What does GlobalGAP do to regulation?

The role of a private standard in the European Food governance

There’s no easy answer to the natural and man-made issues our planet faces. But there is a way to face the challenges to the food supply and the welfare of food producers.

We can do it by creating a powerful incentive to improve agricultural standards. By helping farmers everywhere, large and small, raise crops and livestock with care. By establishing worldwide Good Agricultural Practice we lay the foundation for safe food produced sustainably.

And this opens up markets for farmers, which they could never have reached before.

THAT’S THE MISSION OF GLOBALG.A.P.

GlobalGAP brochure, A World of Difference, January 2012

Since the mid-1990’s, two phenomena have profoundly changed the way that agricultural production and trade are organised: on the one hand the liberalisation and globalisation of food markets and on the other hand the increasing relevance of environmental and health issues. The concomitance of these two phenomena has been analysed as the emergence of a new agrifood regime (Le Heron, 1993), qualified as a “neoliberal food regime” (Otero, 2012), a “corporate environmental food regime” (McMichael, 2005), or “green capitalism” (Freidmann, 2005). This third regime arose essentially because of a reconfiguration of food systems regulations (Campbell & Le Heron, 2007), marked by the development of voluntary private standards (Busch & Bain, 2004; Bartley, 2007; Busch, 2011) which complemented or competed with traditional command-and-control regulation by the State (Havinga, 2006). In this paper, we use Black’s definition of regulation: “regulation is the sustained and focused attempt to alter the behaviour of others according to defined standards or purposes with the intention of producing a broadly identified outcome, which may involve mechanisms of standard-setting, information gathering and behaviour modification” (Black, 2002: 20). Regulation consists in rulemaking or standard setting, monitoring compliance and enforcement. Where the law is enforced by inspections and by a legal and administrative system, private standards are ensured by third-party certification (Hatanaka et al., 2005), with the certifying bodies henceforth being themselves certified (Hatanaka, 2013). For the last ten years or so, the European Union has recognised the production of private standards to complement its own legislative production. In particular, the EU propounds the notion of coregulation, an original combination of public and private standards defined as follows: “Co-regulation combines binding legislative and regulatory action with actions taken by the actors most concerned, drawing on their practical expertise” (CCE, 2001, p. 25). In the agricultural and agrifood sector, food safety, worker protection, good environmental practices, etc. are all part of the protected interests which can be guaranteed by these hybrid normative modalities (Egan, 2001; Graz, 2006), through distinct mechanisms: regulations, controls and laboratory analyses for public standards; internal controls and third-party certification for private standards.
In this paper we study the implementation of GlobalGAP, a standard for good agricultural practices in the fruit and vegetable sector in France. GlobalG.A.P. or “Global Good Agricultural Practices” was initiated in 1997 with the name EurepG.A.P., by several major north-European retailers (Ahold, Migros, Sainsbury, Tesco, etc.), all of which are members of the Euro-Retailer Produce Working Group (EUREP). This is a professional standard developed to regulate business between producers and distributors, but it is not designed to provide consumers with information, so it is not subject to any product labelling. Managed by FoodPlus Gmbh since 2001, it is a global quality assurance standard which essentially concerns food safety, occupational health and environmental protection in relation to agricultural activities (plant protection products, drug residues from livestock farming). D. Casey (2009) shows that GlobalGAP’s existence is the result of three converging shifts: 1) public authorities transferring responsibility for food safety and food quality over to the food industry 2) the international diversification of sourcing which has led to the retailers wanting additional guarantees, and 3) the change in consumer attitudes towards food. Since the first producer was certified in 2001 there has been a steady increase in the number of certified producers up to the current level of 123,000.

The global spread of this new standard has led to numerous debates in the field of social sciences, revolving around the selection process (among farmers and farms) and the increasing power of retailers over agrifood chains. Some researchers believe that on the one hand GlobalGAP is contributing towards more capital-intensive agriculture (Fox & Vorley, 2006) and on the other hand towards maintaining or accentuating the asymmetrical relationships (Campbell, 2005) between importing countries in the North and exporting countries in the South – Mediterranean basin, Africa, Latin America, Asia and Oceania (Reardon & Berdegué, 2002; Weatherspoon & Reardon, 2003; Ponte, 2008; Henson, Masakure & Cranfield, 2011). Other authors point out that whilst a private standard such as GlobalGAP certainly gives retailers greater power, one must be careful not to overestimate this type of effect (Harvey, 2007), especially as the development of new versions of the standard is now achieved using participative mechanisms which allow producers to directly enforce their interests within GlobalGAP (Tallontire et al., 2011). However, this type of complex strategic alliance with the distribution sector would only appear to be available to the largest producers (Bain, 2010). Most of the above-mentioned contributions have in common the fact that they take for granted the content of the standard, its force, and its significance for those who use it. It is this apparent obviousness that we wish to discuss.

