



INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS

To: Caricom Regional Organisation for Standards and Quality, CROSQ

IFOAM Head Office
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Object: IFOAM comment on the “CARICOM REGIONAL CODE OF PRACTICE Code of practice for organically produced foods -DCS/ CRS 13:200X”

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Dear Sir or Madame,

First of all, we the International Federation of Organic Agriculture Movement (IFOAM) would like to express our appreciation for your efforts in supporting organic agriculture development in the Caribbean Region. IFOAM’s membership includes organic sector umbrella organizations from Caribbean countries such as Jamaica, Dominica and Trinidad and Tobago. The draft CARICOM Regional Code of Practice for organically produced foods has come to our attention. We have looked with interest into the draft, and express the following concerns:

- The aim of the document is not clear enough.
- The language of the current draft restricts imports to organic products that fully comply with the document itself, making impossible the application of equivalence approaches as promoted by IFOAM, FAO and UNCTAD.
- The current draft does not mention Participatory Guarantee Systems (PGS) as a certification option appropriate for the local market.
- Section 3 and Section 4 and Section 6 need further work.

We detail these concerns in the sections below. In addition, we attach a document developed by the International Task Force on Harmonization and Equivalence in Organic Agriculture, a project of UNCTAD, IFOAM and FAO, entitled “ Best Practices for organic marketing regulation, standards and conformity assessment: Guidance for developing countries”. This document, although not a formal policy statement of IFOAM, will amplify our comments below on developing national standards and other instruments for government support of organic agriculture. It is derived from a more complete publication from UNCTAD-UNEP entitled “*Best Practices for Organic Policy – What developing country Governments can do to promote the organic agriculture sector*”. This document is freely available at http://www.ifoam.org/growing_organic/cbtf_bestpractices_unep_unctad.php.

1. The aim of the document is not clear enough.

To facilitate the submission of relevant comments from the stakeholders, it would be good to include an explanation at the beginning of the document about what the objectives for having such regional document are. In the foreword of the current version, we realize that the statement of purpose is drawn from the Codex Organic Guidelines, CL/32, which is an

international guideline advising countries (and regions) on developing their own nationally (regionally) appropriate standards. In the case of the CARICOM Code of Practice, it would be good to specify if the document intends, for example:

- To be a voluntary guideline, more regionally adapted than the Codex, for countries in the CARICOM region to develop their own organic regulation if they wish to do so.
- To become a unified organic production standard for the whole region, similar to what has been achieved in the East African Community and in the Pacific Community through public-private partnerships (but then it should not expand on requirements for verification or import approval), serving primarily the local market.
- To become a regional regulation regulating organic exports from the region, with the objective to obtain, in the long run, equivalence approval from the main importing regions such as the US and the EU. In this case, compliance with the regulation in the region needs to remain voluntary until such equivalence agreements are in place, as operators would anyway need to be certified according to the regulations of importing countries.

Stakeholders would need to understand which of these very different objectives the document intends to accomplish, in order to provide adapted and relevant comments. Ideally, organic agriculture associations, from the region should be involved in the definition of the objective, as they are the primary target beneficiaries of such a document.

2. The language of the current draft makes impossible the application of equivalence approaches for international trade.

The language of Paragraph 9.2 restricts imports to organic products that fully comply with the all the rules of the CARICOM Code, making impossible the application of equivalence approaches as promoted by IFOAM, FAO, and UNCTAD.

IFOAM believes that equivalence approaches should be the basis of how countries recognize each others' organic regulatory systems for the purpose of enabling imports of organic products. With the multitude of national and regional organic regulations coming into place, it is unrealistic and detrimental for countries/regions to request that imported organic products fully comply with their own organic regulation, in addition to complying with the organic regulation of the country or region of origin.

Depending on the purpose of the overall document, it might or might not be necessary to have a section regulating imports. If it is judged necessary, Section 9 should emphasize the equivalence approach to imports approval. The GOMA project, a partnership of FAO, IFOAM and UNCTAD, is supporting governments to set-up and implement these approaches. Please, feel invited to visit GOMA's website, www.goma-organic.org, and contact project Manager, Diane Bowen, d.bowen@ifoam.org for additional information.

3. The current draft does not mention Participatory Guarantee Systems (PGS) as a certification option appropriate for the local market.

Although we see no language in the document that specifically prohibits the labeling and marketing of products guaranteed through Participatory Guarantee Systems (PGS), we call your attention to the importance of this system as an alternative to third party organic certification for small producers selling in local markets. PGS provides a favorable framework for the development of organic agriculture among small farmers, for the growth of the local domestic organic markets in the region and for the involvement of consumers. We encourage that any regulatory document maintains flexibility for the PGS option within the regulatory systems of the Caribbean countries.

4. The Objectives and Principles section (Section 3) needs further work.

IFOAM believes it is very important to have a coherent and well-developed section on Principles and Objectives of Organic Agriculture in each organic standard or regulation. We therefore appreciate the inclusion of Section 3 in this document. Furthermore, we recognize and appreciate that the document has taken up the IFOAM Principles of Organic Agriculture in this section and also that CARICOM has chosen to extract and emphasize an additional main principle for the region, which is “The Principle of Culture and Traditions.” However, Sections 3.2.1 “organic production principles” and Section 3.2.2 “Principle Objectives” contain redundant and overlapping topics and statements. We suggest re-examining and streamlining Section 3 and propose that the sub-points under 3.2.1 and 3.2.2 be brought within the framework of the five Principles in Sections 3.1.1 through 3.1.5.

5. Section 4 and Section 6 lack important requirements that are usually found in organic standards and regulations.

First, section 4 should specifically state the prohibition of Genetically Modified Organisms at all stages of organic production and processing. In this document, the prohibition on genetic engineering only comes in the principles section and in two other citations, 4.2.6.2.2 (breeding techniques) and A.5.3 (list of substances in processing). It is very important to include it as a set of clear requirements for operators. We refer you to the IFOAM Basic Standards (IBS), Chapter 2, section 2.3 for a suggestion about how to address the prohibition of genetic engineering at all stages of production and processing.

Second, we believe that there should be additional emphasis in Section 4 on requirements for Ecosystem Management and Conservation. Specifically, we suggest the following requirements from the IFOAM Basic Standards v. 2005:

- a. Operators should take measures to maintain and improve landscape and enhance biodiversity.
- b. Clearing of primary ecosystems is prohibited.
- c. Operators shall take defined and appropriate measures to prevent erosion.
- d. Land preparation by burning vegetation shall be restricted to the minimum.

- e. Crop production, processing and handling systems shall return nutrients, organic matter and other resources removed from the soil through harvesting by the recycling, regeneration and addition of organic materials and nutrients.
- f. Operators shall not deplete nor excessively exploit water resources, and shall seek to preserve water quality. They shall where possible recycle rainwater and monitor water extraction.

Finally, we recommend adding in Section 6 some requirements on Prevention of contamination and co-mingling organic and conventional products. For an example, see the IBS Chapter 6, Section 6.1.

We thank you for taking our concerns into consideration.

With best regards,

A handwritten signature in black ink, appearing to read 'Markus Arbenz'.

Markus Arbenz
IFOAM Executive Director