

**INTERNATIONAL TASK FORCE
ON HARMONIZATION AND EQUIVALENCE IN ORGANIC AGRICULTURE (ITF)**



UNCTAD
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FOOD AND AGRICULTURE
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ITF Secretariat: Tel: +49 228 926 50 10, Fax: +49 228 926 50 99, E-mail: d.bowen@ifoam.org, m.fecht@ifoam.org

Discussion Paper

**STRATEGY ON SOLUTIONS FOR HARMONISING
INTERNATIONAL REGULATION OF
ORGANIC AGRICULTURE**

DRAFT

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Abbreviations and definitions

Accreditation	Procedure by which an authoritative body gives a formal recognition that a body or person is competent to carry out specific tasks.
CAB	Conformity Assessment Body. In the organic regulatory environment more normally called Certification or Inspection Body
Certification	Procedure by which a third party gives written assurance that a clearly identified process has been methodically assessed, such that adequate confidence is provided that specified products conform to specific requirements.
Codex	Codex Alimentarius Commission of FAO and WHO
Codex Guidelines	Codex Guidelines for the production, processing, labelling and marketing of organically produced foods. GL32-1999, Rev.1-2001
EU Approach	EU model, known as the “New Approach” for harmonisation of standards and the “Global Approach” for conformity assessment
EU Regulation	Council Regulation 2092/91 (and its amendments) on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs.
FAO	Food and Agriculture Organisation of the United Nations
Guide ISO65	ISO/IEC Guide 65 ‘General requirements for bodies operating product certification systems’
ICH	International Conference on Harmonisation – Pharmaceutical Industry regulatory mechanism
IFOAM	International Federation of Organic Agriculture Movements
IFOAM Norms	IFOAM Norms for organic production and processing comprising IFOAM Basic Standards and IFOAM Accreditation Requirements - 2002
IFOR	International Forum for Organic Regulation (as proposed)
IOAS	International Organic Accreditation Service
ISTA	International Seed Testing Association
ITF	FAO/IFOAM/UNCTAD International Task Force on Harmonisation and Equivalence in Organic Agriculture
JAS	Japan Agricultural Standard
MLA	Multi lateral Agreement
NOP	US National Organic Programme
Safe Harbour	US-EC Understanding on the Principles for Data Privacy Protection, otherwise known as the “Safe Harbour Principles ”
UNCTAD	United Nations Conference on Trade and Development
UNECE	United Nations Economic Commission for Europe

US-EC MRAs

US-EC Mutual Recognition Agreements

WANO

World Association of Nuclear Operators

Executive summary

This paper represents a further step in the development of proposals on harmonisation of the regulation of production and trade in products from organic agriculture. The process was initiated in December 2002 by the establishment of the International Task Force on Harmonisation and Equivalence in Organic Agriculture (ITF) established by the Food and Agriculture Organisation, the International Federation of Organic Agriculture Movements and the United Nations Conference on Trade and Development.

The paper proposes a long-term strategic goal for the practical implementation of an improved system for regulating the production and trade of organic products and defines a work plan towards that end. A more detailed short-term work plan including actions relevant to this overall goal has been prepared separately.

Based on the previous work and discussions of the International Taskforce on Harmonisation, the paper summarises the current regulatory environment for organic production and trade, reviews some of the major problems and establishes three main target areas for attention: the rationalisation of organic standards, the rationalisation of certification requirements and the rationalisation of the approval system for conformity assessment bodies.

Further, using the ideas raised at the October 2003 meeting of the International Taskforce on Harmonisation, the paper defines nine criteria or essential characteristics of any proposed model for regulation. Various models from other sectors previously investigated by the International Taskforce on Harmonisation were evaluated against these criteria and several models (Codex Equivalence, UNECE, ISTA and IFOAM) appear to be worthy of further investigation, although aspects of others should not be discarded at this stage.

Based on this review, a long-term strategic goal was defined made up of the following components:

- the establishment of an International Forum for Organic Regulation (IFOR);
- production standards compliant with an international standard;
- one international certification requirement; and
- equivalent, if not same, accreditation/approval mechanism.

Unanswered but critical issues requiring investigation include the willingness of both private and public sector standard setters to permit international trade at the level of an accepted international standard rather than full compliance with their own standard.

A work plan towards the new regulatory mechanism is presented in phases. It is proposed that the first phase be managed by the existing International Taskforce on Harmonisation and involves the preparation of a number of standards and certification requirement comparisons (described in more detail in the short-term actions paper) and discussion documents leading up to the finalisation of draft international standards and certification requirements. Also included in this first phase would be a further investigation of the most promising models and mechanisms, leading to recommendations on the structure, function and operation of an International Forum for Organic Regulation (IFOR) to oversee a new harmonised regulatory system. Phase I will end with the establishment of an administrative unit of IFOR. At the first formal meeting of IFOR the International Taskforce on Harmonisation is expected to dissolve leaving IFOR to manage, in Phase II, its own future development and to initiate implementation of the new regulatory mechanism.

Introduction

This paper represents a further step in the development of proposals on harmonisation of the regulation of production and trade in products from organic agriculture. The process was initiated by the establishment of the International Task Force on Harmonisation and Equivalence in Organic Agriculture in December 2002. Annex 1 provides further detail of the overall objectives of the task force. At a first meeting of the task force in February 2003, an initial work plan was established which resulted in the preparation of five baseline papers :

- Commins (2003) reviewed the current status of existing international standards, regulations and private organic standards and both the current regulatory and private conformity assessment systems. It therefore provides an objective starting point for our discussion.
- Bowen (2003) described the current mechanisms, both public and private that enable international trade in organic products highlighting the differences between the various systems.
- Wynen (2004) provided an initial analysis of the potential impact of increased harmonisation of regulation on the trade in organic product. Looked at it in another way, it discusses the cost of the lack of harmonisation.
- Courville & Crucefix (2003) investigated and described potential models for regulation of other industries and reviewed and raised issues over their appropriateness for the organic sector.
- Arvius - Swedish Board of Trade (2003) presented a review of the obstacles to organic trade with special reference to the European Union and made recommendations for amendments to EU Regulation 2092/91

These papers were reviewed by a follow-up meeting of the ITF in Geneva in October 2003.

This document attempts to build on these papers and the discussion on them at the Geneva 2003 meeting and to chart a course towards finding solutions to what is perceived as a lack of harmonisation in regulating the organic sector. It aims to:

Summarise:

- the current situation
 - a.) the problems experienced, and
 - b.) the harmonisation tools available

and then

- Establish criteria for assessing potential model solutions,
- Perform an initial analysis of likely models
- Recommend best options
- Develop a work programme to lead towards a final workable model
- Propose timelines and assignment of tasks

1 Starting point

1.1 Current situation

Although growing and manufacturing of ‘organic’ products takes place without formal certification, the globalisation of the organic market has led to the situation that an organic product cannot be marketed in major markets unless it’s certified. Likewise there exists models of organic regulation that are variously called ‘peer’ or ‘participatory’ which do not involve third party inspection, but these are not the norm. There is then general agreement that an organic regulatory system is made up of four parts:

- Producers or operators – who actually produce the organic products
- Inspection bodies or conformity assessment bodies – who verify that the producers follow the rules
- An approval and supervision system, usually either a government department or a private/governmental accreditation body or a combination of these – which accredits or verifies that the conformity assessment bodies are competent and work consistently.
- A labelling system, which indicates to the buyer that a product has been produced and approved in compliance with the above mechanisms.

The various participants are guided by various sets of rules as follows:

- A production standard with which the farmer or producer must comply;
- A guideline or requirement for certification with which the third party inspection body must comply
- A guideline or requirement for approval/accreditation with which the approval or accreditation body must comply
- A labelling requirement

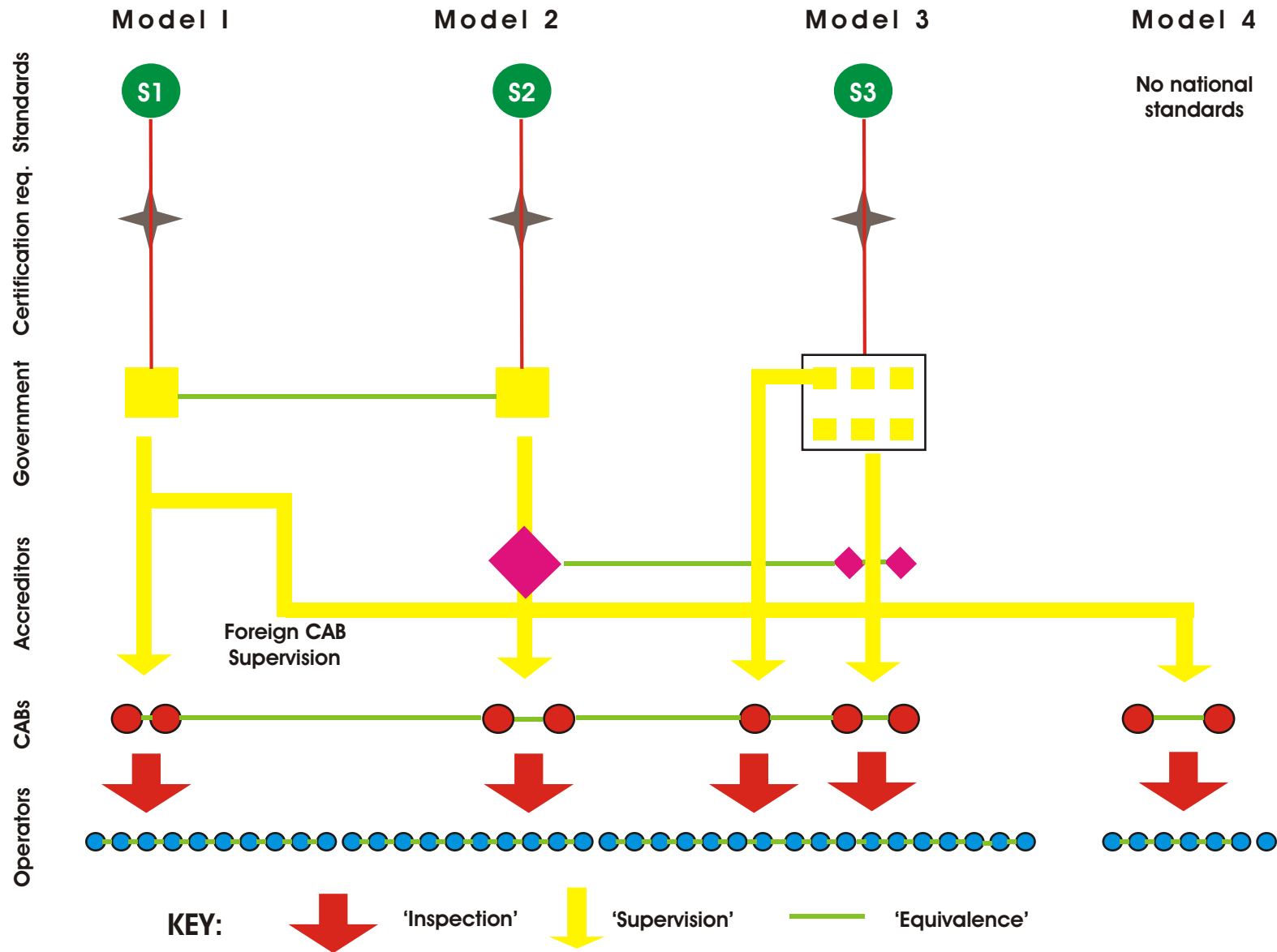
Despite this common overall structure, a number of models have evolved.