Taking the case of French vegetable producers who have GlobalGAP certification, we look at how this standard affects the conceptions and practices of actors in the field, in order to discover how they cope with it. Building on the sociology of sciences and more specifically on the Actor-Network Theory (Callon, 1986; Latour, 1987), we focus on the characteristics of the standard itself. Such focus has already been used in research on the competition between technical standards: for example, in order to understand why certain standards were finally adopted (Wi-Fi, USB), van den Ende et al. (2012) took into account the actual content of the standard and concluded that flexibility is a determining factor of success. In our case, this hypothesis means making a practical assessment of GlobalGAP’s design so as to grasp the strategies of the various actors (not just the producers, but also producers’ organisations, agricultural consultants and advisors, etc.) who appropriate, spread and implement the standard and thus understand its effects.
This paper is organised as follows: in the first section we demonstrate that the GlobalGAP standard is not a single document but a complex set of texts which are interlinked in a more or less coherent way. So as we look at the situation in France, there exists not one but several interpretations of GlobalGAP. We then examine the diversity of the issues that GlobalGAP is intended to cover: by grouping together interests as diverse as environmental protection or product quality, the standard creates a centre of calculation (Latour, 1996) which produces its own effects reinforcing the managerial evolution of agriculture. In the final section, we look at the extent to which this complex and heterogeneous instrument nevertheless leads to standardisation and we examine the limits to this international harmonisation.

Fieldwork

This paper is based on one set of interviews of actors in the tomato sector who are part of the “organised” sector (i.e. members of Producers’ Organisations)\(^1\), and another set of interviews of “independent” vegetable growers (non-PO members) and consultants\(^2\). Within the European Union, the entire common organisation of the market for fruit and vegetables is based on Producers’ Organisations (PO’s), the best-known legal form of which is the cooperative. The aim of European policy is to give producers the power to negotiate with large-scale retailers: in particular, PO’s are responsible for marketing the products and thus for negotiating the sales contracts. Only PO’s may receive subsidies under the Common Agricultural Policy (CAP); they are not available to independent producers. In addition to the marketing, PO’s often provide their members with technical advice (on climate, hygrometry, pest control, etc.). The marketshare of organised production varies considerably within the EU. In the Benelux countries a handful of PO’s market approximately 90% of domestic production, whereas in France in 2009, about 300 PO’s were responsible for 50% of domestic fruit and vegetable production\(^3\).

In 2011, 70% of GlobalGAP certified producers were PO members. A comparison between “organised” and “independent” producers would therefore seem necessary. Therefore, in addition to the subsidies, PO’s offer their members the resources they need to adopt the GlobalGAP standard and pay for some of the related practices, whereas independent producers generally use private consultants.

<table>
<thead>
<tr>
<th>The fruit and vegetable sector in France</th>
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France has 22,940 farms for fruit and 30,800 for vegetables, all together covering approximately 1.5% of Utilised Agricultural Land and representing 8.2% of agricultural production in value terms (CTIFL, 2011). The sector employs over 140,000 AWU (annual work unit), a large number of whom are seasonal workers. They are therefore small farms which use a large amount of manpower. Technical investments (glasshouses, heating, etc.) are common for some crops (tomatoes, strawberries, etc.). For the most part, fruit and

\(^1\) \(n=46\), including PO producers, technicians, quality managers and directors. Jean-Marie Codron and Zouhair Bouhsina (INRA-Moisa) took part in this survey.

\(^2\) \(n=10\) including private producers and consultants. These independent vegetable growers were interviewed twice, with a three-year interval, which allowed us to ask them why some among them had dropped their GlobalGAP certification.

\(^3\) Source: http://www.franceagrimer.fr/industrie-fruit-et-legumes/La-filiere-en-bref/Production.
vegetable growers apply the principles of integrated pest management (the use of auxiliary insects to reduce the need for pesticides, which are nevertheless still allowed).

Within the global deployment of GlobalGAP, France’s position is somewhat specific: in 2011, 3,737 French producers had GlobalGAP certification, compared to 25,923 Spanish producers, 15,893 Italian producers and 8,997 German producers. This puts France on the same level as Belgium or Turkey (respectively 3,330 and 3,009 certified producers). These differences can be explained by whether a country is an importer or exporter on the world trade market and by the distribution and certification history in each individual country (Hertzfeld, 2011). With production estimated at 8.7 million tons in 2011 (3.2 million tons of fruit and 5.5 million tons of vegetables), France is the third largest producer of fruit and vegetables in Europe, though quite a long way behind Italy and Spain. Most of its produce is aimed at the domestic market. Moreover, since the 1990’s, French authorities have tried to develop certifications with agrifood professionals to inform consumers about product quality. Main retailers have also developed their own “quality labels”, combining product quality with health and environmental concerns. Compared to these initiatives, the GlobalGAP standard might have seemed less worthwhile: it is not used to communicate with consumers, it has more varied objectives and it does not integrate the issue of product quality. Furthermore, the French government has tried to introduce a public standard for global quality management on farms - Agriculture Raisonnée (Bernard de Raymond, 2012).
1. The GlobalGAP standard as a repository

To characterise the regulating effects of private food standards, we consider that a standard such as GlobalGAP is material in nature and is seen by people in the field as a set of written documents. With this in mind, what is the content of the standard and how do producers interpret it in concrete terms?

1- A heterogeneous set

First and foremost, the GlobalGAP standard requires a “holistic approach” to protect diverse interests: food safety, sustainable production methods, worker and animal welfare, responsible use of water, compound feed and plant propagation materials. As far as plants are concerned, the standard’s 234 control points are divided as follows: 117 to ensure food safety, 21 for the worker health and safety, 46 to ensure traceability and 50 for the protection of the environment. GlobalGAP therefore brings together items which are usually separated by law (relating to labour law, environmental law or the rural code) thus engendering a process to ensure legal coherency and rationalisation.

