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Commentary on the Preparation of the Final Draft IFOAM Benchmark for Standards

The process from second to final draft

In December, 2007 IFOAM received 34 general comments and 465 specific comment from 43 organizations on the second revision draft of the IFOAM Benchmark for Standards. The comments were compiled and analyzed by Organic Guarantee System staff in late December. The IFOAM World Board was then requested to review the general comments and provide guidance to the Standards Committee on preparing the final draft. The World Board advised the Standards Committee to maintain focus on outcome-based requirements and to avoid adding prescriptive details, except where such detail fulfills a critical purpose and not contradict existing consensus as reflected in key regulatory standards, in line with the scope of revision as set by General Assembly motions. Noting comments concerning the alignment of the Benchmark with the regulations in the major organic markets (US and EU), the World Board asked the Standards Committee to compare and take into consideration the requirements of the Benchmark to those of the USDA NOP regulation and EU Regulation 2091/91 when preparing the final draft. The capacity of the Benchmark to accommodate these regulations was of interest relative to key objectives of the OGS Revision. The World Board also invited the Standards Committee to submit items with political implications arising from the comments and/or from the regulations comparison to the World Board for decision.

The Standards Committee met on 19-21 January, 2008 to prepare the final draft. It adopted a new system for considering and responding to all comments. The Standards Committee constructed a numbered list of common responses and referred to one of these common responses

when responding to each detailed comment. The SC also made additional explanation in many cases. The Standards Committee also compared each of the 110 requirements in the draft to the two major regulations and noted gaps. Committee members then revised the document based on the responses to comments and the regulations comparisons. A number of decisions were referred to the World Board, based on the Standards Committee's judgment that they were political decisions. These included chapters on Biodiversity and Social Justice which are not directly regulated in the scope of the referenced regulations. Some specific requirements in the 2nd draft Benchmark that are not addressed by one or both of the regulations were also referred to the World Board. These include specific requirements related to fertility management in crops, animal husbandry and processing. In most cases the SC made a recommendation to retain the requirements in the Benchmark. The World Board took these decisions, mostly by accepting recommendations of the Standards Committee, where provided. In a few cases, specific requirements were because they were too prescriptive. For example, a specific requirement concerning soil sterilization was deleted because it is covered in both the regulations and the Benchmark by requirements for building and maintaining "living soil" and fertility.

What has changed in the final draft?

- Conversion: Although in general the SC did not insert more prescriptive and quantitative requirements, it reinstated time requirements for conversion in Chapter 3. In the case of land/crops, care was taken to accommodate the both the concept of organic management and the time since application of a prohibited substance. In the case of animals, conversion times for animals on the farm were reinstated. It is still left to standards setters to set exact minimum ages for animals that are brought into the operation.
- Some specific requirements that were determined to already be covered by more general requirements were removed in line with the revision of the document as a standard for standards.

- New requirements were added that any use of treated seed and non-organic animal feed be time-limited.
- There is now more consistency between the requirements of the aquatic animal chapter and the animal husbandry chapter.
- Many suggestions for adopting clearer and/or more appropriate terminology were implemented.
- Language of some principles and objectives has been improved.

What has remained in the Final Draft?

- The final draft retains the same structure as the second draft: principles applied, objectives, requirements and prohibited practices.
- The requirements remain focused on outcomes to be achieved. Although in some cases this approach has been criticized as being too vague, there are numerous instances of similar outcome-based language in the current IBS and various organic regulations.
- The indicative list has been retained. The Norms Management Committee is preparing a clear and transparent policy and procedure for how the indicative list will be further developed and employed in the Organic Guarantee System.