



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

071028 db

## **Background Paper**

### **History of IROCB Development**

**Prepared by Diane Bowen**

**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

This paper presents, in chronological order, a summary of the development of IROCB.

**December 2005 Workshop Tunisia (excerpt from report)**

Regarding the options for a Certification Requirement:

The following options were identified for moving toward a single requirement for organic certification:

- a. ISO process:
  - o include in the revision of ISO/IEC Guide 65 and IAF guidance more requirements relevant to organic certification;
  - o "amplify" ISO/IEC Guide 65 for the organic sector, perhaps by developing a specific guidance document for it;
- b. develop the document in the Codex process;
- c. develop a stand-alone (ITF?) international reference document.

Regarding the ISO process:

The discussion took up several questions, including the outlook for the revision of ISO/IEC Guide 65, the role and enforceability of the ISO Guidance documents.

As the ISO 65 system is still very much in development it was cautioned not to cast anything in stone, or otherwise to have a mechanism to address shifts. It was stated that IAF is open for suggestions to work with it to address the ITF needs. The point is to reduce the need for multiple accreditations. The group was informed that the ISO/CASCO Secretariat has requested national standardization bodies to comment about whether to start the revision of ISO /IEC Guide 65 in 2006. It was proposed to contact national standardization bodies and give them suggestions for revising. Maybe notes to IAF guidance on ISO/IEC Guide 65 will be brought into future ISO/IEC Guide 65, which could mean progress.

Organic sector accommodation does not mean automatically to revise ISO/IEC Guide 65, but to focus only on the additional requirements.

It was pointed that there is more interest now to develop sector-specific guidance for ISO/IEC Guide 65. Someone could request an organic sector-specific guide. However, there are no known examples of ISO Guide/IEC Guide 65 being amplified and adapted for a specific sector. ISO CASCO can develop guidance documents in 2-4 years, but the timeframe to develop technical guidance can be done in a shorter timeframe. The problem is that the organic sector is not involved in ISO/CASCO.

With respect to using guidance documents for bringing in the other requirements, it was explained that guidance documents are intended to provide flexibility and not to be additional requirements. Also, they are not enforceable. The main principle of guidance is to

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

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

help the accreditation bodies have the same interpretation and to train their assessors. The IAF experiences show that guidance documents should not be prescriptive requirements.

Regarding adding it to the Codex process:

This would be difficult due to the complexity of it, and the lack of organic expertise. It was pointed out that at the ITF Rome meeting, there was a discussion of the Codex Committee on Food Inspection and Certification (CCFIC) but that also there could be some work on inspection and certification in the Codex Committee on Food Labeling (CCFL) where there is more organic expertise in the dialogue.

Regarding the ITF/stand-alone option:

Gunnar Rundgren expressed that there is already a consensus within the ITF that it should go ahead to develop a common document (or set thereof).

**2005 December ITF Main Meeting Tunisia (excerpt from report)**

The Workshop had defined three areas of requirements (boxes) to which the ITF could provide input. These are:

- Box 1: the area containing requirements for agricultural production and processing (the standards).
- Box 2: the area containing requirements (many of them prescriptive in nature and sector-specific) for how certification is conducted, e.g. what specific records the certification body must check, grower group inspection requirements, verifying the GMO prohibition.
- Box 3: the area containing requirements for the competency of the certification body (the content of the ISO/IEC Guide 65).

The consensus of the Workshop was that any requirement for conducting certification needs to be based on the ISO/IEC Guide 65. Regarding opportunities for the ITF to influence a revision of the ISO/IEC Guide 65, the ITF was informed that the ISO CASCO Committee had requested its members to give feedback on whether the Guide should be revised. If the revision starts in 2006 it will most likely be completed by the year 2009.

The ITF agreed that it should focus on Box 2. The essential certification requirements should be identified based on an assessment of whether a certain requirement is really necessary for assuring organic integrity.

**Decision**

- **Commission a draft of one set of essential (integrity tested) international certification requirements (that can be the basis for equivalence)**

*The ITF approved this proposal.*

**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

Based on the ITF study on requirements for certification bodies, a first identification of existing requirements is to be carried out. After completion of this step, the process of defining the essentials should commence.

#### **April 2007 ITF Steering Committee Meeting (excerpt from minutes)**

The Steering Committee discussed the ToR

The ITF Steering Committee gave feedback for revising the Terms of Reference. There are different dimensions e.g. the scale and stage of development issues. The scale and stage of development issue should be addressed more and the draft of the international certification requirements should try to accommodate this somehow (perhaps through guidance notes). Mildred Steidle will be invited to develop the draft International Requirements for Certification Bodies (and it is noted that the title is changed to this terminology).

#### From Terms of Reference:

The set of International Requirements expected to consist of the ISO Guide 65 Requirements for Bodies Operating Product Certification Systems, plus a set of essential organic certification requirements developed through the ITF process. This project aims to develop the essential organic certification requirements. The project will also recommend if the International Requirements for Organic Certification Bodies should drop any ISO 65 requirements due to their inappropriateness and/or difficulty to enforce in the case of organic certification.

