be reached about who may collect and purchase in a given area. This is important for local communities in order for them to be able to manage the resource effectively and in particular the collection methods.

### 3.1.2 Training

Training can play an important role in ensuring sustainability. This is particularly important with regard to how the plant or part of the plant is collected. If it is collected in a proper manner this will ensure that the plant is not damaged and will survive and can be collected from in the future. This is often referred to as sustainable harvesting methods and manuals for the collection of a number of plants have been produced, for example Devil's Claw.

Training is also important with regard to the processing and storage which will contribute to ensuring that a good quality product is produced.

## 3.2 TRACEABILITY

Another main aspect of organic certification is traceability. This means that the records that are kept should be such that the product can be traced back to where it was collected from and by which collector. This requires that detailed records are kept which record each step in the supply chain. In addition, the details of all purchases and further processing also need to be documented.

## 3.3 QUALITY CONTROL

While the quality of the product is not directly linked to organic certification at this stage it is vitally important that a good quality product that meets market requirements is produced. Quality affects the marketing potential and the price. It is important therefore to ensure that basic measures are in place regarding hygiene, processing and storage.

### 3.4 CONTAMINATION

Another important aspect is to ensure that the product is free from contamination of any forbidden substances that could damage the quality of the product or be harmful to those that may use the product. Some of the main potential sources of contamination that should be avoided are highlighted below.

#### Human settlements

Plants should not be collected in or near human settlements. Polluted water, inadequate sewage systems and the use of insecticides (against mosquitoes) are potential sources of contamination.

#### Agriculture

The collection on or near conventional fields should be avoided as they may be treated with fertilisers and pesticides which are not allowed by organic regulations. Collection should only take place where no agricultural activities other than livestock grazing takes place.

## SECTION 2 – INTERNAL CONTROL SYSTEM

This section deals with the requirements for the collection of wild harvested plants. These requirements form part of the Internal Control System (ICS) also sometimes referred to as the Internal Collection Rules. The name used differs from one certification body to another.

A separate ICS needs to be compiled for each operation or project. The ICS is a management tool and it sets out all the collection activities and procedures that will be followed as part of the operation. Additional aspects that are related to local conditions can also be added. The ICS will be reviewed by the certification body and approved subject to them meeting the requirements of the specific standards. It is important that all those involved understand and agree to abide by the rules and procedures set out in the ICS.

The components discussed in this section need to be included in the ICS as a minimum requirement. Documentation that will need to be produced and maintained is highlighted in shaded boxes in this section.

### 1. COLLECTION

#### 1.1 COLLECTION AREA

The area where the organic plants are to be collected needs to be defined and needs to meet certain requirements. The following points are important :

- ***The borders of the collecting areas need to be known by all the collectors***
- ***The collecting areas must not have been treated with any prohibited inputs for at least three years***
- ***The collecting areas need to be free from possible sources of contamination***

#### Required documentation - Map

This map should indicate the following :

- The outer borders of the collection area (e.g. Conservancy)
- All purchase centres and processing facilities
- The major sources of potential contamination and other land use applications

Confirmation from a relevant authority may be required to verify that the area has not been treated by any prohibited inputs for the last three years (e.g. Ministry of Agriculture Water and Forestry).

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## 1.2 DESCRIPTION OF PLANT

### 1.2.1 Suitable plants

The following list provides a guideline about what plants can or can not be collected if organic certification is to be applied for.

- Only plants that grow naturally in non agricultural areas
- Only plants of which there is a sufficient quantity
- Plants that occur on the "Red List" as endangered may not be collected
- Only plants which are allowed to be legally collected

#### Required documentation – Resource Assessment

If sustainable collection quantities can not be determined and verified by an expert or through previous collection experience then a resource assessment may be requested. This assessment would determine the plant population size and the sustainable collection quantity.

Resource assessments, although time consuming and costly, can provide an important monitoring tool for collectors of their resource.

### 1.2.2 Information about the plants and collection methods

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

#### Required documentation – List of Plants

The list should include the following information

- Botanical name
- Local name
- Part of the plant to be collected
- Collection period
- Collecting area (in which of the collecting areas is the respective plant found)
- Habitat of the plant
- Collection method

A description of the collection method is important in order to ensure sustainability. It will be useful to be able to back up the proposed method with research that can verify that the method is sustainable. Only where this can be assured will organic certification be possible.

## 1.3 COLLECTOR'S

### 1.3.1 Approved collector's list

Every collector needs to be registered. The registration ensures that the collector's have been trained and know and understand the rules for collection. How the collectors are registered may depend from area to area depending on the circumstances. Whatever method is decided on must be implemented consistently. Collectors' can be registered on an individual or household basis.

#### Required documentation – Registered List of Collectors

The list of registered collector's should include the ***names, collector code and residential address***. This list will be approved by the certification body and only those that are on this list may sell their product as organic.