Secondly, GlobalGAP is not a single document but a set of documents: the system’s general regulations, national guidelines, a list of control points and compliance criteria, and a checklist for auditing farms. Since EurepGAP became GlobalGAP, the list of control points has been divided into different “modules”, starting with a compulsory module applicable to all farms, and then a second module specific to the type of farm in question (crops, livestock, aquafarming) and which itself contains further modules relating to various sub-categories (fruit and vegetables, field crops, coffee, tea, flowers and ornamental plants for the Crops module). Furthermore, the type of requirement can vary, depending on the document: there are declarations of principle, recommendations, directives of varying degrees of restriction, relating to the production itself, or to how the farm should be organised, or to how employees should work, etc.

Finally, in its physical form GlobalGAP is a documentary system (usually in the form of a binder file) which for actors in the field relates to different activities: some documents describe farm operation, others serve as proof of purchase (receipts for certified seeds and plants, water analysis); others take account of farming practices (fertilisation or plant protection); still others provide a self-monitoring system to ensure that all certification requirements are being met, along with descriptions of corrective procedures.

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4 Cf. Leigh Star (2010): “we suggested that one kind of object, a repository, took the form of a set of modular things. These are things that might be individually removed without collapsing or changing the structure of a whole. A library, for example, or a collection of case studies (as in some parts of medicine, or in the Talmud), is a repository. A repository of this sort comes from the need for an assembly of things that are conceived iteratively. It has the feature that heterogeneity (internally) across things can be maintained but need not become confrontational. In a repository, the heuristic advantage is the encapsulation of internal units” (p. 603).

5 This documentary system is further complicated by the introduction of add-on modules which allow producers who so wish to take their certification even further on certain points, such as social or animal welfare. GlobalGAP now publishes documents which summarise the changes and new aspects relating to upgrades in the standard. The complexity of the system has also caused GlobalGAP to introduce a procedure for gradual entry into the standard, via a simplified version known as “localgap”.

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2- Conditions for certification

In order to obtain GlobalGAP certification, producers must undergo an audit by a certification body. The most important documents for obtaining certification are the list of control points and compliance criteria, and the check-list for the auditors. The audit is the procedure which will determine whether or not the producer is granted the GlobalGAP certificate. The control points are divided into three categories: the major musts, the minor musts, and recommendations. The version currently in force consists in 95 major musts, 117 minor musts and 22 recommendations. To obtain certification, producers must satisfy all of the major musts and 95% of the minor musts; the recommendations do not constitute formal criteria for elimination.

The content of the requirements in the “Control points and compliance criteria” document fluctuates between different rationales. Certain points require producers to use a reflexive feedback on how they work, so as to implement good practices; others are based on risk assessment and on introducing risk control procedures; others serve to identify and make an inventory of the components used in the production process; others relate to record keeping and traceability; finally, yet others remind to comply with local laws. As an example, here is an extract from the check-list:

<table>
<thead>
<tr>
<th>FV2 Substrates (N/A where substrates are not used)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FV.2.1</strong> Does the producer participate in substrate recycling programs for substrate where available</td>
</tr>
<tr>
<td><strong>FV.2.2</strong> If chemicals are used to sterilize substrates for reuse, have the location, the date of sterilization, type of chemical, method of sterilization, name of the operator and pre-planting interval been recorded?</td>
</tr>
</tbody>
</table>

*Check-list. "English version 4.0. Valid from: March 2013. Obligatory From: June 2013"

In this extract from the auditors’ control document, we can see the musts (major or minor) and the recommendations. Whilst the recommendations (point FV.2.1) refer to a rationale of practices improvement (in this case participating in a substrate recycling program), the musts (i.e. what is controlled by the certifying organisation) refer to recording how the chemical products are used (FV.2.2.) and hence to practice traceability.

Certain of the standard’s other musts implicitly or explicitly relate to the obligation to comply with the law - or the compliance criterion for a must might in any case be a legal obligation. As an example, here is an extract from the list of control points relating to post-harvest treatments:
<table>
<thead>
<tr>
<th>N°</th>
<th>Control Point</th>
<th>Compliance Criteria</th>
<th>Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>C.B. 8.1.2.</td>
<td>Do producers only use plant protection products that are currently authorized in the country of use for the target crop (i.e. where such official registration scheme exists)?</td>
<td>All the plant protection products applied are officially and currently authorized and permitted by the appropriate governmental organization in the country of application. Where no official registration scheme exists, refer to the GlobalG.A.P. guideline (annex CB 4) on this subject and FAO International Code of Conduct on the Distribution and Use of Pesticides. Refer also to Annex CB 4 for cases where producer takes part in legal field trials for approval of PPP by the local government. No N/A.</td>
<td>Major must</td>
</tr>
</tbody>
</table>

We can see here that the GlobalGAP standard is presented as a complex and hybrid set of written recommendations, in that it is based on specific requirements, whilst at the same time referring to items which exist in public regulations. How do actors in the field interpret such a standard?

### 3- How GlobalGAP is interpreted in the field

The heterogeneousness of GlobalGAP’s design is not without consequence in the field. The actors have to deal not only with these different documents, but also with the different rationales that they contain.