#### **October, 2007 Workshop Stockholm (excerpt from report)**

The Steering Committee reported that the approach of the document was very much appreciated by the workshop participants. Participants supported that there could be progress requirements and some participants thought that there could be more of these. The recommended deletions from ISO 65 were generally supported, but it was recommended to call them “non-applicable” or another similar term. The workshop discussions included: the various ways that product acceptance are handled; the responsibilities of the operator; whether ISO 65 is the best starting point; clearer rules for market surveillance; potential of progress requirements to undermine acceptance of the document; appropriate language style of the document; relationship to PGS systems; balance between outcome-based and descriptive/prescriptive content of the requirements.

The main issue of the workshop discussion was the nature of the document. Should this be developed for actual use in accrediting and approving certification bodies (in which case it should be rather detailed) or should it be guidance for equivalence? It was concluded that it might be hard to sell on adopting new criteria, the paper fell more along the lines of an equivalency tool, and creating another, perhaps competing, international norm in addition to IFOAM Accreditation Criteria for use in accreditation. The workshop proposed a new title, “Requirements for Conducting Organic Certification: Guidelines for Establishing Equivalence”. It was then questioned that, if this will be a guideline, then whether it should

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

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

become more outcome-based and less reflective of the ISO 65 elements. Concerns about re-positioning this document to guidance were that it would be less useful as guidance for writing new regulation and may not be practically useful to any stakeholder. It was also pointed out that the process for this document must include careful consultation and an eventual determination of the document's ownership. It was requested that participants at this meeting take a clear decision on the role of the document before taking other decisions on it. Questions to be addressed in deciding the role should include: Will anyone use it directly for accreditation/ approval? How difficult to "sell" it? Could it lead to less harmonization? How to give guidance for developing new regulations? Is there political will to solve the problems? Will responsible authorities and the other users put enough energy into it?

### **October, 2007 Main Meeting Stockholm (excerpt from report)**

The ITF agreed to continue with the development of an international requirement that will serve as a guide for equivalence and discussion of further harmonization and will also be available for use in countries where new organic guarantee systems are being developed.

The ITF decided to continue to develop the current draft in its current format. It also decided that the next steps are for the members to provide written comment on progress requirements criteria and the sector-specific descriptions. The document will serve as a benchmark for equivalence, a reference for convergence on a single international requirement, and for direct accreditation as possible.

#### ***Discussion***

Regarding the role of the document: Participants reviewed the discussion from the first meeting day and observed that: The workshop preferred the option for the document to serve as an equivalency guideline; the ITF discussion introduced some new ideas and some members stated a preference for the document to be available as a norm for use in accreditation/approval; still others suggested that there could be multiple roles. One participant expressed an opinion that the workshop was not the best approach, and would have preferred that the document was only discussed in depth in the main meeting. It was generally agreed that there should eventually be a single normative document for direct use, and that the current document can be moved along to that aim. In the shorter term there are other needs and the document can fill these needs, including to have a norm available for use by countries that are implementing new programs (provided that it is rewritten in a format conducive to this use) and to influence the ISO 65 revision process as well as to demonstrate the insufficiency of ISO 65 on its own for the organic sector for the purpose of dialogue and convergence on an international norm. It was noted that an ISO 65-plus requirement is the current model for all the regulations and the private international systems – they all have additional requirements to ISO 65. There are still some major issues to be resolved in developing the document for the longer term, including whether this should be developed as a more outcome-based approach. It was also suggested to move quickly into a communication mode about this work.

**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

## **2<sup>nd</sup> Draft and Consultation Process**

In January, 2007 the ITF Steering Committee approved a consultation plan, to be also sent to ITF members for review and comment. The consultation plan was sent to members for a 30 day consultation period in early February, 2007. No substantive comments were received. A second draft of the IROCB was prepared in mid February and consulted at the Biofach with the Certification Body Forum. It was then sent for a written consultation in early March to a list of over 300 stakeholders comprised of lists from IFOAM, the Codex CCFL Organic Working Group, the CB Forum, and the ITF Members, with a 1 May deadline for comments.

In April the ITF Steering Committee discussed the IROCB with the EU Commission. The Steering Committee also appointed a Working Group to guide the author in the development of the 3<sup>rd</sup> draft. The Working Group appointees were Klaus Budde of BLE Germany, Reinaldo Figuerido of ANSI/IAF, Vitoon Panyukul from IFOAM, Paddy Dougherty from IFOAM. Mark Bradley from USDA NOP and Herman Vanboxem from the EU Commission were also invited but could not participate. In June, 2007 the Working Group met and reviewed the 24 comments received on the 2<sup>nd</sup> draft. Comments were summarized and responses were noted in the records of the working group. These documents are available from the ITF Secretariat upon request.

