**GACP+ STANDARD FOR DEVIL’S CLAW IN NAMIBIA**

Checklist for Self-Assessment



Principles, Criteria and Guidelines on Good Agricultural and Collection Practices (GACP), including compliance with UNCTAD BioTrade guidelines for natural resources from Namibia, with a focus on Devil’s Claw (*Harpagophytum* spp.)

|  |  |
| --- | --- |
| **ADOPTION BY BIA DEVIL’S CLAW PROJECT PARTNERS TEAM FOR RELEASE FOR EXTERNAL CONSULTATION** | 18 October 2021 |
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# **Foreword**

The BioInnovation Project (BIA) aims to foster European-African business partnerships in the BioTrade sector by providing support to identified gaps in existing value chains including addressing regulatory hurdles. The BIA Project runs from 2019 to 2022. Under this project, the Namibia Network of the Cosmetics industry (NANCi) received a grant to develop a standard for the devil’s claw industry.

The Namibian GACP+ standard is developed keeping the context of the Namibian devil’s claw wild collection (harvesting), production and trading system in mind, as well as various certification systems, international guidelines and biotrade agreements and national legislation. The BIA project has supported the development of the project. The partners to this project are GIZ, NANCi, NDCEAT, Naturex and Givaudan Foundation. The standard is planned to be monitored by NANCi. An appropriate certification body will be appointed once the standard is accepted by the relevant stakeholders.

This document does not give dispensation in any case from the obligation to comply with statutory provisions. The document was prepared with great care. Nonetheless, the authors and BIA project partners, NANCi, NDCEAT, Naturex and Givaudan Foundation do not take over any liability for the accuracy of the information, indications, recommendations or possible printing errors. It is therefore not possible to derive any claims against the authors or against the project partners concerning any consequences thereof. This does not apply if damage has been caused intentionally or grossly negligently by NANCi or its vicarious agents.

# **Acknowledgements**

Mention

* BIA
* GIZ
* Givaudan Foundation
* NANCi
* Naturex
* NDCEAT

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# **Purpose of the standard**

The purpose of establishing a nationally and internationally recognised Standard is to pursue sustainable natural resource management of the resource known as devil’s claw (*Harpagophytum* spp.) and ensure the sustainable harvesting and trade of this plant species considered; further improve on quality of products; and promote biodiversity conservation and human development,, as envisioned by the Namibian constitution.

# **Context**



1. *H. procumbens* ssp. *procumbens*
5. *H. zeyheri* ssp. *sublobatum*



(Source: Hitchcock R, 2015)

Devil’s Claw refers to two plant species, naturally occurring in sandy soils of central and northern Namibia, namely *Harpargophytum procumbens* and *H. zeyheri*.

Devil's claw is a prostrate, sprawling plant with a stout, perennial rootstock that has a group of secondary storage tubers. Trailing annual stems bear opposite greyish green leaves. The flowers are trumpet-shaped and range from dark velvety red or purple to pink. The very distinctive spiny fruits are woody, oval and flattened capsules with many dark brown or black seeds (National Botanical Research Institute, 2017).

The San of the Kalahari have used devil’s claw as a medicinal plant for centuries. The tuber was used as a bitter-tasting medicine especially for stomach complaints and an infusion for relief of all fevers, for blood diseases, and as an anti-inflammatory and analgesic agent (EMA, 2015). Devil’s claw has one of the oldest histories in the commercialisation of wild plants in Namibia (Cole, 2014). It was first exported to Germany in the 1950s and when the treatment of arthritis and rheumatism by devil’s claw gained recognition, a small industry based on plant material mainly from Namibia and Botswana developed (National Botanical Research Institute, 2017).

Devil’s claw occurs widely in Namibia and many rural households earn an additional income through its harvesting and trade. The policy of the Government of Namibia is to manage the harvesting and sale of devil’s claw products in a way that recognises the rights and development needs of local communities while also recognising the need to promote biodiversity conservation.

To achieve this, Government has created a policy framework which enables harvesters to benefit from these plant resources as well as encouraging and supporting responsible management of the resource (Ministry of Environment and Tourism, 2010). Since the revised policy on the utilisation of devil’s claw in Namibia was ratified in 2010, all stages of harvesting, processing, trading and export are part of a permit system that is tied to a fixed harvest time (Cole, 2014; National Botanical Research Institute, 2017). The complex supply chain has been improved by the introduction of the sustainably harvested devils claw model (SHDC) which established different harvesting and trade organisations. These focus on fair compensation along the supply chain as well as sustainable harvest techniques and quality issues (Cole, 2014).

