

# THE ORGANIC STANDARD

www.organicstandard.com

Issue 138/October 2012

Grolink

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## Traditional varieties and farmers' rights

In the EU only officially registered seed varieties can be marketed. Consequently, farmers growing traditional varieties can keep their own seeds for sowing again, but cannot sell any saved seed. As seed companies are not interested in registering most of the traditional varieties, as registration is a lengthy and costly process, it is likely that many of the old varieties are being lost – a great loss of biodiversity in cultivated plants. In fact, the IFOAM EU Group has declared 'The FAO estimates that 75% of domestic plant varieties globally have been lost in the last hundred years'.

For many years, organic and/or local farmer associations, and organisations that support them, have fought to change the law. This year their hopes were raised. The seed company, Graines Baumaux SAS, went to the EU Court of Justice in a case against the association Kokopelli. During this case the general advocate of the European Court of Justice stated that 'the prohibition to commercialise non registered traditional seed was exaggerated and the procedures to register traditional seed varieties are too strict'.

However, the final judgement dashed seed savers' hopes. Published this summer it declared that the EU's seed marketing laws are valid and appropriate – which means that things

will remain the same.

Nevertheless, the EU is currently revising its seed marketing legislation. The IFOAM EU Group believes that the result of this revision should finally facilitate market access for traditional varieties and farm bred varieties. They also claim that the EU needs to set a framework for the marketing of open-pollinating varieties, which are varieties organic farmers are especially interested in using as they produce plants that respond better to the changing environmental conditions and at the same time are better adapted to specific local conditions. ■

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### Sources:

IFOAM EU Group press release [www.ifoam-eu.org/press](http://www.ifoam-eu.org/press)

Red de Semillas "Resembrando e Intercambiando" press release [www.redsemillas.info](http://www.redsemillas.info)

Summary of the judgment in Case C-59/11, Association Kokopelli v Graines Baumaux SA: <http://curia.europa.eu/jcms/upload/docs/application/pdf/2012-07/cp120097en.pdf>

Full text: <http://curia.europa.eu/juris/document/document.jsf?text=&docid=125002&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1&cid=18938>

The recommendation by the general advocate had pointed out before that the current seed marketing legislation contradicts certain European policy objectives: <http://curia.europa.eu/juris/document/document.jsf?docid=118143&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&cid=354849>

Farmers growing traditional varieties can keep their own seeds for sowing again, but cannot sell any saved seed. ■

# Interpretations and transparency

When revising a standard one of the biggest pleasures for the standards officer and/or writer is to sort out all the areas of unclarity that have been found in the standard since the last revision. This takes place along with the introduction of new issues and, often, rewriting some parts of the standard. The vision and dream is that the next version of the standard will be clear and have all the problems sorted out. So then comes the publishing of the new standard and in just a few months or less that crystal clear image is covered with scratches and wounds. New eyes and brains find situations where the standard is unclear or where the language is unclear or ambiguous. This happens; it is just inevitable even if the revision process has followed all rules of the ISEAL code for good standard setting and used all the best input.

Even when standard setters have done their best to make a new or revised standard clear and unambiguous it is likely that there will be some parts that are open to interpretation. To deal with this there should be a procedure in place that can correct the situation. Firstly the intended meaning of the text must be determined and how operators should use the standard in similar situations in the future must be made clear. These interpretations and final decisions must then be communicated to all other operators, inspectors, and CBs using the same standard.

In a wider sense all actors will make their own interpretation of a standard themselves. For example,

the EU Organic Regulation is read and interpreted by many individuals: operators reading the standard text, advisers guiding the operator, inspectors, certification bodies or certification authorities, competent authorities, and standard setters. In this particular example there are even the lawyers interpreting the regulatory system. Many of these interpretations are not formalised while others are, however in general few of the formalised ones are published.

Sometimes the interpretation differs for the same standard, depending on where the standard is implemented. For example, the implementation of buffer zones between organic and conventional farming often seems to be stricter in villages in East Africa than in intensive vegetable farming areas in the EU. Another example concerns organic egg production in Germany; some producers move their production unit to a different Bundesländer (state) which has a regional authority that interprets the EU Regulation in a manner that suits their needs better than others. A third example of differing interpretations is on the issue of gender separated semen. The EU Commission has deemed that gender separation of semen is not in line with the intention of the EU Regulation for organic production (see page 4).

In the EU and possibly other parts of the world where organic farming is regulated by detailed legislations

there are few official, legally binding, interpretations. A legal act is required to establish an official interpretation, and all legal actions are slow and difficult procedures. In addition, when the EU Regulation came into force it was quickly learnt that asking for too much clarification and interpretation might result in an unwanted reply.

There might also be a problem with having many very detailed interpretations as these function as a straight-jacket, hindering a needed development of organic agriculture. On the other hand standards without any interpretations create a system that is unclear and possibly unfair, as producers certified to the same standard under the same or similar conditions can be treated differently. An investigation into the ISO system reveals documents like 'Guidelines for interpretation of ISO 9000 series for application within the iron ore industry' and the IAF guidance of ISO 65, which makes it clear that the ISO has seen the need for interpretations.

What is the solution to achieving more dynamism around the interpretations in the organic legislative system? A first step could be to have a better transparency in how standards are used and interpreted. The next step could then be to formulate a better procedure in handling interpretations. To some, such steps could be seen as a dangerous road to take, one that would reveal certification body and operator secrets, and put civil servants' decisions at stake. But the organic world would be much healthier, with an openness and a more even playing field for the operators. ■

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Interpretations differ for the same standard, depending on where the standard is implemented. ■

# Views on what lies ahead for organics - part 2

*Four leaders in the North American organic movement answer questions on the accomplishments and challenges faced by their sector.*

Last month TOS interviewed four leaders from the North American organic community. Questions ranged from accomplishments and challenges in the organic sector, to possible future directions of organic certification and standards. Their thoughts on the future were published in the last issue of TOS (issue no. 137). Part 2 covers the accomplishments and challenges.

\* \* \* \* \*

*What progress or accomplishments in the past five years do you consider most important with respect to organic policy?*

**Matthew Holmes:**

Domestically, establishment of the Canadian Organic Regime and publication of national standards and regulatory structures was a major milestone. It came into effect in 2009, with full implementation in 2011.

In a wider context, breaking the logjam with equivalency was a moment of real pride and accomplishment. I put a lot of effort into describing how a full system equivalency could work, between the US and Canada – which has become somewhat of an international model for harmonisation that respects national standards and differences. This was officially implemented in June 2009, and the Canada-EU equivalency

agreement was implemented in July 2011.

**Miles McEvoy:**

I've been at USDA for three years, and in that timeframe a number of significant things have been accomplished – foremost of which is increased transparency and getting more information out to the community. The Organic Insider (a news bulletin about the NOP) goes to over 14,000 people. We have also made improvements to the NOP website to streamline information according to user needs. Information that previously was hard to access is now more available.

We have reinforced our systems to protect organic integrity, mostly through better oversight of certifiers and additional international audits. We have been able to devote more effort to enforcement and compliance, including developing a programme handbook that gives more guidance and instructions to certifiers. We have homed in on audits to make them more targeted and refined, bringing more consistency to the certification process.

Equivalency arrangements and harmonisation with Canada and the EU have been significant – these have changed the discussion on how we move forward with trade.

**VOF:**

The NOP pasture rule has started to put some definition to some of the livestock standards that were never fleshed out.

Consistency among certification bodies and the interpretation of standards has improved markedly – though there's always room for improvement. Miles McEvoy's knowledge of how the industry really works has helped

## *The interviewees*

**Miles McEvoy:** Deputy Administrator of USDA Agricultural Marketing Service, in charge of the National Organic Program (NOP), since 2009.

