

## NMC Response (Commentary) to Member Comments on Draft Policy for Revision of the IFOAM Norms

**Bonn, 30 August 2007**

This document includes all comments made on the draft Policy for Revision of the IFOAM Basic Standards as approved by the World Board in March 2007 and published for stakeholder comments on the 14<sup>th</sup> of June 2007. This document also includes the Norms Management responses to the comments received. Following the comments IFOAM has developed a final revision draft of this policy, which is subject to approval by membership vote.

The following members commented on the draft policy.

Name	Country
Ecocert-Afrisco	South Africa
Ekologiska Lantbrukarna	Sweden
Fibl	Switzerland
Grolink	Sweden
KRAV	Sweden
Naturland	Germany
OMRI	US
Soil Association	UK
Bioland	Germany
General Commission for Scientific Agricultural Research (GCSAR)	Syria
French Organic Farmers Federation (FNAB)	France
Fédération Nationale Interprofessionnelle des Vins de l'Agriculture Biologique (FNIVAB)	France
Fédération régionale des agrobiologistes de Bretagne to IFOAM (FRDAB)	France
Groupe de Recherche en Agriculture Biologique (GRAB)	France
Inter Bio Bretagne to IFOAM (IBB)	France
Institut Technique de l'agriculture Biologique (ITAB)	France
Mouvement de Culture Bio-Dynamique (MCBD)	France
Nature & Progres France (NPF)	France

### General Comments received:

- **Ecocert-Afrisco:** Not sure where the changes are, but it looks OK to me.
- **Fibl:** The Draft meets our general consent with the exception of Point 1.d bullet 5. (incorporated below)

- **Grolink:** A general comment is that there is no reference to the Procedure for Revision of the IFOAM Norms, it would be good to state that there is a more elaborate document on the procedures.  
**NMC response:** The reference to the procedure was incorporated - see last page of final revision draft of the Policy.
- **KRAV:** We think that the suggested draft does fulfill the decision of the IFOAM GA 2005 very well. (“IFOAM shall amend policies 20, 21 and 47 to establish a single procedure to revise the IBS to be consistent, simple, clear, democratic and participatory.”) We do not have any suggestions for changes.
- **OMRI:** OMRI agrees that a clear and consistent process is needed and that the current process can be improved. Most of the proposal is an improvement.
- **Soil Association:** We consider that the draft policy is generally acceptable and sets out a reasonable procedure.
- **Bioland:** We feel that it is a good idea to bring the existing policies and procedures together in one document. This makes it more transparent, more clear and more consistent. One aspect I want to bring up: Time.  
To make a "regular" revision it takes a lot of time:  
Zero: Shortly after publication of a norm a suggestion to change the standard is made by anybody  
24 months: Two years later the Committee puts it on the provisional revision plan.  
23 months: Publication.  
25 months: end of 2 months period to comment.  
26 months: Committee meets again, makes final revision plan, forwards it to WB.  
27 months: WB approves final revision plan.  
30 months: let's say: 3 months to meet and to develop a 1st draft is not much time for the committee.  
31 months: publication 1st draft.  
33 months: end of 2 months period to comment.  
34 months: committee meets and produces 2nd draft.  
35 months: publication.  
37 months: end of 2 months period to comment.  
38 months: committee meets again to prepare the 3rd draft  
39 months: publication.  
41 months: end of 2 months period to respond with motions.  
42 months: motions published with suggestions for reconciliation.  
43 months: end of 1 month period to comment.  
44 months: consultation with motion maker and development of final draft.  
46 months: end of 1,5 months period to comment, final decision.  
47 months: official publication.  
71 months: adopted in relevant certification standards after 2 years.  
83 months: end of e.g. 1 year implementation period for the operator.

Too pessimistic? I think no, my experience is that the committees need even more time to meet and develop drafts.

So, well: It takes 4 years from the suggestion to the publication of the result; all in all mystical 7 years to bring it to the fields of the farmer ...

And I feel that the membership and stakeholders will get tired to comment and comment ...

The process is democratic and includes a lot of involvement of the stakeholders and members - that's important, but anyway, IFOAM must be able to act faster! We should try to accelerate the procedure (e.g.: earlier/ongoing revision plan, no consultation at this stage, approval directly by WB only 2 draft as maximum, may be 1 year implementation time for the standards setters ....).