In addition to the provisions of the policy framework and permit system in place, various international market players and processors are requiring a more rigorous approach towards proof of resource sustainability and traceability, quality management and benefit sharing, according to WHO or EMA GACP guidelines for herbal substances and herbal preparations. Furthermore, in line with Namibia having acceded the Nagoya Protocol, measures to attest the UNCTAD BioTrade principles should be implemented.

The latter involves inter alia: developing and implementing of Namibia GACP+ standard, ensuring sustainable harvest of devil’s claw, quality, and safety analysis of products, as well as, well-processed and fairly compensated harvester and producer organisations.

# **Scope of the standard**

This standard is applicable to all devil’s claw harvesters, traders and exporters in Namibia. Importers of devil’s claw from Namibia are encourage to acknowledge the standard, *in lieu* of the WHO’s and EMA’s GACP guidelines. The Namibian GACP+ standard combines the guidelines, principles and criteria of the WHO’s and EMA’s with those of the UNCTAD BioTrade Initiative. Therefore, the Namibian GACP Standard is called GACP Plus (or short GACP+).

# **GACP+ Standard Development and Consultations**

# **Standard Development**

Experts from the environmental, economic and social sectors of Namibia were called upon to assist with the development of the standard. The standard is authored and edited by:

|  |  |  |  |
| --- | --- | --- | --- |
| Expert’s name | Organisation | Field of Expertise  | Role |
| Peter Cunningham | Environment & Wildlife Consulting Namibia | Environment, Ecology, Compliance | Author |
| Dagmar Honsbein | NANCi | Project Management, Social, Techno-Economics | Author, Project Coordination |
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|  |  |  |  |

# **Consultations**

The Drafts of the GACP+ standard considered comments received from a diversity of stakeholders, experts, representatives of key interest groups and government officials including:

1. Representatives of the xxxx
2. xxxxx

# **References, Background Information on Standard Development**

The following documents were consulted in the development of this draft Standard:

1. AHPA 2017. Good agricultural and collection practices and good manufacturing practices for botanical materials. American Herbal Product Association, Maryland, USA.
2. Anon, 2021. Organic and Fair for Life harvesting protocol. Unpublished report, Windhoek, Namibia.
3. Cole, D. 2021. Devil’s Claw Checklist. Unpublished report, Windhoek, Namibia.
4. CRIAA SA-DC. 2007. Devil’s claw in Namibia – Guidelines for harvesters. Devil’s claw working group and MEFT, Windhoek, Namibia.
5. EMEA, 2006. Guidelines on good agricultural and collection practices (GACP) for starting materials of herbal origin, London, UK.
6. EMA, 2015. Assessment report on *Harpagophytum procumbens* (Devil’s Claw)., radix;. s.l., EMA/HMPC/627058/2015.
7. EUROPAM 2016. A practical implementation guide to good agricultural and wild collection practices (GACP). European herb growers association (EUROPAM) - GACP working group.www.europam.net
8. Heron, B. 2010. FAO good agricultural and collection practices for medicinal plants. FAO for the United Nations, New Delhi, India.
9. Hitchcok, RK. 2015. Authenticity, Identity, and Humanity: The Hai//om San and the State of Namibia. Anthropological Forum, 25:3, 262-284. Taylor & Francis. Accessed from ‘ResearchGate’ on 15 September 2022.
10. MEFT. 2010. National policy on the utilisation of Devil’s Claw (*Harpagophytum*) products. Ministry of Environment, Forestry and Tourism, Windhoek, Namibia.
11. MEFT. 2017. Access to Biological and Genetic Resources andAssociated Traditional Knowledge Act, Act 2 of 2017. Government Gazette 6343, Namibia.
12. UNCTAD. 2020. Biotrade Principles and Criteria for terrestrial, marine and other aquatic biodiversity based products and services. UNCTAD Biodiversity Initiative, Geneva, Switzerland.
13. Union for Ethical Biotrade. 2021. Gap assessment GACP standard and UEBT standard, Devil’s Claw project in Namibia. BIA Project, Bonn, Germany.
14. Zhang, X. 2003. WHO guidelines on good agricultural and collection practices (GACP) for medicinal plants. WHO, Geneva,Switzerland.

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# **Compliance with national and international legislation**

**Criteria A:** Activities respect all national and international laws; treaties, conventions,agreements and regulations that are applicable and relevant to biotrade and bioprospecting, with the aim of biodiversity conservation and socio-economic sustainability.

