

THE ORGANIC STANDARD

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Another step in the EU Regulation revision

The last issue of TOS (TOS no. 144) published a description of the Irish Presidency's proposal on how the revision of the EU Regulation should be handled. The Council of the European Union has now accepted this proposal, which is seen as an important document. It is likely the Commission will use the proposal to guide it in its next steps towards designing the revision of Council Regulation 834/2007. The adopted document was almost identical to the proposal described in TOS 144. One of the few differences concerned the development of the organic sector through revising the current legislation. The final document states it should 'be at an ambitious level' and should improve usability 'while providing for a period of stability and certainty'. The other significant change was that the language concerning the inclusion of new areas was made weaker, asking for 'clarifying the situation' instead of 'exploring the possibilities', which was written in the proposal.

The main components of the accepted document are requests for:

- The legislation should be further clarified and simplified.
- The number of exceptions should be reduced. Also production rules to handle the specific circumstances and stage of development of the sector should be made flexible.
- Responsibilities should be clearly distributed among the control bodies and control authorities.
- The sanctions system should be harmonised on the EU-level.
- Interpretations should be harmonised and divergences in interpretations has to be handled.
- Reciprocity in agreements with other countries should be requested and equivalency procedures should be robust.
- Access for developing countries should be supported if certification is effective.
- The EU logo should be promoted.
- The Action plan should be reviewed and updated. ■

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The document can be found on www.consilium.europa.eu/uedocs/cms_Data/docs/pressdata/en/agricult/137076.pdf

LINK MISTAKE

The last issue of TOS published an article titled 'New Dossier on the organic EU logo'. The piece stated that 'The dossier is available in English, German, Spanish and Italian', and it gave an internet link to the document. However the link was for a different IFOAM

EU dossier.

The dossier on the EU logo is available in English only and can be found at www.ifoam.org/about_ifoam/around_world/eu_group-new/positions/publications/logo/IFOAMEU_new_organic_logo_dossier_2012.ver2.pdf

Sound and sensible – the way forward

The NOP has introduced a new programme, 'Sound and Sensible Organic Certification'.

Reading the short description and its five principles gives me hope of a development in certification to a more focused and tight certification system. Many of us have often pointed out that certification is only a tool, and the ultimate goal is organic integrity and consumer protection. When going from talking to taking action – action in setting standards and certification criteria, in designing and implementing the certification system – the statements about certification being a tool to ensure consumer protection often seem to be a bit out of focus. It seems that certification itself becomes more of the main activity. For certification bodies the key issue is how to get their own certification system to function well, fulfilling all the requirements from accreditors, legislation and private standards and logo owners. They must achieve this while, at the same time, running as a business with employees, financial management and normal daily problems and tasks. Certification bodies check that their clients are fulfilling a certain standard, because that is what certification bodies have promised to do. It is not their role to be the overall finder of fraud, nor to check whether non-clients are violating the standards.

With this in mind, this initiative from the NOP is welcome. One of its statements is that the focus will be on the big willful violations, while smaller deviations will be handled so that producers having a problem will return to following the standards instead

of leaving the certification system. Catching the big crooks doing willful large-scale fraud needs different tools and skills to those necessary for the normal once a year visit on a farm. As it is now, the focus of certification is still on the farmers and the bulk of the standards are about farming. However, the worst fraud cases in Europe take place in the large scale selling of conventional grain as organic, often by using a certificate from another country in the EU. This is not because traders are worse cheaters but because that is a part of the system where it is possible to make big money by cheating. The inspection of the chain of custody and especially input/output calculations of bought-in products compared with sold processed product has never been a favourite either by inspectors or by operators. It is a difficult and time-consuming exercise, but more focus in this area would probably be good.

Another part of the NOP programme is to make processes more efficient and to streamline record keeping. Most standards, certification requirements and documentation requests would probably benefit from an analysis of what they actually provide towards maintaining the integrity of organic products. It is easy to ask for data, sowing dates, yield data, yield estimates in grower groups and many other things. It is also easy to insist upon procedures such as, for example,

the farmer needing to apply for one or another thing before using a certain input. But is the data really used and does it contribute to an overall integrity? Yield estimates are notoriously unreliable for many crops. What sowing dates have to do in certification of organic is difficult to explain. Many good farmers record field data anyhow, but does poor record-keeping risk organic integrity?

To acquire resources to handle the big problems and to reduce the burden on organic production some rules for documentation and procedures could be downplayed.

More focus on product flow in certification and more resources going to market surveillance and tracking products back from the market to primary production would probably be a productive exercise. To handle this, certification bodies could be requested to be more active in tracking products through the chain of custody. To keep a tight overview of what is on the market, the intensive exercise of tracking products back from the market, through the different processing steps, to their origins would probably have to be handled in a separate programme and likely to be financed through sources other than operator fees. How these issues will be handled in the US with the Sound and Sensible programme will be very interesting to see. Hopefully other authorities and certification systems will adopt the thinking in the Sound and Sensible Organic Certification programme to develop certification and use resources better. ■

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It is not surprising the big picture and emphasis on organic integrity is lost. ■

Moving from wild harvesting

Organic developments in the Western Balkan region

Serbia, Bosnia and Herzegovina (BiH), Montenegro, Albania, Former Yugoslav Republic of Macedonia (FYROM) and UNSC Resolution 1244 Administered Kosovo (Kosovo) are the states that are currently in various stages of the EU accession process. Characteristic of all these countries is a gross domestic product (GDP) that has a high share of agriculture and food industry within its structure (from 8.9 to 18.7%). However, only Serbia – with 50,966 km² or 66% of the total area, being agricultural land, of which over 50% is good quality arable land – has favorable conditions for agriculture production. Other countries are significantly smaller than Serbia, while the share of agricultural land varies from 33% (Kosovo) to 49% (BiH). A hilly or mountainous terrain is prevalent in these countries, while small areas of high-quality agricultural land can be found only in river valleys. However, the dominant activity in all rural areas of the region is extensive, traditional agricultural production.

Production

The origins of organic farming in the region dates back to the beginning of the 21st century. By 2012 there was about 19,793 ha of organic certified land, including land in conversion (note this does not include data from Kosovo, which is missing, and data for BiH, is from 2010).

The country with the highest proportion of certified agricultural land in the region is Serbia, while the largest number of operators registered for

organic production are in FYROM. A characteristic of all the countries in the region is that in the last few years the area under organic production is on the increase. The greatest increase in organic land area and number of operators has occurred in Serbia and BiH. In FYROM and Montenegro production has been slightly lower and in Kosovo organic production is just beginning. Only in Albania has production area under organic production remained relatively static.