To help visualise the various models more clearly and establish our starting point, Figure 1 and Figure 2 summarise the current public sector and private sector organic guarantee systems as described in Commins (2003) and Bowen, (2003). For background, these are briefly described below.

1.1.1 Public sector models

Figure 1 demonstrates four public sector models (though there are a number of further variations), which are evident today. Models I-III are set in a framework of government legislation providing a typical structure, which can be related to the general one above:

Figure 1 Diagrammatic representation of current public sector models regulating the organic sector



International Task Force on Harmonization and Equivalence in Organic Agriculture

- national production standards and labelling requirements (the green circles – S1, S2 etc in Figure 1),
- requirements against which conformity assessment bodies operate and can be assessed (the stars in Figure 1) and
- a government approval system for the conformity assessment bodies or CABs (the yellow squares in Figure 1).

All models have developed somewhat separately. In model IV, no such legislation exists and to date there may be no government interest in regulating the sector (and therefore it is not really a public sector model but is included here for completeness). Model III is a group of states governed by common legislation and we have in mind here the European Union in which harmonisation is encouraged by the single market but implementation is performed at the Member State level.

In all four models, organic producers are inspected by conformity assessment bodies (CABs). These may be private sector organisations (USA, Japan and most Member States of the EU), part of, or related to government (Denmark, Czech Republic, Estonia) or a mixture (Spain). These CABs may either act solely as inspection bodies (not setting standards themselves) utilising the national or regional standard or may set private standards themselves. The conformity assessment bodies are normally approved by government (eg. Model I – however where the government is itself the CAB, there is generally no approval or oversight process) but written into the legislation may be the need for accreditation, (in the European Regulation, to Guide ISO65, a generic (ie not specific to organic certification) guide of the International Organisation for Standardisation) which is performed by the national accreditor – Model II. Where formal accreditation is active, equivalence of the work of the accreditors is governed by multi-lateral recognition agreements (MLAs) between accreditation bodies involving peer review visits. This latter peer review system functions under the auspices of the International Accreditation Forum or related regional entities such as European Accreditation.

In most countries, accreditation (rather than government approval) is optional and in fact a CAB may voluntarily undergo a private accreditor audit in addition to an audit by a government office. In still others a regional government structure may also impose its own requirements. In Italy for example, CABs are supervised by regional government offices, the Ministry of Agriculture and in addition many CABs have opted to undergo voluntarily, accreditation against Guide ISO65. Government approval systems generally range from a document audit only to full annual physical audits as would be done by accreditors. In model IV where there is no national approval system, one might find CABs approved by a foreign government or accredited by a foreign accreditor (and/or by the private system described below). CABs operating in such circumstances must obtain as many individual approvals as is necessary to satisfy their client's (the organic producers) need to access export markets.

Once individual government mechanisms are established, equivalence with other government systems may be sought or export countries may apply for approval. Through equivalence agreements or attaining approved status, CABs, and in turn their certified producers, may recognise product as equivalent and products may be traded. The green lines in Figure 1 represent recognition of equivalence. Such overarching recognition may not be available for all required trade routes, as is the case for the European Union where the majority of products still enter under Article 11(6) as described in Arvius – Swedish Board of Trade (2003). For fear of complicating the scheme in Figure 1, this mechanism has been omitted and is merely indicated as a gap in equivalence between CABs and by implication between operators.

Proponents of such government mechanisms argue that governments are obliged to protect their producers and consumers and only through government regulation can this be achieved. Private systems might be viewed by some as self-interested and lacking in rigour and the full force of the law.

1.1.2 Private sector model

The private sector mechanism (see Figure 2) was established by the International Federation of Organic Agriculture Movements, an international membership organisation of producers, traders, non-government organisations, researchers, conformity assessment bodies and consultants. The mechanism is made up of the same basic components as the public sector systems:

- international basic reference standard including labelling requirements (IFOAM Norms)
- international certification requirements against which a CAB is assessed (IFOAM Norms) and
- evaluation of CABs is performed by one organisation (International Organic Accreditation Service),

Proponents of the IFOAM Organic Guarantee system suggest that the international nature of the model and the reference to single guidance documents at each level avoids the need for equivalence negotiations or peer review between national accreditors. CABs recognise the equivalence of other accredited CABs on the basis of their accreditation, which permits organic producers supervised by the various CABs to trade freely.

1.2 The problems

The public and private sector systems work alongside each other and to some extent duplicate each other, as there is a lack of formal recognition (in both directions) between the two systems.

The five papers prepared for the Geneva 2003 ITF meeting indicate some of the problems with the current way in which the trade in organic products is regulated. Figure 3 attempts to summarise the problems identified in the papers and in the record of further discussion in Geneva 2003 and links them in a problem tree.

It can be argued that both public and private sector systems leave room for improvement in the way in which they serve the sector.

The public sector systems impose different requirements at both organic producer level and at the level of the CABs resulting at worst in multiple inspections and evaluations, and at best in reassessment of reports by different authorities. Claims of inconsistency in the way in which production systems and products are approved by different authorities are, whether true or not, likely to continue whilst different rules and procedures apply on the one hand, and whilst even unified rules may be interpreted differently by different authorities.

The private system is 'weakened' in some instances by the additional standards requirements imposed by some 'importing' CABs which leads to extra verification checks being required

Figure 2 Diagrammatic representation of the private sector model (IFOAM Accreditation) regulating the organic sector