The first task for anyone wishing to obtain certification is to make a list of all of the requirements – and not just those found in the control points. Indeed, as this quality manager explains, the musts and the control points are not always consistent:

> With certain musts, the compliance criteria aren’t always fully relevant, or they might be quite different from the must. For example, it might require the personnel to have facilities to wash their hands with drinking water. And the compliance criterion is that the soap must be fragrance-free and must disinfect your hands. So the must relates to the equipment and the compliance criterion is about the consumables. They are not really linked. So you need to re-list all of the compliance criteria and re-merge them to get a complete must. We’re planning to make a new list of all of the compliance criteria to see if we have forgotten anything mentioned in the musts. (Quality manager – PO in the west of France)

This point might seem anecdotal were it not for the consequences for audits. It is open to different interpretations by auditors. It is impossible to know whether the representative from the certifying body will prefer to conform with the general provisions or with the control points, or with both. It is therefore very important to consider – carefully and in advance – how the various documents might be interpreted given that they are not always coherent. When one touches on sensitive aspects of farm operation, where practices are not always perfectly in line with regulations, these ambiguous requirements offer producers a certain amount of flexibility. In such cases the level of precision in the way the must is written is decisive, as this quality manager explains with regard to re-entry intervals:
I’d say that the biggest problem at the moment is the re-entry interval. It’s funny, in GlobalGAP they’ve put:

- major must: is there a procedure for regulating the re-entry interval?
- minor must: are re-entry intervals controlled?

So, unlike pre-harvest intervals where they ask “are the pre-harvest intervals respected?”, here, regarding re-entry intervals, they ask whether they are controlled! But if, in their next version, they were to put: “are the re-entry intervals respected?” and they make it a major must … well, I don’t think anyone in fruit and vegetables would have GlobalGAP! (Quality manager – west)

This shows how the heterogeneous nature of the GlobalGAP standard is just as much a constraint – involving a lot of work by actors in the field to ensure that requirements are coherent – as a resource which allows flexibility in the implementation of the standard. The heterogeneous nature of GlobalGAP’s components leaves open the issue of what the standard is and what conceptions of agriculture it conveys.

Highlighting the internal heterogeneousness of GlobalGAP’s components is only the first stage in our analysis. Another source of heterogeneity is the diversity of the items that the standard covers.

2. The GlobalGAP standard as a new form of codification?

Whilst it contributes towards the development of a “hybrid” system of governance – coregulation - GlobalGAP is also a hybrid instrument, encompassing recommendations, requirements, recording requests and reminders of the law. What type of governance does this standard produce? Out in the field, how can we describe the scope of this voluntary private standard compared to a more classic regulation based on the law. The literature offers several interpretations. After presenting two opposite interpretations, one describing GlobalGAP as weakening the law, the other as strengthening it, we will take into account the point of view of those in the field, and propound GlobalGAP can be seen as a new form of codification.

1. GlobalGAP weakening the law

First and foremost, the development of voluntary standards can be seen as a risk which might lead to a legal crisis, in as much as technical standards tend to replace the law (Frison-Roche, 1998), whilst private standards create confusion between what is legal (obligatory) and what is voluntary (optional). This is the argument put forward by lawyer I. Doussan in relation to the environmental standard “l’Agriculture Raisonée”: “Legally speaking, the fact that the AR scheme is almost identical to existing regulations indicates […] a shift in policy. From a restrictive policy, justified by the existence of a risk of harming the environment which led to the enactment of a regulatory environment, public authorities are moving towards an incentive policy to help ensure that these restrictions are observed. […] The mixture of legal, incentive and regulatory genres is leading to the introduction of a hybrid policy as an intended response to the failed application of environmental regulations by farmers.”6 (Doussan, 2004).

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6 Our translation from French.
in the field to believe that any effort to protect health and the environment is optional and that it should therefore benefit from some type of consideration, be it added market value or public subsidy.

The farmers we met all subscribed to this conception of GlobalGAP. When they described how they began the process, they explained that above all they were expecting to sell at higher prices, win new customers or penetrate new markets, especially for exports. After several years of certification, their assessment of the mechanism was clearly based on weighing up the cost and the effort they had put into the standard and the economic benefits that they had received.

I wanted to get EurepGAP ... But it’s supply and demand that matter. End of story. And at the end of the day you’re not paid in terms of the effort you put in, because you spend hours managing everything, monitoring everything... I mean it’s a lot of work on top of your everyday work, and somehow at the end of the day you’re not paid for it (Independent producer, multi-produce, south-east)

The customers are exactly the same ones as before. Nothing’s changed. We’re not paid more, we’re spending our time for no return. (Independent producer, multi-produce, south-east)

Yes, yes, we’re GlobalGAP, EurepGAP and all that! It’s a nightmare! [laughs] If they paid us more there’d be no problem, but we’ve never seen any difference! We’ve always gone along with all that ... all that paperwork, all that administration... But then they always want the same thing ... always filling in the paperwork ... always writing everything down. It’s not that we can’t do it, but it’s tiresome because we don’t get anything in return. Yes, fine, we’re GlobalGAP, so what? You don’t get more money! (Tomato producer in a PO – south-west)

In all of these extracts we can see that the producers view certification not as an opportunity to work in line with new precepts, but as a way of helping their businesses cope with economic stakes. In this respect the experience is relatively inconclusive and more often than not the producers are extremely disappointed. We find the same rationale being used by representatives from producers’ organisations who see GlobalGAP as a source of subsidy from the European Union. European subsidies are funded as part of “operational programmes” and their allocation must be justified under criteria which properly relate to GlobalGAP’s stakes.

