

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



Food and Agriculture  
Organization of the  
United Nations



International Federation  
of Organic Agriculture  
Movements



United Nations  
Conference on  
Trade and  
Development

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**Synthesis report  
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**International Task Force on  
Harmonization and Equivalence in Organic Agriculture**

**Introduction**

The International Task Force (ITF) on Harmonization and Equivalence in Organic Agriculture, convened by the Food and Agriculture Organization of the United Nations (FAO), the International Federation of Organic Agriculture Movements (IFOAM) and the United Nations Conference on Trade and Development (UNCTAD), serves as an open-ended platform for dialogue between public and private institutions (intergovernmental, governmental and civil society) involved in trade and regulatory activities in the organic agriculture sector. The objective is to facilitate international trade and access of countries to international markets.

The Terms of Reference for the ITF are the following:

To formulate proposals for the consideration of governments, Codex Alimentarius Commission (CAC), relevant bodies of FAO, IFOAM and UNCTAD and other appropriate organizations on:

- opportunities for harmonization 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.

The ITF's work has three main phases:

- **a Review Phase**, wherein the current situation is assessed, including its impact on international trade, the extent of international harmonization, and models and mechanisms of equivalency and mutual recognition.
- **a Proposal Formulation Phase**, wherein the ITF will formulate proposals for the consideration of governments and relevant intergovernmental and other bodies.
- **an Agreement Phase**, wherein the members of the task force will be asked to seek commitments from their governments and other organizations to implement relevant solutions.

The Review Phase is more or less over. Proposals are being formulated, and some agreements have already been reached in the ITF itself.

This paper by the Steering Committee summarizes the conclusions reached so far and point out possible solutions to identified problems. As such it serves three purposes:

- to allow a quick catch-up for ITF participants who are new to the process<sup>1</sup>;
- to attempt focusing the up-coming actions for the ITF towards tangible results;
- to provide the basis for formulation of agreements during the 5th ITF meeting in Tunisia, as well as for identification of areas where there is disagreement.

### **Agreements reached so far**

As of today, the ITF has agreed to the following long-term strategic goals, made up of the following components<sup>2</sup>:

- production standards equivalent to a single international “reference” standard;
- mechanism for the judgment of equivalence to the above-mentioned reference standard;
- one international requirement for conformity assessment;
- common international procedures for approval or accreditation of conformity assessment bodies which reduce duplication of work and enhance access to markets, including by countries in which regulatory infrastructure is absent or less well developed.

Further, the ITF is of the view that existing structures and mechanisms of regulation, both private and public sector should be used or adapted - rather than seeking to establish any new international entity.

The ITF agreed that solutions should **provide for the continued growth of organic agriculture and maintenance of its principles** and be based on the following criteria:

- benefit producers and consumers and the organic market as a whole;

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<sup>1</sup> For an update of the activities and the reports produced by the ITF, information is available at the Web site: [www.unctad.org/trade\\_env/itf-organic](http://www.unctad.org/trade_env/itf-organic)

<sup>2</sup> See the ITF paper Strategy on Solutions for Harmonizing International Regulation of Organic Agriculture, April 2005.

- take into account of national sovereignty;
- access to markets with minimal bureaucracy;
- fair competition between operators;
- adequate and consistent consumer protection and trust;
- sensitivity to different biophysical, socio-economic environments;
- stakeholder support and involvement;
- take account of market choice;
- transparency of operation and decision-making.

## **Work Plan**

The ITF has already produced and discussed a number of reports, first of a review nature and lately more of a proposal nature. The reports produced so far are the following:

- *Overview of Current Status of Standards and Conformity Assessment System;*
- *Current Mechanisms that Enable International Trade of Organic Products;*
- *Existing and Potential Models and Mechanisms for Harmonization, Equivalency and Mutual Recognition;*
- *Impact of Organic Guarantee Systems on Production and Trade of Organic Products;*
- *Strategy on Solutions for Harmonizing International Regulation of Organic Agriculture.*

In the workplan, the following actions have being agreed upon or are under discussion:

- Review Guide ISO65 with respect to the real needs of organic conformity assessment, with a view to finalizing one internationally accepted conformity assessment requirement (paper presented to December 2005 meeting);
- Guidelines for collaboration and approval between conformity assessment bodies (paper presented to December 2005 meeting);
- Development of a Common Regulatory Objective (paper presented to December 2005 meeting);
- Experiences of equivalence and recognition mechanisms in the regulation of organic agriculture (paper presented to December 2005 meeting);
- Development of a database system for preparation and maintenance of norms comparisons (feasibility being discussed);
- Comparison of Codex Guideline and IFOAM standards with a view to their harmonization and/or development of one single international standard (linked to the potential database);
- Comparison of the European Union (EU), the United States Department of Agriculture National Organic Program (USDA NOP) and the Japan Agricultural Standard (JAS) regulations (linked to the potential database);
- Consumer survey to investigate sensitivity to differences in standards and conformity assessment requirements (feasibility being discussed).

Other tasks that have been proposed but have not yet moved forward, such as:

- guidance document on judgment of equivalency of organic standards;
- analysis of standard differences from a perspective of competition between producers;

- participatory certification and supplier declaration of conformity as tools.

## **Putting the agreements into action**

The ITF is not in favour of the creation of any new permanent structures to deal with the harmonization issues. Therefore, the proposals presented here are largely building on existing systems, programmes and organizations. In some cases, adjustments to these are proposed.

### **Production standards**

The ITF has concluded that the production standards used should be equivalent to a single international standard. There are currently two international standards for organic agriculture, the Codex Alimentarius Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (GL 32–Rev. 2–2004) - CAC/ GL32 - and the IFOAM Basic Standards (published as part of the IFOAM Norms, latest revision July 2005).

The ITF work plan includes a number of actions that were supposed to better inform the participants on the nature of the various standards and the possible differences among them. Most of these actions have not been implemented as they have been pending the establishment of a comprehensive database. In addition, it is assumed that a survey of consumers' sensitivity to differences in standards would give good guidance to understanding the significance of these differences. This survey has still not been carried out. It has also been raised that issues of competition between producers operating under different standards may be a big reasons for non-acceptance of other standards, and it has been proposed to study also this aspect. No decision has yet been taken on this.

Therefore, at this juncture, there has not been much input to the ITF process on the level of standards. The paper "*Objectives of Organic Standards Programs. Oct. 2005*" contains an overview of areas where standards diverge. There are, also many side-by-side comparisons done by both public and private stakeholders. The opinion of most well-informed experts is that the differences between the various organic standards are not huge. The differences are rather in details, e.g. the allowance of a particular input as pest control or fertilizer. The ITF should seriously consider if the database and detailed comparisons between the standards are essential for moving the discussion on the standards forward<sup>3</sup>. Also, if further studies are really moving the discussions ahead.

The two main issues to consider for an international reference standard are:

- design and content;
- the governance and process to revise them.

For production standards, the ITF has agreed that equivalence is a more workable approach than harmonization, i.e. that the standards used in various countries will be different but should follow a basic framework. Such a framework therefore needs to be principle and criteria based and give guidance to the national/regional standards as well as being useful for making equivalence assessment. The existing two international standards can be assessed from that perspective:

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<sup>3</sup> There may be other reasons for the ITF to still pursue these activities, the point here is to what extent they are needed to inform the ITF in order to make a good proposal or not.

- the Codex Alimentarius Guidelines (CAC/GL32) are written as production standard to be directly applied/used<sup>4</sup> as a minimum basis, thus not preventing governments to establish more detailed and country-specific standards;
- the IFOAM Basic Standards (IBS) were initially written as a production standard, but five years ago they started to be reshaped into a “standard for standards”. This development is still in process, and has been reinforced by the recent IFOAM General Assembly.

Both sets of standards struggle with the lists of approved inputs (CAC provides for regular revisions of the List – last update in 2004), where some press for them to be seen as closed lists so that only products on the lists can be used in organic farming, others see lists as useful, but see them as indicative and not comprehensive while yet others want the lists be replaced by well crafted criteria, which are then applied by national standard-setters.

The direction taken by the IBS is more in line with the ITF recommendations. The CAC/GL32 is up for a thorough revision, reportedly starting in 2007. Governments could press that the new guidelines be reformatted into a more principle based documents. Another option is that the Codex Alimentarius Guideline is kept in its current shape and continues to serve as a guide for countries for establishing standards or drafting regulations, but that it is made clear that it is not so appropriate to use for equivalency determination.

