

Government authorities can use IFOAM accreditation to ease the burden of international trade requirements for organic products.

The Situation

The success of the growth of organic agriculture and international trade of its products has brought with it an increasing burden related to the verification of the production method that aims to provide confidence to distant buyers and consumers. Perhaps the most onerous expression of this is the requirement for organic producers to carry multiple certifications to enable them to sell to different world markets. However this complexity at the producer level is mirrored and exacerbated at the level of inspection, certification and accreditation. Extrapolation of this system into the future conjures up nightmarish scenes of layer upon layer of impenetrable bureaucracy which at best will limit the growth of a system of agriculture that is providing environmental benefits and sustainable livelihoods in many countries.

Two bodies active in the international arena have been working in very different ways to ease this burden.

The Global Organic Market Access (GOMA) project follows on from the work of the International Task Force on Harmonisation and Equivalence in Organic Agriculture (ITF - an initiative of FAO¹, IFOAM² and UNCTAD³). The project seeks to simplify the process for trade flow of organic products among various regulatory and/or private organic guarantee systems. GOMA focuses on harmonisation and equivalence of organic standards and certification performance requirements as mechanisms for forging trade pathways. In particular GOMA has focussed its efforts on enabling regulatory authorities to establish equivalence between their regulations. Notable successes have been the reference by the European Commission to the International Requirements for Organic Certification bodies (an ITF document) as a basis for equivalence and the support given to initiatives on regional standards. The equivalence agreements between the USA and Canada and more recently the EU and Canada are positive expressions of this new environment.

The other international body working to ease the trade burden has been the International Organic Accreditation Service (IOAS). The IOAS has sought to provide services to regulatory authorities that enable certification bodies requiring multiple accreditations to achieve these recognitions through a single evaluation process. This has greatly reduced the number of assessment visits by supervisory agencies of the certification bodies with a resulting significant reduction in the financial and time burden of demonstrating competence. The most notable successes in this strategy have been for imports into Canada and the European Union (EU) where the IOAS can provide these services alongside other schemes.

But are these efforts sufficient?

The Problem

This paper argues that while both of these efforts are necessary and helpful, their impact on certification bodies, particularly in developing countries, is insufficient and will likely remain insufficient for an unacceptably long period. Many developing countries have no regulation or have yet to implement their regulation and therefore are not in a position to enter



1 Food and Agriculture Organisation of the United Nations

2 International Federation of Organic Agriculture Movements

3 United Nations Conference on Trade and Development



equivalence negotiations with the major importing countries. In many cases it is difficult to conceive of these countries being on an EU or USA National Organic Program list of approved countries for decades to come. Even those who may have implemented regulations and applied for country-to-country recognition have found themselves languishing on waiting lists for ten years and more due to insufficient resources in the country of import to conduct the equivalence review.

The alternative is that the certification body must itself secure direct recognition from the importing countries. In some cases this may be in addition to the costs it incurs in obtaining recognition in its own country. Even where the IOAS 'one evaluation-multiple accreditation' strategy is in play, the costs to a small certification body can be crippling and represent an unacceptably high proportion of their gross income. It is not unusual for certification bodies to carry 3 or more accreditations with the IOAS. In addition to the costs, the complexity of meeting so many different requirements is overbearing and does not, from our experience, contribute to the organic integrity that we are all seeking in order to build and maintain trust. Although multiple accreditations might be good business for the IOAS, this is not why we exist; we are here to grow the organic market through effective conformity assessment and continued credibility.

If additional answers are not found quickly there is a distinct possibility that many indigenous certification bodies in the developing countries will not survive. It may be that by the time the GOMA tools are applied in these countries and by their target import countries, the only certification bodies present will be the international bodies based in developed countries. The importance of the local certification bodies for the growth of organic agriculture cannot be overstressed, especially when as in so many cases, production of important commodities in developing countries, for example coffee, is a smallholder based, and therefore a resource poor activity.

Freed of the cost and burden of multiple accreditations, local certification bodies could offer a service that is cheaper, more understanding of local conditions and at the same time build local capacity and self-reliance.

Previous approaches

In the 1990s the IOAS and IFOAM lobbied for acceptance of IFOAM accreditation⁴ as sufficient proof of equivalence for imports. This lobbying was not widely successful and led to the IOAS changing its strategy to that explained above. In analyzing the causes for the lack of success, three conclusions emerge:

- Regulations were newly implemented and relations between the public and private sectors were undeveloped. Authorities were not willing under that circumstance to delegate responsibilities to others.
- Asking for acceptance of IFOAM accreditation meant requesting acceptance not only of IFOAM standards and certification criteria as providing the necessary equivalency assurance but also accepting the IOAS as being a reliable accreditation body.
- Accepting IFOAM accreditation essentially meant that imports would be approved on the basis of equivalence not compliance - a concept governments were not willing to take on board at that stage.

