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Contents

1 National institutional framework

In Germany, a number of voluntary certification schemes for agricultural products are in place. While these schemes differ in their aim and focus, considerable overlaps exist between different schemes, but also between certification criteria and cross compliance standards.

Quality and safety of agricultural products have gained increasing attention as a consequence of several food crises in Europe. Quality assurance systems have been introduced covering the complete supply chain from the agricultural producer to the retailer, in an effort to regain and maintain consumer trust. These schemes mostly rely on improved self-control, regular third-party audits and a more systematic documentation of procedures and processes. Quality assurance, as a marketing instrument, is in the interest of producers and retailers alike, and certification may be a required by supermarket chains or dairies (for instance EurepGAP, see section 2.1.3). Other schemes aim at improving marketing and meeting consumer demands by certifying additional attributes of products and making them visible to the consumers, e.g. organic farming labels or labels indicating the origin of a product.

The different certification schemes are run by a variety of organisations, either by national or regional governments, or else by private law institutions, e.g. producers' organisations, retailers or the processing industry.

Control and certification services are usually provided by independent private bodies that have to be accredited. A control institution may be licensed to carry out certification of different standards, e.g. both for private-run quality assurance schemes and for the state-run Eco-label (see chapter 2). The work of private control bodies is usually surveyed by the organisation responsible for the certification scheme, i.e. either by government or by private institutions.

Cross compliance controls, in contrast, have so far been carried out by public authorities only. This seems to be one of the main obstacles to making use of synergies and overlaps between cross compliance standards and standards required by voluntary certification schemes. Since the federal government has the final responsibility for the implementation of cross compliance and risks being fined by the European Commission if implementation is not satisfactory, it is unlikely to delegate the controls to private bodies or to accept certification as sufficient proof of compliance with the standards.

This view was expressed during many of the interviews conducted for the Country Report for Germany (Deliverable 5). In fact, the Federal government has so far not taken any initiative to create synergies or links of any kind between voluntary certification schemes and cross compliance controls. However, a number of actors have called for an integration of certification and state controls of farmers, e.g. the German Farmers' Association.[1] The regional government of Bavaria has been active in promoting the use of voluntary certification schemes for cross compliance. In 2004, a pilot project commissioned by the Bavarian Ministry for the Environment was carried out with the aim of testing the use of EMAS in agriculture. The project was carried out with a view to the pending introduction of cross compliance, and the project report[2] argues in favour of accepting the eco-audit for part of cross compliance controls and of reducing overall administrative and control efforts.

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1 AGRA-EUROPE 11/06, 13 March 2006, Länderberichte p. 10.

2 Bayerisches Staatsministerium für Umwelt, Gesundheit und Verbraucherschutz (StMUGV) 2004: Pilotprojekt – Öko-Audit und Erprobung der Grundzertifizierung in landwirtschaftlichen Betrieben in Bayern. Abschlussbericht. http://wdl.weihenstephan.de/forschung/publikationen/download/oekoaudit.pdf.

However, the report also clearly states that if part of state controls were to be replaced by EMAS certification, it would have to be ensured that the quality and reliability of the controls is satisfactory.[3]

In March 2006, the Bavarian Prime Minister sent a letter to the European Commissioner Günther Verheugen requesting that the possibility should be created to replace state cross compliance controls by certified quality assurance systems. He mentions both EMAS and the German QS system (*Qualität und Sicherheit*, see below) as certification schemes which in principle could be used for this purpose. He states that the scope of the certification systems would have to be expanded or adjusted to the cross compliance criteria in order to create an integrated management system which could then be accepted as a cross compliance control. The letter also says that if such "integrated cross compliance management systems" were considered at EU level, Bavaria would offer to test such as system in a model region.[4]

2 German certification systems and cross compliance – comparison of criteria

Since both cross compliance and certification schemes are to a large extent based on the same legal provisions, there is a considerable potential for overlap and synergies. Cross compliance standards are a subset of national and EU legal provisions, and certification schemes make use of standards that are either congruent with legislative standards or exceed them - it would not make sense to establish criteria that are less strict than legal standards, since the aim of certification is to create an additional marketing benefit.