**Criteria B:** Activities respect international agreements relevant to ethical biotrade.

| **No** | **Reference** |  | **Complied with** | **N/A** | **Justification and Note** |
| --- | --- | --- | --- | --- | --- |
|  |  |  | **As a whole** | **Partly** | **Not** |  |  |
|  |  | **Designation** |  |  |  |  |  |
|  | **6.** | **LEGALITY AND COMPLIANCE** |  |  |  |  |  |
|  | **6.1** | **Compliance** |  |  |  |  |  |
|  | 6.1.1 | Are national and international laws, treaties, conventions and agreements adhered to? |  |  |  |  |  |
|  | 6.1.2 | Have national and international agreements, MoA, etc been put in place that acknowledge resource holder rights? |  |  |  |  |  |
|  | 6.1.3 | Have benefit sharing agreements, MoA, etc. been put in place? |  |  |  |  |  |
|  | 6.1.4 | Prices paid for natural raw materials, products with natural origin are fair and equitable for suppliers of similar materials |  |  |  |  |  |
|  | 6.1.5 | Use of raw materials complies with legal requirements on access and benefit sharing. |  |  |  |  |  |
|  | **6(a)** | **Verifiers:** ABS agreement (as a whole); PIC, MAT, MTA |  |  |  |  |  |
|  | **6(aa)** | **Guidance:** Nagoya Protocol,UEBT Standard, UNCTAD Biodiversity Principles, ABS Act & regulations, Devil’s claw policy, EIA/EMP, all other relevant national legislation governing the natural resources sector |  |  |  |  |  |
|  | **6.2** | **Permission to harvest** |  |  |  |  |  |
|  | 6.2.1 | Has permission to harvest been granted by landowner? |  |  |  |  |  |
|  | 6.2.2 | Has permission to harvest been granted by traditional authority?  |  |  |  |  |  |
|  | 6.2.3 | Has permission to harvest been granted by MEFT?  |  |  |  |  |  |
|  | 6.2.4 | Has permission to harvest been granted by Community Forest committee?  |  |  |  |  |  |
|  | 6.2.5 | Has permission to harvest been granted by Conservancy Management committee? |  |  |  |  |  |
|  | **6(b)** | **Verifiers:**Certificate of training; Contract; valid harvesting permit; letter from TA/MEFT/CF/Conservancy – i.e. written authorisation to harvest should be available for a designate area of harvesting. |  |  |  |  |  |
|  | **6(bb)** | **Guidance:** Devil’s claw policy, EIA/EMP |  |  |  |  |  |
|  | **6.3** | **Unauthorised harvesting**  |  |  |  |  |  |
|  | 6.3.1 | Measures should be in place to prevent illegal harvesting from occurring. |  |  |  |  |  |
|  | 6.3.2 | Measures should be in place to address illegal harvesting should this occur. |  |  |  |  |  |
|  | **6(c)** | **Verifiers:** Permits; disciplinary/legal action, records |  |  |  |  |  |
|  | **6(cc)** | **Guidance:** Devil’s claw policy, EIA/EMP |  |  |  |  |  |
|  | **6.4** | **Transportation and trade** |  |  |  |  |  |
|  | 6.4.1 | Have all national laws regarding transport and trade of devil’s claw been adhered to? |  |  |  |  |  |
|  | **6.4(d)** | **Verifiers:** Harvesting/Marketing/Transport Permits; delivery notes; weight lists; tax/supplier invoice, VAT, Income Tax |  |  |  |  |  |
|  | **6(dd)** | **Guidance:** Devil’s claw policy, EIA/EMP |  |  |  |  |  |
|  | **6.5** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

# **Respect for Human Rights;Organisation, People, Education and Training**

**Criteria C:** Activities respect fundamental human rights, the rights of children and workers.

**Criteria D:** The welfare, health,safetyand hygiene of all people involved in operations should be ensured.

**Criteria E:** All activities and practices promote sustainable organisational development, operations and management systems.