Apart from the structure, coverage and content of the international standard the governing structure and the process to revise them are also essential components. Not surprisingly, governments tend to feel more comfortable with the Codex Alimentarius Commission as a standard-setter while the private sector feels more comfortable with the IFOAM<sup>5</sup>. Both processes claim to be open, transparent and allow for input and participation from stakeholders. For the CAC process, the main possibility for private sector actors to voice their concerns other than being observers is through the national delegations. It is the prerogative of each nation to decide to what extent they include the private sector into their delegations, and the level of representation is therefore very different from different countries. IFOAM is given official observer status in the CAC process and has participated very actively. The IFOAM standard-setting process is directly open for participation and input from all stakeholders, but there is no equivalent to the CAC meetings where stakeholders for days can discuss organic standards, so the participation is mainly in the form of written comments. In practice, very few governments have ever participated in the revision of the IBS. The decision-making in the case of CAC is the intergovernmental Codex Alimentarius Commission and in the case of IBS, it is currently by written ballot by IFOAM members. **It appears that the question about participation, ownership and control of the standards is a stumbling stone and that in the current situation neither Codex nor IBS is ideal.**

It is recommended that the ITF holds an in-depth discussion on:

- how to avoid having two “competing” international standards? If the IBS and the CAC/GL 32 could/should have different roles; the CAC/GL 32 acting as a blueprint for regulations and the IBS as a baseline for assessing equivalence. If so, what

<sup>4</sup> Note that the CAC/GL32 is not intended to be used by producers directly, the statement refers to how the standards are written.

<sup>5</sup> In the ITF meetings this has come out quite clearly, still recognizing that there are both government and private sector representatives that have diverging opinions.

improvements are needed? If not, what roles should they then have, and what can be done to strengthen that role? Alternatively, if there is any possibility to merge the two standards into one, and if so what would the form of the standard be and who would “own” the standard?

- How shall the input lists be dealt with in this context?
- Are there possible improvements in the participation and decision-making processes for the international reference standards to make them more acceptable for all stakeholders?

### **Requirements for third-party certification**

With regards requirements for third-party certification, there is a realization that there are differences between countries. However, the differences tend to be small and mainly related to questions of scale and stage of development. In this case, harmonization seems to be a realistic option, i.e. one set of requirements could be globally applied, as long as there are sufficient provisions for sensitivity for scale and stage of development<sup>6</sup>. The paper “*Requirements for certification bodies – situation and scope for harmonization*”, October 2005 shows that the ISO65 guide provides a valuable guidance for this, while they are in some aspects too demanding and miss other aspects. The IFOAM Accreditation Criteria are more specifically developed for the organic sector, building on the ISO65 framework.

Similar to the discussions on standards, certification requirements of the governing structure and the process to revise them are also essential components. The ISO65 guide has been developed without any substantial input from the organic sector, be it governments or private-sector. As the ISO Guide 65 applies to all kind of certifications, the organic interests will always be a very minor sub-set of the interests represented. The ISO Guide 65 is also not subject to regular revisions (the current version is from 1996), and is formulated for product certification as opposed to process and management certification, which forms essential parts of the organic certification system. The IFOAM process for revising and approving the IFOAM Accreditation Criteria (IAC) is virtually the same as for the IBS (see above).

From the discussion above it is recommended that:

- the IFOAM Accreditation Criteria are used as the international norm for requirements for organic certification:
  - that governments make reference to them and limit additional or diverging requirements in their regulations. There will likely remain some additional requirements of administrative nature in regulations<sup>7</sup>, but these could apply only for domestic certification bodies;
  - that the IAF agrees to them being a sector-specific application of the ISO65;
  - that accreditors use them for accreditation purposes<sup>8</sup>;
  - that certification bodies use them as a basis for mutual recognition of their competence;
  - that the Codex Guidelines makes a reference to them.

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<sup>6</sup> One could say that the approach is for compliance with one set of norms, but that they are flexible enough to allow for diverging solutions.

<sup>7</sup> e.g. requirements for being legally registered under the jurisdiction, reporting to a specified authority.

<sup>8</sup> This implies that IFOAM does not try to restrict the use of the IAC by others than the IOAS.

- governments actively participates in the development in the IAC.
- the ITF recommends an even more open and participatory process for the IAC revision, taking special consideration to include governments into the process.
- IFOAM agrees to such a process.

### **Common International Procedures**

With the agreement on one international reference standard for equivalency judgments, and a single harmonized set of requirements for certification, there is still a need to operationalize these norms in order to provide for the market access sought. There are basically five options for how common acceptance can be facilitated:

- equivalence on the level of governments;
- mutual recognition agreements, cooperation or acceptance between accrediting bodies;
- mutual recognition agreements, cooperation or acceptance between certification bodies;
- cooperation between various levels;
- de-regulation/no regulation.

There are proponents of a no-regulation scenario for organic products, and that option is still a reality in most countries in the world, but mainly countries with a very small organic sector. It is not a realistic option that governments that have a comprehensive organic regulation in place will scrap it, and in many cases the organic sector in the countries supports the regulation. Therefore, this paper is not expanding on a general de-regulation scenario. However as the ITF has agreed upon, solutions must also be developed for trade between regulated and non-regulated markets.

Below the challenges and opportunities for the four options above are outlined, keeping in mind that the task is to improve market access, and the chance for that to be possible will increase with more options rather than one single option.

### **Equivalence Agreements**

As it is agreed that equivalency is the concept to use on the level of production standards, there comes also the question on how to make equivalence assessments. The CAC has developed “Guidelines for the Development of Equivalence Agreements Regarding Food Import and Export Inspection and Certification Systems” - CAC/GL34. There is also another CAC Guideline for the “judgement of equivalence of sanitary measures’ (CAC/GL 53). This applies to the Sanitary and Phyto-Sanitary (SPS) area and not to the Technical Barriers to Trade (TBT) area where we find organic foods. There was also in the development such guidelines (on standards) for the TBT area, but that work item has been dropped<sup>9</sup>.

Notably, there has not been the intention that CAC itself would also make equivalence assessment. The CAC/GL34 is about equivalence of inspection and certification systems and not the underlying standards that are used.

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<sup>9</sup> There have been moves in the ITF for call for this to be revived. However, according to the FAO Secretariat for CAC, it is not likely to be brought back on the agenda.

In its “approval for standards system” (Policy 20&42), IFOAM has developed both the framework and the criteria for assessment if a particular organic standard fulfils the international reference standard (the IBS). The use of the system has shown that it is a difficult exercise and that the system needs revision (as explained in “*Experiences of equivalence and recognition in the regulation of organic agriculture, Oct. 2005*”). The IFOAM process can also be used for regulatory systems, as long as there is agreement that it is to the international reference that equivalence is established (and not to the national regulation). Governments might not, however, want to bind themselves to equivalence assessments by IFOAM or ANY other party. However, governments could be advised by the assessments made by IFOAM, or at least use the criteria as developed by IFOAM as guidance.

What is missing in both IFOAM and the CAC/GL34 are criteria to judge the equivalence between conformity assessment systems. However the ITF has concluded (see above) that there could be one unified standard for certification requirements, which would make such criteria redundant.

It is recommended that the ITF examines a combination of the criteria, for establishing equivalence of standards, in the IFOAM system with the process in the CAC/GL34. This could probably take the form of an “equivalence workshop” at a future ITF meeting.

Another approach to Equivalence Agreement is to use the process of Common Regulatory Objectives (CRO), e.g. as defined in the UN/ECE Recommendation L (see “*Objectives of organic standards programs, Oct. 2005*”). This can take the form of a formalized process within the framework developed by the UN/ECE or as a separate process building on the concept. One starting point could be that a future ITF meeting works to define such CROs for organic regulations. Such an initiative would give the ITF members experience, and understanding, of the CRO concept. It is recommended that a future ITF meeting devote sufficient time to a non-binding CRO exercise.

Equivalence negotiations can also be included in the many regional trade agreements that are under development. It is recommended that Governments include equivalence agreements on organic in, or in the framework of, regional trade agreements

### **Limits to equivalence agreements between government as the main component for market access**

Equivalence agreements as tool pre-suppose regulation in all participating countries. Therefore it provides no solution for the un-regulated markets. Also, equivalence agreements are demanding and therefore will normally only be prioritized if both parties have a substantial stake in the trade (see “*Objectives of organic standards programs, Oct. 2005*”). Finally, it is clear that current systems do not have the capacity to deal with direct government equivalency as the only and not even as the main option for market access (this has clearly been demonstrated by the EU, Japan and the United States of America, see “*Experiences of equivalence and recognition in the regulation of organic agriculture, Oct. 2005*” for more details). It would be wise for governments to expand their willingness to accept mutual recognition and cooperation between conformity assessment bodies as a tool for market acceptance. In a regulated environment, governments can choose to build their equivalence assessment on the two other components.

## **Mutual recognition agreements, cooperation or acceptance between accrediting bodies**

The paper “*Experiences of equivalence and recognition in the regulation of organic agriculture, Oct. 2005*” outlines the experience of cooperation among accreditors. It concludes that “Recognition of conformity assessment systems at the level of accreditation has proved less problematic than equivalence assessments”. Within the IAF framework there is a Multilateral Agreement between national accreditation bodies. The main limitations for this in the context of organic is that:

- most organic regulations do not have accreditation of an IAF member as a requirement;
- the ISO 65, which forms the basis of the IAF multi-lateral agreement (MLA), is not universally recognized, and even where it is recognized, such as in the EU, there are additional requirements formulated;
- most accreditors involved in the accreditation of organic certification bodies are not part of the IAF MLA (the International Organic Accreditation Service [IOAS], USDA, Hungary, Quebec, and some other governments).

However, the format for the MLA could be used for a similar agreement special for organic certification. If that also could include the IOAS it would break one of the big obstacles for better integration of the private and public sector efforts. It is recommended that an Organic Accreditation MLA is established including special national or international organic accreditation bodies (NABs). It should be noted that most countries still will request a separate approval and registration by a competent authority over and above accreditation.

Outside an MLA there are also a number of examples of cooperation between accreditation bodies, most notably between the IOAS and the DAP (Germany), SINCERT (Italy) and UKAS (UK). Such a practical cooperation, while not delivering grand solutions is cost-saving and fosters converging applications, both to the benefit of the certification body, and ultimately of the market. It is recommended that cooperation between accreditation bodies is further developed and encouraged.

## **Mutual recognition agreements, cooperation or acceptance between certification bodies**

While accreditation is a common and powerful mechanism to facilitate trade, it has a number of limitations. To begin with it is expensive, and in the situation where there are also other mechanisms for supervision of Conformity Assessment Body (CABs) one can question the economy of that extra layer. Another limitation is that most countries do not have an accreditation body that is part of the IAF MLA. Accreditation normally (N.B. IFOAM Accreditation is an exception) deals only with the conformity assessment aspects and not with the production standards used. It is a sort of meta-certification which means that even if it is strong from a systems perspective it is not likely to play any major role in the daily problems and scandals involved in the certification of organic food.

In a similar way that Accreditation Bodies can recognize each other, certification bodies can also do that. The current situation and limitations for that is explained in “*Cooperation between Conformity Assessment Bodies in Organic Certification, Oct. 2005*”. Mutual recognition between certification bodies are often facilitated by accreditation, but can also take place as a result of peer-review (peer assessment) as defined in ISO 17040 and ISO Guide 68. It can be (legally) more acceptable for a government to accept a certification body

within its own jurisdiction to be the one responsible for import approval than an accreditation body in another country (whether national or international). To give certification bodies a unique position in this respect is however subject to criticism for protectionism and in the cases of monopolies also for market control<sup>10</sup>. It is recommended that governments allow for delegation of import approvals to certification bodies, based on their cooperation in mutual recognition agreements or otherwise.

From the exporter's perspective, it is not only the legal access to a market that poses a hurdle. Also the dominance of certain labels in certain markets is a major obstacle. In some (few) instances the will of the label-owner might be to protect its own producers and therefore they are very restrictive in giving access to their label. More often, they lack the procedures to easily extend their label/certification to producers certified by somebody else. However, even if they want to they have limits on their "ability" to extend their certification to clients of other certification bodies without redoing the whole process, with costs and time delay as a consequence. As explained in "*Cooperation between Conformity Assessment Bodies in Organic Certification, Oct. 2005*", the restrictions in ISO65 and the IFOAM Norms on delegation of certification authority pose immediate problems and increased costs for operators seeking multiple certification and market access. It is not at all clear why these restrictions would have to apply between partners in a mutual recognition agreement (MRA), or in cases where the licensing certification body supervise the other body. It is recommended that rights to delegate certification decisions should be expanded to partners in MRAs.