Most farms in all six countries are small family farms with small land area that are characterised by mixed farming enterprises and relatively small market surpluses.

The structure of land use under organic production differs significantly between the different countries. Fruit (berries, plums, sour cherries etc.) and

vegetable production dominants in Serbia. FYROM has diverse organic production but with a pronounced crop industry, while organic production in BiH and Albania are specific for the production and collection of medicinal and aromatic plants. The largest proportion of land certified in Montenegro are mountain pastures used for extensive cattle breeding. The region has specific products and production systems, such as honey production (particularly evident in BiH) and buckwheat (Serbia, Montenegro and BiH). With the exception of FYROM, organic livestock production is not over-represented in the organic sector.

A characteristic of all the states are huge areas of land (see table over-page) used for the collection of wild medicinal and aromatic plants, such as mushrooms, berries and forest fruits. However the figures given in the table should be viewed with care, often large areas of land may be counted twice as it is certified for organic collection (for the same or different plant species) by different certification organisations.



Map used with permission

Land area (ha) under organic production and number of operators

Country	Organic land area in 2012 (certified and in conversion)	Area of land used for collection of wild plants	No. of operators
Serbia	11,098	800,000	317
Montenegro	3,057	143,000	143
FYROM	4,663	No data	576
Albania	284	250,000	31
BiH	691	220,000	164
Total	19,793	1,413,000	1,231

Market

Production structure of the organic sector is determined by foreign buyers' needs, so that today the organic products from the region are primarily intended for export. Around a hundred, mostly large, operators in the region have EU certificates, and export more than 70% of the total amount of organic products from the region.

Products are mainly exported to the EU market, and to some extent to the Swiss market. A number of companies also have a NOP certificate, but in reality few companies actually export to the US. Trade within the region has not been developed despite demand by a large number of tourists on the Adriatic Sea during the summer tourist season. The Russian market, which is a major buyer of agricultural products in the region, has not yet shown any interest in certified organic products.

The dominant export products are fresh and frozen fruit (berries, plums, apples, etc.), cultivated and collected medicinal and aromatic plants and their products, mushrooms and forest berries, olive oil, vegetables, some crops. In most cases, the companies export the raw materials or intermediate products, which are then finally

processed in an EU country.

The exception is Montenegro where organic products are sold exclusively in the local market. However, in general the domestic markets for organic products are still undeveloped and unrecognised by consumers. The main reasons for the underdevelopment of the domestic markets are:

- Small number of products available.
- Seasonal nature of the organic products produced.
- Lack of interest by producers to use organic logo (they are only interested in state subsidies).
- The high prices of organic products.

Most registered operators in the region sell organic products at the local market, but they generally have small mixed farms producing small quantities of products for the market. One of the problems is the high price of organic products compared to conventional ones, which especially with the existing economic crisis and high unemployment, is a major problem. However, it should be noted that

the national association of organic producers (with the help of donor projects and relevant government ministries) conducted a number of promotional activities that contributed significantly to raising the visibility of local organic production. Sales of organic products in the green markets (occasional and permanent places for organic products), and greater inclusion in supermarkets have also contributed to increased sales. In recent years there has also been a significant increase in imports of organic products.

Control and certification

There are six certification bodies accredited in Serbia. These are Organic Control System, Ecocert Balkan, Suolo E Salute, TUV SUD, Etoko Pannonia and Control Union Danube. The other countries in the region each have just one or two active certification bodies:

Montenegro - Monteorganica

BiH - Organska Kontrola and BeHa-BioCert

Albania - Albinspekt (also covers Kosovo)

FYROM - Balkan Biocert and Pro Cert

The only certification body that did not have any foreign technical support in its development is Monteorganica. This certification body was established and is financially and technically supported by the Montenegro Ministry of Agriculture and Rural Development. All the other certification bodies in the region were established by organisations from outside the region. Some were set up through the direct input of an inter-

Most registered operators in the region sell organic products at the local market.

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THE EU CONTROL LEGISLATION PUBLISHED

The control regulation described in TOS 141, has now been published and given the name, Regulation (EU) 392/2013. A major rule in the new regulation is that samples should be taken from 5% of operators yearly. Additional random controls should be made on at least 10% of operators and in accordance with their risk category. At least 10% of the inspections should be unannounced. Another important part of the legislation is that there should be a sanction catalogue on the country level that handles non-compliances where the organic status is affected. Several clauses of the Regulation deal with how the information flow should function in the organic certification chain from producer to certification body to competent authority to the Commission. Other clauses handle the supervision of control bodies. The legislation will come into force on 1 January 2014. ■

national certification body, such as Ecocert Balkan, Suolo E Salute, SGS, Bioagricert. More usually, though, the certification bodies were established as a result of donor project activities. Donor programmes connected local staff with a certification body based in Western Europe (Ceres, BCS, ICEA, IMO, Bio Inspecta, Aranea) with the specific purpose of setting up a local certification body. In this way, almost all the major international certification bodies ensured their business in the region.

The certification bodies occasionally communicate with each other. However, there is no cooperation between them, and their organisational and qualitative development is strongly dependent on foreign partners (the mentoring certification organisations).

They all have a relatively small number of clients and face the problem of financial sustainability. The charges for control and certification for the domestic market are very low (up to 400 €) and cannot ensure economic sustainability even if they had a large number of clients. However, the number of controls for EU certification is small, and a high proportion of the inspection and certification payments for these controls goes to the main EU certification body. Therefore, to make ends meet, most of these organisations also perform a variety of other activities such as certification of GlobalG.A.P. production systems, HACCP and ISO certifications, and protection of geographical indications.

Legislative

There is a widely held belief in the

region that the countries should establish national legislation for the organic sector that will foster an environment to encourage the permanent growth of organic production. Consequently, throughout the first decade of the 21st century a great deal of effort and hard work was invested in establishing a legal framework for organic production in all six of the Balkan countries. In Serbia, for example, during the period 2000-2010, three laws on organic production (2000, 2006 and 2010) were passed.

The legal status for organic production differs between the different countries. Currently, only part of the BiH, the Federation of BiH, does not have any legislative framework. All the other states have organic legislation. Montenegro and Albania have had legislation, based on the Regulation EEC 2092/91, since 2004. Both states now have new legislative proposals prepared and waiting for adoption. Kosovo accepted a new law in 2012, but has not accepted the necessary by-laws that will allow the implementation of the Law. Serbia and FYROM have a complete framework, based on the EC Directives from 2007 and 2008. However, both countries will have to do further modifications of existing regulations in order to be in full compliance with EU legislation.

