

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



UNCTAD
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ORGANISATION OF THE
UNITED NATIONS

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

**SHORT-TERM ACTIONS TOWARDS 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’
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
UNCTAD	United Nations Conference on Trade and Development

Executive summary

This paper is closely linked to a long-term strategy paper aimed at harmonising the regulation of international organic agriculture and describes some immediate short-term actions that may be taken with this wider goal in mind. The overall 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.

Both the long-term strategy and this short-term action papers were influenced by, and directly develop ideas emerging from the discussions of the first meetings of the task force held in February and October 2003.

The six actions proposed in this paper contribute to one or more of four identified needs as follows:

- The establishment of an ongoing system for review and comparison of standards and certification requirements in the organic sector. This is considered an essential tool in fostering understanding of differences and similarities between regulatory systems and the development of a common regulatory objective;
- Build on or review already initiated activities and mechanisms which have some potential to become building blocks of a harmonised regulatory system;
- Initiate further discussion of some of the critical issues identified in the development of a harmonised system.
- Focus on time-sensitive developments in the regulatory sector and utilise them where possible to contribute to greater harmonisation in the short-term and assist in developing more 'trade friendly' legislation and norms at the local level.

Most of the actions may be initiated immediately and in some cases are already under way. Several are dependent on the output of another action.

Introduction

This paper complements the long-term strategy paper on development of proposals on harmonisation of the regulation of production and trade in products from organic agriculture (ITF, 2004a).

It was the will of the ITF Geneva meeting in October 2003 that some short-term practical steps towards harmonisation are identified which may be initiated as soon as possible regardless of whether they formed part of a clearly defined long-term plan. Some of the actions identified were raised at that meeting and others have been identified during the preparation of these follow-up documents. Six main actions have been identified and some detail is provided here on the rationale and output of these projects and, where relevant, the status of already initiated actions.

The actions are presented in the context of the longer-term strategy and most are expected to contribute to the wider objective. However, regardless of whether the long-term strategy is approved and further developed, the immediate actions listed represent concrete steps in themselves and maybe conducted (and in some cases are being conducted) independently.

Timelines for action are presented in Table 1 and possible actors involved in their implementation are indicated in Table 2.

The actions are numbered as B1, B2 etc and presented in a format to coincide with the numbering allocated and format presented in the long-term strategy paper.

1 Short-term practical steps to be initiated immediately

ACTION B1: NORMS RATIONALISATION AND EQUIVALENCE

The rationale for this group of actions is threefold:

- the ultimate development of **one international basic standard** or **common regulatory objective** (as defined in B5)
- the provision of an authoritative and agreed analysis of the similarities and differences between the various Norms and regulations to **harmonise the main regulations** in a measured and transparent way.
- the provision of a **database tool** which will be essential in not only maintaining such analyses up to date, as regulations change, but as a tool in performing equivalence judgements.

All five projects should be completed by June 2005 as they provide the basis for many of the other actions.

Action B1i: Develop database system for cross-referencing of multiple Norm comparisons

Action B1i has the purpose of providing the tool to provide and manage up-to-date multiple analyses of the similarities and differences between the two international organic Norms and the three main regulations. The database design should anticipate that other Norms would be added later. A number of analyses have already been performed in recent years but quickly become out of date. In 2002/2003 a private Finnish company went some way to developing a database that could handle such comparisons with the aim of providing services to government authorities and organic processors but the project was shelved for commercial reasons.

Time-frame: by March 2005

Action B1ii: Complete comparison of Codex and IFOAM standards.

See action B1 above. The Codex Guidelines and IFOAM Norms stand as the two international organic baseline standards and are already known to be quite similar in terms of production standards. The Codex Guideline however includes little that could be considered certification requirements, whereas the IFOAM Norms include 'Criteria for Certification' (see B3 below). A previous comparison of the standards was performed in 2002 comparing the EU Regulation with both Codex and IFOAM Norms (Schmid, 2002). A new comparison will update the analysis and will focus on the production standard, the purpose being their potential harmonisation as one international reference standard. It is noted that IFOAM standards are clearly written as 'standards for standards' whereas the Codex Guidelines are closer to a production standard and this should be taken into account when performing the comparison. Both however assume that more specific standards may be developed at the local level.

