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Guide for Promoting the IROCB

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The Purpose of IROCB

The International Requirements for Organic Certification Bodies, IROCB, is a norm which presents good practices that certification bodies (CB) must implement in order to provide a quality organic certification process. IROCB is an internationally agreed set of minimum requirements. Its main purpose is to serve as a reference document for a government authority or a private accreditation body to use when deciding if a certification body outside of its control system fulfills requirements that are equivalent to its own.

For example, instead of directly accrediting certification bodies all over the world, a government authority would accept those certification bodies that demonstrate that they are fulfilling the IROCB. IROCB incorporates many of the requirements of ISO Guide 65. However, it is an internationally agreed organic-sector-specific norm.

Why IROCB is a Good Idea in General

- Using IROCB is consistent with WTO guidelines, which encourage equivalency based on reference to international norms.
- IROCB fills a void for a useful international norm for organic certification. Codex Organic Guidelines on inspection and certification are of limited use because they are not consistent with the ISO65 based requirements that are currently implemented by government and private approval systems for organic certification bodies.
- Using IROCB to determine equivalence can be more fair. CBs can be accepted based on an international norm rather than on case-by-case conformity to national requirements or proprietary private requirements, both of which may be oriented to a special context.
- Using IROCB to determine equivalence is much more efficient. In the case of government regulations, a CB can demonstrate that it fulfills the international requirement, and this is then accepted by many government authorities. This case contrasts to the CB demonstrating conformity to the certification requirements of many different countries, which may even be contradictory.
- IROCB can be applied in both the government and the private sectors. Private bodies that accredit organic certification bodies can use IROCB to regulate how their accredited CBs accept other certifications that their clients encounter in the course of organic trade.
- Common reference to IROCB in the government and private accreditation sectors will foster private-government cooperation, which can lead to more cooperation and recognition.

Why IROCB is a good idea for governments

- Direct accreditation of foreign certification bodies by governments will not be sustainable in the long term, due to the worldwide expansion of the organic sector and in the number of CBs needing accreditation.

- Governments that are just starting to regulate organic imports have an off-the-shelf reference for approving foreign certification bodies without having to develop one themselves or get into costly direct accreditation of foreign CBs to their own system.
- Approval of foreign certification bodies based on IROCB will fulfill the spirit of WTO Technical Barriers to Trade (TBT) guidelines, which encourage use of international norms for conformity assessment and efforts towards harmonization of government requirements.
- Use of IROCB for approval of foreign certification bodies will encourage long-term harmonization of requirements among governments.
- IROCB can serve as a template for a government that is developing its own certification requirements for certification bodies that operate within the country.

Why IROCB is a good idea for the private system

- IROCB provides private accreditation systems and their certification body clients with a tool for recognizing certification bodies outside the particular accreditation system.
- IROCB will bring efficiency to the process of recognition in the private system, because it is a single international reference norm for equivalence among certification bodies.
- IROCB will enable private systems to recognize certification bodies operating to the requirements of government systems, and vice versa.
- IROCB will create more business opportunities for private accreditation, because they can provide verification of conformity to the IROCB to government authorities.
- IROCB will encourage long-term harmonization of certification requirements between the government and private sectors.

Case Example (hypothetical)

An exporter wants to import organic chocolate confections, organic maple wafers and shortbread biscuits to India and Thailand. The chocolate is certified by Certisys in Belgium; the maple wafers by OCCP in Canada, and the shortbread biscuits by Soil Association Certification Ltd. in the UK. Certisys is accredited to EN 45011 (ISO 65 equivalent) by the Belgian Ministry of Economic Affairs. OCCP is accredited by Standards Council of Canada to ISO 65 and the Canadian Organic Regulation. Soil Association Certification Ltd. is Accredited by UKAS for EN 45011 and also runs a small IFOAM Accredited certification program under which the shortbread biscuits are certified.

The governments of India and Thailand regulate imports of products with organic claims. Both governments have decided to use IROCB as their reference norm for recognizing other certification bodies as operating certification systems equivalent to their own requirements. India and Thailand will accept the organic certification of the three CBs as equivalent to their own requirements, provided that the CBs can demonstrate that they meet the IROCB. SCC Canada has verified that the Canadian government requirements meet all the IROCB requirements and therefore that OCCP meets IROCB. IOAS has verified the same regarding IFOAM Accreditation Criteria for Soil Association Certification Ltd. Therefore, India and Thailand only require a confirmation statement that the CBs are under supervision to these schemes. Certisys (ISO-65/EN45011 accredited) has contracted with IOAS to verify that it fulfills those requirements of IROCB that go beyond ISO 65/EN45011. Certisys can present its EN 45011 accreditation and in addition, IROCB verification, for acceptance in any country that requires IROCB.

In this one example, IROCB has streamlined acceptance for three CBs in two countries. But the case example should inspire a larger vision of how the international tool can facilitate the recognition of CBs on a large scale.

Question and Answers

How was IROCB developed?

IROCB was developed by the International Task Force, guided by its three organizing bodies, UNCTAD, IFOAM and FAO. ITF developed four drafts of IROCB, and extensively consulted two of these drafts prior to finalizing it in early 2008.

Who owns the IROCB?

The International Task Force has developed the document, but it is not itself a legal entity. The ITF has decided to request IFOAM to be caretaker for the document for the next several years, while arrangements are made for either Codex Alimentarius or ISO to take it up.

How does IROCB compare to ISO Guide 65?

IROCB contains most requirements of ISO Guide 65, and additional sector-specific (organic) interpretations and requirements. Its organization differs from ISO 65 (which is itself undergoing a revision and reorganization). The few ISO 65 requirements that are omitted were not considered to be of high relevance to the organic sector certification.

How does IROCB compare to the certification requirements in Codex?

The relevant section in the Codex Organic Guidelines (on inspection and certification) is a mixture of guidelines for the approval/accreditation body and for the organic certification body. It is not based on ISO 65; it is missing key ISO 65 elements altogether or addresses them at a more general level. The approach is not based on quality system management as is ISO 65. Annex 3 contains minimum requirements for inspection, but is far more detailed than any government or private requirements for organic certification bodies. IROCB is much more similar to the existing government and private accreditation requirements in the organic sector.

How does IROCB compare to the IFOAM Accreditation Criteria?

The IROCB and IFOAM Accreditation Criteria are comparable. However, the IFOAM Accreditation Criteria contain more specific details in some areas and address a few topics that IROCB does not. The organization of the two documents is also somewhat different. Finally, the language style of IROCB is geared toward its use as an equivalence document; whereas the language style and guidance notes in the IFOAM Accreditation Criteria are focused on its use as a norm for accreditation.