



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

Background Paper

IROCB Development

Compiled response to the comments submitted to the 3rd draft

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Introduction

16 organizations submitted their comments on the IROCB 3rd draft. This paper presents an explanation how comments have been considered drafting the 4th draft which is presented at the ITF meeting in BALI, November 2007

The following does not address and answer each single comment submitted. It addresses the major issues that have resulted into revised text and content change. Language corrections offered have been dealt with by a native speaker but are not further addressed in this document.

Documents presents the comments in following the structure of the IROCB document starting with general remarks. The relevant comment, issue raised, is mentioned followed by an explanation on how the comment has been addressed.

Comments requesting more adherence to ISO 65

In general IROCB should be based on ISO 65 however it should not repeat ISO 65 requirements, or reword it and add additional requirements. It should restrict the requirements to those that are seen as minimum requirements to ensure that certification bodies adhering to these requirements operate third party certification of organic operations in a consistent and reliable manner.

In general the instruction was to use language that reflects terms and language used in the organic industry.

Therefore comments requesting to add missing ISO 65 requirements or requesting more adherence to ISO 65 have not been accepted.

However, for better understanding the definitions section has been amended, the origin of each definition is noted and ISO definitions added, in cases ISO offers variant definitions.

Comments generally questioning the objective and intention of this document:

Reference is made to the Introduction section of this document and the background paper outlining the 'history of the IROCB development'.

Consider PGS, Participatory Guarantee Systems:

Not considered as IROCB is based on the principle of third party certification. IROCB requirements should represent international consensus on good practice in organic conformity assessment (third party certification)

Reference to regulations / laws

According to ITF Steering Committee instruction, a general paragraph has been included into the Introduction to clarify that existing regulations must be applied and laws respected.

Level of Detail

Again reference is made to the general instruction that the document should restrict the requirements to those seen as minimum (see comment above); however in case the commenter requests more detail or specificity instead of general terms such as 'periodically', a footnote has been added to state current industry practice.

1.3.1 Chain of custody

Request for more clarity, a footnote has been added to provide further explanation

2.1.2 Certification agreement

Ownership of logo, wording should leave it open who owns the logo, certification body or somebody else. Accepted and paragraph revised accordingly.

2.1.3 Responsibility for certification decisions

Request to use 'responsibility' instead of 'authority' accepted.

Request to add clarification that delegation of inspection service is possible, not considered covered in paragraph 2.2.5.

2.2.1 Qualification criteria, 2.2.2 Continues training

Commenter requested to include a reference to organic agriculture and practical experience under 2.2.1 qualification criteria. Not accepted however (see paragraph 2.3.2 Continuous training which covers that personnel has and continuous to have competence in performing organic certification).

2.2.2.3 Comment that paragraph is too prescriptive but at the same time should be expanded beyond inspectors; accepted, prescriptive details moved to an explanatory note.

2.2.3 Assignment of personnel

Explanatory note added to clarify that 'to declare association' is included to avoid possible conflict of interest situations.

2.3 Impartiality

Sentence to be deleted: CB shall not be financially dependent on single operations subject to their certification such that impartiality is compromised:

Stays: clarifies what at least should be avoided to demonstrate financial independency. The key word is 'single'. It is accepted that certification bodies are financially dependent on certification fees as their major or even single income.

2.2.5 Subcontracting (outsourcing)

It was questioned whether or not it is relevant and practice that inspection duties are performed by subcontracted parties.

No change, because it is practices that inspection bodies subcontract work including inspections (e.g. CBs working international, testing, analysis etc.)

2.5.6 Appeals and complaints

Request to cover the situation that under certain systems appeals and resolution is dealt with by authorities and not the certification body: see general comment reference to regulations has been included into the Introduction. IROCB should cover the situation where certification bodies act on their behalf. .

3.2.2 Inspection protocol

Request to be more clear and specific regarding elements like length of inspection, exit interview etc.

To be discussed at the ITF meeting

3. Process requirements

Delete this whole section because it appears to be a repetition of details already given. Not accepted.

IROCB distinguishes two major sections, first, general requirements covering the internal structure and organisation whereas paragraph, '3. Process requirements to conduct organic certification' outlines how the CB shall perform the certification work.

3.1.2 repeats requirements already covered under 2.1.2

Not accepted, see comment above.

3.2.5 Wild collection

Based on an ITF steering committee instruction chapter 3.2.5 Particular requirements for certification of wild products has been deleted. Comments regarding this chapter therefore are irrelevant.

3.2.4 Particular requirements for group certification systems

Comment regarding level of detail applies however the ITF steering committee decided to put the whole chapter on the agenda for discussion at the ITF meeting.

3.3.2 Exceptions on certification requirements

Section to be deleted: violates ISO 65 and will prevent regulatory bodies to accept IROCB because it would allow practice to issue exceptions from regulatory requirements.

For discussion at the ITF meeting

3.3. Decision on Certification:

Request for clarification, language and terminology; see changes in the text and amendment in the definition section

3.4. Retention and renewal of certification

Not to request application of all evaluation procedures re-evaluation is performed to renewal of certification.

To be discussed at the ITF meeting

3.4.1 Inspection

Inspection shall not be understood as physical inspection

Not accepted, would require changing the definition and common understanding of the term inspection which is defined as on site visit.