You have to understand that operational programme aid for our producers’ organisation comes to 550,000 euros a year. That’s standard. (...) It finances all of the marketing side, the technical consultancy, all the work that’s done through the brand. Then there’s the producers’ investments side of things. GlobalGAP is part of that. (...) All of the quality aspect, the quality control above and beyond the regulations is eligible through the PO. So I put down the time spent by the quality manager, because it’s allowable. There are lots of things; traceability for example, which we’ve computerised with barcodes ... (Director of a PO specialising in tomatoes – south-east)

When they are analysing voluntary standards, jurists put themselves in the shoes of the actors who have to implement the law and the standards, i.e. they consider how individual actors alter their attitude towards the rules and see in GlobalGAP an economic opportunity
rather than an obligation. More particularly, these analyses show that when legal provisions are included in a voluntary standard (regulated by certification and market access), the penalty for non-compliance disappears. When producers do not comply with a regulation applicable in their country and this is highlighted by an audit, the only penalty is non-certification, but they escape their own country’s repressive system. From a legal standpoint, the standard thus weakens laws which have been introduced under a traditional command-and-control system.

Other interpretations of the development of private standards tend to highlight evolutions in the production of standards and in how controls are organised within the chains.

2. GlobalGAP as a law enforcer

If we base ourselves on transaction cost economics and analyse the relationships between law and standards, a radically different interpretation appears. From this point of view, standardisation constitutes an institutional guarantee which ensures a greater level of confidence in transactions and thus reduces the risk of opportunism. In particular, by adding a system of third-party certification and market exclusion, standards allow for better application of the law (Codron et al., 2005; Henson, 2011). Indeed, in sectors which attract little vigilance from public authorities, certifying bodies regularly ensure that there are controls which had beforehand been no more than hypothetical. The fruit and vegetable sector is a prime example of a sector where there are few controls. In 2009 for example, official French monitoring and control programmes led to the analysis of 4,953 samples of fresh or processed fruit and vegetables, products for baby food, cereals and organic vegetable products. This level of sampling must be compared to the 169 kg/year of fruit and vegetables eaten by each of France’s 26,365,000 households (CTIFL, 2010).

Our survey confirms that field actors’ commitment to comply with health standards (for example) is greater in relation to GlobalGAP than to the law. This observation must be interpreted in the context of the collective nature of the standard, whereas compliance with the law is an individual obligation. The GlobalGAP approach is a process which involves a large number of actors in the field. Within producers’ organisations it engages producers, crop managers, technicians, quality managers, sales departments, etc. To varying extents, all of these have a vested interest in the producer obtaining certification and they will all help him/her in achieving that. In turn, this common objective puts group pressure on each producer taken individually (Durkheim, 1900). In the same way, individual producers turn to consultants, who help them to prepare their case and give them support during the audit process.

Before they are audited, do you assist them?

Completely, totally and utterly! [laughs] Yes, it’s in our interest! As far as we are concerned it’s always a bit like an exam, so we prefer to pass rather than fail. And the producers are always somewhat stressed before an exam. There mustn’t be any stupid mistakes. When we know the date of the audit, we visit once a week and we do a little bit of cramming. It’s a work method … producers know they will have to answer all of the questions in the scheme, and there are over 300 questions, so the producers are fairly stressed out, that’s what you have to do, get into the documents, have a farm that corresponds to what you’ve written, not have any plastic containers
lying around. Generally speaking there aren’t any, but you don’t want to screw up on the day …

Above all, the standard’s heterogeneous composition allows it to be implemented in a shared fashion, thus constituting a “distributed cognition” support (Hutchins, 1996). Indeed, as we demonstrated in the first section, GlobalGAP can be considered as a repository for requirements which set down a series of operations to be accomplished. So as far as organised production is concerned, all of the documentation and risk analysis is prepared by the PO, and a certain number of annual analyses (water, sprayer calibration, plant delivery) is carried out for the producers as a whole. Certain PO’s also have servers which allow them to automatically and remotely update the entire documentation system required for the audit, without the producers having to do anything. Only the recordings most relevant to everyday practices are left to the producers, coordination being the responsibility of the PO’s quality managers. The latter set up the documentary system, carry out the required internal controls with the producers and assist them at the time of the audit. Constraints are thus shared across the organisation, under a rationale of economies of scale and of reducing time spent on “red tape” (Bonnaud et al., 2012).

For the actors in the field, GlobalGAP represents a constraint of a different nature to that of the rule of law. In PO’s, the standard is seen as an addition to regulatory obligations. In all PO’s, as an example of progress due to GlobalGAP quality managers mention the installation of phytosanitary cabinets on farms – something that is a legal obligation. In their opinion, the voluntary process encourages producers to obey the law and makes it possible to finally achieve what should already have been in place for a long time.

GlobalGAP helps you to get organised and catch up. Health-wise, when you are certified it’s a case of: “You have to have a phytosanitary cabinet!” End of story. Which establishes authority at farm and organiser level.

