

Criteria Committee Commentary on 2nd Revision Draft of the 2002 IFOAM Accreditation Criteria Explanatory Notes (Former Guidance Notes)

Introduction

This documents comprises the stakeholder comments received on the Second Revision Draft of the **Explanatory Notes** and the responses (commentaries) of the CC on these comments.

As only a few comments were made on the Explanatory Notes this document is only an excerpt of the Second Revision Draft. It includes those Explanatory Notes as in the second revision draft that received comments, the respective stakeholder comment (in green/Times New Roman) and the CC response (in purple/Times New Roman).

In general, the stakeholder comments follow directly after the Explanatory Note. Acronyms (if applicable) of the commenter name are assigned to every comment. The acronym can be found in the overview of commenters below.

Remark: The CC has decided to incorporate the Explanatory Notes as footnotes into the main text of the IFOAM Accreditation Criteria (IAC). Therefore, the changes resulting from the comments and the CC responses can be found in the Final Revision Draft of the IAC.

IFOAM very much likes to thank all those parties who commented on the previous drafts of the IAC and the Explanatory Notes and would like to encourage you to take advantage of your right to make motions on the Final Revision Draft.

Overview of Commenters

Commenter	Acronym
Organic Trade Association	OTA
Organic Crop Improvement Association International	(OCIA)
Anne Macey	Macey
International Organic Accreditation Service	IOAS
KRAV	KRAV
Naturland	NALA
Soil Association	SA
International Certification Services, Inc	ICS

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1.4 Resources

1.4.7 The certification body should ensure that there is competence on all categories for which certification is granted. This may be on the certification committee itself or at staff level.

NALA: This has the wrong numbering. It should be 1.4.5

IOAS: There is no explanatory note for Criterion 1.4.5. If it is meant to be the explanatory note currently numbered as 1.4.7, then the first sentence seems redundant as it repeats what is in the criterion itself. Suggest that this first sentence is deleted and the second sentence stands as the explanation for 1.4.5.

CC: The CC agrees and has inserted the Explanatory Note to as footnote to the correct criterion and deleted the first sentence as proposed by IOAS.

3.4 Internal Audits

3.4.1 and 3.4.2: The first of these criteria requires auditing to check that the system is being implemented. The second calls for review of whether the policies and procedures are effective in achieving the goals.

NALA: The guidance note is misleading since 3.4.1 asks for evaluation of implementation and effectiveness. So drop 3.4.2 from this guidance note and have a separate guidance note for 3.4.2 explaining in more detail what the management review shall cover.

Add new 3.4.2: “A management review shall evaluate that procedures and measures to achieve superior quality goals of the certifier are effective. The management shall take appropriate measures for constant improvement of its quality goals.”

CC: The CC has deleted the Explanatory Note and has inserted an amended version of the second sentence as Guidance to IAC 3.4.2.

3.5 Complaints

3.5.4~~b~~**&c** These criteria require that complaints should not merely be resolved but that the certification body should review the complaint to determine whether the complaint indicates a structural or procedure fault and, if so, to remedy it. 3.5.4b requires the certification body to review whether the corrective action taken has solved the identified problem.

NALA: Change 3.5.4b at the end of the explanatory note into 3.5.4.c since IAC 3.5.4c requires to check the effectiveness and not 3.5.4.b.

CC: The CC has amended IAC 3.5.4 considerably. As a result of this the last sentence of the Explanatory note has become superfluous and was deleted.

5.4 Records

5.4.~~7~~**6**This may be an electronic signature.

KRAV: We are very happy with the statement in the explanatory note that electronic signatures are OK.

6.1 Application procedures

6.1.4.c Regions where there is only one certifier are not considered relevant.

KRAV: In the explanatory notes there it seems as if 6.1.4 c has got the wrong numbering, and should refer to 6.1.2 c instead. We suggest a new wording “**In** regions where there is only one certifier **operating, this information is not** considered relevant.”

NALA: I don't understand the explanatory note. Please clarify by rewording.

ICS: 6.1.4c - We believe this is supposed to be a note to 6.1.2c. In any case, we propose it be deleted. The consideration in criterion 6.1.2c is always relevant. In some regions there is no certifier, and all certification is done by a foreign control body. In any given case, the new certifier should have knowledge of the operation's prior certification history. If that was done by a foreign body and the new certifier has no way to be aware of that, then potentially valuable information will not be known.

IOAS: Do not understand this explanatory note. Unless it is misplaced, please explain further.

CC: The comments regarding the numbering are correct. The explanatory note refers to IAC is 6.1.2 c. The CC has corrected the IAC accordingly but has not taken up the proposed wording changes.

6.5 Inspection Report

6.5.4 An example would be: In cases of partial compliance or lack of clarity in the standards the inspector being required elaborate.

AM: Is the “to” missing between “required” and elaborate”

NALA: Wording is unclear. Change to:In cases of partial compliance or lack of clarity in the standards the inspector should have the possibility and should be asked to elaborate.

IOAS: Cannot understand the explanatory note.

CC: The CC has corrected the wording according to AM comment and believes the note is now understandable.

7.2 Certification Decisions

7.2.2 In a system where the certification is done annually the operator should be informed accordingly. In a system with an ongoing status the communication should assure that at any time the operator is informed about the certification status.

IOAS: The explanatory note is not clear to us - does this mean that in a system with an initial certification decision and then ongoing status, there needs to be no communication to the operator unless or until that status is changed? This has implications for a considerable number of currently IFOAM accredited operators and an unequivocal explanatory note would be appreciated.

CC: The CC agrees and has amended the wording of the Explanatory Note.

7.3 The certification process

7.3.1 This criteria requires that the current certification status (certified, conversion, non-organic) of all product or production, is stated on all forms and document used through the certification process. ~~Where the certification body operates more than one certification program, the applicable scope should also be stated.~~ Deleted sentence now guidance note to IAC 7.3.1

IOAS: Document should be plural

CC: Corrected.

7.5 Surveillance

7.5.2c If a certifier has 5000 operators, the Certifier has to perform at least 5000 inspections per calendar year plus new applications.

OCIA comment on 7.5.2: We suggest removing “c” as it makes the criterion unworkable/unusable.

OCIA: suggest removing explanatory note. See our comment on 7.5.2. above.

CC: The CC has not removed IAC 7.5.2 c and has therefore also not removed the Explanatory Note. See also CC commentary to second revision draft of the IAC.

8.3 Group Certification of smallholder groups

8.3.2~~ce~~ The criterion refers to the ~~two~~ factors that the size of the group should ensure - sufficient resources, transparency and impartiality. The certification body must determine whether the group is large enough to satisfy these factors.

NALA: This should be the explanatory note to IAC 8.3.2e (as the listing is at the moment)

CC: The CC has incorporated the Explanatory Note as footnote to the correct criterion (Now 8.3.2d).

8.3.15 (A) witness audit(s) will depend on seize of the group and the number of internal inspectors.

IOAS: Typo – should be size and seize

CC: Corrected.

8.3.15 The form shall include identification, name, location (at least on an area map), year of entrance into the certification system, date of last internal and external inspection, number of hectares, cash crops, and yield estimates. (from the IAC)

NALA: Erase as this note was included as guidance note in the IAC .

CC: Corrected.