However, the certification schemes are set up by different actors with different aims, and they contain certain selections of standards and criteria that are appropriate to meet these aims. As a consequence, none of the existing voluntary certification schemes comprises *all* cross compliance requirements, although there is considerable overlap. The cross compliance standards concerning the good agricultural and ecological conditions (GAEC), for instance, are not part of any of the more widespread certification systems.

Several attempts have been made up until now to facilitate farmers' administrative efforts and simplify documentation requirements by identifying the overlaps between individual certification systems and cross compliance. Several management systems have been created by *Länder* governments[5] and by farmers' associations[6] that integrate national and EU law requirements, cross compliance standards, and requirements of quality management systems. These management systems do not award any certificates themselves, but provide help to farmers to cope with the complex requirements that stem from different sources and to avoid inefficiencies and double-work. The Bavarian government, for example, provides a web-based tool[7] that allows farmers to compile a checklist of standards relevant for their individual holdings. These checklists are produced on the basis of information farmers

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3 Bayerisches StMUGV 2004, p. 45.

4 Letter from 1 March 2006 from the Bavarian Prime Minister Edmund Stoiber to the Vice President of the European Commission Günter Verheugen. A copy of the letter was sent to the Commissioners Mariann Fischer-Boel (Agriculture and Rural Development) and Markos Kyprianou (Health and Consumer Protection), and to the German Minister for Agriculture Horst Seehofer.

5 For instance in Rhineland-Palatinate (www.gqs.rlp.de), Saxony (http://www.landwirtschaft.sachsen.de/de/wu/Landwirtschaft/lfl/inhalt/4176_4249.htm), Baden-Württemberg (www.gqs-bw.de).

6 http://www.vit.de/Cross_Compliance_KKL_Beratungs-_und_Servicesystem.html.

7 http://www.stmlf.bayern.de/xcpl/GQSStart.jsp.

provide about their production branches and about the certification systems they are involved in.

In the following sections, some certification schemes applicable to agricultural production in Germany are presented. The selection of examples chosen introduces the most important and most widespread quality assurance schemes, but also should give an overview of the variety of systems and of the different aims and approaches. Table 1 shows, in a simplified form, which of the cross compliance standards can be found in voluntary certification schemes. The table is not comprehensive, giving an indication only of the extent of overlap and the scope for synergies. Note, however, that the table shows only which cross compliance requirements are part of which certification scheme. The certification criteria may include a variety of additional standards that are not relevant to cross compliance.

For EMAS, not that there is no defined list of standards (see section 2.2.1), however, all environmental measures including the GAEC standards may potentially included in an environmental management system.

The different certification systems are denoted in the table by the following acronyms:

QS_C: *Qualität und Sicherheit*, Cattle

QS_P: *Qualität und Sicherheit*, Pigs

QS_F: *Qualität und Sicherheit*, Field crop

QS_{FV}: *Qualität und Sicherheit*, Fruit/Vegetables

QS_{PT}: *Qualität und Sicherheit*, Potatoes

EGP: EurepGAP

QM: *Qualitätsmanagement Milch*

EMAS: Eco-Management and Audit Scheme

Table 1 Comparison of mandatory standards of cross compliance with standards contained in selected certification schemes

Cross Compliance standard	**Same (or equivalent) in:**
Environment	
FFH/Bird	EMAS
Groundwater	
Storage of oil products	EMAS
Storage of plant protection products	EMAS, EGP, QS_{FV}, QS_{PT}
Storage of slurry, manure and silage effluent	EMAS, QS_C, QS_P, QM
Sewage sludge	
Nutrients considered in nutrient balance	EMAS
Restrictions to application	EMAS, Q_{FV}, EGP (no application)
Maximum amount of application	EMAS, EGP (no application)
Nitrate	
Periods when land application of fertiliser is inappropriate	EMAS