Adoption of legislation has obviously had some influence on the development of organic production in the region. National legislation is the basis for control and certification for the local market.

All the laws passed in the region anticipated incentives for organic

The certification bodies occasionally communicate with each other, however, there is no cooperation between them. ■

State logos for organic production



FYROM



Serbia



Montenegro

production. However, the incentives provided by these laws were not permanent. In some years there were no incentives for organic production, and in the years when there were incentives, they varied greatly between the countries. Only Kosovo had no subsidies. In recent years it has been common to have incentives based on land area (per ha) and livestock. In addition, organic producers have the costs of control and certification partially or completely covered.

State agricultural policies primarily support increased production and competitiveness. Organic production is, with the exception of FYROM, recognised as needing support. However, with 1% of the agriculture budgets allocated for the development of organic production it is clear that conventional production is favoured. Indeed, the allocated state budget funds for the organic sector are merely symbolic in relation to the agricultural budgets of these countries, and this is certainly one of the reasons why organic farming is developing slowly.

Nevertheless, even in these amounts, incentives significantly contribute to the development of organic farming in all countries, indicating the desire and motivation of producers to produce in an ecological way.

Labels

In Serbia, Montenegro and FYROM control and certification is based on existing legislation, while in Albania and BiH private standards of certification organisations are in use.

Other stakeholders

In each of the six countries there is a national association of organic producers. All these associations were created as a result of project activities of different donor programmes. The level of activities of these associations directly depend on the presence of donor programmes and/or support of the relevant ministries. Despite all the weaknesses, these associations are the basis for further development of organic production.

Every country in the region has had at least one organic production development donor project. These projects had significant positive results for the local organic sector, for example they supported the establishment of local certification organisations, and organised the export of organic products, legislation development, the establishment of national associations, and strengthened the domestic market for organic products.

Conclusion

Organic production in the Western Balkans is still at very early stages. However, the trend is a steady increase in the area of land under organic production.

There are many problems, most of which are present in all countries of the region. However, at present there is no permanent or temporary, regional cooperation. Also, there is no transfer of positive experiences and results to users in the other countries. The most important stakeholders know each other, but do not cooperate.

Regional projects, supported by the EU or other donors, could have a significant impact on the rapid development of organic production. The goal of such projects could be to network key regional stakeholders, secure permanent exchange of experiences, and collaborate on the most important problems, such as regional trade, cooperation and common qualitative development of certification bodies and national associations, joint advisory services promotions and presentations. ■

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More information available from

- *Organic Certification Directory, 2012*
- *Thomas Bernet, Izis Kazazi - Organic Sector in Albania – Sector study 2011.*
- *Ulrich März, Tobias Stolz, Marija Kalentic, Nada Mišković - Organic Agriculture in Serbia 2012 - At a Glance*
- www.dnrl.minpolj.gov.rs/organska.html,
- www.orgcg.org
- www.organskakontrola.ba
- www.behabiocert.ba
- www.mzsv.gov.mk
- www.procert.mk
- www.balkanbiocert.com
- www.albinspekt.com

Incentives significantly contribute to the development of organic farming in all countries. ■

US guidance documents progress

NOP seeks public comment on draft guidance documents on materials questions

On 2 April 2013, the US National Organic Program (NOP) published two sets of draft guidance documents on the subject of allowed and prohibited materials for organic production and handling. One set is a guide on the classification of materials, and includes an overview and decision trees for classification of a given substance as either agricultural or non-agricultural, and then as either synthetic or non-synthetic. The second set consists of two lists, one of allowed materials the other of prohibited materials for organic crop production. Public comment is requested on all these draft documents by 3 June 2013.

These documents are intended to help the National Organic Standards Board (NOSB) make consistent decisions when classifying materials. They are expected to help organic crop producers and certifiers better understand what materials may be used as fertilisers, soil amendments, and pest control substances as well as livestock feed ingredients. Much of the information presented is based on recommendations made over the past ten years by an ad hoc Materials Working Group, which were then adopted by the NOSB. The terms 'materials' and 'substances' are used interchangeably in these documents.

The concerns about natural and synthetic substances have been the subject of endless debate and task force recommendations since the

inception of the NOP and the first NOSB meetings. Their resolution would be a huge step, and it is critical that they reflect clear and consistent approaches to interpreting the rules. The natural products industry, under assault for misleading consumers with their labels, is watching this process for clues to what might be considered acceptable in a product labelled as 'natural.'

Guidance is needed because the legislation establishing the NOP mandated that any use of synthetic materials in organic production and handling is prohibited, except for those synthetic materials that have been reviewed by the NOSB and found to meet certain criteria. These exceptions form the basis for the National List. Similarly, 'natural' or nonsynthetic materials are generally permitted for organic crop and livestock production, except for certain cases that are deemed to be harmful or incompatible with organic production.

Organic processed products may contain only those nonorganic ingredients that appear on the National List. Nonorganic agricultural ingredients must appear in Section 205.606 of the National List and be documented as commercially unavailable

in organic form. To further complicate matters, livestock feed ingredients of agricultural origin must, without exception, be organically produced, regardless of commercial availability. Non-agricultural substances, regardless of whether they are classified as synthetic or nonsynthetic, must appear on the National List before they can be used as ingredients in organically labelled processed products.

'For the vast majority of materials', according to the draft overview document, 'classification as synthetic or nonsynthetic, or as agricultural or non-agricultural, is straightforward; however, other materials are more complicated to classify which can result in inconsistent interpretations. Controversy has repeatedly emerged over how a few substances should be classified, due in part to definitions that are either overly broad or imprecise. While it is hoped that this guidance will help avoid areas of past controversy, areas of uncertainty remain.

Classification of materials: Overview and Decision Trees

The overview document (NOP 5033) clearly explains the requirements for different categories of agricultural and non-agricultural, synthetic and nonsynthetic inputs to organic production and handling. It then identifies policies and procedures for making appropriate classifications, and a list of terms defined in the regulations and the law. The procedures for making determinations refer to either the Decision Tree for Classification of Materials as Synthetic or Nonsynthet-

Organic processed products may contain only those nonorganic ingredients that appear on the National List.

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SOUND AND SENSIBLE — A NEW USDA INITIATIVE

The national Organic Programme in the US has introduced a programme to make certification more accessible, attainable and affordable. It is called 'Sound and Sensible Organic Certification'. The intention is to make certification of organic production less burdensome while protecting integrity and ensuring compliance.