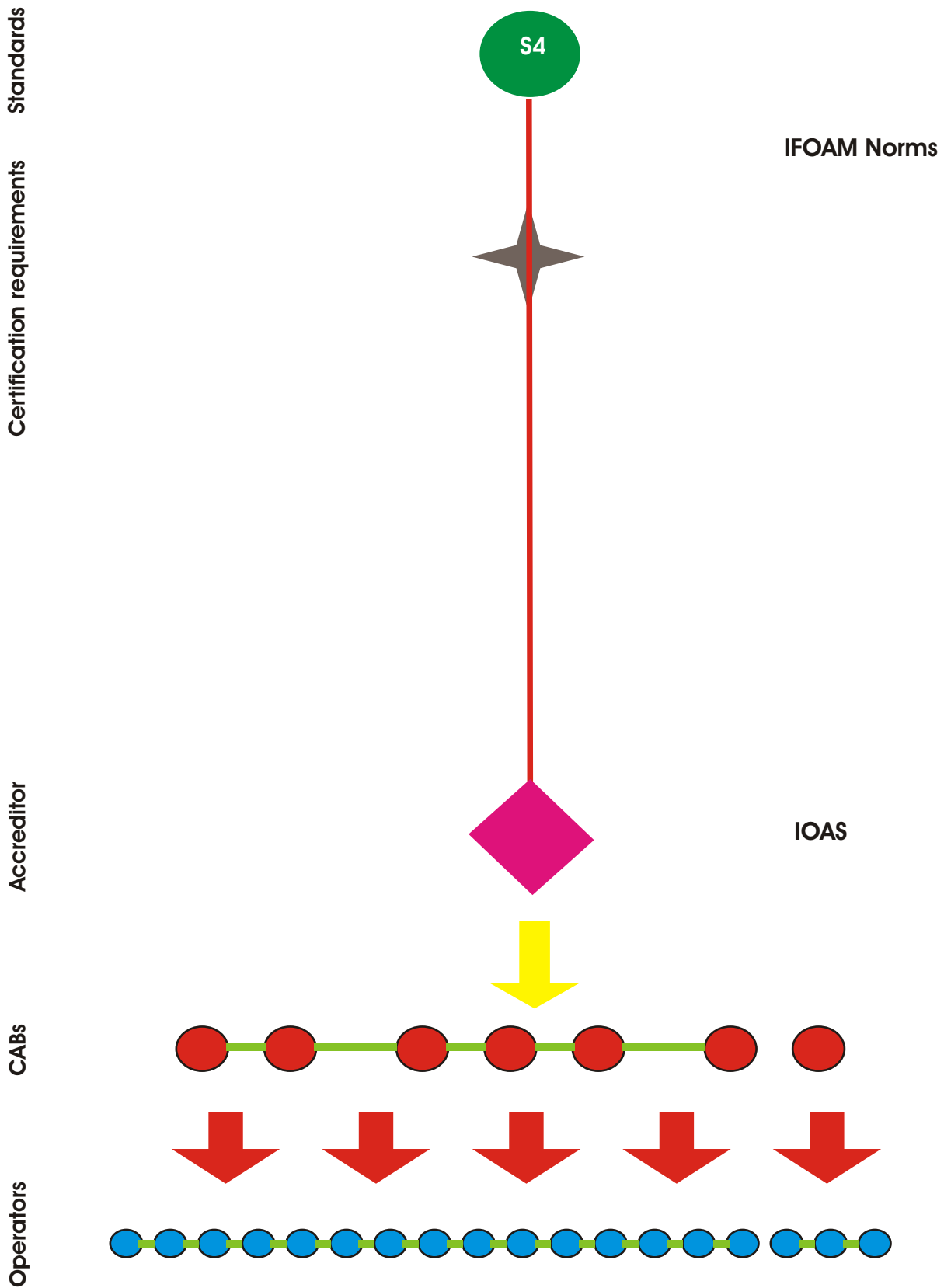
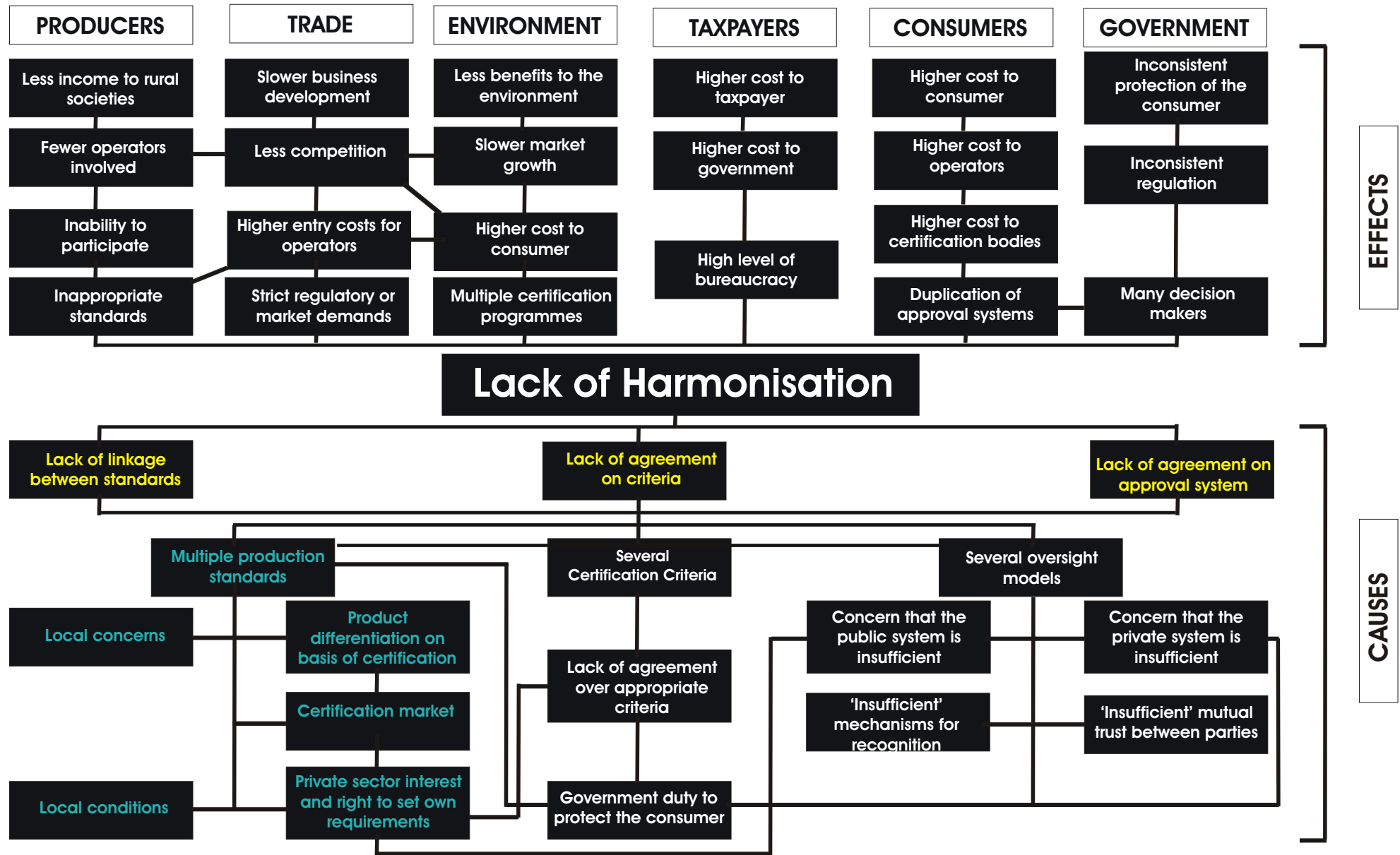


Figure 3 Summary of problems relating to trade in organic products represented as a problem tree



(represented as a break in the green equivalence links between one CAB and its operators with the others in Figure 2). The IFOAM Accredited certifier group is reported to be working to eradicate such extra requirements, some of which are said to be required to comply with legislation. In addition, in some markets, the power of the private labels is such that even though legal access is possible without entering via the local private label, the latter remains the preferred option from a market acceptance viewpoint (see further discussion of private labels below).

The core problem in the centre of Figure 3 is designated 'Lack of Harmonisation' with 'causes' below and 'effects' above. The 'affected sector' (producers, consumers etc) is indicated at the top of the diagram and it demonstrates the ultimate spread of the impact of the problems.

The diagram should be viewed primarily as an aid to visualising the problems and, broadly, their origins and effects but is unlikely to be complete. The evidence for stating a problem and its impact are currently based on common knowledge and experience rather than hard data. This lack of data on the impact of 'lack of harmonisation' was also a problem in the preparation of the paper by Wynen (2004) and reference should be made to this paper for further detail. The collection of further data is likely to form part of the future work plan.

Nevertheless the message of this diagram is that there are three principal causes of problems shown in yellow text in the figure:

- lack of agreement, linkage or equivalence on standards;
- lack of agreement or equivalence on certification requirements;
- lack of agreement or equivalence on the CAB approval/accreditation mechanism.

The result suggested is that we have a higher cost and more burdensome regulatory system than is necessary achieving less than consistent results.

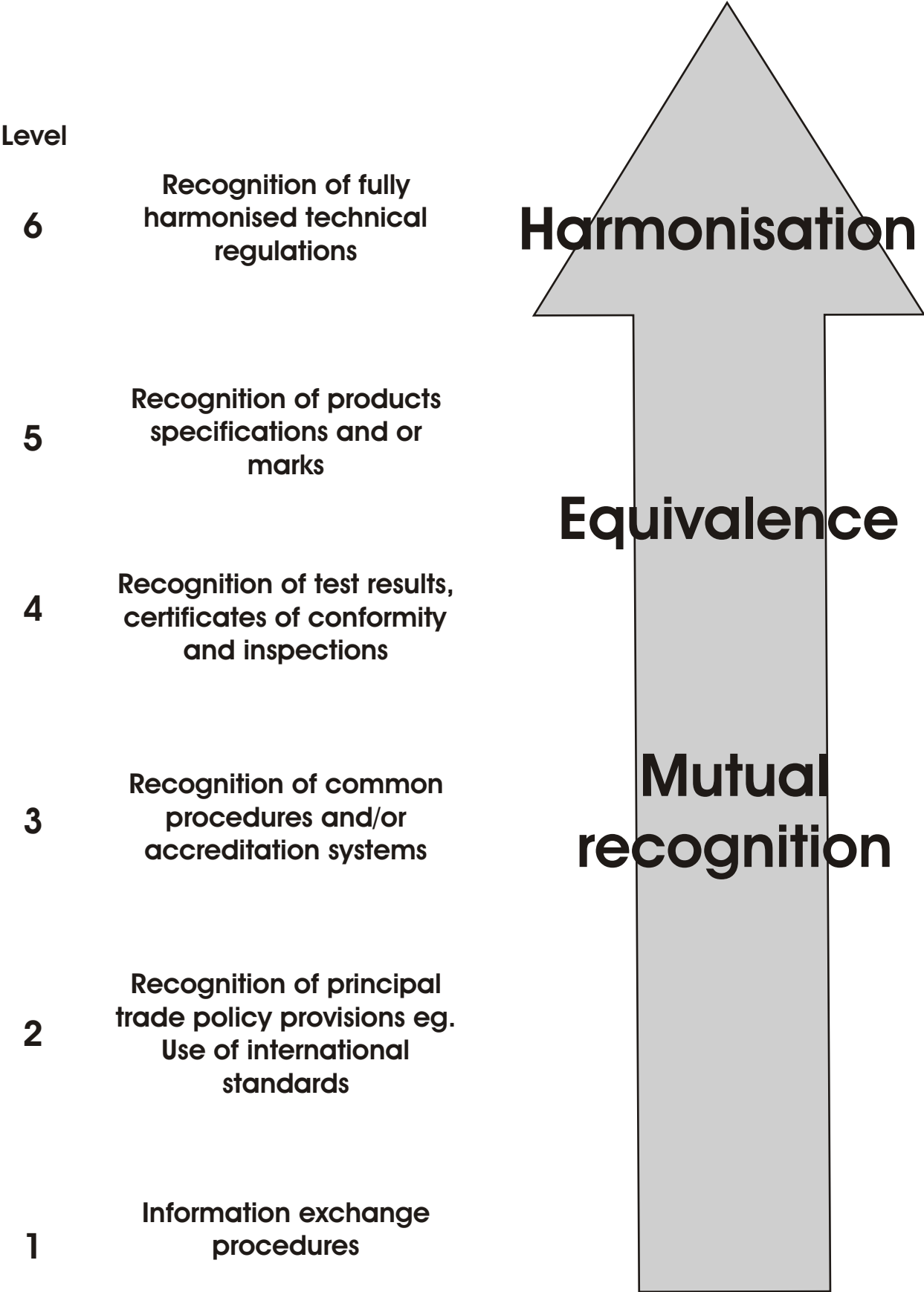
1.3 Harmonisation tools

The box of tools available to us in converging regulation of the organic sector was described separately in the papers by Arvius (2003) and Courville & Crucefix (2003). Figure 4 adapts and combines this analysis.