**Criteria F:** People and stakeholders should receive relevanteducation and training.

| **No** | **Reference** |  | **Complied with** | **N/A** | **Justification and Note** |
| --- | --- | --- | --- | --- | --- |
|  |  |  | **As a whole** | **Partly** | **Not** |  |  |
|  |  | **Designation** |  |  |  |  |  |
|  | **7.** | **HUMAN RIGHTS; PEOPLE, EDUCATION & TRAINING** |  |  |  |  |  |
|  | **7.1** | **Human Rights** |  |  |  |  |  |
|  | 7.1.1 | The organisation upholds fundamental human rights as per ILO convention and Namibian labour act, including providing conducive working and living conditions. |  |  |  |  |  |
|  | 7.1.2 | Only children from the age of 14 may be employed for light work but it does not interfere with schooling, nor be harmful to their health or development |  |  |  |  |  |
|  | 7.1.3 | The organisation prohibits the worst forms of child labour |  |  |  |  |  |
|  | 7.1.4 | There is no evidence of forced or compulsory labour. |  |  |  |  |  |
|  | **7(a)** | **Verifiers:** Proof of payments/ payslip, invoices, certificates of issue such as but not limited to Social Security payment, collective agreement ID documents, birth certificates, affidavit by workers and employment records of workers; Interview with workers; Field Assessment, Labour inspector records, dispute and grievance records and interviews with workers, worker representatives and unions, employment contracts signed by employer and employee with witness signatures |  |  |  |  |  |
|  | **7(aa)** | **Guidance:**Namibian Constitution, Labour Act, 2012, as amended, ILO Convention, UEBT Standard, UNCTAD Biodiversity Principles |  |  |  |  |  |
|  | **7.2** | **Welfare, Health and Safety, Hygiene** |  |  |  |  |  |
|  | 7.2.1 | The organisation has implemented health and safety practices to protect workers from occupational safety and health hazards that meet or exceed legal requirements. |  |  |  |  |  |
|  | 7.2.2 | The organisation ensures that people and personnel who sick, injured, having open lesions or otherwise incapable to work, are excluded from the area of open products, or do not come in contact with the produce. |  |  |  |  |  |
|  | 7.2.3 | Has a hygiene programme been established for the production (harvesting up to trade), quality control and storage areas? |  |  |  |  |  |
|  | 7.2.4 | Has the hygiene programme been adapted to the needs of the production system and circumstances? |  |  |  |  |  |
|  | 7.2.5 | Are the requirements defined in the hygiene programme understood and followed? |  |  |  |  |  |
|  | 7.2.5.1 | - are sufficient facilities for washing & disinfection of hands, tools, processing equipment available (possible)? |  |  |  |  |  |
|  | 7.2.5.2 | Has personnel been instructed in respect of washing and disinfection of hands, tools, processing equipment? |  |  |  |  |  |
|  | 7.2.5.3 | - are the washing and disfection facilities being used? |  |  |  |  |  |
|  | 7.2.6 | Does personnel wear appropriate clothing and protective garments to avoid contamination of products? Is this also applied to personnel responsible for quality control/ assurance and warehouse personnel? |  |  |  |  |  |
|  | 7.2.7 | Is there a ban on eating and drinking, chewing and smoking in the production (processing), quality control/assurance and storage/warehouse areas? |  |  |  |  |  |
|  | 7.2.8 | Is there a ban on storing food, drink, smoking or pesiticides, fertiliser materials or personal medication in the production, quality control and storage/ warehouse areas? |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **7(b)** | **Verifiers:**, certificates of issue such as “First Aid”employment records of workers; Risk Assessment for Chemical Application and other Hazardous work records; Interview with workers; Field Assessment, Labour inspector records, dispute and grievance records and interviews with workers, employment contracts signed by employer and employee with witness signatures, health records, accident reports, minutes of meetings/ resolution register |  |  |  |  |  |
|  | **7(bb)** | **Guidance:**ILO Convention; ILO Health and Safety Guidelines, Labour Act & Regulations, Social Security Act, Health and Social Welfare guidelines, SOPs |  |  |  |  |  |
|  | **7.3** | **Organisational & Operations and Management Systems** |  |  |  |  |  |
|  | 7.3.1 | Does the organisation have an environmental (biodiversity), social and an economic sustainability (business) plan in place? |  |  |  |  |  |
|  | 7.3.2 | Is an updated organisation chart available, which is comprehensible and appropriate for the size of the organisation? |  |  |  |  |  |
|  | 7.3.3 | Are adequate and relevant staffing levels available according to the processes in place? |  |  |  |  |  |
|  | 7.3.4 | Does the organisation chart show the independence of the quality unit (quality assurance / quality control) from the other units of the organisation? |  |  |  |  |  |
|  | 7.3.5 | Are quality systems aligned with market requirements |  |  |  |  |  |
|  | 7.3.6 | Is a traceability system in place in line with market, certification and legal requirements |  |  |  |  |  |
|  | 7.3.7 | Are procedures developed and implemented on the use of pesticides, fertilisers and hydrocarbons which comply with ILO, Namibian legislations, as well as international best practice |  |  |  |  |  |
|  | 7.3.8 | Have social impacts of practices and management activities are monitored, evaluated and adadpted, if/when necessary? |  |  |  |  |  |
|  | 7.3.9 | Have environmental (incl. Biodiversity consideration/ sustainability measures) impacts of practices and management activities are monitored, evaluated and adadpted, if/when necessary, consistent with environmental conditions? |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **7(c)** | **Verifiers:**Appropriate SOPs, Manuals, Strategic, Management & Business Plan; certifications and labelling; Pest and Fertilisation Plan; in-field inspections; interviews with stakeholders; Monitoring & Evaluation Plan & Reports; assessments (pre- & post) of sites & reports; incident reports and remedial actions taken; |  |  |  |  |  |
|  | **7(cc)** | **Guidance:**Labour Act, and the Fertilizers Farm Feeds and Agricultural Remedies Act 36 of 1947, organic certification documentation, EMA GACP, WHO GACP, Global GAP, ISO 14000, HACCP documentation,  |  |  |  |  |  |
|  | **7.4** | **Education and Training** |  |  |  |  |  |
|  | 7.4.1 | Is sufficiently educated and trained personnel with regard to the activities available? And are specific training steps developed, implemented in these fields? |  |  |  |  |  |
|  | 7.4.1.1 | - In the field of cultivation, the resources and the specific plants? |  |  |  |  |  |
|  | 7.4.1.2 | - in the field of harvesting? |  |  |  |  |  |
|  | 7.4.1.3 | - in the field of processing (cutting, drying, packaging, storage)? |  |  |  |  |  |
|  | 7.4.1.4 | - in the field of logistics? |  |  |  |  |  |
|  | 7.4.1.5 | - in the field of quality control & assurance? |  |  |  |  |  |
|  | 7.4.1.6 | - in the field of purchasing/ procurement? |  |  |  |  |  |
|  | 7.4.1.7 | - in the field of gateway/ incoming / outgoing goods? |  |  |  |  |  |
|  | 7.4.2 | Is a training programme developed and implemented on the basis of identified training needs and consistent with the operational/policy environment? |  |  |  |  |  |
|  | 7.4.3 | Are the training programme and trainings documented? |  |  |  |  |  |
|  | 7.4.4 | Are people/personnel offered appropriate training? |  |  |  |  |  |
|  | 7.4.5 | Are the training courses of the respective stakeholders, people, personnel tailore to the appropriate to the tasks, jobs, responsibilities of indviduals considering their expertise and experience? |  |  |  |  |  |
|  | 7.4.6 | Are the training courses developed and implemented by internal and external personnel? |  |  |  |  |  |
|  | 7.4.6.1 | Are trainings carried out on a regular basis and adjusted to current circumstances (by internal and external experts)? |  |  |  |  |  |
|  | 7.4.6.2 | Are trainings carried out by internal and external experts) documented? |  |  |  |  |  |
|  | 7.4.7 | Is newly recruited personnel (and stakeholders) provided with basic trainings (induction) on the theory of GACP/GACP *Plus* as well as training appropriate to the duties, responsibilities, jobs, etc. assigned to it? |  |  |  |  |  |
|  | 7.4.8 | Is the knowledge accumulated by personnel, stakeholders, interested & affected people evaluated and certified during or after trainings? |  |  |  |  |  |
|  | **7(d)** | **Verifiers:** Appropriate SOPs, Manuals, Training materials and documentation; training records/minutes; in-field inspections; interviews with stakeholders; occasional training assessmentsreports/records;  |  |  |  |  |  |
|  | **7(dd)** | **Guidance:**SOPs/Manuals from organic certification processes, EMA GACP, WHO GACP, GGAP, ISO 14000, HACCP documentation,  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