There are five main principles:

1. Efficient processes: Eliminate bureaucratic processes that do not contribute to organic integrity.
2. Streamlined recordkeeping: Ensure that required records support organic integrity and are not a barrier for farms and businesses to maintain organic compliance.
3. Practical plans: Support simple Organic System Plans that clearly capture organic practices.
4. Fair, focused enforcement: Focus enforcement on willful, egregious violators; handle minor violations in a way that leads to compliance; and publicise how enforcement protects the organic market.
5. Integrity first: Focus on factors that impact organic integrity the most, building consumer confidence that organic products meet defined standards from farm to market. ■

Source: Organic Integrity Quarterly, April 2013

ic (NOP 5033-1) or the Decision Tree for Classification of Agricultural and Non-agricultural Materials for Organic Livestock Production and Handling (NOP 5033-2). Both of these documents also include new definitions as recommended by the NOSB, including 'chemical change', 'extract', 'formulate', 'generic', 'manufacture', 'natural source', 'naturally occurring', and 'substance'.

Policy guidance concerning inputs for organic handling and processing states that 'materials derived from agricultural products may be classified as agricultural or non-agricultural, depending on the manufacturing and processing methods used'. An agricultural material can become non-agricultural if it is deemed to be synthetic, according to NOP 5033-2. A non-agricultural material that consists of microorganisms or enzymes (e.g. yeast) can be classified as agricultural if it is produced or grown on an agricultural substrate or medium (e.g. grain), as long as it does not undergo a process that renders it synthetic. This possible outcome, however, contradicts the recent decision reached by the NOSB to change the annotation for yeast to require an organic form to be used if it is commercially available. Because of the fact that many livestock producers use nutritional yeast as a feed supplement, and the rules do not permit them to feed any nonorganic agricultural substance to organic livestock, the NOSB decided that yeast should continue being classified as non-agricultural.

The NOP's definition of synthetic is 'A substance that is formulated or

manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.' The policy clarifies that chemical changes due to allowed processing methods such as cooking and baking, in addition to biological processes such as fermentation or enzymatic digestion, do not make an agricultural material synthetic. When it comes to burning or combustion, however, plant or animal matter (e.g. wood or manure) can be burned and still be considered nonsynthetic; wood ash, for example, is a commonly accepted organic fertility input. However, heating or burning a mineral substance (e.g. limestone), turns it into a synthetic (e.g. slaked lime).

The policy portion also provides criteria for evaluating whether a non-organic material that has been produced using manufacturing processes that involve separation techniques (i.e. extraction) has become synthetic. A synthetic material may be used as an extractant as long as it is removed from the final product to the extent that it has no technical or functional effect in the final product. However, if the synthetic is used as a pH balancer, as is the case with fish emulsion stabilised with phosphoric acid, the otherwise naturally occurring substance is considered synthetic.

It remains to be seen whether these inconsistencies will continue to create difficulties for organic producers and

It remains to be seen whether these inconsistencies will continue to create difficulties for organic producers and processors. ■

processors seeking to understand what they can and cannot use as inputs to their operations.

Crop materials

The long awaited guidance on crop material, for the first time, offers organic producers a positive list of inputs that are considered to be 'natural' or nonsynthetic, and therefore acceptable for use in organic crop production. The overview document notes that the guidance 'is not intended to be comprehensive, but rather serve as a tool for organic producers to un-

derstand which input materials have already been reviewed and for which decisions have been made.'

The guidance includes a 23-page cross-referenced alphabetical listing of all the materials that have been reviewed and determined to be non-synthetic and therefore acceptable as organic crop inputs. Producers are urged to submit any material they may wish to use that is not on this list to a certification body to determine if it should be included on this list. A single page lists all those materials that are either nonsynthetic and

have been specifically prohibited on the National List at Section 205.602, or are synthetic and have been reviewed by the NOSB and not recommended for addition to the National List and/or reviewed by a Federal agency and determined to be prohibited for organic crop production.

These lists do not address formulated brand name products that are listed by the Organic Materials Review Institute (OMRI) or other accredited agency as acceptable for use in organic production. The NOP is specifically requesting comment on the following crop materials, listed in the draft document as nonsynthetic and therefore permitted:

- Bagasse
- Biochar
- Corn steep liquor
- Fatty acids
- Glycerin
- Molasses
- Vegetable protein hydrolysate
- Vinasse
- Xanthan gum

Any member of the public can submit comments about any of the documents discussed. ■

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To submit a comment on the documents visit www.regulations.gov/#!submitComment;D=AMS-NOP-12-0060-0001

Links to the NOP draft guidance documents:

- Overview – Classification of Materials (NOP 5033)
- Synthetic/Non-Synthetic Decision Tree (NOP 5033-1)
- Agricultural/Non-Agricultural Decision Tree (NOP 5033-2)
- Overview - Materials for Organic Crop Production (NOP 5034)
- Materials for Organic Crop Production (NOP 5034-1)
- Prohibited Materials for Organic Crop Production (NOP 5034-2)

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THE 'GREEN GLASS CEILING' OF THE ORGANIC MARKET

Organic Monitor, a specialist research and consulting company, is working the concept that nowadays, even where the organic market is growing, it can only aspire to get to the top of a 'glass ceiling' in which only certain types of consumers are regular buyers of organic products.

To reach a wider demand and from more diversified consumers, it would be necessary to break the ceiling. 'Marketing appears to be the solution', Organic Monitor says, and in their coming events some examples of success will be explained by those involved.

Organic Monitor believes that expanding the small green consumer segment will be fundamental to the long-term growth of the organic and sustainable product industries. In the interim, Organic Monitor advises brands to follow the pioneers and focus on marketing to reach out to new customers. ■

For more information see: www.organicmonitor.com

Defining the scope of equivalency arrangements

Recently, the Global Organic Market Access (GOMA) project, of FAO, IFOAM and UNCTAD, released the paper 'Bilateral Equivalence Arrangements on Trade of Organic Products: a review of processes leading to arrangements between Canada and United States, Canada and European Union and European Union and United States'. Over the course of its development, the authors felt it would be helpful to compare the three major equivalencies discussed therein. Although this was a departure from the orientation of the paper, which describes the process by which the equivalencies were reached, it does provide the first discussion on how these equivalencies differ on matters of scope and application. Further discussion on this topic may lead to a better understanding of how equivalency arrangements may be specifically tailored to a given country or trade situation. It may also eventually lead to 'best practices' or preferred models for future equivalencies.

Each of the three equivalencies discussed in the paper (i.e. Canada-US, Canada-EU, and EU-US) have a unique 'scope' of application, which has significant bearing on how trade is conducted under the arrangements. They all vary in the critical variances or additional requirements they place on product flow from either the standpoint of technical standards or country of origin.

