

Introduction

Organic farming is the only agricultural system that is governed by a strict legal framework and robust controls from farm to fork [1]. The EU organic sector has seen tremendous growth in recent years with retail sales in 2022 reaching 53.1 Billion Euros [2]. A significant share of products on the EU organic market comes from third countries and from smallholders who make up 80% of organic producers [3].

The new Organic Regulation (EU) 2018/848 entails important changes to group certification (GC) that will take full effect from 2025 [4]:

- GC requires implementation of an internal control system (ICS)
- Separation of the trader from the group of operators (GoO)
- Group size must be < 2000 and members in close proximity
- Individual farm size and annual turnover are limited

Whilst the EU seems to see these new rules as a form of *empowerment* of small producers, others decry *neocolonialism* as the rules apply also to third countries and diverge from current business models.

Our study investigates the impact of the new regulation on Ghana's organic cocoa sector through the case of trader managed cooperative.



Fig 1- Cocoa farming in Ghana
Image source:
<https://ghanaremembers.com/storeis>



Fig 2- Cocoa farmers in an organic farm
Image source: Yayra Glover

Methodology

Table 1: Summary of Research methodology

Method	Details
Research design & Approach	• Qualitative study
Study population	• Actors the cocoa value chain
Study participants (13)	• A manager (trader), Internal Control System managers & inspectors, representatives from cooperatives, actors from Ghana COCOBOD, a certifier, and a researcher.
Sampling technique	• Purposive
Data Collection Instrument	• In-person and online interviews • Document analysis • Group interviews
Data analysis	• Recorded interviews • Transcription • Qualitative Content analysis and Thematic analysis
Ethical Considerations	• Informed consent, confidentiality and trust, Anonymity, freedom of participation

Results

Our results show that

- ✓ A functional Internal Control System (ICS) was already in place
- ✓ A joint marketing system was in place fitting to the Ghanaian cocoa system
- ✓ There was voluntary participation in the trader managed cooperative
- ✓ There was already farmer empowerment through local structures (embedded in a limited autonomy)

The new regulation

- could exclude certain operators from organic certification due to the cap on the maximum number of members in a cooperative
- presents a bureaucratic burden for groups who may lack the capacities to implement and run their own Internal Control System
- increases the costs and overall effort of certification, leading to
 - a disincentive for engaging in organic farming, and/or
 - incentives to pursue legal evasion strategies

Discussion

According to our results stakeholders do not perceive the new rules as 'empowering' - at least in the current circumstances. However, effects also do not justify the verdict 'neocolonial'. Most stakeholders take a pragmatic stance.

- Empowerment
 - GoO may already be empowered through a limited autonomy
 - Empowerment essentially depends on economic factors. It does not necessarily require that cooperatives need to manage every area of the certification process by themselves [5]
- Neocolonialism
 - The assumption that smallholders voluntarily arrange with the new framework, can be seen as a "purported freedom and empowerment" [6]
 - In that sense, the Organic rules reflect an asymmetrical relationship between the more powerful former colonizers and the weaker one [7]
 - However, neocolonialism usually implies a subtle coercion to force third countries to tow the lines of the Western world [6]. The new organic rules mostly seem bureaucratic and overly burdensome. The main risk is, that they drive actors out of the certification.
- No big deal
 - Organic is just another voluntary standard
 - Actors perceive rules as something that can always be side-stepped

Conclusion

- The new organic rules could be seen as *neocolonial* in the sense that they do not match with the reality of the Ghanaian trader managed cooperatives.
- Still, farmers and cooperatives voluntarily participate in certification schemes based on market demands and potential benefits, rather than coercion.
- In a country like Ghana, and for a commodity like cocoa, the essential decisions are not taken by the EU regulator.
- Certification can exacerbate existing vulnerabilities particularly for small-scale producers and GoO. Organic is not worse, but also not much better than other certifications.

Recommendations

- **EU Organic rules should acknowledge their global dimension:** As the main market, the EU is setting organic rules for the entire world. The idea of the new regulation to create a level playing field for EU Member states and third countries might be a sensible starting point. However, a one size fits all approach may not necessarily achieve the goal.
- **Compliance and control are essential.** Trust is key for the success of the organic certification. Organic Fraud is the biggest threat. Strict rules, that are not being obeyed, are counterproductive. The certification must keep track with latest developments, e.g. in the field of digitization.
- **Organic rules should reflect agroecological values.** A purely export driven commodity production seems at odds with organic's purported values. It is high time that organic regulator focusses on the "big picture" rather than perpetuating exploitative relations and creating unnecessary bureaucracy.
- A **more experimental approach** could help to move forward. Organic stakeholders themselves must take action to create a more balanced system.

References

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