## **3<sup>rd</sup> Draft preparation and Consultation**

A 3<sup>rd</sup> draft was prepared by the author, Mildred Steidle, and sent to the stakeholder list on 6 August with a deadline of 6 September for comments. The comment period was shortened to 4 weeks from the original plan for the 6 week consultation period in order to have comments for review by the time of the Steering Committee meeting in late September. 19 comments were received and compiled for review by the ITF Steering Committee and the author. At its meeting on 20 September in Washington D.C., the Steering Committee prepared instructions for a 4<sup>th</sup> draft, based on comments. It also discussed the document at an in-person meeting with the USDA NOP on 21 September. The author has prepared a 4<sup>th</sup> draft for presentation at the November 2007 ITF meeting. A commentary on the response to the 3<sup>rd</sup> draft comments is also included with the IROCB documents for this meeting.

Documentation of comments and responses, as well as this summary, will be posted on the ITF website.

**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



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

070131DB

**DRAFT**

Consultation Plan

## **International Requirements for Organic Certification Bodies (IROCB)**

**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

### **Scope of document**

This document outlines how the IROCB will be developed and the procedures for consultation and adoption of the IROCB. The scope of the IROCB itself is not defined in this document.

### **Introduction**

The overarching ambition is that

- all relevant stakeholders shall have the opportunity to give input to the IROCB, directly or indirectly,
- the process is professionally managed
- consensus should be the guiding principle
- through intensive consultation, the IROCB will be supported by the stakeholders

Parallel to the process of consulting the content of the IROCB, there should also be consultation regarding the "home" of the IROCB, i.e. which organisation shall have the long-term responsibility for, for publishing, distributing and revising the norm.

### **Development of the IROCB**

- The IROCB is developed under the auspices of the ITF.
- The ITF Secretariat administers the consultation process.
- One person is commissioned to be in charge of the content of the document – below referred to as "the consultant".
- A smaller working group with committed people will assist and guide the consultant. The working group can consist of:
  - representatives from the IFOAM Criteria Committee
  - 3 representatives from the ITF, including ITF members from the USDA NOP and European Commission
  - 1 representative of the IAF
  - 1 representative from the ISO CASCO, if interested.

The working group will be appointed by the ITF Steering Committee.

### **Adoption of the IROCB**

The ITF as an whole should adopt the IROCB. Other organisations shall be encouraged to state their acceptance of the IROCB

### **Time plan**

The target is to have the IROCB presented and adopted at the November, 2007 ITF meeting. This is an ambitious target.

**Consultation process**

<b>Stage</b>	<b>Activity</b>	<b>Time</b>
<b>First draft</b>	<b>Presented to the ITF meeting in Stockholm, Oct 2006</b>	<b>October 2006</b>
	<b>Comment from the ITF</b>	<b>22 December</b>
<b>Further clarification of scope and approach</b>	<b>The ITF-SC</b>	<b>Mid January</b>
<b>Production of second draft</b>	<b>Consultant</b>	<b>10 January – 10 February</b>
<b>Second draft consultation</b>	<b>Consultant</b>	<b>10 February</b>
	<b>Second draft sent out for comments</b>	<b>10 February</b>
	<b>Consultative meeting at Biofach / CB Forum</b>	<b>14 February</b>
	<b>Steering Committee Presentation of draft to the EU Commission and other stakeholders (pending Commission availability)</b>	<b>April 18-20</b>
	<b>Official Appointment of Working Group by Steering Committee</b>	<b>April 18-20</b>
	<b>Deadline for comments on second draft</b>	<b>1 May</b>
	<b>Compilation of comments by secretariat</b>	<b>8 May</b>
<b>Production of third draft</b>	<b>Consultant + working group</b>	<b>25 May –31 July</b>
	<b>Working Group Meeting in Bonn</b>	<b>1 June</b>
<b>Third draft consultation</b>	<b>Third draft sent out for comments</b>	<b>1 August</b>
	<b>Steering Committee Presentation of the third draft to the USDA AMS Administrator and NOP.</b>	<b>21 September Washington D.C.,</b>
	<b>Deadline for comments on third draft</b>	<b>1 October</b>
	<b>Compilation of comment – secretariat</b>	
<b>Production of final draft</b>	<b>Consultant prepares final draft in consultation with the Steering Committee ( and in consultation with working group as necessary)</b>	<b>22 October</b>

Insert Document Name

	<b>Sent to the ITF</b>	<b>25 October</b>
	<b>ITF meeting</b>	<b>26 –30 November</b>

**Mailing list for consultations:**

The following mailing lists could be used for consultations:

- the IFOAM mailing list for norms
- the Certification Directory, of The Organic Standard (400 organic certification bodies)
- the Codex Committee on Food Labeling (CCFL) list
- CASCO members
- ITF members
- ISEAL Members

**Web site**

The ITF website will include a section where the schedule, drafts and summary of comments are posted. Website will include a public invitation to comment.

**Handling consultations and comments**

All comments submitted shall be acknowledged.

The comments and response to them will be summarized and the summary shall be made available to the public, i.e posted on the web site. A weblink to the summary will be sent to all those who submitted comments.

Insert Document Name