Describing the equivalencies

To better distinguish these equivalencies according to the approach taken, they are described as either 'full' or 'partial' with regards to technical standards requirements – that is, whether or not an arrangement places limits on products or practices through the inclusion of technical variances or other additional requirements. The equivalencies may be further described in terms of being 'open' or 'restricted' in terms of product provenance – that is, whether or not an arrangement introduced restrictions based on country of origin.

Canada-US equivalency

Thus, the Canada-US equivalency is best described as an 'open partial equivalency'. It is 'open' as it is a true system-to-system equivalency, whereby any product certified by an approved body in accordance with the requirements of the arrangement, from anywhere in the world, can enter either or both jurisdictions. For example, a product certified in South Asia to the Canadian standards (and additional specific technical requirements demanded by the equivalency) can be sold and labelled for trade in the US. The equivalency is also 'partial', which means the US and Canada both maintain critical variances in regards to their standards. These variances require specific additional actions or technical requirements when products

Each of the three equivalencies have a unique 'scope' of application, which has significant bearing on how trade is conducted under the arrangements. ■

■ news shorts...

IFOAM STANDARD UNDER REVISION

The IFOAM standard is out for consultation. The comment period for the first draft will end on 16 June 2013. Comments should be sent to ogs@ifoam.org. The main change to the previous version of the IFOAM standard is an expanded chapter on social justice. In addition, artificial light and energy use has been introduced in greenhouse management. Another change is that the possibility of buying conventional animals is stricter handled. ■

Read the full proposal on www.ifoam.org

ORGANIC DATA NETWORK

The project 'Data network for better European organic market information' (OrganicData-Network) aims to increase the transparency of the European organic food market by suggesting improvements on data collection techniques, data quality, data publication and coordination of the different related actions. It started in 2012 and will run to 2014.

The project has now opened a forum on its webpage to provide a platform for exchange and discussion on any topics related to organic market data. ■

The forum is for registered users only, but one can register at: www.organicdatanetwork.net/odn-organicdataforum.html

certified under one system are to be traded in the other.

Canada-EU equivalency

The Canada-EU equivalency is best described as a 'restricted' full equivalency. It is 'restricted' in that it has specific country-of-origin limitations put in place by the EU on products originating from Canada. In practice, this results in only single-ingredient commodities and a very limited set of multi-ingredient products, whose ingredients are 100% Canadian origin, falling under the arrangement. It should be noted that Canada did not put this same restriction on products under the EU system, which also means the arrangement is 'asymmetric' as well. The Canada-EU arrangement is also 'full' in that there are no critical variances identified under the agreement, that is, both standards are seen as fully equivalent to the other.

US-EU equivalency

Finally, the US-EU equivalency could be described as a 'restricted partial equivalency'. Though more 'open' than the Canada-EU arrangement, the arrangement between the US and EU still requires a specific country-of-origin prerequisite. Under this arrangement, the final point of trade of a product must be a signatory of the arrangement. For example, products from South America must be imported into the US and processed or packaged there by an operator under the control of a US certifier before it can be shipped to the EU. The agreement is also 'partial' in that the arrangement includes technical critical variances, placing limits on practices or products from both sides.

Further questions of scope

There is one other area in which equivalency arrangements might be viewed as 'partial' or lacking comprehensiveness. This relates to the question of scope of the kinds of products covered by each jurisdiction (e.g. non-foods, pet foods, etc.). For example, organic aquaculture falls under organic regulations in the EU, is subject to a voluntary national standard in Canada, but is not covered in the US where standards are only beginning to be developed. Aquaculture products do not fall under any of the three equivalencies; the arrangements only apply to the areas and products in which both jurisdictions overlap. At this youthful stage of the organic sector's development of emerging sub-sectors and relevant production standards, this is consistent among all of the arrangements. For this reason, and as the global sector is likely to continue expanding its scope asymmetrically over the coming decades, the author would suggest that there is no notable distinction worth making at this time. Over time, as well, it is expected that the equivalencies themselves will continue to improve, and it is hoped that those that are restricted will become more open, and those that are partial will become full. ■

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The paper, 'Bilateral Equivalence Arrangements on Trade of Organic Products: a review of processes leading to arrangements between Canada and United States, Canada and European Union and European Union and United States', can be found at: www.fao.org/docrep/017/aq205e/aq205e.pdf

Over time it is expected that the equivalencies themselves will continue to improve, and it is hoped that those that are restricted will become more open. ■

Is cocoa certification beneficial for farmers?

A report on the costs, advantages and disadvantages of organic certification, with a specific emphasis on the producers.

In 2012 the International Cocoa Organization (ICCO) commissioned a consultancy agency, KPMG Advisory N.V., to conduct a study on the costs, advantages and disadvantages of cocoa certification, with an emphasis on the farmers. The objective of the study was to bring more clarity to the debate on the value of certification, where some stakeholders consider complying with sustainability requirements and improving the living standards of cocoa farmers an adequate reason for certification, while others are less optimistic on the benefits of certification.

The study was concluded by the end of the year and its findings published. The report points out that despite individual opinions on the role played by certification, it is important to understand that certification is a tool that establishes requirements to facilitate the sustainable production of commodities. It is an intervention that should complement other interventions taken by the private sector, governments and NGOs and should not be seen as an end in itself.

The report focuses on two West African countries, Ivory Coast and Ghana, where about 60% of the world's cocoa is produced. The findings of the report produced by this study, however, are relevant worldwide. The study compared the two countries, which are very different regarding the cocoa trade – in Ghana it is under government control, while in Ivory Coast the cocoa trade is privatised with no government interven-

tion. This difference influences the farm gate price of cocoa, which is lower in Ivory Coast than in Ghana.

A common finding for both countries is that investments at farm level are low and this has a direct impact on the quality and yield of the cacao bean.

The report concludes that it is unlikely future demand will be met unless there are interventions in the sector now aimed at improving productivity and output quality.

Currently there are several initiatives worldwide aimed at increasing the sustainability of cocoa production. These initiatives consider all points of view, including social aspects, especially the issues that are typically associated with cocoa production in some countries, such as slavery and child labour. Several governments, such as the Dutch and the German Governments, as well as many of the big players from within the cocoa industry, are involved. Some of these

initiatives are aiming for 100% sustainable cocoa sourced by 2020.

One result of these commitments is that demand for certified cocoa is increasing and that private sector actors are establishing strategic partnerships with other players in the value chain – such as processors, NGOs, certification schemes and development agencies – in an effort to secure their supply.