Cross Compliance standard	Same (or equivalent) in:
Application of fertiliser to steeply sloping ground	EMAS
Land application of fertiliser to water-saturated, flooded, frozen or snow-covered ground	EMAS
Minimum distance to water courses	EMAS
Capacity of storage vessels for livestock manure	EMAS, QS_C, QS_P
Procedures for the land application of both chemical fertiliser and livestock manure	EMAS
Comparison of nutrient requirements of crops and nutrient supply; nutrient balance	EMAS, QS (all), QM
Application limited to 170 kg per hectare	EMAS, QS_{PT}
GAEC	
GAEC1: Soil erosion	EMAS
GAEC 2 Soil organic matter and soil structure	EMAS
GAEC 3 Maintenance of set-aside land	EMAS
GAEC 4: Protection of permanent pasture	EMAS
Animal identification and registration (cattle & pig)	
Eartags	QS_C, QS_P, QM
Animal register	QS_C, QS_P, QM
Notification of livestock changes	QS_C, QS_P, QM
Passports (Cattle only)	QS_C
Public, Animal and Plant health	
Plant protection products	
Use of authorised products only	EGP, $QS_{FV,}$ QS_{PT}
Certificate of competence	EGP, $QS_{FV,}$ QS_{PT}
Proof of inspection on application devices	EGP, $QS_{FV,}$ QS_{PT}
Compliance with prohibitions and restrictions	$QS_{FV,}$ QS_{PT}
No application close to surface waters	-
Documentation of application	-
Food safety	
Hygiene requirements concerning storage and transport of feed	Partly EGP, QS
Cleaning and disinfecting facilities, vehicles and containers	Partly QM, QS
Traceability of food and feed	Partly EGP
Notification of diseases	-
Animal welfare	
Housing of calves	
Space requirements	QS_C
Floor and slat width	QS_C
Lighting	QS_C
Air and climate, Temperature	
Feeding	QS_C

2.1 Quality assurance

2.1.1 Qualität und Sicherheit

The *Qualität und Sicherheit* (quality and safety, QS) system[8] was founded in 2001. It is a supply chain-wide quality management approach that covers all members from agricultural feed and food producers to the retailers. The system is managed by the *Qualität und Sicherheit GmbH,* a private organisation that was founded by associations from the agricultural sector.

The system started in the meat sector, but since then quality assurance systems in the QS framework have also been created for fruit, vegetable and potato farming (2004) and for field crop farming (2005).

Approximately 30 retailer companies are participants of the system, including Metro, Edeka, Rewe, Kaiser's, Aldi, Marktkauf and Wal-Mart. Also, it is the certification scheme most widespread among farmers. In 2005, more than 50,000 German farmers[9] participated in the QS system for meat, almost 4,000 in the QS system for fruit, vegetables and potato.[10]

Standards

The focus of the QS system lies on product and process quality; the majority of standards refer to hygiene, documentation and traceability. Nevertheless the requirements for farmers, particularly those of the new field crop branch of the system, also include environmental standards, e.g. concerning the storage and application of plant protection products. In the meat sector, animal identification and registration and animal health and hygiene standards are most relevant.

Generally, the QS guidelines and checklists contain a large number of individual requirements, the greater majority of which are congruent with legal provisions. Thus, the main achievement of the QS system is to systematically document existing quality standards. The system establishes a minimum standard that only slightly exceeds existing legal provisions.[11]

Control and certification

In the QS system, participants are responsible for the correct and complete documentation of production, the necessary self-control and for keeping to the QS guidelines. Compliance is controlled by independent bodies that have to be accredited according to the norm EN 45001 and approved by the QS GmbH. During the first audit, the degree of performance is assessed for the different criteria. If performance is not satisfactory, the access of the farm holding to the QS system may be denied. The frequency of controls in the years following depends on the results of the audit – the better the overall performance, the later the next audit will take place. In agriculture, the frequency varies between once in one year to once in three years.

The QS GmbH monitors the independent control bodies either itself or via delegation to a third independent institution.

