



INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS

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CROSQ Secretariat – Technical Officer for Standards

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Object: IFOAM comment on the "CARICOM REGIONAL CODE OF PRACTICE - Code of practice for organically produced foods - DCS/ CRS 9:201X"

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Dear Fulgence St.Prix,

We thank you for the opportunity to comment on the new draft of the aforementioned document. We have noted with appreciation that this new draft has taken into account our previous comments related to:

- the inclusion of additional requirements in Section 4 such as on the prohibition of genetic engineering, ecosystem management and conservation, and
- the inclusion in Section 6 of requirements related to the prevention of contamination and co-mingling organic and conventional products.

On the other hand, our earlier comments related to the need to clarify the scope and purpose of this regulation have not been fully addressed. We notice that the Foreword still contains language drawn from the Codex Organic Guidelines CL/32, which does not fit your Code of Practice. As an example, the language uses the term "these guidelines" whereas the document is not called "guidelines" but "code of practice". Another example is that one of the purposes still listed is "to provide international guidelines for organic food control systems in order to facilitate recognition of national systems as equivalent for the purposes of imports": this is one purpose of the Codex guidelines, but cannot possibly be a purpose of the CARICOM Regional Code of Practice.

We understand from this new draft that the intent of the CROSQ is to set-up a compulsory regulation applicable to all operators in the CARICOM region that label their products as organic, regardless of their marketing channels, whether it be for direct sales to the consumers, sales in organic shops within the CARICOM region or even export to international markets. We question whether developing a regulation with this scope is the right approach at this point in time to promote organic agriculture in the region and would be happy to offer our consultancy services to explain the possible impacts of and alternatives to this approach for your region.

Nevertheless, in the case that you would pursue a compulsory regulation applicable to all operators in the region, we would like to re-iterate our earlier recommendation that the language relating to conformity assessment be more open to other verification systems than third party certification, including Participatory Guarantee Systems. This would be in line with the document “Best Practices for organic marketing regulation, standards and conformity assessment: Guidance for developing countries”, developed by the International Task Force on Harmonization and Equivalence in Organic Agriculture (a project of UNCTAD, IFOAM and FAO), which included the following recommendation:

“Recommendation 3. Compulsory requirements for mandatory third party certification should be avoided as it will not enable other alternatives to emerge. Other conformity assessment procedures, such as participatory guarantee should be explored.”

To this end, and realizing that your current draft does not stipulate requirements for certification or accreditation (which may in the future be developed as a separate regulation), we recommend that you adopt a more open language, throughout the document, using phrases such as “the verification body”, instead of “the certification body”, “conformity assessment” instead of “inspection / certification”, “with verified organic status” instead of “certified organic”, etc. You may also delete the definition of certification / certification body from this document. There will be opportunity in other documents to work on the details of what these terms would mean in the context of a fully regulated organic market in the CARICOM region. The conformity assessment requirements may later be developed at the regional level by the CROSQ or may be developed by each individual state. In the meantime, it is of vital importance that the new regional regulation does not prejudice the development of diverse and locally adapted verification systems in the region.

Additionally, you may already specify in the foreword or definition sections that Participatory Guarantee Systems (PGS), as defined by IFOAM, are an acceptable mean of verification of organic products for the local market within the region. To this end, you may use the IFOAM definition of PGS: “Participatory Guarantee Systems are locally focused quality assurance systems. They certify producers based on active participation of stakeholders and are built on a foundation of trust, social networks and knowledge exchange.”

Finally, we have noted your effort to change the language related to the regulation of imports, to recognize certification programs operating in various parts of the world. IFOAM has been working for quite some time on the issue of import regulations, and on advising governments on related technically appropriate regulatory language. Below is the improved language that we would recommend that you adopt in your paragraph 10.1.4:

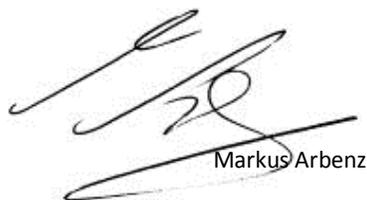
101.4 The labelling and advertising of a product may refer to organic production methods only where:

- a) such indications show clearly that they relate to a method of agricultural production;
- b) the product was produced in accordance with these standards or, if imported from a third country, in accordance with an organic standard or regulation equivalent to these standards. Are accepted as equivalent all standards and regulations officially recognized as equivalent to the Common Objectives and Requirements of Organic Standards (COROS), appended to the FAO, IFOAM & UNCTAD "Equitool". This includes all standards and regulations approved in the IFOAM Family of Standards.
- c) the product was produced by an operator who is subject to the national conformity assessment measures, or if imported, produced by an operator certified by a an organic certification body with valid organic accreditation (this can be IFOAM Accreditation, Global Organic System Accreditation or any governmental organic accreditation)
- d) wild ingredients or products shall be declared as such as well as organic, except for ingredients in imported products.

With such a language, you would be assured that only organic products backed-up by a credible and internationally recognized standard and certification system could be imported in your region.

We thank you for taking our concerns into consideration. Please do not hesitate to contact us for clarification or for any assistance related to the implementation of our comments or the improvement of the current draft.

With best regards,



Markus Arbenz