# **Technical Measures**

**Criteria G:** All relevant technical details regarding the resource are known and/or collected, analysed and used to sustain socio-economic well-being and biodiversity.

**Criteria H:** Clarity about land tenure, right of use and access to natural resources is ensured and maintained.

**Criteria I:** Information on the resource and biodiversity is known, collected in wild collection (harvesting) areas.

**Criteria J:** Concrete actions are taken to protect, maintain, regenerate or enhance biodiversity, with a focus on the specific natural resource in the wild collection (harvesting) areas.

**Criteria K:** To ensure relevance and continuous improvement, concrete actions are periodically adjusted to changing conditions.

**Criteria L:** Practices are adopted to ensure sustainable use of the species cultivated or wild collected (harvested), and to prevent or mitigate impact on other species, including measures for the promotion of climate resilience.

**Criteria M:** Local development needs, as defined by producers and their local communities in wild collection (harvesting) areas, are supported.

**Criteria N:** Buildings, facilities, tools and equipment are appropriate, clean to process the natural resource and measures are in place to prevent cross-contamination with chemicals (incl. lubricants and cleaning materials) and other non-desirable substances.

**Criteria O:** Agreements between producers and buyers of medicinal plants/herbal substances with regard to quality such as content of active principle, macroscopical and olfactory properties, limit values for microbial contamination, chemical residues and heavy metals etc., must be based on recognised regional and/or national specifications and should be laid down in written form.

**Criteria P:** All processes and procedures that could affect biodiversity, social well-being and the quality of the product must be documented.

| **No** | **Reference** |  | **Complied with** | **N/A** | **Justification and Note** |
| --- | --- | --- | --- | --- | --- |
|  |  |  | **As a whole** | **Partly** | **Not** |  |  |
|  |  | **Designation** |  |  |  |  |  |
|  | **8.1** | **Resource – Pre Harvesting** |  |  |  |  |  |
|  | 8.1.1 | A resource inventory is available – i.e. distribution & density of devil’s claw determined. |  |  |  |  |  |
|  | 8.1.2 | Species harvested known – i.e. *H. procumbens* or *H.zeyheri*. |  |  |  |  |  |
|  | 8.1.3 | Distance to harvesting site known/estimated. |  |  |  |  |  |
|  | 8.1.4 | Reproductive state of plants known. |  |  |  |  |  |
|  | 8.1.5 | Harvesting period known and/or adhered to (i.e. March to October). |  |  |  |  |  |
|  | 8.1.6 | Changes in resource availability known. |  |  |  |  |  |
|  | 8.1.7 | Harvesters have received training in resource estimates & harvesting techniques. |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **8(a)** | **Verifiers:** Density estimates; training records; species details known |  |  |  |  |  |
|  | **8(aa)** | **Guidance:** Devil’s Claw Policy; Devil’s Resource Assessment (from BIA Project); UEBT Resource Model |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **8.2** | **Resource – Harvesting**  |  |  |  |  |  |
|  | 8.2.1 | Harvesting techniques & protocols |  |  |  |  |  |
|  | 8.2.1.1 | Harvesting technique known – i.e. describe technique (only harvest tubers on one side of plant at a distance of 30cm from main stem). |  |  |  |  |  |
|  | 8.2.1.2 | Harvesting protocols followed – i.e. confirm technique (e.g. harvesting holes closed; plant not damaged). |  |  |  |  |  |
|  | 8.2.1.3 | Harvested plant marked with colour coded identification. |  |  |  |  |  |
|  | 8.2.1.4 | Harvesting not conducted along road verges; old fields, garbage dumps, etc. – i.e. areas with potential contaminants.  |  |  |  |  |  |
|  | 8.2.1.5 | No harvesting under wet conditions. |  |  |  |  |  |
|  | 8.2.1.6 | No litter left at harvesting sites. |  |  |  |  |  |
|  | 8.2.1.7 | No collateral damage of non-target species at harvesting sites. |  |  |  |  |  |
|  | 8.2.1.8 | No poaching activities at harvesting sites. |  |  |  |  |  |
|  | 8.2.1.9 | No open fire made at harvesting sites and/or cooking areas cleared of all combustible material (e.g. ~5m). |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **8(b)** | **Verifiers:**Density estimates; training records; species details known |  |  |  |  |  |