Level 6 represents a high degree of harmonisation, perhaps where all organic producers work to a single organic standard and where the CABs are approved by a single authority against the same certification requirements. Such a system exists under the National Organic Programme in the USA. The CABs operating in the USA (and overseas) act essentially as 'agents' of government operating a conformity assessment system, which must comply with NOP rules and in their turn, the organic producers must also comply with all details of the NOP production rules.

The US National Organic Programme also incorporates mutual recognition in that it has determined that several foreign government (Denmark, United Kingdom, New Zealand amongst others) conformity assessment programmes are sufficient to ensure conformity to the technical standards of USDA's National Organic Program (NOP), the so-called Option 2 of the NOP.

Figure 4 Harmonisation tools
(adapted from Arvius, 2003 and Courville & Crucefix 2003)



International Task Force on Harmonization and Equivalence in Organic Agriculture

Multi lateral agreements function between national accreditors under the auspices of the International Accreditation Forum provide for a mutual recognition of competence in performing the accreditation work. In turn this permits conformity assessment bodies and authorities to trust surveillance performed by signatories in other parts of the world. This may not lead to product equivalence given that standards assessment does not form a part of traditional accreditation evaluation.¹

The active multilateral agreement between IFOAM Accredited certification bodies is based on accreditation by IOAS to common baseline standards and conformity assessment requirements. This is an equivalence agreement based on a strong harmonisation component in which each CAB can accept other's certificates as equivalent. The fact that IFOAM Accreditation includes an assessment of organic standards as well as certification requirements provides an additional level of confidence in terms of product equivalence.

So it is clear that various harmonisation tools are already being used in organic regulation and in any one system, a number of tools are being used. The higher up the arrow in Figure 4, the greater the convergence of procedures and standards and the greater potential simplicity of the system. It should however not be assumed that level 6 is necessarily the ultimate goal

¹ Accreditation to Guide ISO65, for example, is an assessment of competence to perform certification to a reference standard identified by the client CAB. The evaluation assesses that the CAB has the capabilities to interpret and certify to that standard, but it does not assess the standard itself. In IFOAM Accreditation, an assessment of the chosen organic standard is performed against the IFOAM Basic Standard.

2 Considerations in finding long term solutions

2.1 Background

The meeting of Geneva 2003 included a brainstorming session to bring out potential solutions to the stated problems bearing in mind the tools available and focused on an overall model and the assumed components of such a model;

- governments/regulations,
- private standards,
- conformity assessment requirements,
- certification and
- accreditation.

The main points raised are summarised and structured as Figure 5.

The issues indicated are a mixture of **requirements** of the model (e.g. transparency), **recommendations** (e.g. that Codex Guidelines could be the reference international standard) and **question marks or alerts** (e.g. private labels). The diagram again helps us to visualise the potential components of a model that we will have to consider and their inter-relationships. The main points raised are summarised here but it must be realised that this does not necessarily imply agreement of the meeting on an issue or course of action.

Under **Regulations** the meeting raised the issues of requiring more flexibility and less detailed requirements and considered reference to Codex, IFOAM Norms and Guide ISO65 to be desirable.

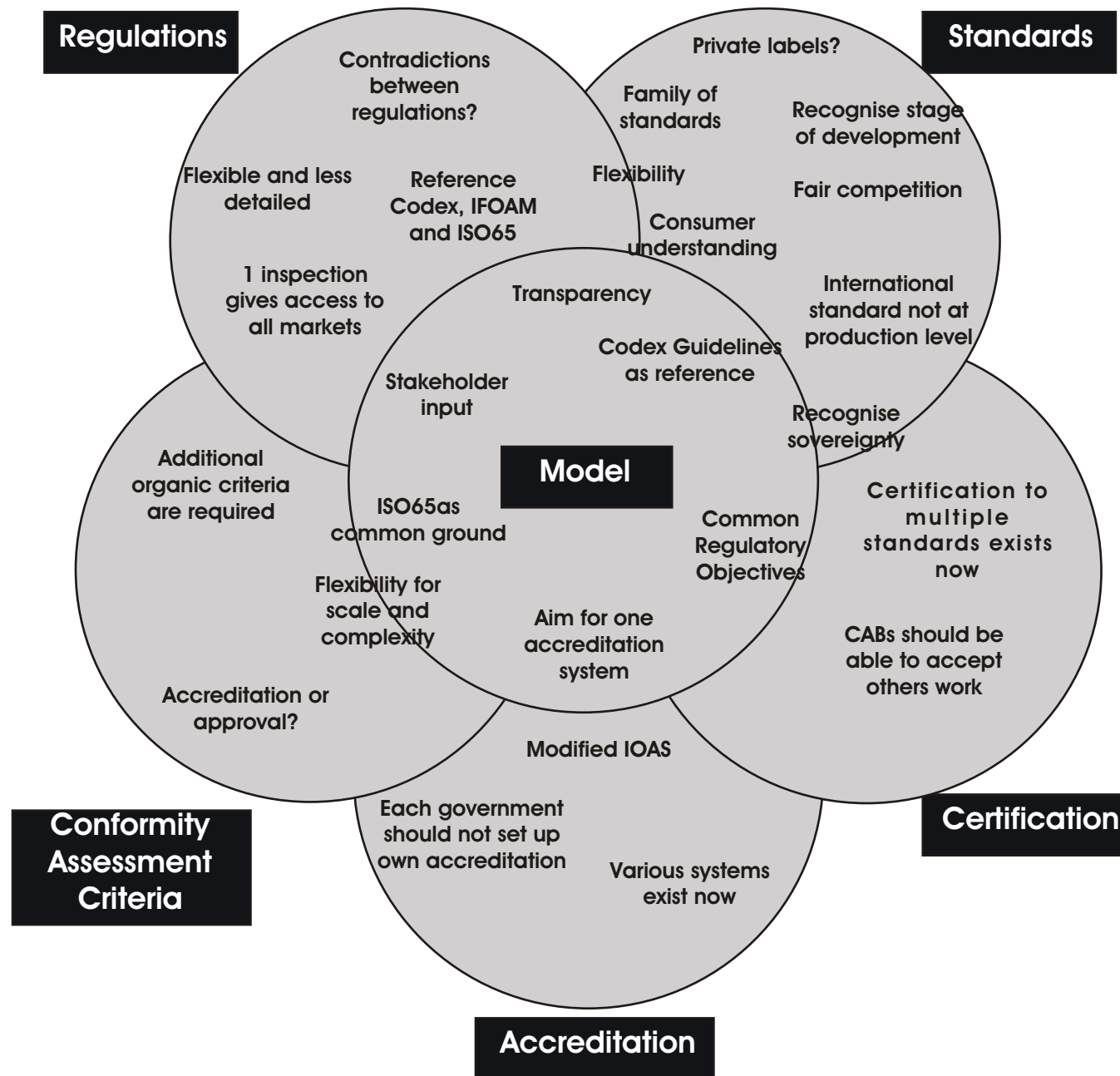
When considering **Standards** the meeting recognised the existence of private labels and government sovereignty and raised again the issue of flexibility in relation to stage of development of organic agriculture in different parts of the world whilst maintaining fair competition.

Multiple **Certification** was seen to already exist where CABs conduct one visit checking against a number of standards. The desire that CABs should be able to accept each other's work was also expressed; one inspection, all markets was a consistent desire expressed.

On considering **Conformity Assessment Requirements** the meeting again raised flexibility appropriate to scale and complexity, whilst recognising some common ground provided by Guide ISO65² but also the need for additional 'organic' requirements such as are expressed in Annex III of the EU Regulation 2092/91 and as in the IFOAM certification requirements.

² Although it is only the EU Regulation 2092/91 (Article 9.11) that directly requires that inspection bodies satisfy the requirements of EN45011 (ISO65), the US National Organic Programme requirements for CABs (expressed in subpart F) are based on ISO65 requirements.

Figure 5 Summary of issues and solutions raised during the brainstorming session of October 2003



Under **Accreditation (or Approval)** the view was expressed that it does not make sense for each government to establish its own approval system, that various models exist now and that a ‘modified’ IOAS (an international accreditation model) could be a solution.

Finally, in bringing these various deliberations towards an ultimate **Model**, the October 2003 meeting prioritised issues of working with a common international standard and common requirements for certification and developing one accreditation system, which could be established with stakeholder input and with transparency.

To take the problem analysis of Figure 3 further and compare issues with the discussion of Geneva 2003, some of the causes of the problems, like multiple standards, are perhaps a fact of life that we have to live with. This is highlighted (in red) in the lower left hand corner of Figure 3. The ITF discussion to date has already noted that ‘local production conditions’ (that is, the need for regional standards) are an accepted aspect of organic agriculture and something we have to work with, rather than eradicate or resolve. ‘Local consumer concerns’ are another issue though perhaps a little more complex.³

The issue of multiple standards and equivalence also relates to the level of detail in an international standard and there appears to be some broad agreement that any international standard must focus on core issues and avoid detail, the detail, if needed, being defined by regional or national standards; hence the ‘family’ of interrelated standards noted in Figure 5.