Time-frame: by June 2005

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Action B1iii: Complete comparison of IFOAM Requirements and Guide ISO65

See action B1 above. The IFOAM Certification Criteria published as part of the IFOAM Norms and the Guide ISO65 Guide are the two formal reference documents currently used in the organic sector which describe the requirements for conformity assessment. The IFOAM requirements have been adapted from Guide ISO65 specifically for the organic industry. A comparison of the two documents has already recently been performed by the IOAS for IFOAM (Commins, 2003). The analysis will need to be entered into the new database as a reference for analysis of the regulations.

Time-frame: Already available but needs to be added to database. By June 2005

Action B1iv: Complete comparison between IFOAM, Codex Guidelines, EU Regulation, USDA NOP and JAS requirements.

See action B1 above. The three regulations in place in the main organic markets have influenced all others. All three include production standards and include or refer to separate certification requirements but are all structured quite differently and do not permit easy comparison. The European Action Plan for Organic Food and Farming notes that a comparison should be performed of the EU Regulation against the Codex guideline and the IFOAM norm. Liaison with this initiative is encouraged. It is also assumed that during the negotiations between the USA, Japan and Europe to determine equivalence, some analyses will have been performed. As before the main aim of these analyses is to provide a solid and objective basis for initiating moves to harmonise. The analysis should address both production standards and requirements for certification.

Time-frame: by June 2005

Action B1v: Development of Common Regulatory Objectives

It is widely recognised that the approach of defining common regulatory objectives (CRO) may serve as an important stepping-stone towards a harmonised system. As a result of the actions B1-4 it should be possible to distil out such common regulatory objectives, which could form the basis for developing both individual and global regulatory systems in both public and private sector. The CRO should contain the essential elements in order to achieve the criteria proposed in the longer-term strategy paper (ITF, 2004a) and may guide the rationalisation and perhaps address the suggestion from the ITF discussions of simplification of requirements (i.e. regulations, IFOAM Norms and ISO65 are all too complicated to form the basis of harmonisation). Such an agreed CRO would form the basis of subsequent work proposed below in support of influencing existing and emerging regulations and private systems.

Time-frame: Dependent on conclusion of B1- B4 – by June 2005

ACTION B2: PROMOTE AND SUPPORT HARMONISING EFFORTS IN GOVERNMENT REGULATIONS

A number of developments are taking place amongst the three main import blocks: the European Union, USA and Japan. As was suggested at the ITF Geneva meeting in October 2003, the revision of the EU Regulation import rules during 2004 and 2005 are an important event that the work programme should take into account. The European

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Action Plan on Organic Food and Farming published by the European Commission in June 2004 (European Commission, 2004) also contains some very encouraging comments concerning harmonisation, consideration of standards equivalence and the setting up of a specific accreditation system. Since publication of the US NOP in 2001, negotiations have taken place between US and EU authorities to agree equivalence. An agreement is still pending and can be expected to be currently under discussion. In Japan, new legislation on organic livestock is currently being drafted and amendments to import rules are being considered.

The overall output of this group of actions is a greater awareness amongst the regulatory community of the benefits of harmonisation and some practical ideas and tools to assist in achieving it. A number of options are explored in the following actions, which will be used to feed into regulatory developments over the next few years:

Action B2i: Promote reference to agreed international standard and requirements

The acceptance of IFOAM and/or Guide ISO65 Accreditation by designated accreditors is being suggested in the EU Action Plan. A similar mechanism may also emerge in Japan. If such a mechanism is established, it is still likely that equivalence to the domestic regulation will be required rather than equivalence to any international standard requirements, which would be preferable in terms of harmonisation. This action would take the output of B1v and make it available and promote it as the basis for international equivalence. This might be done through direct meetings with regulators or workshops with the wider organic sector at national level. Success even with this approach however will not solve the obstacle to access via smaller certification bodies from countries where equivalence has not been agreed or where accreditation is too costly.

Time -frame: Following B 1v. During 2005 but ongoing

Two routes of collaboration between certification bodies themselves may assist this latter problem of access from emerging producer countries and where smaller CABs operate (even in the USA, the largest organic market in the world, many of the CABs are small companies which may not be able to afford formal accreditation) and are formulated as actions B6ii and B6iii below.

Action B2ii: A blueprint for CAB-CAB approval

The current organic regulation in Japan permits a Japanese CAB to make trust agreements with foreign CABs to make it possible to accept their work as part of the certification process (Under the JAS, the foreign CAB must still be recognised within its own country or be accredited against ISO65 or IFOAM Norms). Similar practices occur within the environment of the EU Regulation but they are not acknowledged in the legislation itself. The US NOP does not allow for such practices. Such a measure delegates authority to CABs to make the assessment of a foreign body as competent to perform the work. The IFOAM Norms include such measures either both on the level of overall acceptance of the foreign CAB or solely on the level of product. The action proposed here would raise discussion on these issues and develop an agreed blueprint for how CAB-CAB approval could operate and their possible incorporation into regulatory systems. An additional positive benefit of such collaboration is the increased contact between CABs with potential trust building and harmonising spin-offs.

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Time-frame: by June 2005

Action B2iii: A blueprint for collaboration between CABs to facilitate imports

There is a number of emerging local certification bodies in developing countries. While the longer-term objective should be that they are accepted on their own account in import markets, there are also possibilities for them to act as “inspection agents” for other CABs. This serves as a good experience and introduction to the demanding international arena. It also serves as a business opportunity for CABs that have few other options for securing income, as local markets are often initially undeveloped. However, either the regulations themselves or their interpretations, or the demand from accreditors (national or international) may be placing such high demands on these arrangements that the local bodies need to be accredited in their own capacity to be able to be accepted by the foreign CABs. It may also sometimes be in the interest of a foreign CAB with an international scope to exaggerate these demands in order to motivate them using their own inspectors in such situations. However they may do so with reference to the demand from regulators or accreditors. This action would develop a blueprint for acceptable arrangements for inspection service, and encourage adoption within public and private sector approval requirements.

Time-frame: by June 2005

Action B2iv: Advice and support to emerging regulations to encourage ‘trade-friendly’ and harmonising systems.

A number of governments are preparing or amending legislation on labelling of organic products. The Canadian government is currently considering proposals for a new mandatory system to regulate import and export of organic products. The Australian government is also in the process of revising its national standard. Both Chile and Peru are in the process of initial definition of regulations in the organic sector. There are many others. All these initiatives emphasise the need for encouraging engagement by governments in the ITF process but also require specific effort by the ITF to engage with key personnel in the organic regulatory sectors in these countries. Meetings with some key government figures have already taken place with IFOAM and IOAS personnel within 2003 and 2004. The main effort of this activity is to ensure that the “mistakes” in existing regulations are not just repeated by countries developing organic regulations. IFOAM, FAO and UNCTAD as well as a number of governmental or private development agencies are active in the support of government policy development for organic agriculture, including aspects of regulation. It is important that this support is aimed at coaching countries towards a ‘trade friendly’ organic regulation. As a first step IFOAM, FAO and UNCTAD, based on the findings of the ITF, should develop a common policy brief as guidance, and as a second step ensure that it is brought to use by the various stakeholders. An extension of this option would be to develop and publish a guideline aimed at established and developing CABs on structure and function of CABs in the organic sector so as to move towards a more harmonised organic certification mechanism.

Time-frame: Policy brief by June 2005. Ongoing

ACTION B3: PRIVATE LABELS AND TRADE AT THE LEVEL OF AN INTERNATIONAL STANDARD.

It is suggested that immediate steps be taken to engage private standards setters in a discussion on the dichotomy presented by locally adapted standards: on the one hand appropriate standards for local producers but on the other, potentially unrealistic demands and trade barriers to 'outsiders'. The European Commission Action Plan recognises private labels as an obstacle to trade. This action could be initiated by holding a seminar at the major organic trade fair, BioFach in Nuremberg in February 2005. This seminar could also double as a way of presenting the agreed ITF work plan to the CAB community.

Time-frame: Seminar at BioFach February 2005. Ongoing.

ACTION B4: COLLABORATION BETWEEN ACCREDITORS AND AUTHORITIES

One of the main conclusions arising from the analysis of harmonising efforts in other sectors (Courville & Crucefix, 2003) was the need for exchange of views, joint evaluations etc. between the various participants to raise mutual understanding and confidence. Several initiatives are already ongoing between the IOAS and a number of national accreditors and under discussion with authorities. The types of activity have included observed audits, simultaneous audits, joint audits and one auditor performing the audit for both parties. In one instance the collaboration with a national accreditor is such that a task force has been assigned to consider how procedures and reports could be rationalised. It is hard to say what the role of the ITF here should be other than to encourage and support the process and others like it. Similar exchanges have taken place between CABs and could be further encouraged.

Time-frame: Ongoing

ACTION B5: REVIEW OF THE IFOAM GUARANTEE SYSTEM

During 2004 the IFOAM Organic Guarantee System (comprising the IFOAM Norms and Accreditation Programme) is subject to a comprehensive review. One of the main objectives of the review is to make the system more inclusive and more accessible. Various scenarios are being considered. The Accreditation Criteria could be made simpler and more "easy" to comply with, and similarly the development of the IFOAM Basic Standards as a real standard for standard can be taken much further and much of the detail could be taken out of the standard. The approval mechanism – currently the IFOAM Accreditation Programme - could also be simplified in a number of ways. There are also suggestions that the IFOAM Norms should be put in the public domain, which would allow other bodies to accredit to them. Such actions could lead to a more accessible programme, with lower costs and higher participation. The two major questions for such an approach are to what extent a more accessible system will be 'accepted' by major private sector certification bodies and to what extent the system will be seen as an interesting tool by the regulatory authorities in major importing countries. Essentially, can accessibility, which provides for harmonisation, still deliver integrity?

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A 'simplification' of the IFOAM system may need to be combined with an increased efficacy of implementation of mutual recognition between private sector organic bodies. Underpinning this however is the acceptance of trade at a given international level.

This action is already underway and in the hands of IFOAM but is open to comment from ITF members.

Time-frame: Comment period up until January 2005 with the process being finalised by June to September 2005.

ACTION B 6: EQUIVALENCE ASSESSMENT

It can be expected that judgement of equivalence between organic standards will continue to be a significant building block of an international system. IFOAM Policy 25 allows for approval of national or regional standards as an approved variation of the IFOAM basic standard. Policy 42 sets down criteria for assessing such variations. To the writer's knowledge, this is the only transparent attempt to conduct such an exercise and the experience gained from doing it will be invaluable in any future attempts at judging equivalence between organic standards. The American Organic Standard is already some way through this process and its finalisation should be encouraged. An Italian group of CABs have also submitted a unified organic standard to IFOAM to undergo the same process. The objective, in both cases, from the proposers viewpoint is that once approved, the user would not need to submit them for assessment when applying for IFOAM Accreditation. The ITF's interest here is to learn from the experience and may wish to commission a report from IFOAM and the client on the difficulties experienced and proposed modifications. It is also likely that government personnel will have gained considerable insight into the judgement of equivalence in performing their regulation-to-regulation reviews and it would be beneficial to combine such knowledge.

Time-frame: Ongoing

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Table 1 Short-term work programme towards a harmonised system for regulating trade in organic products¹

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 ²						PHASE II ³							
Short term practical steps																
B1. Norms rationalisation and equivalence	i. Database	System for handling and maintaining Norm comparisons														
	ii. Complete comparison of Codex and IFOAM standards.	Identified areas of convergence and divergence between Norms														
	iii. Complete comparison of IFOAM Requirements and Guide ISO65 ⁴	Identified areas of convergence and divergence between certification requirements														
	iv. Complete comparison between IFOAM Requirements and EU Reg., USDA NOP and JAS requirements.	Identified areas of convergence and divergence between regulations and international Norms														
	v. Development of CRO	Simplified principles														
B2. Support/promote harmonising efforts in regulations	i. Promote reference to agreed international standard and requirements	Acceptance of principle of trade at level of international guidelines														
	ii. Blue-print for CAB-CAB approval	Simplified import mechanism														
	iii. Blue-print for CAB collaboration on inspection	Acceptance of guideline on sub-contracting inspection. Harmonisation of work practices.														
	iv. Support to emerging regulations	Common policy brief leading to harmonisation of effort														
B3. Private labels and trade at international level	Commence discussions with private standard setters on trade at the level of an international standard.	Sensitisation amongst private standards setters of the need to permit trade to an international standard.														
B4. Collaboration between stakeholders	Collaboration between accreditors and authorities ²	Confidence and understanding between the various parties.														