|  | **8(bb)** | **Guidance:** Devil’s Claw Policy; Devil’s Resource Assessment (from BIA Project); UEBT Resource Model |  |  |  |  |  |
|  | **8.3** | **Harvesting equipment** |  |  |  |  |  |
|  | 8.3.1 | Equipment used to slice tubers is clean – i.e. knives, brushes & cutting boards clean). |  |  |  |  |  |
|  | 8.3.2 | Bags to carry/transport tubers should be dry, clean and free of any contaminants. |  |  |  |  |  |
|  | 8.3.3 | No plastic bags to be used to carry/transport tubers. |  |  |  |  |  |
|  | 8.3.4 | Equipment used to dry sliced tubers is raised off the ground for good ventilation purposes and prevention of contamination.  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **8(c)** | **Verifiers:**permits, Harvesting records, in field inspections, stakeholder interviews, chronological photo library |  |  |  |  |  |
|  | **8(cc)** | **Guidance:**previous reports, MEFT legislation, SOPs, Manuals |  |  |  |  |  |
|  | **8.3** | **Drying &Storage** |  |  |  |  |  |
|  | 8.4.1 | Damaged and spoiled tubers should be discarded. |  |  |  |  |  |
|  | 8.4.2 | Drying should be conducted on clean racks, lifted off the ground (~1m) and in the shade – i.e. no direct sunlight. |  |  |  |  |  |
|  | 8.4.3 | Dried tubers should be inspected to remove discoloured, mouldy and damaged material including all other foreign material. |  |  |  |  |  |
|  | 8.4.4 | No roots/tubers, etc. of other plant species mixed with devil’s claw tubers. |  |  |  |  |  |
|  | 8.4.5 | No chemicals to be used in/close to drying facilities and/or storage sites. |  |  |  |  |  |
|  | 8.4.6 | Personal behaviour that could damage/contaminant the product should be avoided – e.g. personal hygiene maintained. |  |  |  |  |  |
|  | 8.4.7 | Packaging material should be agreed between supplier and buyer. |  |  |  |  |  |
|  | 8.4.8 | Equipment used to pack dried tubers is clean and safe – i.e. no fertiliser bags, etc. |  |  |  |  |  |
|  | 8.4.9 | Storage of dried tubers is clean and safe – i.e. secure, dry, well ventilated and away from farm animals. |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **8(d)** | **Verifiers:**production documentation and records, in field inspections, stakeholder interviews, chronological photo library |  |  |  |  |  |
|  | **8(dd)** | **Guidance:** previous reports, SOPs, Manuals |  |  |  |  |  |
|  | **8.5** | **Resource – Post Harvesting**  |  |  |  |  |  |
|  | 8.5.1 | Plants rested for at least 3 years between harvesting to ensure sustainability. |  |  |  |  |  |
|  | 8.5.2 | A follow up resource inventory is conducted – i.e. distribution & density of devil’s claw determined. |  |  |  |  |  |
|  | 8.5.3 | Assessment of regrowth and plant health and vitality made before harvesting the same plants/area.  |  |  |  |  |  |
|  | 8.5.4 | Have all the necessary documents/permits been returned to MEFT, etc?  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **8(e)** | **Verifiers:** Rest, regrowth, vitality and sustainability understood & implemented; harvesting documents, field inspections; harvesting records, permit reports from MEFt |  |  |  |  |  |
|  | **8(ee)** | **Guidance:** Devil’s claw policy, previous reports, SOPs, Manuals |  |  |  |  |  |
|  | **8.6** | **Documentation** |  |  |  |  |  |
|  | 8.6.1 | Inventory of harvested quantities kept and maintained. |  |  |  |  |  |
|  | 8.6.2 | Records of harvesting site(s) indicated. |  |  |  |  |  |
|  | 8.6.3 | Records of harvesting personnel indicated. |  |  |  |  |  |
|  | 8.6.4 | Records of sale kept and maintained. |  |  |  |  |  |
|  | 8.6.5 | Harvesters have received refresher training in harvesting techniques. |  |  |  |  |  |
|  | 8.6.6 | Have suppliers and buyers entered into a product specifications agreements, incl. having agreed on measures of quality and quality assurances? |  |  |  |  |  |
|  | 8.6.7 | Have the parties entered into terms of trade agreements on all possible aspects, to *inter alia* avoid disputes, complaints and recalls? |  |  |  |  |  |
|  | **8(f)** | **Verifiers:** Harvesting techniques and related rules understood & implemented; harvesting records; training records; field inspections, agreements between parties |  |  |  |  |  |
|  | **8(ff)** | **Guidance:** SOPs, Manuals, Product Specifications between supplier and buyer |  |  |  |  |  |