Another, ‘fact of life’ might be the right for private bodies to set their own standards and the right and duty of governments to impose legislation to protect consumers. Though they may give rise to problems (ie multiple unrelated standards), they need not be problematic in themselves and may be seen in a positive light (private standards are flexible and generally apply pressure upwards whereas legislation can provide a useful backdrop of enforcement). The problems they give rise to must be dealt with, but we cannot deny either governments or private bodies to act in this way.

Putting these issues to one side for now and focusing on the remaining issues, we can rationalise our problem tree into a more simplified version in line with the model discussion in Figure 5 and amend the problems to positive objectives and outcomes as shown in Figure 6.

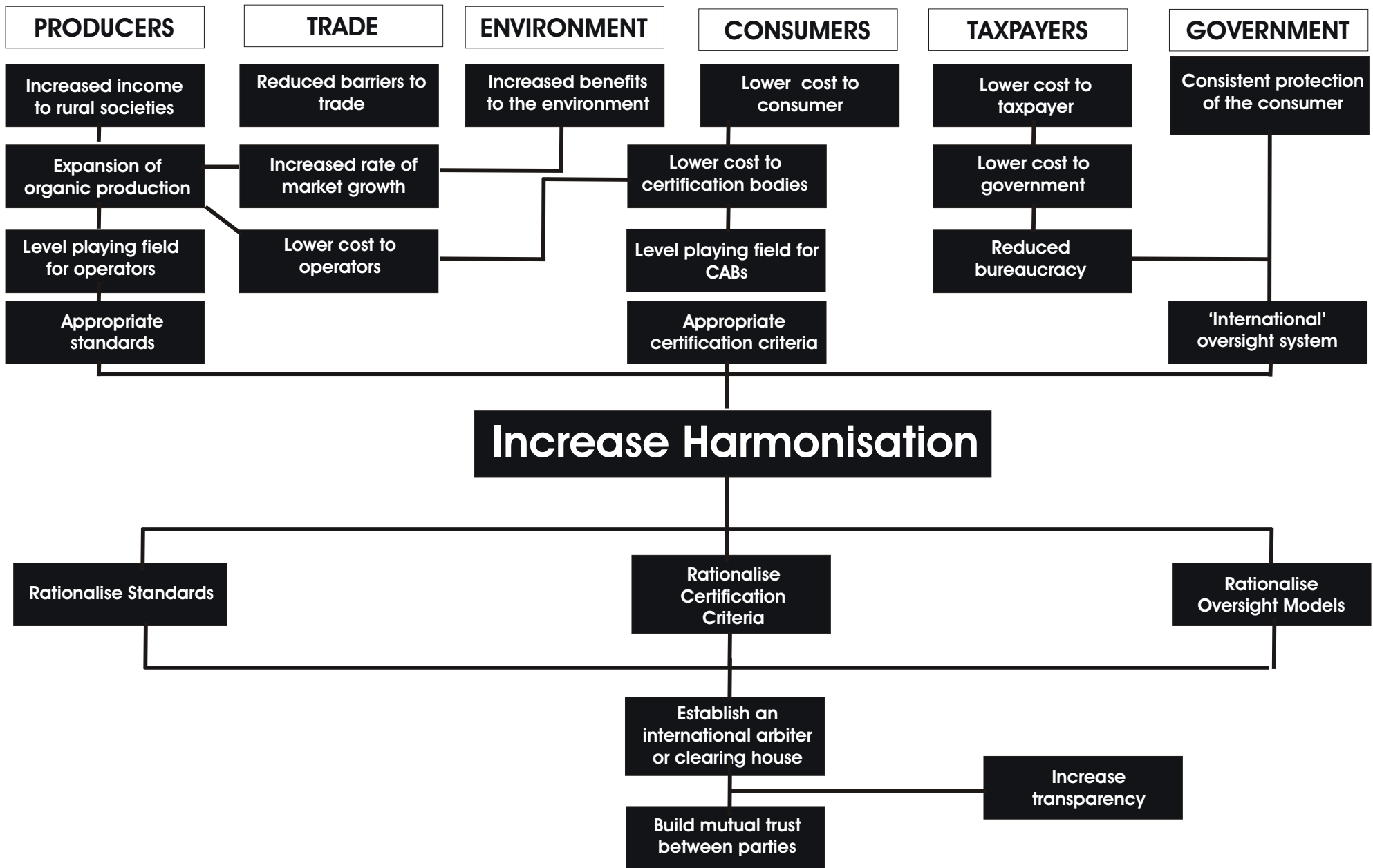
The core problem has become our core objective of ‘Increasing Harmonisation’ and this is made up of three main objectives:

- rationalising standards,
- rationalising certification requirements and
- rationalising oversight models.⁴

³ For example, citizens in one market may consider that organic milk must come from grazing cows. In another where this approach to land use is not customary, the market may not have such an expectation. The question is how one citizen’s expectation be rationalised with that of the other. If a respected international regulatory mechanism was able to state transparently that it was justified for producers in one country to keep ruminants without grazing access on the basis of sustainable land use, whilst in another that access must be provided, the question is, would the consumer be satisfied? Aspects of consumer acceptance are the subject of the planned work of the ITF and are raised in the work plan proposed later (Action C3).

⁴ We could add here a fourth objective, that of rationalising labelling and there may well be some interest in that. However, for now this is left to one side as it depends fully on the achievement of the previous objectives. It is however indicated in the final model in Figure 7.

Figure 6 Final simplified objective tree



The objectives remain purposefully wide ranging at this point in time, as it would seem wise not to narrow our options to exclude any possible solutions. Each one of these components can be dealt with using different harmonisation tools and could be placed at different levels in Figure 4.⁵ However a critical phase in initiating these first steps is likely to be building trust between participants and increasing transparency. This may or may not lead to, or require the establishment of some kind of international arbiter or oversight organisation but it seems likely. This forum or organisation would need to provide the environment for fostering participation, common purpose and transparency.

2.2 Criteria for assessing possible regulatory models

With these broad goals identified we need to not only refine them but also consider what model or combination of models might achieve them. Reviewing the problems defined, the solutions raised in the discussion to date, the tools available and the characteristics of the organic trade described by Courville and Crucefix (2003) it is possible to propose the following broad requirements for the development and implementation of a model regulatory system in the organic sector.

1 Access to markets with minimal bureaucracy

The model should aim to provide access to all markets based on one inspection and as far as possible one certification decision. This is a common and expected aim of most harmonisation efforts from which flows the need that the standards, inspection procedures and oversight can be seen to be the same or equivalent. By this means the model should remove unnecessary technical barriers to trade and in addition should at least reduce duplication of effort in rule setting and decision-making

2 Fair competition between operators

This is another essential and expected criterion that should guide the development of a convergence model. Although this is a common aim, its achievement in bi- and tri-lateral agreements is limited only to the participating countries or bodies. If our aims are to provide for fair competition amongst operators across the world, then bi- or tri-lateral negotiated agreements would seem inadequate. On the other hand bi- or tri-lateral agreements may be seen as a practical way of proceeding in the absence of a broader agreement.⁶

3 Adequate and consistent consumer protection.

This is a basic objective with the same limitations in relation to bi- and tri-lateral agreements.

4 Sensitivity to different agro-ecological, socio-political and economic environments

This requirement addresses the need not only for sensitivity to different agricultural environments but also to stage of development of organic agriculture (which impacts on

⁵ Are we thinking of harmonisation around one standard or considering equivalence for example?

⁶ There are a number of factors that affect competition that are outside the scope of this paper but which are nevertheless relevant to a discussion on fair competition. The initial and ongoing payments to EU farmers converting to organic farming can be argued to distort any idea of fairness. They may also distort what is reasonable and unreasonable to require in terms of organic production rules.

production standards), and to institutional, legislative and economic situation of any country which in turn may impact on control systems and oversight. For example any model that required for its functioning, full legislation on organic agriculture and labelling in each territory would immediately exclude a good many participants. The third country recognition procedure of the EU Regulation is an example of this problem and the recently published EU Action Plan for Organic Food and Farming recognises this (European Commission, 2004).

5 *Stakeholder support and involvement.*

The issues of mutual trust and feelings of engagement are important here. Like it or not there are feelings of mistrust between private-private bodies, private-public and public- public bodies involved in the regulation of the organic sector. Additionally there exists the dominance of the import markets over the export suppliers. If a new regulatory model is to be truly respected by producers, private control bodies, governments and consumers, it must seek involvement from all such parties.

6 *National sovereignty and market choice*

Governments have a responsibility to serve and protect their constituency and this must be respected. Likewise there is a legitimate place for private companies to provide certification services, which may involve the setting of higher standards if there is a demand for such a service, or for buyers (whether at consumer level or trade level) to insist on higher standards to be met. At present this results in 'barriers' to trade. A new regulatory model must address this anomaly.

7 *Transparency of operation and decision-making*

Maximum transparency of operation and decision-making and provision of information is required to engender mutual trust and respect for any objective regulatory system.

8 *Led by principal trade policy provisions*

The WTO/TBT principles of reference to an international standard and recognition of equivalence where similar objectives are being met will be central to the establishment of a new regulatory system.

9 *Benefit to producers and consumers and the organic market as a whole.*

The regulatory systems' principal clients are the organic producers and consumers. All other participants may be important components, whether government or private sector control or accreditation bodies, but they are, in the end, just service providers.

2.3 Review of models against criteria

This section reviews the models described by Courville & Crucefix (2003), in the light of the above criteria, assigning a crude scoring system. The reader is referred to their paper for background discussion of the models. The IFOAM Accreditation model is also reviewed as an existing international model in the organic sector.

We are seeking an international mechanism and not all the models are fully international in nature. Although the individual models may, as a result, be marked down in certain

circumstances, this does not mean that components of such models may not be of interest. However this scoring process allows us to pinpoint an initial ‘best fit’ which may be the focus of initial investigation.

The general policy provisions expounded by the WTO/TBT are included as a general guide to the process and the WTO ‘model’ is therefore not reviewed in itself. Table 1 provides a summary of the review, which is described in more detail below.

1 Access to markets with minimal bureaucracy

The principle of access to markets with minimum regulatory burden is embodied in all the models except the WANO model in which this aim is not relevant. The bi- and tri- lateral models of the ICH, the US-EC Safe Harbour, the US-EC MRAs and the EU new approach are marked down to partial fulfilment on the basis that the access is limited to the parties involved and not to the rest of the world. The Codex, UNECE and ISTA models score well as, in theory, these models are open to all who participate. Additionally they are based on an international standard rather than rules negotiated between several parties as in the ICH and rules set by one party in the Safe Harbour and the US-EC MRAs. The IFOAM model is marked down on the basis that it does not in practice provide access to all markets although this has more to do with its lack of acceptance by authorities than any mechanistic problems.

2 Fair competition

Most models set out to achieve fair competition between producers although once more this is not really an objective of the WANO system. The international models are a gain given higher scores for the reason that less than all-inclusive models cannot achieve fair competition for those not involved.

3 Consumer protection

Similar scoring is achieved to fair competition for producers although the WANO model can also be included as this is surely the intention of this model.

4 All environments

This criterion receives the worst scores over all models principally because the bi- and tri- lateral models described require participants to provide similar institutional facilities. Such a requirement may for example require the existence of a manufacturers association or a government department responsible for trade and consumer protection. The lack of such institutions either excludes or makes negotiations difficult. The Codex and UNECE models however are also limited to working through governments and not all governments may currently view engaging in negotiations for equivalence for organic products as of sufficient priority, leaving producers in those countries with access problems. Both ISTA and WANO receive positive scores here because of their relative independence from these ‘environmental’ factors.

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Table 1 Evaluation of various models of harmonisation against the proposed criteria⁷

Criteria	ICH ⁸	Safe Harbour ⁹	Codex ¹⁰	US-EC MRAs ¹¹	US-EC Marine ¹²	UNECE ¹³	ISTA ¹⁴	WANO ¹⁵	EU approach ¹⁶	IFOAM Accreditation
Access to all markets	-+	-+	+	-+	-+	+	+	NR	-+	-+
Fair competition	-+	-+	+	-+	-+	+	+	NR	-+	+
Consumer protection	-+	-+	+	-+	-+	+	+	+	-+	+
All environments	-	-	-	-	-	-	+	+	-	+
All stakeholders	-+	-+	-+	-+	-+	-+	+	+	-+	+
Respect sovereignty	+	+	+	+	+	+	+	+	+	+
Transparency	+	+	+	+	+	+	+	-	+	+
Benefit participants	-+	-+	+	-+	-+	+	+	-+	-+	+

⁷ Key: - Not provided for + Provided for in part + Provided for NR not relevant

⁸ International Conference on Harmonisation within the pharmaceutical sector with main actors being the US, EU and Japanese pharmaceutical sectors.

⁹ US-EC Understanding on the Principles for Data Privacy Protection

¹⁰ Codex Guidelines for the Development of Equivalence Agreements regarding Food Import and Export Inspection and Certification Systems

¹¹ US-EC Mutual Recognition Agreement covering six sectors: telecommunications equipment, electromagnetic compatibility, electrical safety, recreational craft, medical devices and pharmaceutical good manufacturing practices.

¹² US-EC Mutual Recognition Agreement on Marine Equipment

¹³ United Nations Economic Commission for Europe International Model for Technical Harmonisation based on Good Regulatory Practice for the Preparation, Adoption and Application of Technical Regulations via the use of International Standards.

¹⁴ International Seed Testing Association

¹⁵ World Association of Nuclear Operators

¹⁶ EU 'New Approach' for harmonisation of standard and the 'Global Approach' for conformity assessment.

Strategy on solutions for harmonising international regulation of organic agriculture

5 *All stakeholders*

The pattern of scoring for involvement of all stakeholders is similar to that for environments above. It would be unfair to award low scores to those models other than ISTA and WANO as most models do attempt to address both public and private sector concerns. Bi- and tri-lateral agreements are marked down for lack of geographical coverage and Codex and UNECE are marked down because of the emphasis placed on governments.

6 *Respect sovereignty*

National sovereignty is respected in all cases and this is interestingly achieved nevertheless in the models of WANO and ISTA, which emphasise more the private sector. This seems to be achieved through government involvement.

7 *Transparency*

This has been judged on the basis that transparency is provided where standards and procedures are published and publicly available which in most cases they are.

8 *Benefit to participants*

The scores here mirror those for fair competition and consumer protection as might be expected. Participants in this context refers to potential not actual, therefore regulatory mechanisms that have limited participation do not score as well as open participation models.

In summary, the Codex, UNECE, ISTA and IFOAM models score most promisingly. The various models exhibit some or all of the requirements emerging from our earlier analysis as follows:

- an international arbiter or oversight body
- stakeholder participation and transparency
- involvement of international organisations and governments
- one international rule set
- one international operating requirement set
- one international accreditation system performed (in ISTA and IFOAM systems only)

3 Long Term Goals and Strategies

It is proposed that the long-term strategy for a new international regulatory mechanism for organic agriculture and trade adapts a model based on that of ISTA and IFOAM utilising the neutral territory offered by the Codex and UNECE models where possible.

The model should be designed to meet the criteria expressed in section 2.2 above through structures and mechanisms that provide for:

- production standards compliant with an international standard;
- one international certification requirement; and
- equivalent if not same accreditation/approval mechanism.

In more detail, the following characteristics are proposed:

3.1 Production standards

- An international set of basic standards agreed and maintained by an international forum with input from all stakeholders
- National governments could either reference the international standard in legislation or set their own national standard following the format of the international standard.
- This guideline standard or legislation should avoid too much detail and become the ‘common regulatory objectives’ or the essence of ‘organic’ rather than the detail;
- To aid transparency, a common standards format be agreed
- Private standard setters within the jurisdiction of the legislation would be assessed to meet these standards but higher standards would be permitted.
- Operators and CABs in countries where no legislation exists would not be disadvantaged because they would likewise use the international standard as a baseline.
- International trade would be on the basis of the international standard.
- An approval mechanism to ensure that CABs complied with the international standard (or a higher national standard where appropriate) would be required.

3.2 Certification Requirements

It can be argued that there is greater scope and justification for harmonising certification requirements than standards. They are less ‘environmentally and institutionally’ sensitive although care should be taken to ensure that the requirements provide for certification of integrity without favouring or penalising either large or small CABs or that procedures resulting from the norms are putting undue burdens on (disadvantaged) producers.

So the aims would be to:

- Seek agreement on one harmonised set of certification requirements

- Give consideration to ensuring the requirements are scale sensitive
- Develop an international forum for seeking such agreement.
- Develop an approval system to ensure CAB compliance.

3.3 Conformity Assessment Bodies

The international accreditation model illustrated in Figure 2 appears as the simplest and most transparent regulatory model but a national model could also work if standards and requirements are harmonised and should not be rejected at this stage. Both accreditation models already function in the organic sector.

The international model is the model that eliminates the necessity for peer review between national accreditors. Oversight of the competence of the body implementing such a system may be required for credibility by some independent forum although this does not appear to be the case in the ISTA model. An international accreditation model may cut across certain governments' current policy that accreditation should be performed at national level by one body.

The national model is the traditional model and generally accepted by governments. One reported disadvantage experienced of the national model is the initial lack of expertise in the field of organic agriculture by some national authorities or accreditors. A further problem is that national accreditation bodies do not exist in many, especially less developed, countries. Advantages of the national model over the international model however, are the potential ability to do more frequent audits and spot checks, greater familiarity with local legislation and of working in the home language.

There would then appear to be several options:

- Adopt the international accreditation model
- Adopt a national accreditation model using harmonised certification criteria and standards.
- A third option might be to combine the two models in an attempt to realise the advantages of both systems. Either an international model could use local personnel or a national model could use 'international organic' expertise.
- Consideration would need to be given as to whether the assessment of compliance of standards is included in the accreditation or evaluated separately by an independent body.

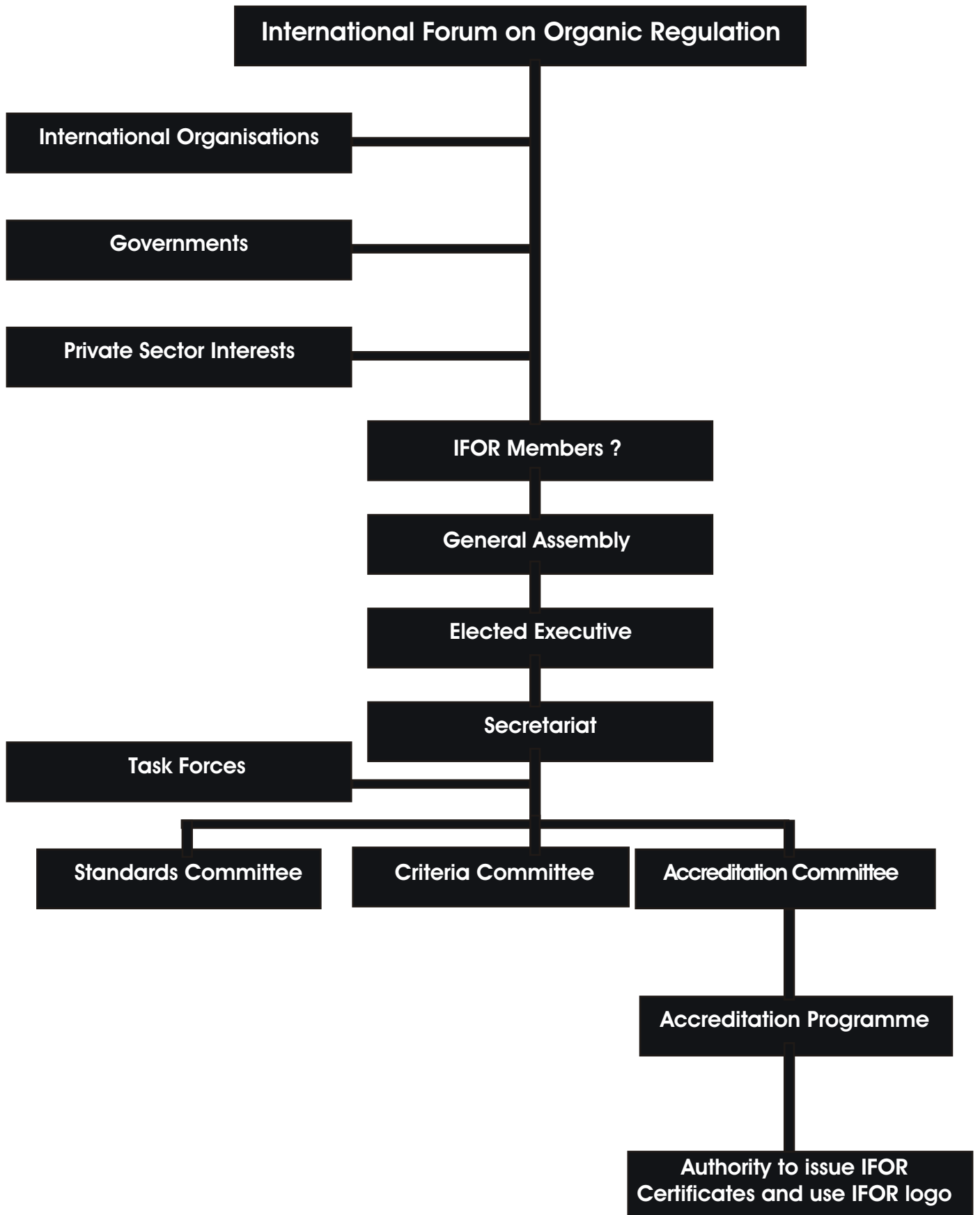
A diagrammatic representation of the new model is presented as Figure 7.

3.4 Issues arising

A new organic model would fulfil the criteria if:

- Inspection is performed of an operator against a standard clearly linked to and at the level of or above (ie equivalent to) the international standard;
- Inspection and certification is performed in line with international certification requirements;

Figure 7 Proposed model goal for regulation of the organic sector



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- The standards and certification are deemed to be in compliance by an international or national accreditation body; and,
- Trade takes place based on the level of the international standard

The following issues would have to be considered in relation to each of the required criteria proposed earlier:

3.4.1 Access to markets

In principle, the ‘one inspection - all markets’ goal can be achieved but there remain some uncertainties that must be addressed.

Issues

Where national or private standards exist that are more stringent than the international standard, insistence that imports meet these requirements will create barriers to trade and weaken the ‘one inspection, all markets’ goal.

- This then raises the question as to the willingness of both government legislators and private sector standard setters to either reference, or use as a basis, an international standard given that at this point in time, a lot of time and money have been invested in setting up individual country and private standards?

3.4.2 Fair competition

Again in principle, fair competition is assured by the reference to an international standard and requirements for certification but this is again threatened by the freedom to set higher standards.

Issues

Producers in an export country with what are considered to be ‘lower’ standards compared to those of the importing country may be considered to have an advantage over the domestic producer. This could lead to downward pressure on standards or, at least, a settling of standards to a lowest common denominator permitted by the international baseline. Some would see this erosion as a threat to the existence of an organic identity. Others may see the ‘simplification’ or a reduction in stringency of organic standards as an acceptable price to pay for harmonisation.

IFOAM have an ongoing effort to address equivalence and have developed Criteria for Regional Variations of the IFOAM Basic Standard. The American Organic Standard¹⁷ is currently being reviewed by this mechanism.

¹⁷ The American Organic Standard is a private sector standard developed through a consultation process in the USA led by the Organic Trade Association

3.4.3 Consumer protection

The same issue arises. Consumers will be guaranteed organic integrity at the level of an international standard but again variation in standards whether between private bodies or between nations may be seen as confusing and undermining of the guarantee.

Issues

- Is it acceptable for a product of 'less stringent' organic requirements to be sold as of the same organic integrity as a product of 'more stringent' requirements if there is sufficient transparency in the regulatory system. For example, if a private standard setter made quite clear in its standards that ingredients or products not certified by it were all at least at the level of a recognised international standard but could be below its own more stringent requirements.

3.4.4 All environments

The existence of international norms and an agreed system of approval that can operate nationally or internationally permits CABs, and therefore operators, in all countries to access the international market irrespective of whether adopted legislation is in place in their own country. Similarly no negotiation of equivalence is required between a powerful importer and a weak exporter

Issues

- A related issue here is the important one of whether an international standard can be agreed given the wide variation in 'environments' in which it has to apply. Current international standards are criticised by some as being too weak and by others as being too stringent.

3.4.5 All stakeholders

The extent to which this is achieved would depend on the nature, structure and operating procedures of any international forum that would oversee the maintenance of the international norms.

Issues

- This then raises the question of what forum can be envisaged to oversee the agreement and maintenance of the organic norms and in the case of an international accreditation model, the oversight of accreditation as well.

3.4.6 Respect sovereignty and market choice

The model neither requires nations to enact legislation nor does it prevent them from doing so, nor from setting higher standards.

Nor does the model prevent private standards setters from maintaining their own and stricter standards.

Issues

- As indicated above, to enable free trade, the model does require those who set higher standards to accept the international standard as the level for trade. This may be considered an incursion on sovereignty
- This then raises the question that, accepting that governments or the private sector may set higher standards, what is the willingness (and legality in terms of a label guarantee) of either to use the international standard as the basis for trade?

3.4.7 Transparency

The requirement to reference, link to, and structure standards and certification requirements in the same way as the international norms will assist transparency and simplify comparison and evaluation.

Issues

- Further effort will be required to achieve full transparency in terms of standard setting and approval of national norms. The accreditation system will also need to strive for maximum transparency without endangering confidentiality.

3.4.8 Principal trade provisions

Reference to international norms is a clear requirement. Trade at the level of the international norm and acceptance of equivalence is also inherent in the model.

Issues

- Questions relate to the willingness of nations and the private standard setters to reference an international standard in the spirit of harmonisation and to accept as equivalent those standards and control systems that can be shown to 'meet the same regulatory objective'

3.4.9 Benefit to participants

Less duplication of effort and greater linkage and transparency in norm setting with an expected increased uniformity of application of standards and control should both reduce the cost of the guarantee system worldwide as well as improve its consistency and enhance confidence in organic integrity. All will benefit both producers and consumers and the organic trade as a whole.

Issues

- Depending on how both governments and private organisations choose to engage and implement such a model, a decrease in the size of the organic regulatory sector could be expected which could lead to loss of jobs in some organizations. On the other hand, such a result would be construed as a benefit in other organizations where the human resource to administer the system is not available.

In summary, three key issues are arising as follows:

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- What type of forum (existing or to be developed) can be envisaged to foster harmonisation efforts and maintain oversight over a harmonised system whilst providing the appropriate authority, participation and transparency?
- If a basic international standard can be agreed, are both government and private standards setters willing to harmonise around it, either by reference to it or by restructuring their own standards in the same format to allow easy comparison?
- Are government and private standards setters willing to accept that trade should take place on the basis of an agreed international basic standard or regional variations thereof?

4 Implementation

Some of the main building blocks listed above already exist in one form or another in the current organic regulatory structure. Two international standards exist (Codex Guidelines and IFOAM Norms), as do two international conformity assessment requirements (Guide ISO65 and IFOAM Norms). We also have available both the international and national accreditation models operating in the organic sector. Why, if we already have many components does the system not operate, as we would wish?

It seems that it is not just a matter of having the tools but the will, the need to be convinced of the rationale or the ability to visualise a route for moving towards harmonisation. The initial problem appears to be a lack of will or forum to discuss and consider these issues on a global level. A Codex Guideline exists but it has hardly been referred to in national legislation, as was the intention. Guide ISO65 is a generally accepted criterion for certification but has only been adopted fully by the EU Regulation. IFOAM Accreditation is a fully functioning international model but lacks formal recognition by the government sector. Private sector standard setters continue to differentiate themselves on the basis of 'higher' or more detailed standards. As one commentator put it in the Geneva 2003 ITF meeting, the aim should be to differentiate, not between organic and organic but between conventional and organic.

The establishment of an international forum to discuss and develop this argument appears to be required. Both the Codex Equivalence and the UNECE Equivalence models provide some ideas on calling for participants but both rely primarily on the response of governments. The ISTA model involves both governments and the private sector and the establishment and operation of ISTA needs to be further investigated in the initial work plan.

The work programme presented below takes these considerations into account by ensuring representation of all stakeholders, by providing data on the current situation and the benefits of harmonisation, by working simultaneously on developing the various pieces of the jigsaw and finally by trying to achieve some practical successes in the short term.

It is proposed that the work plan is implemented in two phases; the first will be managed by the ITF with the overall aim of taking the work plan up to the establishment of an international oversight body. During this period, it is hoped that a large part of the groundwork including standards and certification requirement comparisons and research on alternative structures and mechanisms can be performed. Ultimately it is expected that the ITF will be dissolved and the new body, for convenience here named the International Forum on Organic Regulation (IFOR), will take over the management of its own development and ultimate implementation.

The sequence of thought is presented as Table 2 and runs as follows:

- Section A - Present and gain initial support for the ultimate objective and route map

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Table 2 Work programme towards a harmonised system for regulating trade in organic products

OBJECTIVE	ACTIVITY	OUTPUT	Yr 04		Yr 05		Yr 06		Yr 07		Yr 08		Yr 09		Yr 10	
			1	2	1	2	1	2	1	2	1	2	1	2	1	2
Half year																
			PHASE I ¹⁸						PHASE II ¹⁹							
A. Acceptance of problem and initiation of plan																
	1. Acceptance of the final version of this paper by ITF	Overall acceptance of project direction														
	2. Distribution of this final paper and/or summarised version and invite comment from specific actors	Assurance of support from key actors, both public and private sector														
	3. Amendment of objectives and work plan where necessary															
	4. Seek funding for Phase I ²¹	Funding available														
B. Short term practical steps	see separate paper (ITF, 2004b)															
	6 actions	Early contributions towards harmonisation														
C. Evidence available to support and guide harmonisation																
	1. Completion and publication of data on trade impact ²²	Evidence available to support and guide harmonisation effort.														
	2. Collation of data on cost of administering the regulatory system															
	3. Survey on consumer attitudes ²³															
D. Establishment of an international oversight body - IFOR																
	1. Further investigation of most promising models	Clarity on how established and how operated (if already active)														
	2. Investigation of existing fora e.g. Codex, UNECE	Decision on whether an existing forum														

¹⁸ Phase I includes the preparation of this paper and its eventual adoption by the ITF and proceeds until an administrative unit of IFOR is in place. During this period the existing ITF and its Secretariat will manage the development process.

¹⁹ Phase II starts from the time when an administrative unit of IFOR is in place and leads up to the initiation of the harmonised regulatory system two years later. The IFOR unit will take over management of the process from its inception.

²⁰ The yellow band (5 years after the approval of this work plan) indicates the target date for the IFOR harmonised system to be initiated.

²¹ Initial funding has been acquired but to conduct the activities indicated and maintain impetus further funding will need to be sought.

²² The paper of Wynen (2003) provides initial data on this topic.

²³ An investigation on consumer attitudes was already considered as part of the work-plan of the ITF.

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OBJECTIVE	ACTIVITY	OUTPUT	Yr	Yr	Yr	Yr	Yr	Yr	Yr
			04	05	06	07	08	09	10
		may be suitable.							
	3. Approach existing forum or propose new one	Final decision on IFOR structure							
	4. Build up to and convening of first meeting to initiate IFOR, agree terms of reference, operating procedures, work plan and funding.	Agreement on tor, operation and funding.							
	5. Installation of an administrative unit/secretariat	Administrative unit in place							
E. Acceptance of an International Standard									
	1. Develop standard format and draft international standard	Agreement on common format and draft international standard							
	2. Reformulate 5 national standards and 2 private standards in international format and compare.	Identified areas of convergence and divergence and the potential for harmonised formats.							
	3. Who and how will production standards be approved?	A standards approval mechanism agreed							
	4. Web site development to aid transparency	Transparent decision making							
	5. Ongoing international standard development and approval of local production standards.	Current international standard							
F. Acceptance of International Certification Requirements									
	1. Consider issue of scale and complexity of CABs	Solution to the issue of scale and stage of development of CABs							
	2. Draft international requirements	Final draft requirements							
	3. Ongoing international certification requirements development	Current international requirements							
G. Acceptance of an Accreditation model									
	1. Draft proposal on an international model of accreditation	Accepted model for accreditation							
	2. Development of draft oversight system	Accepted oversight system if necessary							
	3. Implementation	Implemented accreditation system							

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- Section B - Immediately initiate/continue identified practical steps that are either time sensitive or that are important first steps towards harmonisation (these actions are presented in more detail in a separate paper (Crucefix, 2004)
- Section C - Amass further data on the cost of not doing anything, the benefits of harmonisation and consumer attitude to organic standards, equivalency etc.
- Section D, E and F - Simultaneously initiate projects to develop an international oversight structure, an international reference standard, international reference certification requirements and a 'unified' accreditation system.
- Sections B, D, E - Develop papers on some of the options for solving the expected problems indicated above.
- Section E - Complete standards restructuring and comparisons to demonstrate the impact and feasibility of moves towards compliance with the proposed international standard.
- At the end of phase I an IFOR administrative unit should be appointed to provide the required focused effort to assist in developing over the next two years the structures and legislative changes needed to inaugurate the harmonised system
- Five years after the approval of this work plan IFOR takes over management of its own development and implements a harmonised international regulatory mechanism.

A timeframe for implementation is provided although it is of course very difficult to say how quickly such a process may take and that presented may be optimistic given the processes of discussion, support and change that will need to take place in a number of administrations.

5 Actors and task assignment

As was made clear in the review of Courville & Crucefix (2003) and in Figure 4 of this document, exchange of information between the various parties is a necessary component in moving towards and maintaining harmonised regulatory systems. It is therefore proposed that wherever feasible, tasks are assigned to joint stakeholders and in some circumstances this will mean parties with potentially opposing views and certainly different perspectives. This may result in some ‘forced collaboration’ that will hopefully break down barriers and lead to increased understanding on all sides. This may be particularly important in performing some of the initial standard and regulation comparisons (the short-term actions of section B presented as a separate paper) where it would be desirable to involve the organisations responsible for the respective standards as well as neutral third party. Alternatively it may be desirable to invite tenders for specific identified projects in which case the ITF will need to consider how such a process will be managed.

Table 3 presents initial proposals on assignments of the activities indicated in Table 2.

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Table 3 Proposed assignment of tasks

OBJECTIVE	ACTIVITY	ACTORS IN ESTABLISHING THE REGULATORY MECHANISM											
		ITF	GOV	FAO	UNCTAD	IFOAM	IOAS	NABs	CABs	CON	OP	Trade	IFOR
A. Acceptance of problem and initiation of plan													
	1. Acceptance of the final version of this paper by ITF												
	2. Distribution of this final paper and call for comments and invite comment from specific actors												
	3. Amendment of objectives and work plan where necessary												
B. Short term practical steps	4. Seek funding for Phase I See separate paper (ITF, 2004 b)												
C. Evidence available to support action.													
	1. Completion and publication of data on trade impact												
	2. Collation of data on cost of administering the regulatory system												
	3. Survey on consumer attitudes												
D. Establishment of an international oversight body - IFOR													
	1. Investigation of most promising models												
	2. Investigation of existing fora												
	3. Approach existing forum or propose new one												
	4. Build up to and convening of first meeting to initiate forum, agree terms of reference, operating procedures, work plan and funding.												
	5. Installation of an administrative unit												
E. Acceptance of an International Standard													
	1. Develop standard format and draft international standard												
	2. Refo rmulate 5 national standards and 2 private standards in												

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OBJECTIVE	ACTIVITY	ACTORS IN ESTABLISHING THE REGULATORY MECHANISM											
		ITF	GOV	FAO	UNCTAD	IFOAM	IOAS	NABs	CABs	CON	OP	Trade	IFOR
	international format and compare.												
	3. Who and how will standards be approved?												
	4. Web site development to aid transparency												
F. Acceptance of International Certification Requirements	5. Ongoing international standard development and approval of local production standards.												
	1. Consider issue of scale sensitivity												
	2. Draft international requirements 3. Ongoing international requirements development												
G. Acceptance of an Accreditation model													
	1. Draft proposal on an international model of accreditation												
	2. Development of draft oversight system												
	3. Implementation												

Key to Organisations: GOV = governments FAO = Food & Agriculture Organisation UNCTAD = United Nations Conference on Trade and Development IFOAM = International Federation of Organic Agriculture Movements IOAS = International Organic Accreditation Service NABs = National Accreditation Bodies CABs = Conformity Assessment Bodies CON = Consumer Organisations OP = Operator organisations IFOR = International Forum on Organic Regulation

6 Conclusions

The long term goal and work plan proposed here will need to be revisited, reviewed and revised in an iterative process over the next few years. Not only is it impossible to set a goal and proceed directly to it when so many stakeholders and concerns need to participate, the sector within which we work is also dynamic and growing. This should not concern us unduly. What is most important is that we agree upon a goal and a course and that we maintain it as a guide and reference point as we proceed. The ultimate goal is not the sustainability of any one organisation, company or point of view but the sustainability of an agricultural system, fair competition between producers and protection of consumers.

As has been indicated in this document, for such a relatively small sector, the organic movement, trade and regulators have already put in place many of the components that are required for effective regulation and this is cause for considerable optimism. Although it is the incompatibilities and the differences between the various regulatory systems that are most frequently emphasised, we should also celebrate and build upon the relative degree of harmony that has already been achieved to date.

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Annex I

Terms of reference of the International Task Force on Harmonisation and Equivalence in Organic Agriculture

As agreed in December 2002

The ITF

The UNCTAD/FAO/IFOAM Task Force on Harmonization and Equivalence in Organic Agriculture was established in December 2002 to serve as an open-ended platform for dialogue between public bodies and agencies and private sector institutions/companies involved in trade and regulatory activities in the organic agriculture sector, in order to facilitate international trade.

Aims of ITF

1 *Review the existing organic agriculture standards, regulations and conformity assessment systems including:*

- Their impact on international trade in organic agriculture products;
- Models and mechanisms of equivalency and mutual recognition;
- Extent of international harmonisation

2 *To formulate proposals for the consideration of governments, Codex Alimentarius Commission, relevant bodies of FAO, UNCTAD and IFOAM and other appropriate organisations on:*

- Opportunities for harmonisation of standards, regulations and conformity assessment systems;
- Mechanisms for the establishment of equivalence of standards, regulations and conformity assessment systems;
- Mechanisms for achieving mutual recognition among and between public and private systems;
- Measures to facilitate access to organic markets, in particular by developing countries and smallholders.

These proposals will take into account their impact on production systems, their relevance to consumers and the need for transparency.

3 *Advise stakeholders and provide information on developments following discussions of the above proposals.*