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8 www.q-s.info.

9 plus roughly 1,400 farmers from other European countries.

10 DBV Situationsbericht 2006, S. 48/50.

11 Bayerische LfL 2004, S. 13.

Upon certification, the QS label is awarded to the products. However, although the system is relatively widespread compared for instance to eco-labels, the QS label is not very well known among German consumers.

2.1.2 Qualitätsmanagement Milch

The *Qualitätsmanagement Milch* (quality management of milk, QM) is a self-control system for the dairy sector. It was set up by the German Farmers' Association, the Raiffeisen Association and the Dairy Industry Association. The system is based on codes of practice laying down the foundations for a standardised quality management system for milk production, collection and processing which are recorded in a manual[12]. The manual basically summarises and integrates legal requirements and good farming practice concerning quality management in the dairy sector.

The *QM Milch* system is implemented by dairies who integrate the requirements into their contracts with dairy farmers, thus making use of their bottleneck function in the value chain. The three main elements of the quality management system are monitoring of milk quality, monitoring of feed products and documentation. Approximately 70-80% of dairy farms participate in the *QM Milch* system.[13]

Standards

As in the case of the QS system, *QM Milch* essentially reproduces existing requirements in order to avoid additional economic pressure on German dairy farmers.

The guideline document lists a number of standards concerning animal health and welfare, animal identification and registration, hygiene in milking and in storage of milk, quality and storage of feed products, and animal medication. In addition, two environment standards are also set in relation to the storage of manure and the preparation of the nutrient balance.

Control and certification

Similarly to the QS system, *QM Milch* relies on self-controls and external audits. The audits are carried out by the dairies or by commissioned third parties. Existing control systems may also be made use of in order to avoid a doubling of controls. Additionally, compliance is controlled by public authorities (control of self-controls).

There is no QM label that communicates the certification to the consumers; the process serves the purpose of assuring quality in the processing stage.

2.1.3 EurepGAP: Euro Retailer Produce Working Group – Good Agricultural Practice

EurepGAP[14] consists of a series of sector specific certification standards. The system is international, driven by a number of large-scale retail chains in Europe, among others Tesco, Safeway, Coop Italia, and Spar Austria. Initially, the EuroHandelsinstitut e.V. (EHI) acted as co-ordinator. In 2001, an independent daughter company, FoodPLUS GmbH, was founded that acts as global body, serves as legal owner of the normative document, and hosts the EUREP Secretariat.

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12 http://www.milchwirtschaft.de/Download/QM-Milch%20Leitfaden%20.PDF.

13 http://www.veredelungsproduktion.de/pages/de/rinder/cpd/1066.html

14 www.eurep.org

The system was first set up for fruit and vegetables, but today also includes livestock and crop farming, aquaculture, coffee and flowers. As opposed to the German QS system, it does not apply to the whole supply chain, but refers to farmers only.

In Germany, relatively few farms participate in the EurepGAP system so far. Approximately 500 German farms were certified by EurepGAP in 2004. However, this may change in the future since there is now mutual recognition of the QS and EurepGAP systems in the fruit and vegetables sector (see below).

Standards

The declared aim of EurepGAP is to increase consumer confidence in the safety of the food. The standards establish good agricultural practice, the main focus of the norms being on food safety and traceability. Some environmental and social aspects are also addressed.

Control and certification

Certification bodies need to be accredited by FoodPLUS. A prerequisite for accreditation is an ISO 65/EN 45011 accreditation.