# **Non-Compliance and Corrective Actions**

**Criteria Q:** All challenges, problems and non-compliance matters are addressed and dealt to ensure compliance.

**Criteria R:** All risks are identified and mitigated in line with good practice, international and national agreements, conventions and legislation.

| **No** | **Reference** |  | **Complied with** | **N/A** | **Justification and Note** |
| --- | --- | --- | --- | --- | --- |
|  |  |  | **As a whole** | **Partly** | **Not** |  |  |
|  |  | **Designation** |  |  |  |  |  |
|  | **9.1** | **Non-compliance** |  |  |  |  |  |
|  | 9.1.1 | Is there a procedure to handle non-compliance which may result from internal/external auditing and/or customer complaints?  |  |  |  |  |  |
|  | 9.1.2 | Are there procedures for the identification of non-compliances?  |  |  |  |  |  |
|  | 9.1.3 | Is a dispute resolution process developed and implemented through culturally appropriate engagements with personnel, people, stakeholders and/or affected partiers; and the process is understood? |  |  |  |  |  |
|  | 9.1.4 | Non-compliances recorded and documented? |  |  |  |  |  |
|  | **9(a)** | **Verifiers:** Organisational procedures, policies, SOPs, Manuals; Harvesting techniques and related rules understood & implemented; harvesting records; training records; grievance and complaints records/registers, field inspections, discussions with people, personnel, managers, stakeholders |  |  |  |  |  |
|  | **9(aa)** | **Guidance:** EIA/EMP, Labour Act, Traditional Authority Acts, Land Acts |  |  |  |  |  |
|  | **9.2** | **Corrective actions** |  |  |  |  |  |
|  | 9.2.1 | Are corrective actions evaluated and linked to a time scale for action? |  |  |  |  |  |
|  | 9.2.2 | Are the responsibilities for implementing and resolving corrective actions defined?  |  |  |  |  |  |
|  | 9.2.3 | Are all corrective actions attended to and adaptive measures in place to prevent recurring incidents? |  |  |  |  |  |
|  | 9.2.4 | Are corrective actions recorded and documented? |  |  |  |  |  |
|  | 9.2.3 | Is training supplied to prevent recurring incidents?  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  | **9(b)** | **Verifiers:** Records kept and maintained |  |  |  |  |  |
|  | **9(bb)** | **Guidance:** Risk register, SOPs, Manuals, relevant legislation |  |  |  |  |  |