Cocoa certification schemes

The report analysed the four main certification schemes for cocoa, which are organic and fairtrade schemes from several different operators, and specific schemes offered by the Rainforest Alliance and UTZ Certified. It is estimated that in 2011 the total volume of certified cocoa was about 6% of total global cocoa production, double that in 2010.

The ICCO report states that 'the organic label had an estimated market share of 15% in 2010; however as it addresses a niche market, organic certified cocoa is expected to grow at lower rates than the other schemes. Due to its lower representativeness in terms of market share, a wide variety of (sub) schemes and a different agricultural approach we have opted for not analysing the economics of

Volume of certified cocoa (tonnes)

Certification scheme	2010	2010 share of certified cocoa ¹	2011
Fairtrade schemes	106,400	39%	150,000
Rainforest Alliance	56,000	20%	98,400
UTZ Certified	70,000	25%	214,000
Organic schemes	42,000	15%	n/a

¹ Numbers do not add up to 100%, discrepancy probably due to data coming from different sources.

certification & accreditation

organic label and focus our efforts on the largest three schemes: fairtrade, Rainforest Alliance and UTZ Certified.’

The comparison concludes that the ‘certification schemes operate in similar ways and have as key objective to promote sustainable practices in the cocoa supply chain and improve the livelihoods of farmers in producing countries. Even though similar in the way the certification process is structured, certification schemes differ in their specific focus and requirements. These differences in requirements can have a direct impact on the costs and benefits at farm level. They can also impact certification schemes’ attrac-

tiveness for actors in the value chain.’

The study analyses many different factors, reviews literature, conducts a cost-benefits analysis and carries out a detailed comparison of the different schemes in the two countries that are the focus of the study. Some of its interesting conclusions are:

- The advantages and disadvantages of certification at the farm, cooperative and community level shows that the number of benefits of certification exceeds the number of disadvantages or shortcomings.
- The net benefit to farmers is on the provision that certain conditions are met.

- While certification can provide a net benefit to farmers, the magnitude of benefits differs per country.
- Some farmers benefit from certification more than others. In particular farmers with a large plot of cocoa trees benefit more than farmers with small plots. ■

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The report ‘Cocoa Certification. Study of costs, advantages and disadvantages of cocoa certification’, commissioned by The International Cocoa Organization (ICCO) is available at the ICCO website: www.icco.org/component/search/?searchword=Certification&searchphrase=all&Itemid=189

Comparison of the three certification schemes’ requirements

Payment to scheme

Fairtrade: No fee per volume. Entry fee for small producers.

Rainforest Alliance: Fee per volume for exporter but no entry fee.

UTZ Certified: Fee per volume for first buyer and fees through supply chain.

Rainforest Alliance: Minimum % of dry weight end-product. At least 30% to bear RAC seal. Encouraged to scale up to 100%.

UTZ Certified: Minimum content will increase gradually up to 95% in 2014.

ment practices on greenhouse gases (GHG) and renewable energy.

Rainforest Alliance: Requirement to plant and/or maintain trees.

Farmers need to carry out plan on renewable energy and GHG savings.

UTZ Certified: Requirement to plant and/or maintain trees. No requirement about GHG savings.

Premium received by farmer/crop

Fairtrade: Fixed premium + minimum price paid to coop.

Rainforest Alliance: Premium determined by market paid to coop.

UTZ Certified: Premium determined by market paid to certificate holder.

Mass balance

Fairtrade: Mass balance allowed up to 2014.

Rainforest Alliance: No mass balance allowed.

UTZ Certified: Mass balance allowed.

Waste disposal

Fairtrade: Farmer responsible after 2014. Burning of waste allowed in absence of disposal system.

Rainforest Alliance: Farmer responsible. Burning of waste in open air not allowed.

UTZ Certified: Farmer has limited responsibility for organisation waste disposal system.

Audit

Fairtrade: Fixed fee per year.

Rainforest Alliance: Fee per year determined by market.

UTZ Certified: Fee per year determined by market.

Wage level

Fairtrade: Following local legislation or regional average whichever is the higher.

Rainforest Alliance: Higher than regional average.

UTZ Certified: Following local legislation and equal payment.

GMO

Fairtrade: No GMOs.

Rainforest Alliance: No GMOs.

UTZ Certified: Subject not addressed in standards.

Certified content

Fairtrade: 100% or minimum % of total weight composite product.

Biodiversity and climate change

Fairtrade: No requirements regarding shade trees. Farmer needs to docu-

Garden Earth

From Hunter and Gatherer to Global Capitalism and Thereafter

Gunnar Rundgren is well-known to TOS readers as an articulate leader, consultant, theorist and practitioner of organic agriculture worldwide – and of course, as the founder of this publication. Having high expectations of his ambitious and far-reaching book, recently translated from Swedish into English, I was not disappointed.

While the book does not directly address regulatory and standards development issues, it does offer critical insights and well-founded information about the evolution and current status of global food production and distribution systems. The subject is very broad in scope, but brings the reader through a carefully reasoned and accessible discourse that outlines a clear path towards wider adoption of organic practices. The creation of a sustainable food system requires a cultural shift towards organic values, and away from the domination of the market system.

The book is divided into four parts, beginning with 'The Great Narrative, which traces the evolution of modern society from the long period of human life as hunters and gatherers, and includes a discourse on 'How Technology and Energy Shape Our World'. Part II addresses ecological challenges such as global warming, water and land degradation and chemical pollution, as well as including several chapters that discuss different aspects of agriculture and food production. The concluding chapter in this section offers a lucid philosophical discussion on the relationship between humans and nature. In asserting that 'human

beings are part of nature, have always been and will always be', Rundgren places himself firmly in opposition to the belief, prevalent within the organic community, that human creations are inherently at odds with the natural world. Rather, he argues, the history of human exploitation of nature is more appropriately seen as 'a history of a few people exploiting many other people'.

Part III, which deals with 'Our Society', focuses on economics and development issues, and an emphasis on how resources are distributed and the social forces that define how we divide our lives between work and leisure pursuits. The concluding chapter in this part calls into question 'The Legitimacy of Capitalism' and the supremacy of the market economy, which turns all aspects of life into commodities to be bought and sold, and turns citizens into consumers. Asking the question, 'Can capitalism be combined with sustainable development?' Rundgren outlines the logic of the commoditisation of nature thus: 'Capitalism is dependent on a thriving society and on the exploitation of nature's resources for its existence. At the same time, capitalism undermines both those fundamentals of its own existence. This is the real crisis of capitalism.' The hope, perhaps paradoxically, lies in human nature, and the observation that most social interactions do not involve profit seeking. 'It is humanity as such that makes the world a decent place to live in, despite capitalism and not thanks to capitalism.'