¹ This table and timeframes are maintained within that developed in the long-term strategy paper (ITF, 2004a) and shows the two phases proposed.

² 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.

³ 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 indicated by the yellow band. The IFOR unit will take over management of the process from its inception.

⁴ A comparison of IFOAM certification requirements and Guide ISO65 has already been completed.

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OBJECTIVE	ACTIVITY	OUTPUT	Yr	Yr	Yr	Yr	Yr	Yr	Yr
			04	05	06	07	08	09	10
B5. Review of international accreditation system	Complete ongoing review of IFOAM OGS	Assessment of how an international system might promote further harmonisation							
B6. Equivalence assessment	Complete the approval of the American Organic Standard as a regional variation of the IFOAM Basic Standard and review the process. ⁶	Experience in determining equivalence of organic standards and proposal for future implementation.			?	?	?	?	?

⁵ Collaboration between accreditors active in the organic field and between accreditors and authorities is already ongoing.

⁶ The IFOAM assessment of the AOS is already ongoing but not yet completed (Oct. 2004). As indicated by the ??? this process may continue with other standards.

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2 Actors and task assignment

As was made clear in the review of Courville & Crucefix (2003) and in Figure 4 of the strategy paper, 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 where it would be desirable to involve the organisations responsible for the respective standards as well as a 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.

Some of these actions are already ongoing and need little or no input from the ITF but a formal expression of interest in such developments by the ITF may assist in pushing the initiatives up the agendas of the various participants. In others, funding if available, may achieve the same effect.

Table 2 presents initial proposals on assignments of the activities indicated in Table 1.

Table 2 Proposed assignment of tasks

OBJECTIVE	ACTIVITY	ACTORS IN ESTABLISHING THE REGULATORY MECHANISM										
		ITF	GOV	FAO	UNCTAD	IFOAM	IOAS	NABs	CABs	CON	OP	IFOR
B. Short term practical steps												
B1. Norms rationalisation and equivalence	i. Database											
	ii. Complete comparison of Codex and IFOAM standards.											
	iii. Complete comparison of IFOAM Requirements and Guide ISO65 ⁷											
	iv. Complete comparison between IFOAM Requirements and EU Reg., USDA NOP and JAS requirements.											
B2. Support/promote harmonising efforts in regulations	v. Development of CRO											
	i. Promote reference to agreed international standard and requirements											

⁷ A comparison of IFOAM certification requirements and Guide ISO65 has already been completed.

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OBJECTIVE	ACTIVITY	ACTORS IN ESTABLISHING THE REGULATORY MECHANISM										
		ITF	GOV	FAO	UNCTAD	IFOAM	IOAS	NABs	CABs	CON	OP	IFOR
	ii. Blue-print for CAB-CAB approval											
	iii. Blue-print for CAB collaboration on inspection											
	iv. Support to emerging regulations											
B3. Private labels and trade at international level	Commence discussions with private standard setters on trade at the level of an international standard.											
B4. Collaboration between stakeholders	Collaboration between accreditors and authorities ⁸											
B5. Review of international accreditation system	Complete ongoing review of IFOAM OGS											
B6. Equivalence assessment	Complete the approval of the American Organic Standard as a regional variation of the IFOAM Basic Standard and review the process. ⁹											

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

⁸ Collaboration between accreditors active in the organic field and between accreditors and authorities is already ongoing.

⁹ The IFOAM assessment of the AOS is already ongoing but not yet completed (Oct. 2004). As indicated by the ??? this process may continue with other standards.

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References

Commins, K. (2003) Comparison of the requirements of the IFOAM Accreditation Criteria and the requirements of the ISO/IEC Guide 65. IFOAM.

Courville, S. & Crucefix, D. (2003) Existing and potential models and mechanisms for harmonisation, equivalency and mutual recognition. ITF Discussion Paper.

ITF (2004a) Strategy on solutions for harmonising international regulation of organic agriculture. ITF Discussion Paper

European Commission (2004) European action plan for organic food and farming. Commission Working Document

Schmid, O. (2002) Comparison of EU-Regulation 2092/91 and Codex Alimentarius Guidelines for organically produced food 1999/2001 with IFOAM Basic Standards 2000. Study performed for the IOAS.

Wynen, E. (2004) Impact of organic guarantee systems on production and trade in organic products. ITF Discussion Paper.