# **Abbreviations and Glossary of Terms**

|  |  |
| --- | --- |
| **Abbreviation or Term** | **Description** |
| ABS | Access and Benefit Sharing |
| BIA | BioInnovation Africa (Project) - Equitable Benefit-sharing for the Conservation of Biodiversity, commissioned by German Federal Ministry for Economic Cooperation and Development (BMZ), implemented by GIZ in Cameroon, Madagascar, Namibia and South Africa. |
| CF | Community Forests – Forests declared on communal land, with the agreement of the Chief or Traditional Authority. A body representing the people who traditionally use the community forest is appointed as the forest management authority. |
| EIA | Environmental Impact Assessment |
| EMA | European Medicines Agency |
| EMP | Environmental Management Plan |
| GACP+ | Good Agricultural and Collection Practices (Plus) |
| GGAP | Global Good Agricultural Practices |
| GIZ | Gesellschaft für Internationale Zusammenarbeit |
| HACCP | Hazard Analysis Critical Control Point |
| Herbal preparations | are obtained by subjecting herbal substances to treatments such as extraction, distillation, expression, fractionation, purification, concentration or fermentation. These include comminuted or powdered herbal substances, tinctures, extracts, essential oils, expressed juices and processed exudates. |
| Herbal substances | are mainly whole, fragmented or cut, plants, parts of plants, algae, fungi, lichen in an unprocessed state, usually in dried form but sometimes fresh. Certain exudates that have not been subjected to a specific treatment are also considered to be herbal substances. Herbal substances are precisely defined by the plant part used and the botanical name according to the binominal system (genus, species, variety and author). |
| ILO | International Labour Organisation |
| ISO | International Standards Organisation |
| MAT | Mutually Agreed Terms |
| MEFT | Ministry of Environment, Forestry and Tourism |
| MoA/ MoU | Memorandum of Agreement/ Memorandum of Understanding |
| MTA | Material Transfer Agreement |
| Organisation | An organised group of people with a particular purpose, such as a business. For the purposes of this document, it can be a company (MSME, NGO, etc), community based organisation, business support organisation, or similar who will be responsible for the self-assessmnt and proof of conformity to the GACP+ standard as contemplated. |
| PIC | Prior Informed Consent |
| SHDC | Sustainably Harvested Devils Claw model |
| SOP | Standard Operating Procedure |
| TA | Traditional Authority |
|  |  |
| UEBT | Union for Ethical BioTrade |
| UNCTAD | United Nations Conference on Trade and Development |
| WHO | World Health Organisation |
|  |  |
|  |  |
|  |  |
|  |  |

# **Self-Assessment and Proof of Conformation**

To confirm conformity with the requirements of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (importer) requirements to comply with the Namibian GACP+ Standard, European Medicines Agency and the WHO’s Guideline on GACP for Starting Materials of Herbal Origin.

**PROOF**

For the application of Good Agricultural and Collection Practices in Namibia (GACP+) in the wild collection (harvesting), production/ processing and trade of Devil’s Claw produce

It is hereby confirmed that all Devil’s Claw produceis collected, processes, stored,transported and traded in accordance with the guidelines on Good Agricultural and Collection Practice for starting materials of herbal origin (GACP+).

The GACP+ includes the following system sections:

* Compliance with national and international agreements and legislation
* Respect for Human Rights; Organisation, People, Education and Training
* Technical Measures
* Non-Compliance and Corrective Actions

Reference is made to the Devil’s Claw Policy, EMA GACP and WHO GACP Guidelines, the UEBT Standard, UNCTAD BioTrade Principles and EN ISO 22716:2008-12

Date Date

Signature Signature

(for production) (for quality assurance)

Address: