

## ICS Requirements for BSO Smallholder Groups

Information note for BIOSUISSE ORGANIC (BSO) operations outside of Switzerland (last updated 01/2025)

Basis: [The Bio Suisse Standards, part V, Art. 3.1.1.3 Smallholder Groups](#)

From 1 January 2025, specific requirements apply to the Internal Control System (ICS) of BIOSUISSE ORGANIC (BSO) smallholder groups without simplified certification.

### Definition of smallholder groups

From 1 January 2025, Bio Suisse will no longer apply its own definition of smallholder groups. The Bio Suisse certification of smallholder groups is based on the definition of groups of operators according to the EU Organic Regulation 2018/848 (areas smaller than 5 ha or turnover < € 25,000). In addition to the standard certification of smallholder groups, "simplified certification" is also possible where certain requirements are met: see the description in section b.

### Which BSO smallholder groups are affected/are not affected by the specifications?

#### a. Affected: groups without simplified certification

BSO-certified smallholder groups with an internal control system (ICS) that do not have simplified certification according to the Bio Suisse Standards [Part V, Art. 3.1.1.3](#) Smallholder groups.

#### b. Not affected: groups with simplified certification

Bio Suisse facilitates simplified certification for smallholder groups or subgroups if the following requirements are met as set out in [Part V, Art. 3.1.5](#) Simplified certification of smallholder groups:

- The group is situated in a developing country in or outside of Europe as defined by the OECD DAC list.
- The group will apply for simplified certification for crops eligible for simplified certification in accordance with Appendix 2 to Part V, Art. 3.1.5: Simplified certification of smallholder groups, Part V. The group may apply to Bio Suisse for a derogation for crops that are not included on the list.
- Only the crops of smallholders that organically farm all cash crops in a controlled manner can receive BIOSUISSE ORGANIC certification. It is not permitted to cultivate conventional cash crops.
- Utilised agricultural areas of the (sub)group applying for BIOSUISSE ORGANIC certification do not contain any sites that were originally high conservation value areas and have been converted to utilised agricultural areas since 2004.
- If BIOSUISSE ORGANIC certification is only sought for some of the producers within the group (subgroup), separation of goods and traceability must be guaranteed for the products of the BIOSUISSE ORGANIC subgroup as compared to other products.

These requirements are confirmed by project managers and need not be incorporated into the ICS. They are tested at random during external inspections. Other requirements under the Bio Suisse Standards are dispensed with for smallholder groups that comply with the above-mentioned requirements and apply for simplified certification.

For this reason, from 2025 it will be even more important to establish in advance whether the group fulfils the requirements for simplified certification and, if so, to apply for it at the inspection body.

**If the group fulfils these requirements and applies for simplified certification, the following information is irrelevant for the group's ICS.**

### Background to and objective of the specified requirements

Until now, Bio Suisse Standards have not explicitly required how BSO smallholder groups must present Bio Suisse Standards in their ICS. This has resulted in BSO smallholder groups presenting and implementing Bio Suisse Standards via the ICS in a wide variety of ways.

The aim of the revised Standards is for BSO smallholder groups to specifically supplement their ICS with the relevant aspects of the Bio Suisse Standards. This will enable BSO smallholder groups to provide targeted training to their producers and ensure compliance with the Bio Suisse Standards by means of internal inspections.

### Specified requirements from 1 January 2025

If not already available, BSO smallholder groups with an ICS must incorporate the relevant aspects of the Bio Suisse Standards into their ICS from 1 January 2025. This means that a BSO smallholder group with an ICS may have to adapt the following documents:

- Handbook/manual
- Training documents
- Internal inspection checklist
- Catalogue of sanctions

BSO smallholder groups and/or the ICS must also ensure training for their producers and internal inspectors concerning the aspects of the Bio Suisse Standards and monitor compliance on an annual basis. In the event of non-compliance with the Bio Suisse Standards, the BSO producers concerned must be sanctioned according to the catalogue of sanctions contained in the ICS.

### Text of the Standards

The associated text of the Standards can be found in the Bio Suisse Standards, Part V, Art. 3.1.1.3 Smallholder groups, in the second paragraph (see Figure 1). Click here for the [Bio Suisse Standards](#).

#### 3.1.1.3 Smallholder groups

Smallholder groups<sup>(58)</sup> have collective and regional structures (e.g. advice, marketing) and are controlled and certified by their inspection body according to the EU organic regulation (or equivalent) as a group of operators.

The aspects of the current Bio Suisse Standards that are relevant for smallholder groups must be specified in the Internal Control System (ICS) handbook and producers and internal inspectors must be trained accordingly. Compliance with these relevant aspects must be reviewed annually in the internal inspection and sanctioned in line with the ICS sanctions catalogue in the event of non-compliance.

Figure 1: Extract from the Bio Suisse Standards 2025

### Implementation

The persons responsible for ICS must review all documents and processes relevant to the ICS or the respective group. Documents and processes may need to be supplemented to incorporate the relevant aspects of the Bio Suisse Standards.

The relevant aspects of the Standards may differ, depending on the region and the crops grown.

### Examples of relevant aspects

- There are aspects such as the whole-farm approach, how to deal with areas subject to retroactive recognition or a short conversion period, which are relevant for all groups and must be incorporated into the ICS.
- Groups that are located in a water risk area<sup>1</sup> and irrigate, must meet additional water management requirements ([Part V, Art. 3.6.2](#) Use of water in areas with water risks).
- Groups that grow quinoa, sugar cane or pineapple must also indicate in their ICS the specific requirements applicable to the respective crop under the Bio Suisse Standards.

<sup>1</sup> Areas that are categorised as “High” (50%–75%) or “Extremely high” (>75%) in accordance with the [Ageduct](#) “Water Depletion” indicator (annual determination) or are located in a desert area according to the [Köppen-Geiger climate classification](#) (indicator “Bwh”) of the Oak Ridge National Laboratory (webmap.ornl.go – Version 2017) are considered areas with water risks.

- Groups with field crops must have included aspects of crop rotation, cover crops, rotation breaks, propagating material, burning of crop residues, etc.
- Groups must have specified in the ICS the maximum fertiliser limits for the crops grown in each case.
- For groups that only cultivate permanent crops, the requirements applicable to crop rotation or rotation breaks between two main crops of the same species are irrelevant ([Part V, Art. 4.2.1.1 and 4.2.1.3](#)) and therefore do not need to be incorporated into the ICS.
- Groups without animal husbandry or that engage in animal husbandry only for self-sufficiency purposes do not have to incorporate the Animal Husbandry Standards into the ICS.

These requirements should be fulfilled as soon as possible and must be met within two years at the latest.

### **Support and questions**

If you have any questions or comments, please contact us at [international@bio-suisse.ch](mailto:international@bio-suisse.ch).