We can only understand such remarks if we remember the nature of the fruit and vegetable sector, where public control is weak – unlike the meat sector for example. Whilst GlobalGAP producers can be certain that there will be regular audits which will determine whether or not they keep their certification (incentive/penalty system), independent producers are very unlikely to be the object of regulatory controls and are even less likely to receive an official report (no incentive/low probability of penalty).

3. **GlobalGAP as a centre of calculation**

We would like to offer a third interpretation of the debate on the complementary or antagonistic nature of the voluntary standard and the law, focusing on the fact that these standards unite areas of the law which are usually separate (labour law, health and safety, environmental law). As a result, the standard creates a sort of “standards library”. Bruno Latour has done considerable research on the role that collections play in the production of knowledge (Latour, 1996). He refers to these real or virtual spaces where initially scattered elements are placed on an even footing as “centres of calculation”. Through this process, each individual element becomes better known and its comparison with the other elements also leads to increased knowledge. For example, Latour describes a library in which each book provides self-knowledge, but also additional knowledge, because it can be qualified and compared with other books. In the same vein, GlobalGAP’s collection of obligations
relating to products, workers, the environment and animal welfare, creates effects which are greater than each requirement taken individually. Producers, especially the intermediaries who help them to implement the standards, create equivalences (not always immediately obvious to an outside observer) between production and protection of the environment, or between integrated protection and occupational health.

Before joining GlobalGAP, you already have to understand hygiene and quality, have a process in mind. Protecting your glasshouses from outside contamination: they learn about that when they get into integrated production and crop protection; little by little they learn about boot baths and all these systems that help you to really protect your glasshouses. I think that once they’ve achieved that, we can move on to another point, that of workers protection. And work organisation. Because GlobalGAP is about “environment”, “quality” and “safety”. (Quality manager – south-east)

Let’s take traceability as an example. It helps you to learn more about the farm, so potentially it’s a tool for managing production costs, but the producers haven’t taken that into account. They mainly see EurepGAP as a hindrance. [...] Nowadays producers have to be managers. They need to know everything that goes on their farms. They need management charts but they don’t have any. They are not in control of their processes. They haven’t identified the sectors that need priority action. If I had to modernise farming, I’d turn producers into managers. That’s about it! (Consultant for independent producers)

Similarly, here is the chairman of a major fruit and vegetable shipping group (Bluewhale) talking about EurepGAP:

We also want quality procedures to become real internal management tools. When EurepGAP requires an informational signpost to be placed on each plot of land to identify it, at first you wonder about the reasoning behind it, what the point may be. And then you gradually realise that a clear signpost can eliminate mistakes or misunderstandings between managers and employees, or when entering data. (L’Echo des MIN, n° 199, March 2004, p. 85)

GlobalGAP is therefore an additional stage in the managerial rationalisation of farms (Compagnone et al., 2009), a movement which has already been observed in Denmark by Mouritsen et al. (2000) in relation to the environmental certification of pig farms. So as far as market intermediaries are concerned, GlobalGAP does not simply protect interests (quality, the environment, occupational health, animal welfare), it also improves a business’s internal management. Indeed, it is for the method that it brings that they recommend it to producers, for example to those who have to organise multi-site farms:

There are producers [in the Rhône valley] who want to join because they have several enterprises and GlobalGAP helps with organisation. Whatever the level, it’s bang, bang, bang, it’s the same organisational structure, it’s easier. Then there are other cases where it’s the producers who want to evolve, because it’s dynamic and they want to get involved with a process like that. (Quality manager – south-east)

[GlobalGAP] covers all the aspects where producers are not always really on the ball. Or it’s also areas where they need to improve, to progress. It was an opportunity to provide a method. I’m not saying it’s the be all and end all, there may be others
which are much better, I’m sure there are, but it provides a method, a business framework to improve in certain areas. That’s what I find interesting. In my organisation, the people who adopted this process are people who have structure. The major disadvantage of these standards is the administrative side of things, which is fairly tiresome. A farmer who’s all alone with his hectare of glasshouses and whose only employees are those in the glasshouses, who’s got no secretary, no accountant, no … who is all alone, well that’s a problem! (Director of a producers’ organisation – south-east)

As an instrument of both a normative and managerial nature GlobalGAP makes it possible to combine technical provisions with an organisational diagram and a value system. By taking account of the decisive role played by the intermediaries (quality managers, private consultants) who disseminate the standard and stabilise the way in which it is interpreted, we find that GlobalGAP’s main effect is the dissemination of a managerial farming norm.

It remains that whilst by using its internal heterogeneousness GlobalGAP succeeds in creating an instrument of a managerial nature, its main challenge is to become a standardised mechanism for trade – and thus in the eyes of distributors. How does one achieve the interface between differentiated appropriation of the standard by producers and the standardised dissemination of the same standard among distributors?

3. GlobalGAP as a unifying instrument

With GlobalGAP, distributors try to produce commensurability between heterogeneous situations, by integrating them into a standard framework of requirements. Because GlobalGAP serves as a basis for exchange between producers and distributors, it helps in the international organisation of markets for agricultural products, by disseminating a same and unique standard which is valid for all producers across the world. The certificate thus makes it possible to unify products: once its producer got the certificate, a mango is a GlobalGAP mango, whether it was grown in Africa or South America, and the same goes for all other farm produce. How does the standard manage to transform products which are all different into a single certified product?