**NMC response:** The consultation process complies with the ISEAL Code of Good Practice for Standard Setting to which IFOAM committed itself. The approval of standards has always been the right of the membership and there is no mandate for the revision of this policy to hand over the responsibility for taking decision on the Norms to the World Board.

**NMC regarding GCSAR comments:** GCSAR made several proposals for editorial changes. These were incorporated in the final draft of the policy where appropriate.

**Status:** DRAFT as approved by IFOAM WB in March 2007

## Policy for Revision of the IFOAM Norms

### Purpose

To ensure that the decision making regarding the IFOAM Norms (IFOAM Basic Standards and IFOAM Accreditation Criteria) is based on efforts to achieve consensus in line with the ISEAL Code of Good Practice for Setting Social and Environmental Standards.

### Scope

All changes to the IFOAM Norms, including:

1. regular revisions
2. inclusion of new items in the IFOAM Basic Standards

### Grolink:

- Inclusion of new areas should cover both standards and certification. The IAC has some areas covered like group certification, inputs etc. How would it be possible to include a new area in the IAC if not through this process?

**NMC response:** The wording was changed. It now also covers the IAC. See final draft of the Policy

- How can totally new areas be include in the IFOAM guarantee system be proposed for addition? PGS would be such an area.

**NMC response:** The policy covers only revisions of the IFOAM Basic Standards and IFOAM Accreditation Criteria and not revisions of the Organic Guarantee System. At the moment the only way for initiating changes or revisions of the OGS is to make a respective motion at the General Assembly for example to include PGS in the OGS.

3. urgent revisions
4. changes resulting from Norms Interpretations
5. (changes to the lists of Inputs, Additives and Processing Aids)

**Grolink:** Why brackets?

**GCSAR:** Delete the brackets

**NMC response:** The brackets were removed. See final draft of the policy.

For every type of revision above this policy describes under:

- a. *Initiation:* The parties eligible and the main steps to be taken for making a proposal for a revision.
- b. *Decision to Commence:* The party eligible to take the decision to commence with the revision.
- c. *Revision Process:* The **main** components of and parties involved in the actual revision process.
- d. *Decision Making:* The main parties involved in the revision and procedures for approving a revision (e.g. membership vote).
- e. *Implementation:* The period within which approved changes have to be implemented by Norms users.

### Definitions

**Official Publication:** The date of the publication of the English version of the Norms as defined in the print version.

**Other Stakeholders:** Non-members as defined in IFOAM Policy 61.

**Soil Association:** However, we are concerned at the definition of Other Stakeholders. Policy 61 seems to contain a very limited list of stakeholders, basically only organisational ones. Why are the licensees of accredited certifiers not also included in this 'Other Stakeholders' definition? These are the producers and manufacturers potentially most affected by any change in standards, yet this policy gives them no right of input.

**NMC response:** Policy 61 will be verified and revised if needed.

**Members/Membership:** IFOAM members.

**Responsible Committee:** The committee responsible for revising the IFOAM Basic Standards or the IFOAM Accreditation Criteria.

**Ekologiska Lantbrukarna, Sweden:** Please clarify: different “committees” is mentioned in the Policy: Responsible committee, Criteria committee – is it different or the same committee?

**NMC response:** The term responsible committee is defined. For the Accreditation Criteria the Criteria Committee is the responsible committee. For the IFOAM Basic Standards the Standards Committee is the responsible committee.

**Revision Plan:** Document, which outlines the main revision areas and changes and basic timelines for the revision of an IFOAM Norm.

**New Area:** Categories of production or processing (e.g. catering, turf management) or products (e.g. paper) or concepts (e.g. Climate Change) not currently addressed in the Norms.

### 1. Regular Revisions

- a. *Initiation:* The Responsible Committee assesses periodically whether a revision is needed and makes a recommendation (Revision Plan) to the Norms Management Committee.

**Naturland:** Include a bullet point for timelines: e.g. at any time; every two years, etc.

**NMC response:** Timelines are addressed in the draft Procedure for Norms revisions.

**Grolink:**

- Why can only the Committee initiate a revision and the topics covered in the revision? As it is written here it seems like there are no other ways to start a revision. What happens if a group of members or the World Board is not satisfied with a part of the standard, but the Committee is satisfied.