Part IV gives the author's prognosis of 'What Lies Ahead of Us?' Now that capitalism has 'passed its best-before date', what kind of society can emerge to prevent the impending ecological and social crash predicted by a wide range of critics and theorists. This is clearly an unknown realm, which defies confident prediction. Nevertheless, as Rundgren emphasises, 'even if we can't be sure or we know that we will never know for sure, it is our obligation to do our best to ensure that future generations will have a decent life.' The conclusion offers 'Garden Earth' as an alternative vision to the capitalist ideology. What this entails, among other things, is 'expanding liberty and the notion of liberty to include also the capabilities of the individual and to resolve the false contradiction between the freedom of the individual and that of society.'

While this book represents serious and well researched scholarship, abundant with factual data from authoritative sources, it is written in a very accessible style with a sense of personal warmth and lighthearted humour that keeps one's interest without excessive jargon. It succeeds in painting a picture of the role of organic production systems in counteracting the environmental crisis created by the failed 'free market' system, without lapsing into overly abstract rhetoric. Like its author, it is both philosophically deep and grounded firmly in earth bound reality. Reading it, to be sure, affirms my own understanding of this big picture. This is certainly a valuable contribution to the discussion of how to bring about a society that is rational, prosperous and ecologically based. ■

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More information at <http://gardenearth.info/en/garden-earth-the-book/>

Seafood labels have a new kid on the block

Why the Aquaculture Stewardship Council, when there is Organic?

In 2010, the WWF decided to set up the Aquaculture Stewardship Council (ASC), a certification scheme for aquaculture products operated by accredited CBs. This decision was clearly in response to demand from leading European retail chains who were seeking a popular, consumer-facing logo for aquaculture products. On the ASC website it states that the ASC 'aims to be the world's leading certification and labelling program for responsibly farmed seafood [...] to transform the world's seafood markets and promote the best environmental and social aquaculture performance.'

The WWF, the largest environmental NGO, had had previous experience in launching labelling schemes, being responsible for schemes such as the Forest Stewardship Council (FSC), dealing with forestry, and the Marine Stewardship Council (MSC) for capture fisheries. An important difference between these schemes and ASC, however, is that ASC does not deal with the management of natural resources and populations, which are basically determined by public legislation and national policies. Instead, it is concerned with private companies and their individual farming methods, including their global supply chains for feedstuffs, typically determined by technical developments, shareholder interests, and economical restraints. And on a global scale, it is only slightly influenced by any public processes. From the early beginnings, it was clear that the nature of the ASC

would inevitably require the WWF to take a position in a longish list of critical and complex aquaculture issues. These included topics such as adequate stocking densities, permissible veterinary treatments, defensible fishmeal and other protein sources (including genetically modified organisms, e.g. soy and corn), which are thought to define sustainability of the 'Blue Revolution' as a whole. As a strategy to deal with these hot topics, WWF organised the 'Aquaculture Dialogues', open multi-stakeholder meetings with the purpose of producing certification standards that address the issues in a way that is acceptable for as many players as possible. Critically, it has to be noted that despite its multifaceted character, the outcome of such a process frequently reflects the financial and political conditions of the participating companies and organisations. For example, since there was no funding available for stakeholders to attend WWF's 'Aquaculture Dialogues', only those who could bear the travel costs to attend the meetings, or to invest working time in follow-up, could afford to contribute.

In the public perception, the ASC standards, even if not directly developed by WWF headquarters, represent WWF's view on 'how aquaculture

should be', and even if there is a separate trademark, the power of the ASC logo finally stems from the WWF panda bear.

Obviously, 'new' certification standards and visions for tomorrow's food industry, if launched by a powerful NGO, represent a challenge for the organic movement, and for certified organic producers. An organic farmer wouldn't hesitate to claim that organic practices represent the only possible sustainable method of production, particularly expressed by working in closed nutrient cycles and without petrochemical fertilisers, supporting soil fertility through protection of the microorganisms, and of course prohibiting any GMOs. Consumers sharing this conviction create the demand for organic products, motivating the retail sector to increase the organic range and volume.

Compared with ASC's 'multi-stakeholder' approach, certification standards for organic aquaculture are more robust and more demanding. Moreover, they describe a real 'organic system', whilst the ASC standards are more representative of a collection of supposedly 'better practices' on various variables, that are neither related or even contradictory. An example – and the single most critical factor influencing the future of aquaculture – is feed, in particular, its composition, origin and feed conversion, i.e. the quantity needed to produce a certain amount of seafood. Core positions of the organic feeding strategy are:

- Clearly defined low stocking densities in order to achieve the highest

The single most critical factor influencing the future of aquaculture is feed, in particular, its composition, origin and feed conversion.

possible share of autochthonous feed (i.e. feed that is produced on the farm area itself).

- Sourcing vegetable feed components only from certified organic agriculture.
- Sourcing animal feed components (e.g. fishmeal and fishoil) only from known, documented sources. This feed must contain no products from dedicated fishmeal harvesting, must not be made from terrestrial animals or from conventional aquaculture products, must not contain any GMOs in any feed components, nor any synthetic feed additives – only natural vitamins, minerals, or pigments.

With the declared objective of covering as broad as possible the need of industry, and by employing the above mentioned process of standard development it is understandable that the ASC hesitated to take a stringent position on any of these issues. However, by doing so it has given companies access to the logo without any obligation to change current practices.

Naturland has been asked many times by the media, market players, and other stakeholders, whether the emergence of such an ambitious non-organic aquaculture label can be expected to seriously compete with, or even threaten, the worldwide growing number of organic aquaculture initiatives. There are several possible answers:

1. The long term perspective

The organic movement uses the word 'sustainability' not as a buzzword, but in order to express how organic production methods do the best job in protecting their ecological, social, and economic bases long term. This advantage has been proven not just in the much longer established organic agriculture, but also in organic aqua-

culture which has been performing very well over the last 15 years. In the current times of climate change, peak oil, financial crisis, and overall growing socio-ecological awareness, the importance and momentum of the organic concept becomes much greater, no matter which other labels may develop in the surroundings. In this technical respect, ASC is not a serious alternative, or even a challenge, for the organic concept.