1- Making products equivalent, whatever the producer, whatever the country

The broad diversity of countries in which GlobalGAP is implemented (112 in 2011) ought to constitute a huge challenge where the standardisation of requirements is concerned. Yet unlike other standards, such as ISO (Graz, 2004), the very structure of GlobalGAP allows it to create commensurability without having to go through a lengthy phase of international standardisation. This characteristic is based on partial recognition of the laws in individual States. As we saw in the first section, numerous requirements refer to the obligation to obey the national or local regulations in force wherever a producer may be. This can be especially verified in relation to the standard’s “major musts”. For example, a requirement might be that “The plant protection product storage facilities comply with all the appropriate current national, regional and local legislation and regulations.” By asking a third party (a certifying body) to ensure that their suppliers are complying with the national regulations of their respective countries, distributors – who are often importers – are implicitly declaring that they do not need to know what these various legislations might be and that they are not responsible for any heterogeneousness. In this case the supranational standard has a
unifying effect on heterogeneous national (or local) legislations and may even allow the lack of regulatory uniformity to be optimised.

The producers of our fieldwork had varying opinions of how GlobalGAP affects competition at international level. Some saw GlobalGAP as a restrictive instrument of standardisation taking all countries towards the higher health standards found in north European countries: "When we compare with Belgian health regulations, we can see that we’ll be following Belgium. The Dutch and the Belgians are way ahead of us. For example, there are [plant protection] products which are not approved over there but which are allowed here.” (Independent producers, multi-produce, south-east). Conversely, others stress the voluntarily lax nature of the control exerted by GlobalGAP, which confines itself to requiring compliance with local regulations: “In any case, EurepGAP isn’t too demanding. It was designed for Spanish [producers] and the Spanish are a long way from integrated production! All they ask is that you show them what you’re doing and that it’s legal. Once that’s done, you can spray 50 times, but as long as it’s in compliance with the regulations, no problem, they don’t care!” (Independent producer, multi-produce, south-east). Finally, yet others mischievously point out that some of GlobalGAP’s musts, particularly those relating to GMO’s, seem ludicrous in a country which dealt with the issue a long time ago by banning them: "What can sometimes be a problem, is the GMO part. GMO’s are banned here. By law. But you have to have the paperwork from the seed company as proof, it has to be formal, you need certificates from the seed company. And the seed company says: “They aren’t GMO’s, GMO’s aren’t allowed”. So it’s somewhat superfluous, questions like that make no sense” (Quality manager). However, they are all very aware of the sometimes major disparities which can exist between two products which bear the same GlobalGAP label but which have been produced in two objectively different manners.

Even though they are products within the framework of the same certificate, the heterogeneous nature of conditions for fruit and vegetable growing is not due to its transnational character alone. The conditions for implementing GlobalGAP also play a role. Indeed, many requirements are open to interpretation and it is within the framework of the auditor-producer relationship that a compromise might be found. In the following extract, a quality manager explains that he attended a session organised by his certifying body, in order to obtain a concrete definition of what is expected under any given requirement:

For example, you have an item which tells you: “Documented hygiene procedures have been implemented for harvest time”. When you are not too familiar with the way things work, you wonder: “what shall I do ... what are hygiene procedures?” In fact [the certifying body] explained, in all simplicity, that if you put up posters, if you make people aware, then you are dealing with the problem. It was good to have some training to explain all that because at the time it seems somewhat curt and you think: “if we have to teach everyone in the glasshouses about hygiene, it’s not going to be easy!” So in fact, as a procedure, posters are fine. (Quality manager – 2010)

With GlobalGAP, we are therefore a long way from dealing with a single, unequivocal document which can be applied in a uniform manner throughout the world. On the contrary, we can see that the standard is very open, on the one hand to national regulations, and on the other hand to different forms of implementation in the field. Whilst this characteristic serves to explain the remarkable expansion of GlobalGAP, it is also a weakness, because the heterogeneousness of the conditions for certification is open to criticism. How can we describe these reactions?
2- The proliferation of standards as a response to imperfect standardisation

This tension between formal equivalence and “real” heterogeneous conditions means that GlobalGAP is publicly criticised for symmetrical reasons both within and outside Europe. In Switzerland in 2008, following a scandal concerning the importation of peppers from El Ejido in Spain, the parliament of the canton of Geneva deliberated on a resolution which aimed to prevent the importation of any agricultural foodstuffs which did not meet certain ethical or ecological criteria, the town of El Ejido being well-known for the large number of illegal immigrants working in unsafe conditions and for the pollution of air and water by pesticides. The role of private standards such as GlobalGAP was therefore discussed:

Mr. Erard says it is scandalous that these products reach wealthy countries. This is scandalous hypocrisy. Switzerland is world champion in terms of production and applies very strict standards. El Ejido is a social disaster and an environmental catastrophe. As soon as it is a question of importing goods, we don’t give a fig about anything, and that is unacceptable. The only thing the Confederation monitors is consumer health. For everything else we bury our heads in the sand. Mr. Erard has indicated that the EurepGAP standard was set up by distributors with a view to ensuring food safety. There is no mention of payroll or of working conditions. There is a smokescreen to hide the inequalities.