**Matthew Holmes:** Executive Director of the Canadian Organic Trade Association (COTA). He is also an IFOAM World Board member and ambassador to GOMA, as well as a representative to the Codex Committee on Food Labelling.

**Vermont Organic Farmers (VOF)**

Two leaders of VOF were interviewed together. VOF is the USDA accredited certifying agency that is affiliated with the Northeast Organic Farming Association of Vermont (NOFA-Vermont):

- **Enid Wonnacott:** Executive Director of NOFA-Vermont.
- **Nicole Dehne:** Administrator for VOF.

*For more details about the interviewees see page 10 in TOS 137.*

## ■ news shorts...

### GENDER SEPARATION OF SEMEN

A question from one of the EU Member States on whether gender separated semen is allowed for use in organic livestock farming in the EU was told by the EU Commission that the techniques to gender separate semen cannot be used in organic farming.

The reason given to not allow the technique given by the Commission is that it could decrease the biological diversity, the increase of the gene pool of organic animals is not encouraged and organic production should respect nature's system and cycles. The technique is used for organic cows today in some of the EU Member States.

Some Member States have also protested against the decision. A decision by the EU Commission civil servant is not a legally binding decision and can be brought to the EU Court of Justice for a definitive interpretation. ■

him identify areas that need clarification.

There seems to be more respect for the NOSB – they're working with the NOP better. Communication from the NOP is more professional and standardised, and there is more transparency about interpretations of the rules that are provided to all certification bodies, rather than answering questions individually.

Equivalency hasn't had a big impact on our producers – they mostly sell within the state or regionally.

\* \* \* \* \*

*What do you see as the most pressing issues or challenges facing the organic community now?*

#### Matthew Holmes:

The issue of supply is one of the major challenges we face in the organic sector – it's been looming on the horizon for a long time. Globally there's been a drop in organic production, however, the market continues to expand and consumer demand is there. The natural certification time-lag in conversion to organic is a bottleneck. This is compounded by the model in which farmers will chase a high price for a couple of years. We've seen Canadian farmers jump out of organic due to high commodity prices – and we don't know when or if they will come back.

There are two competing models out there now – the old compliance model and the new equivalence model. They have difficulty working together and have gaps or consequences, which can create problems

for certification bodies. When there were private certification bodies they had to deal with government oversight, then equivalency came along with another layer of complexity.

Sometimes it's merely a matter of education and better understanding. For instance, Canadian wheat is sold to Italy to make pasta, which is then sold to the US market. Under equivalence, Canada no longer has NOP wheat – just NOP equivalent wheat. Italians may not understand that this is acceptable. So we need strong communication within the sector globally.

Another example – a market that lacks its own certification may prefer to see either the EU or USDA organic logo. However, a supplier may not have that certification, but one equivalent – and this may not be recognised by the third country. So, for example, Myanmar may decide to accept USDA organic products, but not understand that this includes Canadian products as Canadian producers are equivalent. This is also a communications issue.

Alternatively, they may realise that the US has an equivalency agreement with the EU, but not know that this doesn't include Switzerland, which requires only EU certification. It is unclear whether the Swiss will accept US products without a separate agreement.

We are also seeing major emerging markets, such as China and Brazil, establishing strict compliance systems. Is this a situation of creating trade barriers? The organic sector excels at writing standards and erecting technical barriers to trade – whether

There are two competing models out there now – the old compliance model and the new equivalence model. ■



intentional or unintentional. This can be manipulated if there's a perceived risk to domestic producers. IFOAM's research indicates that domestic organic markets are best developed by imports, and then later substituting domestic supply.

As IFOAM graduates from Basic Standards to a world map of equivalent standards, through the Common Objectives and Requirements of Organic Standards (COROS) tool developed through GOMA, it has begun to shift to creating an assessment tool or set of principles and practices with which to evaluate standards worldwide and compare them as to equivalency. This is being turned into a map that is on the website – IFOAM is now republishing its 2012 standard that can be used for certification right away. All this is moving away from the splintering of standards and shifting towards reaffirming commonality and equivalence among the various systems.

### **Miles McEvoy:**

Maintaining organic integrity remains our primary focus. It sets the foundation for the industry's viability and trajectory into the global market. We are working to ensure that organic integrity is protected from fraud. While fraud represents only a small segment of the trade, we have to rigorously monitor for it and have significant penalties when it is found. I believe that more rigorous enforcement has been effective in decreasing fraudulent activity within the organic trade.

In light of our shared goals, a pressing challenge, especially in the US, is divisiveness in the organic community. We need better ways to embrace diversity of opinions and ideologies. We also need to build bridges and increase collaboration with the

local and regional food movement. That includes making the certification process as accessible, affordable, and attainable as possible to small growers – that's our real challenge.

### **VOF:**

There are several standards issues that are of concern to Vermont producers. Origin of livestock is a big question – we know that the NOP is working on it now. There are still differences among certification bodies with respect to how animals are transitioned to organic.

The impending prohibition of Chilean nitrate is another problem. We submitted information on how it would impact our growers – they (NOP) are recognising that it may have more impact on growers than anticipated. They may decide to phase it out more slowly – with climate change it is something growers still need in their toolbox.

Degradable plastic mulches – some vegetable growers have decided not to get certified due to an inability to use them. We just found out that a petition has been developed for NOSB to consider this issue.

On a more philosophical level, there is a tension between what farmers need to do to make a living and the ideal of what organic farming should be. Chilean nitrate is a perfect example – sometimes a top-dressing of soluble nitrogen is needed, but the material may not be totally sustainable. The NOSB sometimes seems to lean to one side and sometimes to the other. The purist tries to keep the allowed synthetic list very small. We are trying to balance these models too,

and are often really concerned that our farmers are able to make a living and have the tools they need.

The most pressing issue facing the organic community in Vermont is the strength of the local label – organic is losing ground. The strong beginner farmer movement is more concerned with connecting with their customer than with having a label.

Loss of consumer confidence in the organic label is a concern with some of the disputes that are aired at NOSB meetings – it is nice to have open meetings, but it is hard for people to understand the details of each substance under review. The media often portray the discussions as standards being watered down or compromised. In a way it goes back to Mark Retzliff the then CEO of Horizon Dairy, lobbying for antibiotic free because consumers wanted purity – producers weren't there at the time. This is the point at which the consumer voice became the major influence – consumer perception as opposed to what's really feasible on a farm scale.

The risk of losing the certification cost share programme in the next Farm Bill is another major concern (see TOS issues nos. 133 (May) and 137 (September 2012), in which US Farm Bill was discussed). ■

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### **For further information see:**

*COTA ([www.ota.com/otacanada.html](http://www.ota.com/otacanada.html))*

*NOP ([www.ams.usda.gov/AMSv1.0/](http://www.ams.usda.gov/AMSv1.0/))*

*NOPNationalOrganicProgramHome)*

*USDA ([www.ams.usda.gov/organicinfo](http://www.ams.usda.gov/organicinfo))*

*VOF (<http://nofavt.org/programs/organic-certification>)*

There is a tension between what farmers need to do to make a living and the ideal of what organic farming should be. ■

## ■ news shorts...

### **AQUATIC PLANTS – YES; AQUATIC ANIMALS – NO!**

It is well known that the USDA organic regulations do not include standards for aquatic animals.

This means aquacultural products, like fish, molluscs, etc., cannot be NOP certified. However, in a policy memorandum dated September 2012, the NOP has reminded operators that this exclusion does not concern aquatic plants and their products.