In addition to the certification costs, certified producers have to pay an annual fee to FoodPLUS (around €25 a year). Farmer associations that have already implemented an existing farm assurance scheme with third-party verification can benchmark that scheme against EurepGAP. If the farm assurance scheme is accepted as equivalent and is accredited, the farm audit for that scheme will serve as a EurepGAP audit as well. The German QS System for fruit and vegetables has recently passed the benchmarking process and has been accepted as equivalent to EurepGAP. Farmers with a "QS-Gap" certificate may now simultaneously supply the EurepGAP and the QS system.[15]

There is no product label associated with EurepGAP certification. However, EurepGAP is currently preparing the rules and prerequisites for carrying a reference to EurepGAP at individual box level. This might lead to the appearance of EurepGAP references in European supermarkets, albeit not on the individual products.[16]

2.1.4 Regional labels – "Geprüfte Qualität - Bayern"

In addition to the national and international quality assurance schemes, there are regional certification schemes for instance in Baden-Württemberg[17], Bavaria[18], Hesse[19] and Thuringia[20]. These schemes are state-run and state-financed and thus are in danger of colliding with European state-aid and competition law and have to be approved by the European Commission.[21] For this reason, the labels today predominantly stress the fact that *control* of the quality standards takes place in the region, rather than establishing a link between the regional origin and the quality. The Bavarian label, which will be presented as an example here, was renamed and now reads "*Geprüfte Qualität – Bayern*" (certified quality – Bavaria) instead of "*Qualität und Herkunft – Bayern*" (quality and origin – Bavaria).

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15 Agra-Europe 6/06, 6 February 2006, Kurzmeldungen p. 21.

16 http://www.fao.org/documents/show_cdr.asp?url_file=/docrep/006/y5136e/y5136e08.htm.

17 www.was-liegt-naeher.de.

18 www.gepruefte-qualitaet-bayern.de.

19 http://www.qualitaetsmarke-hessen.de/index.php.

20 http://www.agrarmarketing.thueringen.de/.

21 See Becker, T. 2002: Bedeutung und Nutzung geschützter Herkunftszeichen. Gutachten im Auftrag es Deutschen Bundestages, http://www.uni-hohenheim.de/marktlehre/Forschung/herkunft/download/Gutachten_Herkunftszeichen.pdf.

The label guarantees quality assurance along the food chain, similarly to the QS system, and in addition certifies the geographical origin of the product. The scheme was initially applied to certain meat products only, but today also includes a range of other products (e.g. dairy and cereal products, honey, potatoes etc.).

Standards

The standards farmers have to comply with when participating in the scheme are based on existing legal standards, but as an additional feature include the proof of regional origin and some requirements that go beyond legal provisions. For instance, no antibiotic growth promoters must be included in the feed, and the application of sewage sludge is not permitted. Also certain additional quality standards apply to agricultural products, for instance a minimum content of raw protein in cereals or of sugar in fruits. The system is largely compatible with the QS scheme.

The initial certification costs 200 EUR; 80% of this charge is paid by the Bavarian government.

Certification and control

The control system is similar to that of the QS system and consists of self-control, control by independent control bodies and state controls. Every participating agricultural holding is controlled every year, and all animals for slaughter are checked for their origin (in the case of cattle by means of eartags and cattle passports).

2.2 Environment

By contrast to organic farming labels, environmental certification schemes so far have not become widespread among German farmers.

2.2.1 Agrar-Öko-Audit (EMAS)

The EU Eco-Management and Audit Scheme (EMAS), a voluntary management tool for companies to evaluate, report and improve environmental performance, has been available since 1995[22] and was originally restricted to companies in industrial sectors.

Since 2001, EMAS has been open to all economic sectors including agriculture.[23] In addition, the EN/ISO 14001 was integrated as the environmental management system required by EMAS.

However, so far EMAS has not yet gained much ground in German agriculture. The federal government offers a guideline document for farmers who plan to implement EMAS on their

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22 Council Regulation (EEC) No 1836/93 of 29 June 1993.

23 Regulation (EC) No 761/2001 of the European Parliament and of the Council of 19 March 2001.

holdings.[24] Pilot projects were carried out in Bavaria[25] and Thuringia to test the feasibility of applying EMAS to agricultural holdings, and two large agricultural companies in Thuringia were the first farms in Europe to apply the EU scheme. In 2004, only 6 large agricultural holdings were registered under EMAS. In the Bavarian project, five smaller family holdings were involved.

