

## ATTACHMENT 5



Federation  
Internationale  
des Mouvements  
d'Agriculture  
Biologique

Internationale  
Vereinigung  
Biologischer  
Landbau-  
bewegungen

Federacion  
Internacional de  
Movimientos de  
Agricultura  
Biologica

**I**NTERNATIONAL **F**EDERATION of **O**RGANIC **A**GRICULTURE **M**OVEMENTS

Please reply to: To: Members of the NOSB  
USDA, National Organic Program

From: Linda Bullard, President  
IFOAM

Date: 8 February, 1999

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On behalf of the International Federation of Organic Agriculture Movements (IFOAM), we appreciate the opportunity to continue to provide input into the process of developing the organic program in the United States.

IFOAM is the international standards setting organization for the organic sector. It has 770 member organizations in 107 countries, representing all areas of the organic movement. IFOAM has been active for more than 25 years in the development and promotion of organic agriculture, and is the voice for the worldwide organic movement. As such, IFOAM has participated in the development of organic standards and regulations at the international level, including those of Codex Alimentarius and the European Union, where, through the IFOAM EU Working Group, IFOAM continues to play an active role in the evolution of Regulation 2092/91. IFOAM is also referenced in the U. S. Senate Report language which accompanies the US Organic Food Production Act as "working to harmonize standards internationally" (page 290).

In light of the public response to the first proposed rule, we understand that the USDA has been rethinking its approach to the design and content of the proposed regulation. IFOAM, representing the worldwide organic community, stands with the U.S. organic community in its demand that the USDA establish a true public private-partnership in its new version of the proposed rule, as called for by the OFPA itself.

Our comments in this paper will be directed specifically to the accreditation aspects of this partnership.

The implementation of measures to judge equivalence between standards and inspection from different countries for imports of organic products may result in confusion, inequalities and discrimination which can constitute technical barriers to trade. The Committee on Technical Barriers to Trade of the World Trade Organization has noted the restrictive effect on trade of multiple testing and conformity assessment procedures and stated that the principle of "one standard, one test, one certification, one time" should be pursued in order to facilitate trade and reduce the costs, which are often borne unequally by the countries of the South. IFOAM has instituted the only fully operational, international accreditation system for certification programs in the field of organic agriculture and food production: the IFOAM Accreditation Programme. Based on ISO Guides 65 and 61 adapted to the specific needs of the organic sector, the system is operated independently by the International Organic Accreditation Service (IOAS), based in the United States.

At its recent General Assembly in Mar del Plata Argentina, the worldwide organic movement unanimously called upon all national governments to fully recognize IFOAM Accreditation as providing the necessary evidence of import equivalence in standards, inspection and certification of organic food and farming.

For a portion of an IFOAM Accredited Certifiers meeting during the Mar del Plata Scientific Conference, Beth Hayden from the National Organic Program was in attendance. One of the questions from the certifiers to Ms. Hayden was whether or not the USDA would accept and recognize IFOAM Accreditation. She said that while she could not comment on the current drafting process and how this issue might be addressed there, the first proposed rule had allowed for this option. In our reading of the first proposed rule, we did not recognize this option; however we are pleased to hear that it did exist and encourage the NOSB to recommend and the USDA to adopt this option, in clear language, in the next version of the draft.

During a seminar session at the Eco Farm Conference in January of 1999, Keith Jones of the National Organic Program was presented with a series of questions regarding the cost of accreditation, as well as concerns regarding the USDA's intentions to duplicate in the federal government structures which already exist in the private sector. These questions and concerns are not new. Throughout the entire rule making process, the private sector has consistently asked that the USDA not duplicate structures which already exist in the private sector, but rather find ways to work with these structures. Mr. Jones indicated the USDA's willingness to consider these options.

The accreditation system operated by the IOAS is such a structure. In our reading of the OFPA, there is nothing to prohibit the USDA from delegating the job of accreditation to a private sector body; and the IFOAM Accreditation Programme offers a cost effective, efficient, experienced and operating accreditation system, which meets the OFPA requirements for the Peer Review Panel called for in Section 2117.

Attached is a brief explanatory note about the different roles of IFOAM, the IFOAM Accreditation Programme, and the IOAS. We urge the NOSB to take the international trade aspects of accreditation into account in its deliberations and to recommend that the USDA look to this private sector system for its accreditation needs, rather than creating a costly and redundant accreditation structure within the US government. This would represent a true public-private partnership, as called for by the OFPA.

On behalf of the IFOAM World Board,



Linda Bullard  
President



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**INTERNATIONAL FEDERATION of ORGANIC AGRICULTURE MOVEMENTS**  
**IFOAM, THE IFOAM ACCREDITATION PROGRAMME, AND THE IOAS**

Please reply to:

**IFOAM**

IFOAM is an international federation which unites the various branches of the organic sector worldwide. It was founded 25 years ago in Versailles, France by 5 organizations from different countries. Today its member organizations number 770, coming from 107 countries. It is registered in Switzerland and Germany and has its head office on an organic farm in Germany. **IFOAM does not perform either organic certification or accreditation services.** The service that IFOAM does provide is the elaboration of standards for organic production and processing, and criteria by which the performance of certification bodies may be measured. IFOAM is the international standards setting body for the organic sector. The Basic Standards are the product of a democratic and transparent process which culminates every two years in the General Assembly, when the worldwide membership debates and adopts the revisions to the Standards.

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***The IFOAM Accreditation Programme***

The organic industry represented in IFOAM developed criteria for organic certification based on ISO 40 (which later became ISO 65). Adaptations were necessary because the generic ISO Guide was not designed for certification of agricultural production. In addition, IFOAM developed a programme for assessing conformity to these criteria, called the IFOAM Accreditation Programme.

***The International Organic Accreditation Service, Inc. (IOAS)***

The IOAS was established as an independent legal entity, incorporated in the US State of Delaware, and structured in accordance with ISO Guide 61, to perform accreditation services for organic certification. It is now the largest accreditor in the world in the field of agriculture. The certification bodies which it has accredited certify organic production in 60 countries. IFOAM has an Agreement with IOAS which governs the use of IFOAM's name by those certification bodies which the IOAS accredits according to the criteria laid down in the IFOAM Accreditation Programme, i.e., the sector specific adaptation of ISO 65. Those certification bodies which are determined by IOAS to fulfill these criteria are permitted to describe themselves as "IFOAM Accredited"—**NOT BECAUSE IFOAM DOES THE ACCREDITING BUT BECAUSE IFOAM DEVELOPED THE STANDARDS AND THE CRITERIA AGAINST WHICH THEY ARE JUDGED.** It is shorthand for saying "complies with the criteria of ISO 65 as adapted to the organic sector in the IFOAM Accreditation Programme." It is not a reference to who makes the determination.

**IFOAM does not DO accreditation. IOAS performs this service on the basis of IFOAM norms, which are themselves derived from ISO 65.** The standards and criteria developed by the organic sector in IFOAM are referred to as "IFOAM Basic Standards," and "IFOAM Accreditation", in the same way that the norms developed by the International Standards Organization are referred to as "ISO" Guides, even though neither organization uses those norms for performing certification or accreditation services itself.

The global organic guarantee system consisting of norms developed by the industry and conformity assessment as described above aims to provide a multilateral mechanism to facilitate international trade in organic products and is consistent with the Technical Barriers to Trade Agreement.