Operators and their certification bodies can follow the NOP standards, including the National List of Allowed and Prohibited Substances, as the basis for the production and certification of both cultivated and wild aquatic plants. The memorandum also reminds that certain parts of the NOP specifically address aquatic plant production, for example some aquatic plants, such as kelps and seaweeds, are listed in 205.606 of the NOP, allowing their use in the non-organic form when they are not available as organic. ■

*Source: Policy Memorandum  
from Miles McEvoy, NOP Deputy  
Administrator, 12 September 2012*

## The ‘Swissness’ of Swiss foods

*Though ‘Swissness’ appears to be an English term it is not in the vocabulary of native English speakers. Instead it is a term invented and used by the Swiss, but what does it mean?*

**T**he concept of ‘Swissness’ and the related issue of Swiss identity, and how they affect organic production and consumption and its legislation, have been covered by TOS in several articles recently, (in particular in issues nos. 116 (December 2010) and 126 (October 2011)). It is a subject prevalent in the consciousness of Swiss society, and currently the Swiss legislators are undertaking the difficult and time consuming task of defining the ‘Swissness’ food criteria. With the aim of opening markets and export opportunities for Swiss quality products this debate is of great importance to the Swiss food industry. For the organic sector – especially Bio Suisse – the topic raises the question How relevant is ‘Bio Swissness’?

### **Opening markets and Swiss identity**

In the last few years severe import restrictions have been a significant aspect of Switzerland’s legislative framework for food and agriculture, covering all types of food, including organic products.

In response to this legislators from Switzerland and the EU are in the process of opening up import opportunities. There is already a free trade for cheese, but not for the milk market, and for cereals. The open market for cereals has proved to be a challenge for Bio Suisse, as the majority of organic cereal in Switzerland has to be imported – and sold at a lower price – due to lack of production within the country.

The Swissness debate on the

federal political level has been going on for a long time now. The Swiss legislation process requires an agreement between the two chambers, the Nationalrat (the council representing Swiss citizens) and the ‘Ständerat’ (representing the cantons) for a bill to be made law.

In practice, label organisations such as Bio Suisse have gradually been taking on a market protection role that the state does not cover any more. Besides important lobbying is conducted by farmers’ organisations from the general food sector, such as the FIAL (Fédération des Industries Alimentaires Suisse), there are also consumers’ organisations that strongly influence the decision-making process. According to Bio Suisse, the word ‘Switzerland’ on food labels means that at least 80% of the raw ingredients is of Swiss origin. The intention of this regulation was to increase Swiss organic cereal production. Based on this support, it would be reasonable for Bio Suisse to ask for a ‘100% Swissness’ label for milk products. Another label organisation, IP Suisse, which manages labelling for ‘Integrated Production’, has marketed labelling for cereal products, that are, by definition, ‘100% Swiss’. The national organisation representing all Swiss farmers, the ‘Schweizer Bauernverband’, is supportive towards the positions of Bio Suisse and IP Suisse.

It is important to understand that the whole Swissness issue is espe-

cially important for labelling organisations such as Bio Suisse and IP Suisse, which together have about a third of all Swiss farmers as members (IP Suisse has about 2.5 times more members than Bio Suisse).

## **Bio Suisse label – and Swissness**

The Swiss organic farmers' organisation, Bio Suisse, is by far the main standard setter for Swiss organic agriculture. Its label 'the bud' is present on the majority of Swiss organic products, a fact that has been aided by cooperation with the big retailer chain Coop. The origins of Swiss organic products has always been an important issue to the Swiss, especially among the pioneer farmers and consumers. Imported organic products were viewed with suspicion long before the present climate debate.

Until recently, the Bio Suisse criteria for imported products were very strict, partially based on guideline equality but also based on the market situation. For example, apples and other domestic fruits and vegetables could only be imported if they were not available domestically. Until 1990 imported organic products authorised by Bio Suisse had to be labelled with the word 'import'. Later the concept was changed into a more positive ap-

proach, i.e. informing consumers that products with the bud label contained 90% or more ingredients of Swiss origin. As a result of the ongoing Swissness debate the bud is now also being decorated with a little Swiss flag.

## **Cocoa beans on the Swiss alps?**

What makes the Swissness debate so difficult is a simple fact: The different lobbying organisations are not talking about the same thing. The consumer organisations want one simple solution. The farmers' organisations are mainly concerned with fresh, unprocessed products and the milk industry. The food industry organisation, FIAL, mainly represents the Swiss chocolate and biscuit industry, therefore a product range with a traditional Swiss identity but also traditionally with many ingredients. Cocoa beans do not grow on the Swiss Alps and even climate warming will not help to change that! The Swissness regulation drafts tried to deal with this situation by differentiating between heavily and lightly processed products, with the first category having to contain only 60% Swiss raw materials and 60% of the cost of manufacturing having to occur in Switzerland. FIAL and other food processors are asking for a practical solution that would include

the following basic elements:

- Different regulations for highly processed food products (e.g. chocolate, cookies) and food products that have had little or no processing (e.g. fruit, vegetable, milk, cheese, milk products with few ingredients).
- Regulations that only cover products with ingredients with more than 50% of production by Swiss agriculture.
- No regulations forcing Switzerland's food industry to leave the country and putting employments at risk.
- Simple and understandable regulations supporting the common interests of the whole Swiss food production chain.

The 'Herbstsession 2012', the autumn meeting of the Swiss parliament is expected to move closer towards a final legislation.

## **Language considerations**

The Swiss federation recognises four official languages (German, French, Italian and Rumantsch). Even more minor languages play an important role in the daily life of the country's population. The invention of a 'Swinglish' (Swiss/English) term is often a consequence of this mix of languages, irrespective of whether the word is used by native English speakers. 'Swiss' sounds almost like 'Suisse', the French term for 'Switzerland'. Many official organisations use the English term to avoid the difficult task of translation. It is only a logical consequence that a 'Swinglish' term is used to describe the core of Swiss identity: 'Swissness'. ■

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## **For more information see:**

[www.bio-suisse.ch/de/swissness.php](http://www.bio-suisse.ch/de/swissness.php)  
[www.bio-suisse.ch/de/daslabel.php](http://www.bio-suisse.ch/de/daslabel.php)  
[www.fial.ch/files/messages/de/medienmitteilung\\_swissness\\_mehr\\_als\\_rohstoff\\_d.pdf](http://www.fial.ch/files/messages/de/medienmitteilung_swissness_mehr_als_rohstoff_d.pdf)

## **Author's comment**

### *Swissness debate endangering Swissness*

The aim of the Swissness regulation is to improve the position of Switzerland's food industry as the markets open up, a step that is considered especially important for the organic sector. To achieve this goal a practical solution, accepted by all the lobbying organisations along the whole food production chain, must be found as part of a common quality strategy for Swiss Food. However, if the debate takes much longer it could turn into a negative dynamism, possibly causing a general insecurity among consumers with the legal system. In the end this would weaken the Swissness identity, however it is defined.

## GOTS use partnerships to spread certification

**R**ecently a partnership between the Australian Certified Organic (ACO) and Soil Association Certification was established to certify according to the Global Organic Textile Standards (GOTS) in Australia and parts of Asia Pacific. Under the agreement, ACO undertakes the inspections and provides customer service to GOTS and the Soil Association certifies the operators (inspections can be subcontracted but certification cannot).

Both parties have expressed their satisfaction with this partnership and pointed out that they have a lot in common; both are essentially not-for-profit organisations, and they base their work on organic principles to develop organic standards and support the organic market.

To learn more about this partnership and in general how GOTS certification can be spread through other partnership agreements between GOTS accredited certification bodies (CBs) and other CBs, TOS contacted Marcus Bruegel, GOTS Technical Director to ask a few questions

\* \* \* \* \*

**TOS:** *Is the process of subcontracting the inspections an acceptable arrangement for GOTS certification? Is it something that GOTS encourages?*

**MB:** Yes, various GOTS approved certification bodies use local certifier partners for GOTS and in some cases also as inspection bodies (it is a precondition that the accreditation requirements on subcontracting are met).

The GOTS website<sup>1</sup> provides information on local contact offices, as well as the countries in which there are GOTS certified facilities.