Standards

To receive EMAS registration farmers have to implement the following steps:

- Conduct an **environmental review** that considers the environmental impacts of all farm activities and identifies those that most urgently require action. The environmental assessment also includes compiling all relevant legislative standards and verifying whether they are complied with.
- Set goals for improving environmental performance and determine by what means these goals will be achieved (**environmental management system**).
- Carry out an **internal audit** assessing the management system in place and how it conforms with the goals and programme as well as compliance with relevant environmental regulatory requirements.
- Provide a **statement** of the farm's environmental performance which lays down the results achieved against the environmental objectives and the future steps to be undertaken in order to continuously improve environmental performance.

Thus in the case of EMAS, there is no predefined list of standards that have to be complied with in order to be awarded the certificate. Farmers set their own goals depending on specific conditions, preferences and circumstances. However, compliance with legal requirements is an integrative element of the scheme. All environmental cross compliance standards should thus theoretically be covered by EMAS. The German guideline document for farmers provides a checklist of potential environmental impacts that should be assessed, suggesting for instance to address storage of substances hazardous to water, impacts on conservation areas, storage of manure and slurry, protection of groundwater etc., but also measures that exceed cross compliance standards, such as minimising resource use and optimising energy efficiency.

Control and certification

The environmental review, the environmental management system, the internal audit procedure and the environmental statement must be approved by an accredited EMAS verifier. The validated statement is then sent to the EMAS Competent Body for registration.[26]

Following registration, the farmer can use the EMAS logo, which signals that he ensures compliance with all relevant environmental law provisions, that he makes efforts to improve the environmental performance of his holding beyond the legislative minimum standards, and that the measures he takes are regularly audited and published.

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24 http://www.umweltministerium.de/files/pdfs/allgemein/application/pdf/emas_leitfaden_landwbetriebe.pdf

25 Bayerisches Staatsministerium für Umwelt, Gesundheit und Verbraucherschutz 2004: Pilotprojekt: Öko-Audit und Erprobung der Grundzertifizierung in landwirtschaftlichen Betrieben in Bayern. http://wdl.weihenstephan.de/forschung/publikationen/download/oekoaudit.pdf.

26 see http://europa.eu.int/comm/environment/emas/about/summary_en.htm, guideline document of the German federal government (footnote 24).

2.2.2 Umweltsicherung Landwirtschaft (USL)

The certificate "*Betrieb der umweltverträglichen Landbewirtschaftung*"[27] (environmentally compatible agriculture) was created in 2001 by the Association of German Agricultural Research Institutes (*Verband Deutscher Landwirtschaftlicher Untersuchungs- und Forschungsanstalten - VDLUFA*) with the aim to provide a solid basis for discussions about environmentally compatible agriculture, and to meet the demand for consumer information and increased transparency in the process of agricultural production.

Although potentially applicable across Germany, the certification scheme has so far been applied mainly in Thuringia, where it is based. The certificate has been awarded to 31 holdings.

Standards

The certificate relies on the "criteria for environmentally compatible agriculture" (*Kriterien umweltverträglicher Landbewirtschaftung - KUL*) which include 17 standards concerning nutrient balance, soil protection, plant protection, diversity of species and landscape, and energy balance. For the criteria, tolerance ranges are set up that have to be complied with.

Control and certification

The certificate is awarded on the basis of the data and documentation collected by the farmers. The data are evaluated by the project offices and a report is prepared. If deficits are detected, the farmers are given advice as to the causes of these deficits and possible countermeasures. Sample controls are carried out by the project office.

2.2.3 Organic farming: the national eco-label

The government-driven "*Bio-Siegel*" (eco-label)[28] was introduced in 2001 in an attempt to increase the production and consumption of organic food by creating a nationally uniform, association-independent and easily recognisable label for organic food. The label guarantees that the food is produced in line with the organic farming criteria according to EU legislation[29].