### **Cooperation between various levels**

Governments and private sector alike can seek to use expertise, work and structures by others to relieve their work. It does assume a certain level of trust and confidence which often is a stumbling block. In addition, especially for governments, it can be difficult to "delegate" authority. IFOAM has recently taken steps in this direction by its decision at the General Assembly Sep 2005, where among many things it states that IFOAM should "work together with other existing systems, including governmental systems" in the development of the Organic Guarantee System. The paper "*Experiences of equivalence and recognition in the regulation of organic agriculture, Oct. 2005*" gives a few examples how governments have used the technical expertise of the IOAS: use of IOAS reports for import approval to some EU Member States and contracting the IOAS for oversight by Australia.

Similarly, even if a government is not prepared to accept mutual recognition between CABs as an option under their regulation, it could very well use CABs within their own jurisdiction as technical experts for conformity assessments.

An often heard objection to the use of private bodies by governments is about independence. However, it is hard to see that the private bodies operating in the field by nature is less independent than the governments themselves. Nevertheless, if governments have such a concern they should formulate more precisely what their concern is and how it could be remedied.

An objection from the private sector to the use of, or recognition of, the results of government approvals is that they lack confidence in the technical expertise of government systems.

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<sup>10</sup> If a Certification body is mandated to judge the reliability of other certification bodies as a basis for import approval there is a risk that they would not approve in order to expand their own market in the country of operation of the other certification body.

While this is and has been an issue in the initial stage of regulating the sector, governments with developed regulations are likely to have specialists assigned to their organic programmes. Another obstacle is a government attitude of “we do not have to speak with you-you have to speak with us” as well as lack of transparency<sup>11</sup>, in many governments.

It is recommended that:

- all parties seek to cooperate to solve practical problems, and that government and private sector cooperation is encouraged;
- all parties seek to develop mechanisms whereby they can recognize the technical relevance of the others work;
- all parties realize that transparency and responsiveness is critical for any cooperation.

### **Acceptance of government systems by private sector bodies**

In a similar way that governments have resistance for the acceptance of the private sector work in other countries, also private sector organizations, in particular those with strong market position in importing countries, tend to be sceptical to foreign governments. Most of the recommendations above will serve to break down the walls between governments and private sector and induce an atmosphere of cooperation. In addition, IFOAM’s revision of the Organic Guarantee System goes in the direction of more inclusiveness and more cooperation with governments. It is recommended that IFOAM should proactively seek to evaluate the equivalence of the organic regulations of the major importing countries with the IFOAM Basic Standards.

### Supporting framework

Even if the recommendations above are agreed upon, there is still a need for a “supportive framework” for them to happen.

### **CB Forum**

IFOAM has taken the initiative to create a global Forum for organic certification bodies. The first meeting is scheduled for February 2006. Such a Forum can play a big role in working out practical cooperation between organic certification bodies.

### **Cooperation between Accreditors**

There are quite a few accreditors involved in accreditation of organic certification bodies. One is international, the IOAS, some are government departments (e.g. USDA) and others are NABs. They would need a platform for their discussions. **It is recommended** that a platform for cooperation between accreditors for organic certification is created, e.g. within the IAF framework, or IFOAM.

### **Database of regulations**

A database of regulations might not be a pre-requisite for progress on equivalency or the ITF

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<sup>11</sup> Even governments that have a very high level of transparency tend to have less transparency when it comes to negotiations with foreign governments, trade issues, etc.

process; it can, however, clearly assist the stakeholders to get a better understanding of the issues. Further it can be of use for countries planning to develop regulation. It is recommended that major stakeholders join forces to establish a common database of organic standards and regulations.

### **Champion of the ITF process**

As the ITF now moves away from the review phase and has entered into the proposal and the agreement phase, there is a need for a mechanism that keeps the progress going in order to raise awareness and offer options. It is recommended that the ITF produces supporting promotional materials.