2. The certifiers' perspective

For many aquaculture companies, the biggest challenge in achieving organic certification is not the conversion process nor is it learning to adapt to organic farming methods. This is because they, especially the extensive shrimp and carp farmers, are often already working close to organic principles. Rather the main challenge is to implement a reliable quality management system with all the duties of following a given protocol and documenting this. In this respect, an aquaculture farm that is already used to the general procedures required by another certification programme (e.g. regarding traceability) will have fewer difficulties obtaining organic certification than if the organic certifier has to start from scratch, even if certain technical adaptations still have to be made. Obtaining ASC certification could be a good first step for a company to enter certified organic production. Naturland holds the view that compatible certification programmes should look for synergies wherever possible, e.g. by harmonised checklist, joint audits, recertifications etc.

3. The retailer's and consumer's perspective

Retailers have been seeking an aquaculture b2c (business-to-consumer) label that covers many species and large volumes and can be on the shelves within a short period of time. In consequence, this label had to demand less effort from the aquaculture companies than required for converting to an organic system, while not forcing any substantial changes in the farming methodology. At the same time – and this appears truly more problematic – consumers would probably assume that a label supported by WWF would somehow be 'close', 'equivalent' or even superior to organic, and that it would represent strong standards in nature protection and animal welfare, and prohibit items such as GMOs, dangerous chemicals, etc.. This, however, is clearly not the case, a fact that has even been publicly declared by WWF and ASC themselves.

Nevertheless, in practice this is still 'insider' information, hidden in the multitude of publications in the WWW, camouflaged by 'sustainability talks', and therefore not accessible to consumers expected to make an 'informed choice'. In contrast, seafood traders and retailers, as true experts, must resume the responsibility for providing fair and complete information to their consumers about the meaning of a label and not just 'let confusion and misunderstanding' ensue. ■

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The ASC standards are more representative of a collection of supposedly 'better practices' on various variables. ■

■ news shorts...

RUSSIA CONTINUES TOWARDS ITS ORGANIC REGULATION

In December 2012 (issue no. 140) TOS published that Russia, one of the few large countries of the world without an official legislation for organic production, has started work on developing a bill to regulate the sector.

The Russian official regulation is now on the way. In late February, the Agriculture Ministry submitted a bill on organic agricultural products. It is expected that the certification of producers and state support for farmers will start in 2015.

In addition to the aim of producing organic food for exports, the Russian domestic demand for organic food, which until recently was not significant, is now increasing. Recent opinion polls show that 60% of the residents of the two main cities, Moscow and St. Petersburg, are prepared to pay more for eco-friendly products. It is this demand for organic food that has created a demand for regulation. ■

Sources:

ONECO organic news community,
16/05/2013 article by Kai
Kreuzer
www.rbth.ru/business

A reaction to the leader article 'Private or public'

I have a lot of sympathy for the ideas expressed by Nuria Alonso in the leader published in the March issue of TOS, entitled 'Private or Public'. I share most of the arguments brought forth in the article, and agree that the approach of letting the private sector (if well-organised) manage standards is probably better than handling standard details within a government regulation. I also agree that for new sectors such as organic textile and cosmetics, the private approach should be tested in the EU, at least before embarking on 'regulation as usual'.

I am, however, worried about the idea expressed at the end of the article that governments could start defining what organic is NOT, for example by having a list of the most undesirable additives that should not be in organic cosmetics. I believe that by the time governments engage in writing detailed production or product requirements, there is no intrinsic difference between defining what is organic and what is not. One is simply the corollary of the other. If governments produced detailed rules of what cosmetic organic products should not contain, operators who want to do the minimum will simply consider this as the only standard to be followed. It is to be predicted that many products would be on the shelves that just abide by the 'what is not' government requirements. Another aspect is

that once governments start writing rules, the general tendency is that they become more and more detailed and comprehensive over time, hence it might be difficult for them not to evolve into a detailed standard.

An idea that the author did not express explicitly in her article is the possibility of governments requiring certification to an officially-approved standard, even if this/these standards are developed and maintained by the private sector. In the cosmetic and textile sectors, there are examples such as GOTS or COSMOS, where several actors in the private sector have worked together to agree on a common standard. Governments could have a non-detailed regulation simply requiring, for example, textile products sold as organic to be certified to GOTS. In such cases, they would not even need to start working on the 'what is not' details.

The difficulty of referencing private standards is that it can be seen as government interference in the competition between various market players, especially in cases where there is no single consensual standard but several competing ones. In the textile and cosmetic sectors, this is the case to some extent, as GOTS and COSMOS are not the only private standards in their respective sectors.

I do not have the answer with regards to exactly how governments should take a stand on endorsing one

The difficulty of referencing private standards is that it can be seen as government interference in the competition between various market players. ■

private standard and not another, but it would certainly help if the organic movement could develop a clear proposal on the topic. Such a proposal could be based on solutions such as:

- Having one single common baseline standard for more 'industrial' sectors, such as cosmetics or textiles, where the need for regional variations (inside a market, like the EU, or even globally) is not as crucial as it is with agricultural production. Of course, private actors that wish to develop stricter standards should be allowed to do so, as long as those standards comply with the common baseline standard.
- Having a 'Family' of standards endorsed by the organisation representing the organic movement in the country, region (e.g. EU) or even globally. The message to governments would then be to require certification to any of the standards that have been approved in this 'Family'. IFOAM does have the 'IFOAM Family of Standards', but it does not currently cover the scope of textiles and cosmetic standards. The IFOAM Family of Standards is based on the concept of equivalence to an international reference (the COROS), and it remains to be seen whether the concept of equivalence is truly relevant to the acceptance

of more 'industrial' standards where the need for regional variation is low.

It is interesting to note that the EU Commission, in its Organic Farming Policy Review Consultation Document, envisioned the scenario of 'co-regulation'. Under this scenario a legal act would protect the term 'organic', but the standard would be defined by a private sector EU-level NGO, provided that the sector is strongly organised. This co-regulation scenario, in the context of the general organic regulation, appears unrealistic at this stage, which is probably why the IFOAM EU group did not express support for it in general terms. However, on the issue of scope extension, particularly where it concerned textiles and cosmetics, the IFOAM EU Group did express that one possibility could be for the EU Regulation to endorse international existing standards. How exactly the EU Commission could do this raises the questions mentioned above. Clearly, we might benefit from further discussion and debate within the sector before the commission takes it up. Who will lead such a discussion? ■

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Note from TOS

It is not clear yet who will lead such a discussion, but TOS would like to facilitate the debate by gathering together ideas on this matter. Therefore, we invite all readers to express their opinion on this subject. Tell us your thoughts on co-regulation and/or self-regulation for organic production, especially regarding new scopes such as textiles or cosmetics. Or perhaps you think a public system for all the scopes would be better – if so please tell us.

Please write to assignment@organicstandard.com and we will publish your feedback.

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