**NMC response:** The NMC has revised the Policy accordingly. Also, in order to improve the check and balances the responsibility for developing the final revision plan was moved from the SC to the NMC.

The World Board always has the opportunity as a relevant body to make proposals. In urgent cases the revisions can be initiated by members and stakeholders according to 3 below.

The inclusion of new areas can be initiated according to 2 below.

- In the Procedure for revision it is also made clear that members and other stakeholder can request changes. We are also told that there will be a wish box and active request from IFOAM to the members to submit proposals about the Norms but it couldn't be found by the author of these comments.

From both documents it is felt that IFOAM use the knowledge and strength of the members a bit too little. If members/commenters have to bring up their issues first as a response to a first draft there will not be much possibility to facilitate the proposals from the members in the revision process and even less to have it properly discussed (it is then only one revision round left. IFOAM could have a process where a question/request is send out in good time before the revision plan is formulated. clearly define when proposals will be used at the time of formulation the revision plan.

**NMC response:** Proposals can be made at any time and will be discussed by the Responsible Committee in the Draft Revision Plan and can again be discussed during the comment period on the Draft Revision Plan. The NMC now also included in the draft procedure a call for proposals for revisions of the Norms. In addition IFOAM members and stakeholders are proactively invited to comment on the Draft Revision Plan. The draft procedure was revised to reflect that additions to the plan can be requested (the NMC needs to take into account all comments received). In addition proposals for New Areas can be made according to 2 below. Refer also to the possibility for requesting Urgent Revisions below.

- The World Board should always have the right to initiate a revision

**NMC response:** See response above.

**GCSAR:** Is it possible to add also that the responsible committee according to the suggestion of IFOAM members or other stakeholders, decide to see if there is a need to make revisions

**NMC response:** The Policy was amended accordingly.

- Decision to Commence:* The World Board based on the Revision Plan.
- Revision Process:* There will be one, or in exceptional cases two revision drafts, subject to consultation with the IFOAM Membership and Other Stakeholders. The respective last revision draft (2<sup>nd</sup> or 3<sup>rd</sup>) will be subject to motions from the IFOAM membership.

- d. *Decision Making:* There will be a motions reconciliation process resulting in a final revision draft which will be subjected to an IFOAM Membership vote. Decision by simple majority of the votes cast.

**Fibl:** We propose that at least 1/3 of the total membership must cast an e-vote in order for a decision to be valid.

E-votes however, do not allow for debating as an assembly does. For this reason we suggest that for the final approval of the Revision Draft, ratification by simple majority of the GA is necessary.

- When less than 50 % of the total membership has cast an e-vote, unreconciled motions shall be discussed by the GA
- When more than 50% of the total membership has cast an e-vote, unreconciled motions will not be discussed by the GA

**NMC response:** A postal/electronic ballot as employed by IFOAM allows all members to participate in the vote so that a 100% quorum is established, unlike at the GA where only 25% of the members need to be represented. With a view to democracy this is an improvement. A qualifying number of votes is not necessary.

**Naturland:** Should there be a quorum of a minimum percentage of the members that have to vote in order to make decisions representative of the membership?

**NMC response:** See previous response.

**FNAB, FNIVAB, FRDAB GRAB, IBB, ITAB, MCB, NPF:** As a member of IFOAM, our organisation expects the final decisions on the different revisions of the "IFOAM Basic standards" or part of them to be given back to the vote of the General assembly.

**NMC response:** The decision to approve the IFOAM Basic Standard outside of General Assemblies was taken by the General Assembly in 2002. Only the General Assembly can take the decision to move the approval of standards back to the General Assembly.

- e. *Implementation:* Within two years after Official Publication.

## 2. Inclusion of New Areas<sup>1</sup>

- a. *Initiation:* Five IFOAM members and/or Other Stakeholders, the Responsible Committee, at any time.

- b. *Decision to commence:* The World Board if there is a need and clear benefit for the organic sector. Negative decisions will be subjected to the next General Assembly for ratification.

**Grolink:** The WB should have the final say in this, both for positive and negative decisions. Both kinds of decisions should then be reported to the GA but not for any ratification.