**Collector code** It is sometimes easier for each collector to be given a unique code as names can often be mixed up. The code should indicate where they reside and a number. If for example they live in Gobabis the code could be GOB 001 and so on and so on. Collectors could be issued with collectors' cards to simplify matters.

**Local contact** It is also useful to have a local contact person in each area who will act as a link between the collector's and the operator.

### 1.3.2 Training

Training is vitally important to ensure sustainability, the production of a good quality product and the smooth functioning of the operation. Training should focus on aspects that provide useful information to the collector and could include the following, information on the plant, collection method, processing methods and storage as well as broader information such as where the product is going and what it will be used for.

The ICS must be explained to all collectors before collection starts. A system needs to be put in place to ensure that the ICS is complied with and should include procedures and measures to be taken if they are not complied with.

#### Required documentation – Training Record

The date and content of the training should be recorded and filed.

### 1.3.3 Contracts

Every collector needs to confirm in some manner that is binding that they agree to comply with the requirements set out in the ICS and the action to be taken if they do not. The organic regulation requires that a contract needs to be entered into between the collector and the operator (organising body, e.g. conservancy).

This is a cumbersome process and an alternative manner is to organise it in such a way so that by registering as a collector they agree to comply with the regulations. This must then be stated on the registration form and explained to the collector.

#### Required documentation - Contracts

Either a contract or some documentary evidence that indicates that the collector understands the regulations and agrees to comply with them must be available.

## 2. PROCESSING AND DRYING BY COLLECTORS

### 2.1 HYGIENE

It is important that the risk of contamination during the processing and drying of the collected plant does not occur. This means that hygienic conditions should be maintained at all times during this process. The following important aspects should be implemented.

- Collectors should wash their hands and all equipment to be used
- The cleaning and processing should only be done on clean material and in an area where there is no risk of contamination
- The drying and storage should also be done in an area which is protected from insects or animals
- Only clean bags should be used (i.e. not old fertiliser bags)
- The proper equipment should be used to ensure that quality is maintained

### 2.2 TRANSPORTATION

If the product has to be transported to the purchase centre by the collector it should be done in a manner that ensures that contamination does not occur. The means of transport should be clean and the product protected from dust. Organic products should be transported separately from any other products.

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## SECTION 3 – PURCHASE, PROCESSING AND SALES

This section covers the requirements for the purchase, processing and export of an organic product.

### 1. PURCHASE AND PROCESSING

#### 1.1 PURCHASE PROCEDURES

It is important that the purchase of products from the collector is well documented. The buyer needs to check the following aspects.

- Make sure that the correct packaging has been used
- Check that the quality of the material supplied meets the standards
- Document the relevant information to ensure that the product can be traced back to the collection area and collector, i.e. correctly labelled
- Ensure that the sellers name appears on the approved collector's list

#### Required documentation

Purchase procedures	These should be written, understood and agreed upon
Purchase register	A purchase register must be maintained. It should include the following details, Date, Collector, Collection Area, Product, Quantity and Price paid
Purchase receipt	A purchase receipt with the same information should be issued to each collector
Rejected material	A list of material that was rejected and the reasons why must be recorded
Consolidated record	A consolidated record of all purchases should be compiled at the end of the year or season and sent to the certification body

## 1.2 HANDLING AND STORAGE

The handling and storage of the organic product must also be done according to the requirements of the standards.

### 1.2.1 Handling

The handling of the product needs to ensure that the following requirements are adhered to.

- That the correct labelling is maintained throughout the product flow to ensure traceability
- That the organic product is separated from non-organic products
- That no prohibited methods are used (e.g. fumigation of containers etc)
- That documentation regarding the transport of the product is maintained

### 1.2.2 Storage

#### Required documentation

- The storage area must be labelled "ORGANIC"
- Stock records must be maintained
- Sanitary records must be kept and cleaning can only happen when the store is empty

## 1.3 PROCESSING

The processing of any organic product needs to be inspected and approved. The following main aspects need to be in place and carried out.

#### Required documentation

- All the processing stages need to be identified and presented in a flow chart. Additionally, plans of the facility must be available
  - All incoming goods should be checked and documented
  - All the ingredients and processing equipment must be declared and approved
  - The processing of organic products must be kept separate from non-organic products
-



## 2. EXPORT

All the aspects related to the export of organic products also need to be inspected by the certification body. The export must be fully documented so that the product can be traced back to where it was collected. The following aspects should be noted.

- Exports must comply with local legal requirements (e.g. export permit)
  - All sales records must be kept
  - Documentation will have to be provided by the exporter to the importing authorities, who will, if all the documentation is correct, approve the importation and a ***certificate of inspection*** is issued. The process and documentation required may differ from country to country.
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