It is in GOTS' interest that GOTS certification can be offered throughout the world, and it is certainly an advantage if applicants and certified operators have a local office with their CB. However, most important is that the quality assurance system is implemented on a highly professional level. In this context CBs must assure not to subcontract services if any of the requirements (as defined below) are not met.

**TOS:** *Can any CB approved by GOTS establish partnerships to outsource inspections and increase their territorial scope, or can only the founders of GOTS, such as the SA, that can do it?*

**MB:** Equal terms apply to all GOTS approved CBs. In principle, with regard to the Soil Association we clearly differentiate between the charity which is one of the founders of GOTS and Soil Association Certification, which is one of the current 15 CBs approved by GOTS.

**TOS:** *How are the partnerships agreement controlled? For example, how are aspects like inspector approval and training managed, and who is responsible for ensuring inspectors and operators are aware of GOTS'*

*requirements? Does GOTS participate in the overview of the performance of the partnership, or is it reviewed by the CB's accreditation body?*

**MB:** It is the task of the accreditation body to ensure that the corresponding requirements of the GOTS accreditation document, the 'approval procedure and requirements for certification bodies', are met. These are:

'5.1.2.6. Subcontracting (outsourcing)

When a Certification Body decides to subcontract work (outsourcing) related to certification (e.g. inspection) to an external body or person, an agreement covering the arrangements, including confidentiality and conflict of interest, shall be drawn up. The certification body shall

- a. Take responsibility for such subcontracted work;
- b. Keep final responsibility for the granting, maintaining, renewing, extending, suspending or withdrawing of certification. Delegation of certification decisions is not permitted;
- c. Ensure that the subcontracted body or person is:
  - Competent to perform the subcontracted work,
  - Not involved, either directly or through the body/person's employer, with the operation, process or product that is subject to certification in any way that may compromise impartiality and
  - Committed to the policies and procedures as defined by the Certification Body;
- d. Monitor the performance of the persons or bodies subcontracted for the work.'

It is in GOTS' interest that GOTS certification can be offered throughout the world.



## ■ news shorts...

### ‘HAVE YOU COTTONED ON YET?’

The Soil Association and Global Organic Textile Standard (GOTS) have just launched a global campaign to encourage the use of organic cotton. And the name of the campaign? ‘Have you cottoned on yet?’ The campaign was presented earlier this month at the Sustainable Textiles Conference in Hong Kong by Lord Peter Melchett, Policy Director of the Soil Association. The campaign asks brands as well as consumers and NGOs to ‘cotton on’ to organic cotton production and processing, by signing up on the new micro-site [www.cottonedon.org](http://www.cottonedon.org), uniting supporters of sustainable cotton across the globe.

At the presentation it was stated that the worldwide demand for organic cotton is set to grow by at least 10% in 2011-2012; but at the same time up to 80% of world cotton production currently comes from GM crops (with 95% of the seed in India controlled by one company: Monsanto). In addition, more than US \$3 billion worth of pesticides were used in conventional cotton cultivation in 2010. ■

Source: [www.global-standard.org/images/stories/pressreleasehaveyoucottonedonyet\\_gots.pdf](http://www.global-standard.org/images/stories/pressreleasehaveyoucottonedonyet_gots.pdf)

*TOS: How developed is the certified organic textile industry in Australia and New Zealand? Are there certain areas of the world where there is interest in GOTS certification within the textile industry but no local GOTS certification services available?*

MB: In principle local CB contacts for GOTS certification are available in all continents and almost all regions already. Regarding Australia and New Zealand, to date only one operation is certified to GOTS in Australia and none in New Zealand. However, the opportunity is there, as well as ACO partnering with Soil Association Certification, Control Union Certifications runs an office in Australia.

We consider Australia and New Zealand to be important, not only for the production of organic wool but also as an interesting sales market for organic textiles. Consequently, at the beginning of 2012 we assigned a GOTS representative, Stewart McDiarmid<sup>2</sup>.

However, in most sales markets the main challenge is the lack of legislation to protect organic claims in textiles, and that they are not backed up by a gapless certification in the supply chain. This means many trad-

ers, brands and retailers can make related claims on the basis of self-declarations. It needs time to raise the awareness in the industry and with consumers that this is a valid issue for the credibility in the sector, but we’re positive that in the long run certification will become obligatory for organic claims in the textile sector as it is well established and implemented in the food sector. In the USA, NOP took an important step in this direction with the release of the policy in 2011 clarifying that ‘organic’ or ‘made with organic’ claims must be based on NOP or GOTS certification. With the new agreement between the USA and the EU to recognise each other’s standards and certification, we are more positive that the EU may consider such a policy as well. ■

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<sup>1</sup> Go to [www.global-standard.org/certification/approved-certification-bodies.html](http://www.global-standard.org/certification/approved-certification-bodies.html) and then following the link ‘countries & local contacts’.

<sup>2</sup> For a list of GOTS representatives see [www.global-standard.org/about-us/regional-representatives.html](http://www.global-standard.org/about-us/regional-representatives.html)

#### Sources:

Interview with Marcus Brueguel, GOTS Technical Director  
Organic Advantage, Biological Farmers of Australia (BFA) Newsletter, 23 August 2012

### *NOP labelling instructions include textiles*

In the US, last month in September NOP updated its fact sheet on how to label NOP certified products. The new labelling guide also talks about textiles, explaining that if a final textile product fulfils NOP requirements, the entire product may be labelled organic and include the USDA organic seal. It is also possible to claim that specific fibres are certified organic (according to NOP) and to indicate the total percentage of organic fibres in the final product. In addition, textiles that meet the Global Organic Textile Standard (GOTS) may be sold as organic in the USA. ■

The fact sheet can be found at: <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELDEV3004446&acct=nopgeninfo>

## ■ news shorts...

### ONE PLACE FOR ALL NECESSARY INFORMATION

Working in a specific field, such as organic production, it is not enough to know just one set of standards or regulations. Now one needs to be familiar with aspects of other standards, regulations and legislation that concerns organic production. But how can an operator know all the sources of information for certification bodies and certification processes, related research and advisory services, as well as important subjects such as funds, prices and markets. This can be especially difficult for people starting in the organic business.

By 2015, the USDA hopes to have 20,000 certified organic operators in the US. One of the measures it has taken to encourage this growth and make their goal possible has been the launch of the 'USDA Organic Resources Guide 2012\_Your Guide to Organic and Organic-Related USDA Programs'. This document compiles the information and requirements that relate to organic production. The document includes a description of each USDA agency that manages organic-related programmes and services, and lists the people in the NOP and other agencies involved with the organic sector, giving their email addresses and telephone numbers. Very useful! ■

*The Guide can be found at: [www.ams.usda.gov/organicinfo](http://www.ams.usda.gov/organicinfo)*

## Bad news for GMOs in the US grows

The last few months have brought a spate of bad news for purveyors of genetically modified seeds and crops in the US. The most recent research report from France indicating a high incidence of cancer in rats fed Monsanto's glyphosate tolerant corn (see page 12) only adds to their increasing concerns about super weeds and resistant pests. A recent study also reports that, contrary to claims made by the biotech companies, pesticide and herbicide use has actually increased since the advent of GMO crops. Added to this is a recent report comparing the drought resistance of genetically modified and organically produced corn and soybeans, in which the GMO plots showed clear signs of damage, while the nearby organic ones remained healthy and green<sup>1</sup>. It's enough to give a biotech giant indigestion.

Looming on the horizon now is Proposition 37, a referendum in the state of California on 6 November (US election day) that asks whether genetically engineered food products should be labelled. Despite millions spent by agribusiness to defeat the measure, by all accounts the 'yes' vote has the support of a healthy majority of voters (although this may change after a television advertising barrage funded by Monsanto and Dow). A similar referendum is now being promoted for a spring ballot in the state of Washington. In the past, over a dozen other states, such as in Vermont (see article in TOS 133, May 2012) have attempted, unsuccessfully, to enact similar legislation.

On the federal level, a petition drive that collected over a million signatures was presented to the US Food and Drug Administration (FDA) demanding that it require the labelling of GMO products, as is done in nearly 50 other countries, including all of the US trading partners.

California's referendum would require that by 2014 most raw foods, such as fruit and vegetables and processed foods, must bear the label 'partially produced with genetic engineering' or 'may be partially produced with genetic engineering'. Products from animals fed GMO feed are exempt. The legislation also would ban the use of the word 'natural' on products that contain GMOs. Organic foods, restaurant meals and alcohol are excluded. Supermarkets and other retailers would be responsible for ensuring products on sale are properly labelled. The initiative also allows individuals or groups to sue if they find food that has been mislabelled, prompting charges that the measure invites frivolous lawsuits<sup>2</sup>. Other charges made by the well-funded opposition include the likelihood of a drastic increase in grocery bills and the fear that such labels would be interpreted as a warning and confuse consumers.

The NGO community that is promoting the referendum has been mounting an effective media campaign to counter the opposition's messages. The opposing media blitz is being funded by the 'usual suspects', not only by companies like DuPont, Monsanto, and the Grocery Manufacturers Association, but also by firms

## news shorts...

### NOP CONTROL PERFORMANCE IN NUMBERS

The NOP has published the results of their controls to ensure the correct enforcement of the USDA organic regulations. From January to September this year, the NOP has issued seven penalties to willful violators totaling over USD\$80,000. The NOP also opened 177 complaint cases received from members of the public and closed 156 cases of suspected regulatory violations, taking enforcement action when the complaint was validated. The distribution of closed case types was:

Uncertified operations....	91
Labeling violations.....	39
Prohibited substances and methods .....	26
<b>Total .....</b>	<b>156</b>

#### For more information:

To see suspended/revoked organic operations: <http://bit.ly/suspended-revoked>

To see fraudulent organic certificates: <http://bit.ly/fraud-certs>

The NOP also provided a specific email address to write complaints on suspected violations to the regulations (NOPCompliance@ams.usda.gov).

#### Sources:

Organic Integrity Quarterly,  
September 2012

[www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5100589](http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5100589)

such as General Mills, Smuckers and Coca Cola – who all also own organic brands<sup>3</sup>. The US Natural Products Association, whose standards do not preclude the use of GMOs, also opposes the measure<sup>4</sup>. In an interesting disclaimer, the Academy of Nutrition and Dietetics has disavowed a statement made in the official voter information guide on Proposition 37 that says the organisation ‘has concluded that biotech foods are safe’. While they do not endorse the measure, they note that this position statement was made in 2006, that it has now expired, and that they are still reviewing the information<sup>5</sup>.

Unfortunately, some in the activist community have chosen this occasion to attack the organic industry for what they deem to be insufficient support for the referendum. Although both Whole Foods and the Organic Trade Association publicly support Proposition 37, neither has contributed financially towards helping it win. The same is true of Stonyfield Farm, primary funder of the ‘Just Label It’ campaign that spearheaded the above mentioned FDA petition effort. Recently a video titled ‘Organic Spies’ was released, showing some employees of Whole Foods giving incorrect information about the presence – or lack thereof – of GMO containing products in their stores<sup>6</sup>. The video, which implies that the company deliberately trains its associates to lie about this question, was subsequently removed from YouTube, which cited violation of its terms of service as the grounds for removal. Such divisiveness in the organic community, in the opinion of others, will only make the

task of Monsanto *et al.* easier.

What is the significance of this proposed legislation? As Michael Pollan, who wrote an article entitled ‘Vote for the Dinner Party: Why California’s Proposition 37 Should Matter to Anyone Who Cares About Food’<sup>7</sup> eloquently argues, this effort marks the emergence of the food movement as a force to be reckoned with on the political stage, and has the potential ‘to change the politics of food not just in California but nationally too’. Citing a litany of successful opposition to the corporate industrial food system, as well as a thriving alternative food movement, Pollan asserts that it is time for this movement to grow up and engage in ‘the hard politics of Washington,’ calling on advocates of food system change to vote with our votes, not just forks. ■

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<sup>1</sup> [www.i-sis.org.uk/US\\_drought\\_destroys\\_GM\\_Crops.php](http://www.i-sis.org.uk/US_drought_destroys_GM_Crops.php)

<sup>2</sup> <http://news.yahoo.com/calif-initiative-test-appetite-gmo-food-164707523.html>

<sup>3</sup> [www.nytimes.com/2012/09/14/business/california-referendum-pits-organic-brands-against-corporate-parents.html?pagewanted=all&\\_moc.semityn.www&r=0](http://www.nytimes.com/2012/09/14/business/california-referendum-pits-organic-brands-against-corporate-parents.html?pagewanted=all&_moc.semityn.www&r=0)

<sup>4</sup> [www.carighttoknow.org/](http://www.carighttoknow.org/)

<sup>5</sup> [www.foodnavigator-usa.com/Regulation/Prop-37-voter-guide-has-confused-voters-and-misrepresented-our-position-says-Academy-of-Nutrition-Dietetics/?utm\\_source=newsletter\\_daily&utm\\_medium=email&utm\\_campaign=NewsLetter%2BDaily&c=OAm1ACPZrVTTEWLk10iw0Q%3D%3D](http://www.foodnavigator-usa.com/Regulation/Prop-37-voter-guide-has-confused-voters-and-misrepresented-our-position-says-Academy-of-Nutrition-Dietetics/?utm_source=newsletter_daily&utm_medium=email&utm_campaign=NewsLetter%2BDaily&c=OAm1ACPZrVTTEWLk10iw0Q%3D%3D)

<sup>6</sup> [www.naturalnews.com/037523\\_Whole\\_Foods\\_GMO\\_secret\\_video.html](http://www.naturalnews.com/037523_Whole_Foods_GMO_secret_video.html)

<sup>7</sup> [www.nytimes.com/2012/10/14/magazine/why-californias-proposition-37-should-matter-to-anyone-who-cares-about-food.html?adxnnl=1&pagewanted=all&adxnnlx=1350000135-aMPZ3QKOfryjEUvP1mupw](http://www.nytimes.com/2012/10/14/magazine/why-californias-proposition-37-should-matter-to-anyone-who-cares-about-food.html?adxnnl=1&pagewanted=all&adxnnlx=1350000135-aMPZ3QKOfryjEUvP1mupw)

This effort marks the emergence of the food movement as a force to be reckoned with on the political stage.



# Opposition to GMOs grows worldwide

## *European responses to GMO feeding study*

Several EU countries are either implementing or considering bans on genetically modified corn following the recent release by French scientists of a study that linked the corn to high rates of cancer in rats. The study, led by Gilles-Eric Seralini at the University of Caen in Normandy, said rats fed with corn that had been engineered to resist Monsanto's Roundup herbicide, or exposed to the herbicide alone, developed tumours.

While the study was not conclusive, it represented the first long-term feeding study conducted by researchers not affiliated with the manufacturer of the genetically modified corn. According to Dr Seralini, 'For the first time ever, a GM organism and a herbicide have been evaluated for their long-term impact on health, and more thoroughly than by governments or the industry', adding that 'the results are alarming'.

In response, France's Ministers of Agriculture, Ecology, and Health and Social Affairs have asked the National Agency for Health to investigate, and 'take all necessary measures to protect human and animal health', which could include emergency suspension of imports of the corn that was used in the study.

Russian authorities went even farther, placing a temporary ban on imports of the genetically-modified corn. Reacting to the calls for a European ban, Commission spokesman on health and consumer issues,

Frédéric Vincent said the European Food Safety Authority (EFSA) would examine the new study in detail.

Of course, such a controversial issue does not leave anybody indifferent, and Seralini's study has generated both a lot of support and a lot of criticism and scepticism. In this regard, EFSA, the German Federal Office of Consumer Protection and Food Safety (BLV) and the Federal Institute for Risk Assessment (BfR) have declared that not all the conclusions made by Seralini in his study are justified. In addition, more than 700 scientists and academics have signed a petition asking the French researcher to release the background data collected in the study.

In the meantime, the *Journal of Food and Chemical Toxicology*, where the study was published, has said that Seralini's response to the criticism will be published in a future issue. ■

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For article on the French Report see:  
[www.foodnavigator.com/Science-Nutrition/Safe-levels-of-Monsanto-herbicide-and-GM-crop-linked-to-cancer](http://www.foodnavigator.com/Science-Nutrition/Safe-levels-of-Monsanto-herbicide-and-GM-crop-linked-to-cancer)  
[www.foodqualitynews.com/Legislation/Russia-bans-GM-maize-in-wake-of-controversial-Monsanto-cancer-study/?utm\\_source=newsletter\\_daily&utm\\_medium=email&utm\\_campaign=Newsletter%2BDaily&c=mQdOitVPmR2gKiRCsJedt5jT27OUPPvb](http://www.foodqualitynews.com/Legislation/Russia-bans-GM-maize-in-wake-of-controversial-Monsanto-cancer-study/?utm_source=newsletter_daily&utm_medium=email&utm_campaign=Newsletter%2BDaily&c=mQdOitVPmR2gKiRCsJedt5jT27OUPPvb)

## *Indian opposition to GMOs*

In India opposition to GM crops appears to be growing, not only from activist groups and farmers (who have organised protests on the tenth anniversary of the introduction of Bt cotton in the country this year), but also from regional governments and policymakers. One of the reasons for this concern is that thousands of farmers have committed suicide in the last few years due to indebtedness, mostly in cotton growing regions.

Recently two items have been published supporting this growing opposition. After two years of work a Parliamentary panel on agriculture has produced a 492-page analysis, 'Cultivation of Genetically Modified Food Crops - Prospects and Effects'. The report states that 93% of the cotton crop in India is now Bt cotton. However, Basudeb Acharia, a Member of Parliament who chaired the panel urges a retreat from genetically modified (GM) food crops and is seeking the mandatory labelling of all GM foods.

The other news, published by *The Times of India*, reports that the Government of Maharashtra recently banned the sale and distribution within the state of genetically modified Bt cotton seeds by the Maharashtra Hybrid Seeds Company (Mahyco). Mahyco is a partner of the multinational Monsanto. ■

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Source: Kai Kreuzer, [onco.biofach.de](http://onco.biofach.de),  
30 August 2012

The panel urges a retreat from GM food crops and is seeking the mandatory labelling of all GM foods. ■



# Rabbits, snails and more

## *Catalonia approves a new set of organic technical rules*

In Spain, the autonomous region of Catalonia has approved a new set of technical rules related to organic farming (Quadern de Normes Tècniques or QNT) that derogates the previous version from 2006. The QNT is an official guideline, compulsory for organic operators in Catalonia, which lays down the right way to apply certain European rules in Catalonia, especially in those areas of the Regulation that may appear as ambiguous or subject to possible different interpretations and requires additional rules to be correctly enforced.

The QNT also includes standards for the organic production of rabbits and snails, two animal species not covered by the detailed rules laid down by the EU Regulation 889/2008. It also specifies control measures for cases where organic products are sold to the final consumers in bulk or unpacked – as may happen when producers sell products from other producers in direct sales – and for retailers who sell unpacked products, and therefore it is considered unnecessary to continue controlling the traceability and integrity of the products any further. The provision of these specific control measures was driven by the recent significant development in the Catalan organic market, and includes the control of short marketing channels, such as box schemes.

Additionally, an interpretation guide is in preparation. This guide will be published in the Catalan Government's website and it will not be a legal, compulsory provision,

as the QNT is, but just a supportive document for the better understanding and application of the EU Regulation in Catalonia.

Historically Catalonia has had its own organic regulation since 1995. The first QNT was based on the standards that existed in Spain before the EU Regulation, when there was a Spanish common standard and a unique public control body for the whole country called CRAE. In those early days the EU Regulation 2092/91 coexisted with the first QNT, which was beyond the EU legislation in many aspects. In 2006 the QNT was modified to accommodate certain changes in the EU Regulation, but remained a standards book and quite different to the EU Regulation.

An example of the differences between the former QNTs and the EU Regulation were the several areas that the EU Regulation did not cover in as much detail as the QNTs. For example, the QNTs covered specific standards for different processing activities, such as bakery, preserves, dairy products and beverages. Another example of differences between the documents was the policy for GMO contamination, where the former QNT did not permit any trace of GMOs in organic food; excluding therefore, the 0.9% threshold permitted, since 2009, by the present EU legislation.

However, since the new EU Regulations 834/2007 and 889/2008 came into force in 2009, it became clear that the only rules to be applied were those established by the Euro-

pean legislation, which stipulates that Member States cannot have stricter organic rules than those provided by the EU legislation. The only exception to this stipulation is for those fields not covered by the Regulation, as is the case with rabbits and snails. This is applicable to the governments of the Member States only, not to private standards, which can still have requirements stricter than the EU Regulation.

Following this requirement by the EU, the new QNT was made much simpler and shorter than its predecessors, and it is now no longer a full standards book, but a compilation of points where it has been considered that a certain EU Regulation article needed clarification or an official interpretation from the competent authority. Consequently, it needs to be read in conjunction with the EU Regulation. Two examples on what the QNT covers are:

- Multiannual crop rotations must include legumes and other green manure crops every three years (in relation with Art. 12.1.b of Regulation 834/2007).
- The QNT defines 'factory farming'. This concept is mentioned in Annex I of EU Regulation 889/2008 but not specified.

The QNT has been developed by the regional Ministry of Agriculture and, prior to their approval, stakeholders were consulted, along with the public control authority of Catalonia (CCPAE). ■

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*The QNT can be found at the organic website of the Catalan Ministry of Agriculture [www.gencat.cat/alimentacio/eco](http://www.gencat.cat/alimentacio/eco) and more specifically in: [www.20.gencat.cat/docs/DAR/AL\\_Alimentacio/AL01\\_PAE/03\\_Normativa/Fitxers\\_estatics/120515\\_CNT.pdf](http://www.20.gencat.cat/docs/DAR/AL_Alimentacio/AL01_PAE/03_Normativa/Fitxers_estatics/120515_CNT.pdf)*

## news shorts...

### OMRI'S NEW SEAL

In October, the Organic Material Review Institute (OMRI) launched its new seal.

According to OMRI Executive Director/CEO, Peggy Miars, 'The seal stayed the same for over 15 years, while OMRI and the organic industry both matured. It became clear that we needed a new graphic to reflect what has really become a very different organisation'.



### BIO-SIEGEL ON 65 000 PRODUCTS

Ten years after the introduction the German organic logo, Bio-Siegel, it can be found on 65,000 different products coming from 4,080 companies. The voluntary Bio-Siegel, which is based on the EU Organic Regulation is recognised by 87% of the German population. ■

Source: [www.oekolandbau.de/nc/service/nachrichten/detailansicht/meldung/bio-siegel-65000ste-urkunde-ueberreicht/](http://www.oekolandbau.de/nc/service/nachrichten/detailansicht/meldung/bio-siegel-65000ste-urkunde-ueberreicht/)

## Canadian organic aquaculture standard

In May this year the Canadian organic aquaculture standard was published. The standard, technically called CAN/CGSB-32.312-2012, has been welcomed in a country where aquaculture is an important industry<sup>1</sup> but, until now, did not have a standard for organic production. While previously there were no officially recognised organic aquaculture producers in Canada, some organic aquaculture products certified to other standards were imported and could be found in Canadian markets. TOS interviewed Stephanie Wells, Senior Regulatory Affairs Advisor of COTA, to learn more about the standard and its current implementation.