Deliberations of the parliament of the canton of Geneva, R544A, 27 May 2008, Examination of Mr. Erard, director of Agrigenève

This deliberation echoes the view of many non-governmental organisations and unions who defend farm workers. For others on the other hand, this type of private standard is a non-tariff barrier, or a disguised tariff barrier at the entry point to the EU:

GlobalGAP isn’t without controversy. It's easier for bigger farms to make the investments to meet certain requirements. That puts smaller producers at a disadvantage. A coalition of developing countries, including Brazil and Egypt, has filed a complaint to that effect at the World Trade Organization in Geneva. They say private-sector standards are an unfair trade barrier for the world's poor. “A standard you can't meet is like a 1,000% tariff,” says WTO director Pascal Lamy. The organization is investigating, but it's not yet clear whether WTO has any legal authority over private standards, says Mr. Lamy. The EU and U.S. oppose any interference with private standards.

John W. Miller, 11 March 2008, Dow Jones and Company

GlobalGAP members are aware of the potential effects of distortion of competition due to differences in national legislations, which is why for certain aspects they are trying to ensure that the standard plays a standardising role. This is the case with social rights, for example, via the (optional) system of Global Risk Assessment on Social Practice (GRASP), which aims to standardise good social practices throughout the world:

Legal requirements regarding the control points differ from country to country (e.g. minimum wage, age of legal employment, working hours etc.). Where the

7 Source: https://www.ge.ch/grandconseil/data/texture/R00544A.pdf
requirements are stricter, local legislation overwrites GRASP. Where there is no legislation (or legislation is not so strict), GRASP provides the minimum compliance criteria for a good social management system.

However, GlobalGAP’s efforts to impose minimum social and environmental conditions are not necessarily what GlobalGAP users had in mind, especially buying groups in the mass distribution sector. The latter are faced with an increasingly urgent demand from customers who are sensitive to social rights and the protection of the environment, and who want guarantees concerning supply. This is a particularly sensitive issue when it comes to pesticides. In this regard, international and even European standardisation is far from being achieved and GlobalGAP certification is therefore more a reflection of highly disparate national situations than of any qualitative added value. As a consequence, if customers attach importance to these specific issues, certification is insufficient and must be complemented with requirements integrated into contract specifications (Bonnaud et al., 2012). This is particularly the case for the residues of plant protection products, which are the object of additional clauses in trade contracts:

I don’t know if you are aware, but in … it must have been the end of 2004, in Germany, Greenpeace had residues from various stores analysed and began to score stores in terms of the results. This created quite a buzz, especially among a certain number of discount stores, Lidl in particular. We work with a client, an importer which supplies Aldi, which had therefore been less affected, but suddenly everyone not only began demanding EurepGAP but also imposed really drastic rules regarding food safety. That’s when they started publishing their results, imposing MRL analysis results of 70%, or no more than x molecules per result, things like that. (Quality manager, tomato and strawberry PO, west)

Implementation of residue analyses, setting contractual MRL levels which are stricter than those found in the regulations, laying down the maximum number of pesticide traces which may be found in samples so as to prevent the “cocktail effect” which is not yet covered by European regulations … contractual clauses vary significantly, depending on the distributor. They are a sign that good agricultural practices, as defined in GlobalGAP, are not sufficient to ensure the quality of supply to buying groups, who therefore have to supplement the standard with specific requirements for specific points.

Conclusion

In this paper we have interpreted the voluntary GlobalGAP standard in accordance with three well-known sociology of science categories. Firstly, we examined the material nature of the standard, which allowed us to highlight its intrinsic heterogeneousness within an information indexing system. We then approached it as a centre of calculation. A centre of calculation is a place, a real or virtual space, which centralises flows, transforms them, dispatches them and redistributes them. By formatting a heterogeneous set of signs, it creates a certain relationship between a centre and a periphery (Latour, 1987 & 1996). In GlobalGAP’s case, the centre of calculation is the standard itself, as a set of documents (or information indexing system) assembling heterogeneous requirements: risk management

procedures, good practices, the production of recordings, compliance with the law in different legal areas (social law, health and safety, environmental law). In uniting these elements, ordinarily separate, the standard performs an aggregation which gives a new meaning, one of managerial efficiency, to all of these heterogeneous components. Finally, we examined the standard as a trade support. Certification is the culmination of a process at the end of which disparate elements are grouped together to form a unique entity, the GlobalGAP product. This operation unifies and renders commensurable products developed under objectively distinct conditions. This formal unifying process makes it possible to link local with global – a vital issue when organising an international market. Despite the heterogeneous nature of real production conditions and of the legislations governing production, what remains common to GlobalGAP farms across the globe is that they all meet the same formal requirements. This allows buyers in the mass distribution sector to treat them as being the same and thus to put them into competition with one another.

To describe the nature of the governance that GlobalGAP has created, we have highlighted the following elements: GlobalGAP’s main strength is that it makes it possible to create a standardised qualification for products destined for international trade, whilst at the same time respecting the heterogeneous nature of national legislations. In the field, by encompassing separate areas of the law, the standard helps to create new connections between the reading and interpretation of requirements which resonate with the managerial rationale that has been at work in agricultural development since the end of the Second World War. It is thus fully appropriated by professional groups which ensure its joint application. This is what distinguishes the standard, embedded in a rationale of trade opportunities and managerial innovation, from the rule of law, which remains linked to obligation and individual responsibility.

References:


