



Food and Agriculture  
Organization of the  
United Nations



International Federation  
of Organic Agriculture  
Movements



United Nations Conference  
on Trade and Development

INTERNATIONAL TASK FORCE ON HARMONIZATION AND EQUIVALENCE IN ORGANIC AGRICULTURE

061025DB

## ITF Workshop on International Requirements for Organic Certification Bodies

9 October, 2006  
Stockholm, Sweden

# REPORT

**ITF Secretariat:**  
**Diane Bowen** Secretary  
d.bowen@ifoam.org  
phone +1 414 352 5789  
fax +1 253 669 7921

**Matthias Fecht** Coordinator  
m.fecht@ifoam.org  
phone +49 228 926 5018  
fax +49 228 926 5099

## Table of Contents

INTRODUCTION.....	3
AGENDA .....	3
PRESENTATION OF THE PAPER: “STUDY AND RECOMMENDATIONS FOR INTERNATIONAL REQUIREMENTS FOR ORGANIC CERTIFICATION BODIES” .....	3
IOAS PRESENTATION ON BARRIERS IN THE IFOAM CERTIFICATION REQUIREMENTS .....	6
DISCUSSION OF THE TABLE OF RECOMMENDATIONS .....	7
Section 3 .....	7
Section 4.....	7
Nature of the Document .....	9
Process for Further Consultation of the New Version of the Document.....	10
Title of the Document.....	10
Ownership of the Document.....	11
NEXT STEPS.....	11
ADDENDUM 1– PARTICIPANTS LIST .....	12

## **Report on the ITF Workshop on International Requirements for Organic Certification Bodies**

### **INTRODUCTION**

The Chair introduced the background for this meeting, including the decision to develop one set of international requirements for organic certification bodies, based on ISO 65, adding additional essential organic requirements and possibly deleting non-essential ISO 65 requirements. The objective is to create something solid enough to allow for equivalency on an international basis.

The Chair noted that the terminology in the title was changed and that this change needs to be discussed. The Chair proposed and the workshop accepted the following agenda.

### **AGENDA**

- The goals for the workshop
- Discuss and agree on the proposed approach
- Discuss details
- Discuss progress for further consultation and adoption of the requirements
- Discuss the requirements as basis for equivalency decisions.
- Discuss potential ownership

The chair clarified that this is a preparatory workshop for the main meeting.

### **PRESENTATION OF THE PAPER: “STUDY AND RECOMMENDATIONS FOR INTERNATIONAL REQUIREMENTS FOR ORGANIC CERTIFICATION BODIES”**

Download here: [Discussion Paper](#) / Presentation (to come)

The paper took into account the previous paper, workshop and ITF meetings on the topic of requirements for organic certification bodies. The paper presents recommendations for the international requirements and also a detailed comparison of the key existing norms for certification body requirements. The Terms of Reference asked for minimum essential requirements and also flexible requirements according the stage of development. The paper also refers to the concept from the Tunisia Workshop of requirements as divisible into one of three boxes: requirements for operators; general requirements for competence of certification bodies; specific requirements of the sector certification scheme. After considering this, the consultant decided to also include “sector specific explanations” that elaborate on the application of the basic competency requirements; and these may actually cover “gaps” in the ISO 65 document.

The author explained her consideration of what level of detail is appropriate. She also posed the question, “Should the document be outcome-based, or is prescriptive detail also

appropriate at times? Others aspects to consider include harmonization, minimum essential requirements, conducting process certification, and finally protecting organic integrity.

Regarding flexible requirements for the “stage of development”:

Although there may be need to allow flexibility at the entry level, there is also the need to facilitate access of international markets. Therefore, any flexible requirements should be time-limited. The paper proposes “progress requirements.” Finally, the requirements apply equally; but some are proposed as progress requirements with flexible timelines.

The draft table reflects the considerations above, and it includes the following annotations in the fourth column:

- minimum essential requirements: “m”
- progress requirements: “p”
- deletion of either ISO 65 or organic requirements: “d”

### ***Questions and General Comments***

In response to the presentation, participants raised the following general questions and comments:

- Is there a better way to organize the thinking of this than by starting with ISO 65? Is there a possibility to have a guidance document with this?
- Why use the term “sector specific explanation” as opposed to “guidance”. Answer is that ISO has “guidance” and there may be a need not to confuse the different items.
- What is the meaning of “delete” because these are the accreditation requirements demanded of certification bodies. What is the use of this document?
- It is useful to realize that the organic regulations and IFOAM criteria are constructed in a similar framework. Is this a document for equivalence or for applying to a certification body?
- The document builds on existing tools, and it is useful to have it adopted to be used for equivalence. However, the ITF can consider if there could be other uses, for example, in practice with accreditation and certification bodies. However, if there is buy-in for equivalence, then the immediate need for harmonization is reduced in the short-term but moving toward harmonization in the long-run.
- If it is used only for equivalency, it seems that the document should be “outcome” based.
- Realistically, although the ideal is for governments to work with outcome-based standards for equivalency, the tendency is to focus on a high level of detail. Therefore, we need to consider what will really work with equivalency.
- Codex has developed equivalency guidelines for SPSS. The committee is looking for new work. Perhaps organics could be a sector-specific exercise to extend the Codex work on the topic of equivalency judgment.

### ***Regarding the Proposal for “progress requirements” participants raised the following points”:***

- From a developmental point of view, progress requirements are nice; but they may be difficult from an accreditation point of view. There is not only the matter of being able to write the document, but also the work of knowing the document. When looking at including progress requirements, it is suggested to look at it in this context – not only “writing” but “knowing.”

- There is also a gap in what the producers understand. They cannot always understand the rules, and want simpler explanations.
- The development and use of certification documents is a matter of transparency toward clients and the consumer, and not just to please the accreditation body. What level of detail is necessary to serve these constituents?
- In response to a question it was clarified that the paper focuses on training of personnel, evaluation details, and appeals as the primary requirements in the quality manual.
- Scale and complexity of a CB brings different risks. There are sometimes bigger risks for the larger and more complex certification bodies, not only for the small ones.
- The challenges can be a matter of fulfilling the exact interpretation and detailed demands of the accrediting body. Certification bodies can sometimes be “guinea pigs” for accrediting bodies when they are first trying to deal with organic certification bodies.
- The progress requirements could create an even bigger problem for recognition of the development country CBs. Also, it needs to decide where to put energy. If we want to go by details, progress requirements are more for discussion than if we focus on the outcome.
- Flexibility and quality approach is a delicate balance. WTO includes “progressive” approaches. But there is the question of how to implement them? The key is to find a way to determine if flexibility does or does not compromise the organic integrity.
- Another approach could be to have different requirements for different categories of countries; but also this has the same risks and problems. A response to this suggestion was that it is more the scale and complexity of the CB and situation that is determinative, not the country location. There is a question of how to allow for the development including in markets where big established CBs have been operating and setting a benchmark.
- The word “progress requirement” could be risky. Sovereign countries can decide not to work with a country until it reaches a certain level. Some of the ISO systems accreditation (e.g. 9000) specify when documentation is required and in other cases accept when there is knowledge of procedure.
- In the IFOAM Criteria, there was an attempt to earmark specific criteria for flexibility and it did not work. Instead, there is an explanation in the introduction that provides guidance for the accreditation body to the possibilities for flexibility.
- The issue of progressive requirements should include the issue of fairness when there are very large and small CBS operating in a country.
- How to define when flexibility requirements “kick in”?
- The challenge is the totality of all the requirements, and how to understand and implement it in the language of the quality culture. If you try to do it another way, e.g. plain language, it creates acceptability problems because ISO 65 is so prevalent. The language and requirements sometimes only hide the lack of competence/expertise and understanding of the accreditation bodies themselves, when trying to deal with a sector. On the other hand, it means development of a document that is difficult for the CB to find useful and practical.

## **IOAS PRESENTATION ON BARRIERS IN THE IFOAM CERTIFICATION REQUIREMENTS**

The IOAS reported on the experiences of IOAS staff on IFOAM Criteria requirements that pose difficulties for CB compliance. These include the following difficult requirements:

- Using or sharing work with another CB  
This is an area of challenge and the number one problem, and one that ISO 65 does not address. These include product acceptance, operators transferring between CBs. The regulatory requirements faced by CBs also complicate this issue for CBs.
- Impartiality  
*These include the structural issues (such as ISO 4.2e) and decision-making structure. Struggles include new entrepreneurial CBs, government-linked CBS that are required to set up other groups and hierarchies.*
- Surveillance Techniques.  
This includes inspection of conversion, split and parallel production, audit reconciliation (inspector qualifications in this area are generally low) and unannounced visits. For conversion, there are different concepts operating between regions – e.g, management issue in Europe and related to history of substance use in the US. In parallel production, there are also different histories and experiences. GMO regulation is difficult often because of lack of information (e.g. gmo tracking in the manufacturing and supply chain). Subcontracting creates some difficulty of scrutiny and accountability. Grower groups are another challenge, as inspectors are oriented toward production inspection and not of the control system.
- Indirect Certification  
ISO 65 does not deal with such situations directly.  
Main problem: In smallholder certification the CB has to take over role similar to Accreditor. The inspector do not have the necessary knowl. Training is necessary. Once problem is recognized CBs can overcome.

The IOAS concluded that the problems are not so related to CB size, as to what training is done and available.

### ***Questions and Discussion***

- If you have so many challenges on some particular points, are they really needed?
- How does IOAS address product acceptance when accrediting to ISO 65? Answer: IOAS implements it according to the general way it is addressed in ISO 65.  
Further explanation by IOAS: ISO 65 prohibits CBs using another CB's decision, so in effect it also blocks product acceptance. This is especially challenging in the case of multi-ingredient products.  
Follow up question: Literally, does ISO 65 require a contract between certification bodies in order to accept ingredients certified by others? Answer: ISO 65 does not really cover cooperation with the rest of the world.

- Regarding impartiality, there has been a needed separation of certification from the producer.
- The paper mentions the strengths of the local CBs (local and cultural knowledge), as well as some of the challenges. How is it possible to bring these strengths to the forefront in the international context?
- Is group certification accepted in the EU and US?
  - Discussion:* Some participants think that the EU and US does not accept this kind of work. Others believe that de facto, all the EU member states and the US are accepting group certification for imports. In the EU, there is group certification employed in wild collection, and product is moving.
- What about market surveillance? Answer: There is little attention to what is going on in the shops, but it is outside the scope of this body. The topic of the trade going from one system to another is a matter for the ITF to consider.

## DISCUSSION OF THE TABLE OF RECOMMENDATIONS

Participants discussed “how to discuss” the document and what should be delivered. Despite the overall issue of developing “outcome-based” vs. “descriptive/prescriptive” document, the chair recommended to discuss the document as prepared by the consultant, and that the concept can be debated in the main meeting.

### Section 3

Comments:

- Definition of an operator. The sector specific explanation should include more on operator responsibility: buyers need assurance that what they buy is from organic source. Response: This is only the definitions section and further development is in other sections of the document. Raise it under 8.1.2.

### Section 4

Comments:

#### 4.2a)

- Should the document address details to manage risk with inspectors?
  - Discussion:* There could be other essential organic integrity concerns than just the payment to inspectors. How far can you go (think of the developing country situation) in specifying the fee structure for the operator so as to be fair and enable the operators? The examples here are only fee structure and payment to inspectors, but there could be more, and it is difficult to see where there are more details in other norms. Clarification from author: The related details in other norms are specified in the comparison table.
- This is an example where requirements may be appropriate to the traditional CB but not to other systems such as Participatory Guarantee Systems. Response: This is

focused on third party certification whereas PGS can be discussed on a more general level in the main meeting.

4.2c)

- Should there be a statement that testing is not the basis for inspection and certification? Response: it is addressed in 1.2 . The “scope” for the certification is organic, so it will be limited there. However, maybe the nature of organic certification can have even more emphasis in the document.

4.2h)

- The paper suggested to delete this. It is practically impossible to acquire insurance in some countries and necessary in others. Do other sectors have difficulties with this in countries where insurance is not obtainable? Response: Covering liabilities may not mean insurance, but rather that it is entity subject to prosecution. Some doubts were expressed about the applicability of requirements for financial stability and the difficulty of assessing it. Response: In the IFOAM system, this is more of a “red flag” item than an enforcement item. However, the operators have a risk if CB is not stable. Conclusion: this point could be deleted.

4.2l)

- Some participants thought that this could be deleted or re-phrased. The point is to have different procedures for organic in order to maintain the organic integrity of that certification.

4.2 o)

- What about certifiers soliciting business based on the needs of another one of their clients?  
*Discussion:* Could add “not soliciting applications based on the needs of other clients.” Response: it is a specific example, but there could also be other very specific issues that are not address but generally covered.  
Details in IFOAM Criteria are there mainly because risk was identified.  
Response: There are quite some other details in the other regulations, and should this document be expected to include them all?

4.4

- There is cooperation other than subcontracting which is not addressed in ISO 65. This includes product acceptance and other forms of cooperation.

4.4c)

- It suggested to either delete or keep notes explaining exception in the cases where certification bodies are cooperating in some specified manner as well as to other subcontracting. This could also mean, for example, that operators would be asked to consent to inspectors and testing labs. Note: ISO 17011 clarifies that use of an individual (such as an inspector) is not considered subcontracting.
- In the context of the guarantee systems, there is a wide range of rules of what can be accepted and how it can be accepted. For example:
  - the proposed EU regulation will also require CBs to accept anything from other approved CBs.
  - China: milk produced in Europe and distributed from Korea must be produced and certified to Chinese organic standards. The Chinese CB must review the inspection report. Chinese CBs can have mutual recognition agreement as long as it is submitted and approved by CNCA 45 days prior to implementing the agreement; these are case-by-case agreements for specific products, not a general agreement.
  - India: There will be a means for Indian CBs to work with foreign CBs for imports coming into India.

- Costa Rica: Import checking is in general market surveillance, but there are not mechanisms otherwise for regulating imports.

There was no agreement on how to handle this point above.

#### 4.5 Quality System

##### 4.5.2

- Because 4.5.3 is a progress requirement, then it is appropriate to also make the requirement to appoint a person for ensuring the management.

##### 4.5.3

- There is a proposal for progress requirements. The participants agreed to the consultant's approach.

##### 4.6.2

- Additional organic requirement. OK. Although, ongoing monitoring of operators' changes and corrective actions can be challenging, especially for a farm-oriented CB.

##### 4.7.2

- Should the audit intervals be fixed or left general?

*Discussion:* The participants agreed to leave it periodic because the need will vary on a case-by-case basis. Note: ISO17011 has added many prescriptive requirements for the internal audits and especially the management review.

##### 4.8.1

- Participants commented that although the government regulations also require transparency of certified parties, these parties are often withholding information when requested. It was also noted that b) first bullet point under sector specific explanation is really an addition and should be moved to the list of essential organic requirements. Participants questioned what ISO 4.8.1 means.

The discussion of the Table was discontinued after 4.8.1 due to lack of time.

### **Nature of the Document**

A question was raised: Who are the customers for this document, and how will they use it?

*Discussion:* It might sell better as strictly an equivalency document. The problems are the differences in the rigidity of the systems in their willingness to accept others. This document WAS started with ISO 65, which is a requirement for certification bodies. So if we want to frame it as an equivalency document, then perhaps much more of the detailed ISO 65 prescriptive requirements should be removed, and it should be made much more outcome-based, accompanied by relevant and appropriate description (e.g. what should be addressed, but not necessarily how it should be addressed)

Participants acknowledged that the discussion above contradicts where this has been heading in the ITF, which is that it would be possible to formulate one set of certification requirements that would be used universally. In reality that should be possible (one norm) but difficulties with buy-in for that can be foreseen. For example, to get a country whose

requirements are already written into legal “rules” to now change to this document would be very difficult.

It was suggested that another value of this document could be to interpret quality management for the sector in plain English. It could also start to serve as a sector guidance tool, although another “tool” more specific to this purpose could be developed.

China expressed the opinion that there should be minimum requirements for equivalency that could help China to recognize other CBs that are currently recognized in major government systems. Many of these bodies could not meet some of the country-specific requirements of the Chinese regulation.

This document is something for two accreditation bodies could sit with, to provide a means to measure each others’ requirements, and decided what you can accept or not.

It could also be a reference for new legislation development. Although it contradicts a bit the role of as an equivalency tool.

### **Process for Further Consultation of the New Version of the Document**

The document could be sent to consultation, with questions on the:

- a) concept and approach
- b) details
- c) potential for commitment to it
- d) potential long term ownership

Specific suggestions and agreements for consultation:

- It was suggested that in the private sector, something could be done at the Certification Conference. Response: This paper will be presented there.
- IAF? Brazil agreed to find a way to request IAF review of the document.
- FAO and UNCTAD could send out consultation to its constituencies and IFOAM to its constituency.
- Catalyze domestic pressure on key governments (importing) to review and comment on the document, or send appointed ITF ambassadors.
- Central America: There is a private sector and national competent authorities initiative that could be contacted.
- There should be a report to the plenary about the presentation to IAF .

### **Title of the Document**

If the thrust of the document is changed then the title should be reconsidered.

The group agreed to propose the following title: ***Requirements for Conducting Organic Certification: Guidelines for Establishing Equivalence.***

## **Ownership of the Document**

Participants discussed the ownership of this document, in the context of its role as guidance.

Some options:

IFOAM

Codex

UNCTAD

Suggested criteria for ownership

- If the governments are to use this, it would need a certain type of absorption into the system of the governments.
- Owner should be able to carry the weight and importance of the document.
- It should be a body that organizations have already invested in, e.g. UN bodies or a new organization
- It should be an organization that itself is dedicated to the organic sector and can be a permanent caretaker.
- Ownership should not exclude or de-motivate anyone from participating in the development and continuation of it.

There is a concept for an MLA coming to the ITF, and the frame should be the same.

Consultation of the document should probably ask about the ownership.

## **NEXT STEPS**

Participants agreed to the following two next steps:

- Get agreement in the main meeting.
- Contingent on funding, rewrite a portion of the document as a sample, and send a consultation out per the avenues identified in the workshop.

## ADDENDUM 1 – PARTICIPANTS LIST

	<b>First Name</b>	<b>Last Name</b>	<b>Organization</b>	<b>Country</b>
Mr.	Christer	Arvius	Kommerskollegium/National Board of Trade	Sweden
Mr.	Ken	Commins	International Organic Accreditation Service	USA
Mr.	Paddy	Doherty	IFOAM Criteria Committee	Canada
Ms.	Jane	Earley	World Wildlife Fund, US	USA
Mr.	David	Eboku	Uganda National Bureau of Standards	Uganda
Ms.	Felicia	Echeverria	Eco-Logica Certification Agency	Costa Rica
Ms.	Maria Fernanda	Fonseca	PESAGRO	Brazil
Dr.	P.V.S.M.	Gouri	APEDA	India
Ms.	Marianne	Joensson	Kommerskollegium / National Board of Trade	Sweden
Dr.	Mwatima	Juma	International Federation of Organic Agriculture Movements	Tanzania
Mr.	Cristiane	Mascarenhas S. Sampaio	Ministry of Development, Industry and Foreign Trade	Brazil
Ms.	Eva	Mattson	Grolink/IFOAM Criteria Committee	Sweden
Ms.	Laura Cecilia	Montenegro	Argencert SRL	Argentina
Mr.	Asad	Naqvi	United Nations Environment Program	Switzerland
Ms.	Peggy	Haase	Kommerskollegium/National Board of Trade	Sweden
Mr.	Min	Pu	WTO/SPS Enquiry Point	China
Mr.	Alessandro	Pulga	Istituto per la Certificazione Etica ed Ambientale	Italy
Ms.	Mildred	Steidle	Organic Services GmbH	Germany
Mr.	Boudewijn	van Elzakker	Agro Eco Consultancy	Netherlands
Mr.	Maohua	Wang	Certification and Accreditation Administration of the People's Republic of China	China
Ms.	Wibulwan	Wannamolee	National Bureau of Agricultural Commodity and Food Standards	Thailand
Ms.	Na	Xu	China National Accreditation Service for Conformity Assessment	China

### ITF Steering Committee

	<b>First Name</b>	<b>Last Name</b>	<b>Organization</b>	<b>Country</b>
Mr.	Antonio	Compagnoni	Institute per la Certificazione Etica e Ambientale	Italy
Mr	Gunnar	Rundgren	International Federation of Organic Agriculture Movements	Sweden
Ms.	Nadia	Scialabba	Food and Agriculture Organization	Italy
Ms	Sophia	Twarog	United Nations Conference on Trade and Development	Switzerland
Ms.	Selma	Doyran	Food and Agriculture Organization	Switzerland

### **ITF Secretariat**

Ms.	Diane	Bowen	International Federation of Organic Agriculture Movements	USA
Mr.	Matthias	Fecht	International Federation of Organic Agriculture Movements	Germany