The standard, sponsored by Fisheries and Oceans Canada, was developed by a committee established by the Canadian General Standards Board (CGSB), which included representatives from industry, regulatory bodies, consumer advocacy groups, First Nations<sup>2</sup> and environmental groups. Two of the organisations particularly involved in the process were the Canadian Aquaculture Industry Alliance (CAIA), a national industry association that represents the interests of the Canadian aquaculture sector, and the Canada Organic Trade Association (COTA).

The standard went through two public reviews and a long process of discussions and changes before the release of this definitive first version.

The CGSB committee has made provisions for a review of the standard within five years.

The lengthy approval process was important to the industry, environmental groups and the organic sector, who all claim the final version has much stricter rules than those proposed in the early drafts. Of the many changes, the more notable ensured that in the final version antibiotic use is prohibited, parasiticide use is tightly restricted, feed source requirements are prioritised, organic transition periods are longer, stocking density rates are set for individual species, and sediment build-up underneath the unit may not exceed the local environment's assimilation capacity.

The standard is not included in the scope of Canadian Organic Regime (COR). The standard will be used for certification by accredited certification bodies, but it is currently not referenced in government regulation. This situation is due to the fact that COR was developed under the jurisdiction of Agriculture and Agri-Food Canada and the Canadian Food Inspection Agency, but aquatic life falls under the jurisdiction of Canada's Department of Fisheries and Oceans (DFO). DFO sponsored the development of these organic standards for aquaculture. Basically, the organic aquaculture technical committee wanted the standard to be used and then reviewed and amended before being incorpo-

The standard will be used for certification by accredited certification bodies, but it is currently not referenced in government regulation. ■

## ■ news shorts...

### QUAVERA PROJECT TO IMPROVE INSPECTORS QUALIFICATION

A new project from the EU Programme, Leonardo Da Vinci, started in October 2012. The project, run by the six European members of the international CBs consortium, Quavera, will last until September 2014. Called 'Training on Improved Risk Management Tools for Organic Inspectors (IRM-ORGANIC)', the project will define and develop tools that organic inspectors need to efficiently perform their work, which is getting more complicated every day.

The first step of the project is to define, in detail, the necessary learning contents for organic inspectors with regard to risk-orientation and fraud prevention. A tailor-made professional development (CPD) train-the-trainer concept shall be developed as the learning concept.

IRM-ORGANIC will promote the exchange of the art-inspection methods and techniques in different European countries. It aims to optimise CBs' resources and knowledge through exchange and a coordinated qualification and training of their organic inspectors. The most recent project results will be used, and the flexibility required under the different geographical and socioeconomic conditions of the EU Member States will be taken into account. ■

For more information see:  
[www.irm-organic.eu](http://www.irm-organic.eu)  
[www.quavera.org](http://www.quavera.org)

rated into regulation. It remains to be seen which branch of government will eventually oversee the regulation of organic aquaculture standards.

In the meantime, organic aquaculture products may not carry the Canada Organic logo (the maple leaf) and there is no specific logo to indicate compliance with the new organic aquaculture standard. In addition, the standard has no legal implications for imports of organic aquaculture products. Organic aquaculture is not included in the scope of Canada's equivalence arrangements with the EU or the USA, and it is still possible to import organic aquaculture products certified to other standards and bearing other logos or organic indications.

Currently, some aquaculture operators are working with certifiers and have started the conversion period to comply with the standard. Certification bodies already offering the aquaculture scheme services include Global Trust, Ecocert Canada and Pro-Cert. Accredited certification bodies that want to apply to certify according to CAN/CGSB-32.312-2012 must demonstrate that they have suitable staff and skills to conduct this work. ■

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The Canadian organic aquaculture standard is available for sale on

[www.techstreet.com/cgi-bin/detail?doc\\_no=can\\_cgsb132\\_312\\_2012;product\\_id=1831710](http://www.techstreet.com/cgi-bin/detail?doc_no=can_cgsb132_312_2012;product_id=1831710). The cost is USD\$ 88.50.

#### Sources:

Interview with Stephanie Wells, Senior Regulatory Affairs Advisor of COTA  
 CAIA website: [www.aquaculture.ca/files/organic-standard.php](http://www.aquaculture.ca/files/organic-standard.php)  
 CGSB Website: [www.tpsgc-pwgsc.gc.ca/ongc-cgsb/publications/nouvelles-news/biologique-organic-eng.html](http://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/publications/nouvelles-news/biologique-organic-eng.html)

#### Footnotes:

<sup>1</sup> In Canada, aquaculture is a billion-dollar industry that is practised in every province and in the Yukon Territory, and employs 14,500 Canadians. Both freshwater and saltwater systems are in production. Aquatic plants are cultivated too. Canada's aquaculture industry now produces 70 species, including Abalone, American oyster, Arctic char, Atlantic cod, Atlantic halibut, Atlantic salmon, Atlantic sturgeon, bay scallop, blue mussel, brook/speckled trout, chinook salmon, cockle, coho salmon, eel, geoduck, goldfish, haddock, koi carp, lake trout, Manila clam, Pacific oyster, Pacific scallop, perch, quahog, rainbow trout, sablefish, sea bass, sea bream, sea scallop, short-nose sturgeon, soft-shell clam, steelhead, tilapia, urchins, white sturgeon and wolfish.

<sup>2</sup> First Nations is the term for the indigenous people of Canada. The association would be the Assembly of First Nations (AFN), formerly called the National Indian Brotherhood, a body of First Nations leaders that protects the rights, treaty obligations, ceremonies, and claims of citizens of the First Nations in Canada.

Even today, hunting and fishing is an important part of the culture and economic survival of many First Nations people and a number of them manage or are employed by aquacultural operations.

Information in footnotes provided by Stephanie Wells, COTA.

### Author's reflections

It will be very interesting to see what impact the standard will have on the market development of organic aquacultural products, both for domestic and imported products. If domestic organic production develops well, it may well cause a decrease in sales of organic aquaculture imports. It is also possible that the emergence of a domestic organic aquaculture sector at home could stimulate the market and increase sales of both local and imported products. Only the future will tell.



■ news shorts...

**IFOAM EU-GROUP REQUESTS REQUIREMENTS FOR ENVIRONMENTAL PERFORMANCE**

In a letter to the EU Commission the IFOAM EU-group proposed introducing requirements for environmental performance for organic processors and traders. The text, it is proposed, should be inserted in the EC Regulation 834/2007, and it should require companies processing and trading organic products to establish a basic environmental management system. All primary production and the smallest processing companies are, in the proposal from the IFOAM EU-group, excluded from being required to have this type of management system.

The proposal suggests the management system should contain methods for identifying and measuring direct environmental impacts from the operations, an annual target for the continuous improvement of the environmental performance and a documentation and reporting system. Six key areas are identified, these are energy efficiency, material efficiency, water, waste, biodiversity and emissions. ■

## A management fad elevated to divinity

### *A look at quality management*

*Every second shipment was delayed and the invoices were never correct. Those were the experiences I had as a client of one freight-company in Sweden in the late 1980s. What was special with this company? They were pioneers in the implementation of ISO 9000 certified quality management system.*

When I first implemented a quality management system some 23 years ago, it was new and fresh, and seemed like a good idea. I mean, who could possibly oppose a focus on quality, and approaching quality in a systematic way through a management system? The approach really suited my personality of an introvert system designer. Just write down how things should be done; do; check that it is working and revise if it isn't; then repeat the cycle. However, over the years I have grown more and more cynical about the use of such systems, and in particular how the belief in them is like a dogma that can't be questioned.