**NMC response:** The ratification of negative decisions is a necessary check and balance step. See also current policy for norms revisions.

- c. *Revision Process:* As laid down in 1c above.  
d. *Decision:* As laid down in 1d above.  
e. *Implementation:* As laid down in 1e above.

<sup>1</sup> All changes not referring to including new areas, e.g. adding, removing or changing single standards can only be made in the course of regular or urgent revisions.

**GCSAR:** All changes do not refer to the inclusion or to include new areas, e.g. adding, removing or changing single standards can only be made in the course of regular or urgent revisions.

**NMC response:** The current wording will be maintained.

### 3. Urgent Revisions

- a. *Initiation:* Any IFOAM member, the Responsible Committee, or Other Stakeholder as per Policy 61.
- b. *Decision to commence:* The Norms Management Committee based on a recommendation of the Responsible Committee and the IOAS if the criteria for an urgent revision are fulfilled.
- c. *Revision Process:* There will be one revision draft subject to consultation with the IFOAM membership and Other Stakeholders as per Policy 61.
- d. *Decision:* The World Board based on a recommendation by the Responsible Committee. The use of Urgent Revisions will be reported to the General Assembly.

**Naturland:** Should the membership ratify the WB decision during the GA just like the membership has the final vote on other Norms decisions as well? This may mean that an urgent revision could possibly also be disapproved.

**NMC response:** A ratification is not needed as the World Board needs to report the use of urgent revisions to the GA.

**OMRI:** (However), the Urgent Standards Revision process is flawed and the proposal does not address the on-going abuse of this procedure. The recent experience with a proposed revision of the processing section shows that matters that are not urgent are being put through in a hasty way that will create problems rather than solve them.

Therefore, OMRI cannot support the proposal as written. We suggest that the IFOAM World Board exercise greater caution in the future when referring urgent standards revisions. All urgent standards revisions should be voted on by the membership and not by the IFOAM World Board. Urgent standards revision should be member-driven, transparent, and subject to final vote by the membership by an electronic ballot. The World Board needs to establish a clearer standard for need and those who stand to gain or lose from the proposal need to be identified with the impacts explained to the membership.

**NMC response:** If OMRI feels that the procedure has been abused OMRI should follow the IFOAM complaints procedures. The membership can initiate the urgent revision. There is no need for a vote as the World Board needs to report the use of urgent revisions to the GA. There are clear criteria for the need as defined in Policy 21. Download here:

[http://www.ifoam.org/about\\_ifoam/standards/ogs\\_policies\\_procedures/21UrgentStandards\\_Revision.pdf](http://www.ifoam.org/about_ifoam/standards/ogs_policies_procedures/21UrgentStandards_Revision.pdf)

These criteria have also been included in the draft Procedure for Norms Revisions. Proposals for urgent revisions when sent out to the membership always refer to the applicable criteria.

- e. *Implementation:* Immediately or within the implementation period as laid down under 1e above.

### 4. Changes Resulting from Norms Interpretations (Policy 28)

- a. *Initiation:* Resulting from a needs assessment by the Responsible Committee the Revision Plan will address how interpretations are taken up in the next norms revision.
- b. *Decision to commence:* According to 1b above.

- c. *Revision Process:* According to 1c above.
- d. *Decision:* According to 1d above
- e. *Implementation:* According to 1e above.

## **5. Changes to the lists of Inputs, Additives and Processing Aids**

According to Policy 60

## **6. Publication of new Norms and other Changes**

The revision plans and all decisions related to Norms revisions shall be announced promptly and approved Norms shall be published promptly.

**GCSAR:** To avoid repetition it [promptly] could be "immediatly"

**NMC response:** Promptly is the better term because it provides for the necessary flexibility with respect to timelines while at the same time making clear that the announcements and publications have to be finished within due time.

## **7. Complaints**

Complaints with regard to this Policy and its related Procedures are handled according to IFOAM Policy 27.

**GCSAR:** Why are number "6" and 7 not included in the scope?

**NMC response:** The scope defines the types of revisions possible not how they are published or how complaints are dealt with. The numbering was removed from both headings. See final draft of Policy.

**Approval of this Policy:** By membership vote on (date to be included)

**Responsible for revisions of this Policy:** The IFOAM World Board.