The "Bio-Siegel" may be used by all producers, processors and distributors. Use of the "Bio-Siegel" is free of charge. Suppliers need not abandon their own trade names or eco-labels, as the "Bio-Siegel" may be used additionally. The label is used mainly by the processing industry and retailers. Most farms with organic production are members of organic farmers' associations that have their own labels and production guidelines which usually are more strict than the standards of the EC regulation.

In 2004, agricultural production on 16,603 farms and on 767,891 hectares of agricultural area in Germany was carried out according to the EU organic production guidelines. This corresponds to approximately 4.1% of holdings and 4.5% of the total agricultural area.[30] Currently 1,552 companies have registered their use of the Bio-Siegel for a total of 31,409 products.[31]

Standards

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27 http://www.tll.de/kul_old/kul_idx.htm.

28 http://www.bio-siegel.de/.

29 Council regulation (EEC) No 2092/91 of 24 June 1991 on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs.

30 http://www.bmelv.de/

31 See www.bio-siegel.de.

The national Bio-Siegel requires compliance with the criteria of the EU Organic Farming Regulation which, among other things, prohibits the use of radiation in organic production, the use of genetically modified organisms, and the use of synthetic chemicals and of mineral fertilisers with low solubility. Among the requirements are a diversified crop rotation, livestock husbandry practices appropriate to the needs of each species, and the use of organically produced feed with no antibiotics or growth promoters added.

Certification and control

In Germany, public authorities are involved in the control system as well as private inspection bodies. The Federal Office for Agriculture and Food (*Bundesanstalt für Landwirtschaft und Ernährun*g, BLE) decides whether private control bodies are authorised. Their activities in turn are supervised by the respective federal states (*Länder*). The private control bodies - 24 have been approved nation-wide – control and supervise the agricultural production, processing, imports from third countries (non-EU countries) and the labelling of the organic products. The inspectors are qualified experts who are trained on a regular basis.

3 Conclusions

The previous sections show that there are a number of voluntary certification systems in Germany which cover many of the standards relevant for cross compliance. Since there is also considerable overlap of the standards between the different systems, the same provisions might be controlled several times on a farm. Efforts to reduce controls and to make use of potential synergies do therefore seem desirable.

If voluntary certification were to replace or be accepted as cross compliance controls, ways would have to be found to ensure that all cross compliance standards are covered. One way would be to make use of the different components of cross compliance and allow parts of the controls to be replaced by an appropriate certification scheme. For instance, animal registration controls could be theoretically covered by the QS system. However, this might create additional administrative efforts, and would run counter to efforts by the *Länder* to centralise controls (see Country Report Germany).

On the other hand, individual certification schemes might be expanded and adjusted to include all relevant standards. Alternatively, integrated schemes might be created that would comprise the standards of one or more certification schemes and of cross compliance. Such an approach might be based on existing efforts to integrate the requirements from the different sources into farm management systems (see p. 5).

In principle, both farmers and the responsible public authorities could benefit from such efforts. Farmers would have to deal with fewer controls on their farms, and an integration of systems might contribute to a more efficient documentation. From the point of view of the public administration, costs could be saved by delegating controls at least to some extent to private bodies. Furthermore, additional incentives might be created for farmers to participate in certification systems as long as the certification is not too costly. The report on the Bavarian EMAS pilot project for instance points out that the interest among farmers in EMAS might be considerably enhanced if the certification was accepted by the public authorities. However, since the costs for the EMAS process and certificate are relatively high for farmers (around 3,000 EUR), it is recommended that financial support should be offered to interested farmers.[32]

[32] Bayerisches StMUGV 2004, p. 45.

These potential benefits notwithstanding, there are significant obstacles to combining voluntary certification and cross compliance controls. The most important concern is that control intensity and strictness of the independent control bodies might not be adequate and might not meet the requirements of state controls. The high non-compliance rates found for animal identification and registration standards in the cross compliance controls for instance suggest that there are differences in the way the control of these standards is handled by the authorities and by the private control institutions. The challenge would thus be to ensure that whatever the organisational set-up, control systems are adequate and uniform across the country.