It can be argued that all of these factors have changed with time and experience. Firstly, the complexity and workload for the authorities is increasingly leading them to seek greater efficiency and specific expertise and delegation of at least some of the work is becoming

⁴ IFOAM accreditation is a voluntary accreditation implemented by the IOAS which assesses certification bodies against the IFOAM Norms, an international benchmark on production standards and operating requirements for organic certification bodies.

accepted. Public-private partnership in delivering conformity assessment services is the norm. Secondly in the intervening decade the IOAS has established itself as a professional body that can be relied upon to deliver sound assurances and this is increasingly recognised by authorities. Finally, encouraged by the work of the ITF and GOMA, authorities are far more willing to entertain the idea of equivalence than they were before.

The Proposal

- IFOAM Accreditation can, right now and on an international basis, help to simplify the complexity and cost of regulating imports of organic products.
- This can be achieved by government authorities adding IFOAM accreditation as one of the methods (alongside the common country-to-country equivalence and direct accreditation options) available to accept imports.
- Specifically we propose that government authorities recognise IFOAM accredited certification bodies as equivalent to permit imports without further bureaucracy.
- The IOAS is willing to enter into discussions with any authorities and provide the required transparency in order to give them the necessary confidence. We are available to work on any required equivalence analysis and justifications.

The Rationale

- The rationale of an international system to assist with international trade is inescapable and was the conclusion of the ITF work to which many private and public sector parties contributed between 2003 to 2008. We already had such a system (IFOAM Accreditation), but due to the reasons explained above, this was not universally palatable at that time.
- The IFOAM Norms have been functioning as an international standard and as international criteria for certification bodies for 20 years. Both standards and criteria are important to ensure integrity of the system. The process of setting these norms is an open and democratic process.
- The majority of organic regulations that exist today have their roots in the IFOAM Norms. Equivalence of country regulations with both the production standard and the requirements for certification bodies of control measures should be uncomplicated.
- IFOAM Accreditation has been in operation since 1994 and the IOAS has dedicated itself to accreditation in the field of organic agriculture since 1997. The IOAS is a non-profit organisation committed to cultivating integrity and trust across the organic community. No other accreditation body or supervisory authority has the same depth of experience in this field.
- The IOAS and the IFOAM Accreditation Programme itself is supervised by the National Institute of Standards and Technology of the US Department of Commerce for compliance with international rules on accreditation (ISO Guide 17011).
- Under the new Organic Guarantee System of IFOAM launched in 2011, IFOAM Accreditation offers various options to certification bodies which allows them to either use their own private standard, a regional standard or to use the IFOAM standard itself. In this way IFOAM Accreditation is open to all certification bodies anywhere in the world and without restriction or membership requirements.

The Benefits

- Reduced cost to all participants – if an export country certification body is accepted by all markets through one international accreditation, the need for 3, 4, or 5 accreditations and the associated cost is no longer necessary. If the certification body's accreditation costs are reduced they can provide services at lower cost to their clients, which translate to lower consumer prices. If government authorities accept IFOAM Accreditation, they will spend less on their own direct accreditation systems and need fewer resources for equivalence negotiations which ultimately mean a lower bill for tax payers.
- Reduced trade barriers – if an export country certification body is accepted by all markets through one international accreditation there is no need for producers, the certification bodies and the accreditation or supervisory authorities to deal with the increasing number of rules and regulations that each country system adds. It is not anticipated that IFOAM accreditation replaces the domestic system (although this is also an option for resource poor countries) but a certification body could much more easily combine two systems (one domestic, one international) than, if we look into the future, numerous country regulations. In regions that have developed their own regional organic standard (as in East Africa and the Pacific), the certification bodies could use that standard as a component of their IFOAM accreditation.
- Improved rigour – a direct result of the above reduction in number of norms is that the inspectors on the ground can focus on performing detailed and rigorous audits instead of checking the same issue against multiple requirements. A more robust system which would deter fraud would result.
- Simplicity - local certification bodies working in countries where there is no regulation could adopt the IFOAM standard directly and gain access to multiple foreign markets. Under the rigorous oversight of the IOAS, developing country certification bodies earn the credibility they need.
- Developed countries – the benefits do not only accrue to developing country certification bodies. Although in for example the USA, the NOP is well developed and with recognition agreements in place with several countries, certification bodies still need themselves to address the requirements of other import countries (current example Brazil). IFOAM Accreditation could be implemented alongside the NOP and this would still be a better option than the inevitable multiple systems towards which we are heading.
- Free access – all types of certification bodies can access IFOAM Accreditation, whatever the nature of their legal status. There is no requirement for membership of IFOAM or any other organisation. All certification bodies can participate be they ones that have their own private standards, use those of a related organisation, are bodies that are not interested or able to set their own standard or are government departments.

Next steps

We invite all government authorities involved with regulation of imports of organic products to contact us at the IOAS to discuss your needs for simplifying, but at the same time maintaining sufficient assurance of, the process. Please contact authorities@ioas.org and we can start the process towards a more common sense system of regulating and growing the trade in organic products and the consequent wider adoption of organic agriculture.