There are many definitions of quality management systems (QMS). It can be 'A set of coordinated activities to direct and control an organisation in order to continually improve the effectiveness and efficiency of its performance'. Alternatively, it can be 'A system by which an organisation aims to reduce and eventually eliminate nonconformance to specifications, standards, and customer expectations in the most cost effective and efficient manner.' The latter is at least a bit more modest about what a QMS can deliver, or should deliver.

In my view, the time is overdue to challenge this management idea, to

expose it as just another fad, loaded with jargon and promoted by a horde of consultants (including myself), certification bodies and accreditation bodies who earn their living from it. My objections to it are based on two different issues; on the one hand it is based on some erroneous principles or assumptions and on the other hand, even if it were useful, the positive results are not significant enough to justify the energy spent. What I am discussing here is quality management as a management principle. Clearly, I have no objections to quality, how could I? After all, quality is anything you define. I also have no objections to 'management systems', how could I? All organisations are managed according to one system or another, documented or not, good or bad. But those who have spent weeks writing manuals and training staff etc know what I am talking about, the quality management system (QMS).

The main standard for quality management is the ISO 9000 standards. ISO 9000 was first published in 1987. It was based on the BS 5750 series of standards from the British Standards Institute. However, its history can be traced back some twenty years earlier to a US Department of Defense standard in 1959, which was aimed at ensuring bombs go off at



the target and not in the hangars or in the factory – a laudable effort (not for the targets though). The concept of the ISO 9000 has spread into a wide range of other standards, such as the ISO 14000 series for environmental management, the ISO 22000 for food quality management and the ISO 65 for certification bodies and ISO 17011 for accreditation bodies.

Today, ISO 9000, ISO 14000 and ISO 22000 certification remain voluntary for firms in almost all countries. But for organic certification bodies it is a different picture. Since 1997, when the EU introduced the requirement that all certification bodies follow the ISO 65, it has become an integral part of the organic conformity assessment system. This has big implications. Not only for the professionals in conformity assessment, but also for the producers who are certified and for the governments that are supposed to enforce organic regulation. All of them are affected by the drive for quality management.

Despite its rapid uptake in various industries ISO 65 is not a proven method. Agreed, there are many reports and statements from quality managers, and consultants and certification bodies about how good quality management is. However, very little peer-reviewed research has been conducted that evaluates whether the standard delivers what it promises to do, that is, consistent quality. And there has been even less work done to prove that it delivers general management benefits, which proponents claim most often. However one project in Australia and New Zealand did look at the effect of ISO 9000.<sup>1</sup> The central finding of the project was that 'ISO 9000 certification is not shown to have a significantly positive effect on organisational performance...' The paper concluded that 'this sup-

ports the view that on average ISO 9000 certification has little or no explanatory power of organisational performance. 'However, surprisingly no significant difference is found with respect to defective part production and manufacturing cost between the two groups.'<sup>2</sup>

We are told to put quality first, but what does that really mean? Is quality more important than following the law? How does it relate to workers' safety, the environment or, the most obvious factor in organisations, profit? The quality management culture is based on the fact that there are special quality manuals and a special quality system. But organisations are not managed by these kinds of manuals, and controllers and financial departments work with a different logic. Where does that really leave quality management? Instead of acknowledging the contradictions and different interests in an organisation, QMS proponents spread the illusion that the QMS is the most important part of the management system, which is at best delusional.

The starting point in the development of a quality system is, almost exclusively, the standard itself, and all the issues required by the standard. This is in itself a very bad starting point, even worse than planning an organic farm based on the organic standard (which any farmer knows would be a disaster). 'Planners of quality systems, guided by ISO 9000, start with a view of how the world should be as framed by the Standard. Understanding how an organisation works, rather than how someone thinks it should, is a far better place from which to start a change of any kind' says British management con-

sultant, John Seddon.

QMSs are based on a view that people perform better when told what to do, rather than when they are given freedom and motivation. They exaggerate the use of written instructions at the expense of social interaction and continuous problem solving. This degrades people to automata, a development that risks the quality in their work and ultimately the performance of the organisation.

Even good systems take considerable time and energy to implement. Consequently their implementation competes for resources and attention, resulting in less energy and attention orientated to other (real) problems within the organisation. In addition, QMSs discriminate against small firms as they are more costly to implement while the potential benefit is even less than in a big firm.

While a well functioning QMS might be good for operations, they are often badly designed and implemented, and thus are likely to do more harm than good. An organisation with shelves full of files telling people what to do and how to do it, with a workforce that disregards the policies, is worse off than a company with very few policies, which are vigorously enforced and promoted, and grounded in the organisation's culture. Many organisations implement a QMS because they 'have to' – as a result of demands from the clients or from other outside parties – and not because they see the value of them. Again a very bad starting point for good implementation.

And finally, there are the audits of quality management systems. The actual quality of the product or service is not included in an audit or

Is quality more important than following the law?



assessment. Auditors look into systems, procedures and organisational structures, and very little at implementation. Increasingly, audits look at 'meta-systems', that is the systems used to develop and maintain the system, for instance, internal audits. Here it follows in the footsteps of financial audits, which also has gone from checking the actual books, stocks and assets to auditing the system. This has been well analysed, and criticised, by Michael Power in the book *Rituals of Verification*. Power says that most effort is actually spent on making the systems auditable, and not on making them reliable.

In the organic sector, conformity assessment has moved towards focusing on 'auditable performance'. Quality management is enforced all along the food chain, from the accreditor to the farms; every level expects the next level to implement a QMS. QMS in accreditation demands QMS in certification, which in turn demands QMS on farms. On the farm level this is not as yet formulated in demands for fully fledged QMS, but the tendency to enforce QMS style demands on farms and even more on food processors is clear. Real control is rarely made – this was pointed out in a recent report by the European Court of audits of the auditors of the EU control systems, and it was pointed out by the Swedish Food Authority some years ago. It is clear that audits don't address, detect or prevent fraud to any larger extent. Accreditation of certification bodies is, to a very large extent, an investigation into how the quality system is implemented. When blatant mistakes are made – if the mistake is even detected by the accreditation process – the corrective action is mostly to insist on more quality management policies or written procedures, which are actually counterproductive. Certification bod-

ies are much more likely to lose their accreditation status based on flaws in some written procedure than they are if they do a bad job.

In certain situations a QMS can be useful, even very useful, for organisations, but that does not imply a QMS is good for all organisations. Nor does it suggest that a functioning QMS contributes to the integrity of the system in general. Instead they should be seen as one of many tools organisations use to manage themselves and the service they offer; a tool that suits some much better than others because all organisations differ in size, culture, resources and stability. To elevate QMS into a legal requirement (which is the implication of having mandatory compliance with a QMS, such as demanded by the EU Regulation) that cannot be questioned is not good for development. Instead, requirements for certification bodies and the surveillance of them should focus more on the desired outcomes rather than prescribing details for a quality management system. ■

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*Gunnar has been engaged in organic production and quality assurance for all / most of his working life. His experiences range from practical farming and food processing to certification (Manager of KRAV for seven years) and accreditation (Founding President of the IOAS). For the last fifteen years he has acted as a consultant to certification bodies and other organisations. One of the topics that have taken much effort is the development of quality management systems in certification bodies.*

#### Footnotes:

- <sup>1</sup> *The Business Value of Quality Management Systems Certification. Evidence from Australia and New Zealand, Samson, D. Terziovski, M. Dow, D. Journal of Operations Management Vol. 15, No. 1, 1997, pp. 1-18*
- <sup>2</sup> *The impact of ISO 9000 quality management systems on manufacturing, Tufan Koc, Journal of Materials Processing Technology Volume 186, Issues 1-3, 7 May 2007, Pages 207-213*

## THE ORGANIC STANDARD ■

www.organicstandard.com  
ISSN No. 1650-6057

is owned and published by Grolink AB

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