COMMENTS AND SC RESPONSES

ON THE 2ND IBS REVISION DRAFT

THIS COMMENTARY CONTAINS THE FOLLOWING:

- COMMENTS MADE IN RESPONSE TO SECOND DRAFT CONSULTATION
- RESPONSE OF THE STANDARDS COMMITTEE TO THESE COMMENTS.

SOME REQUESTS FOR COMMENT

THE SC IS INTERESTED TO PROVIDE FULL TRANSPARENCY OF THE STANDARDS SETTING PROCESS. AFTER THE FIRST ROUND OF COMMENTS WE WROTE A GENERAL COMMENTARY. IN RESPONSE TO THE SECOND ROUND OF COMMENTS, WE ARE PROVIDING A COMPILATION OF ALL COMMENTS RECEIVED ON THE SECOND DRAFT AND OUR RESPONSES FROM THE SC'S REVIEW OF THE COMMENTS AT ITS JUNE MEETING. WHILE THE SC CONSIDERED AND TRIED TO ADDRESS ALL COMMENTS IN WRITING, SOME WE MAY NOT HAVE GIVEN A SPECIFIC WRITTEN RESPONSE TO EACH AND EVERY COMMENT. SC WILL CONTINUE TO CONSIDER HOW TO IMPROVE ITS RESPONSE AND COMMENTARY IN FUTURE IBS REVISIONS. WE INVITE YOUR FEEDBACK AND SUGGESTIONS. IS THIS FORM OF COMMENT-AND-RESPONSE PREFERABLE TO PREVIOUS "NARRATIVE STYLE" COMMENTARY FROM THE SC?

SPECIAL NOTE TO ACB RECIPIENTS: THE SC REFERS YOU TO IBS SECTION 4.5.5, WHICH ALTHOUGH NOT A REVISED SECTION, CONTAINS A DATE (END OF 2005) BY WHICH FORMULATED PRODUTS MUST HAVE BEEN ASSESSED AGAINST CRITERIA. SC INVITES FEEDBACK ON HOW ACBS ARE PLANNING TO IMPLEMENT THIS STANDARD.

NOTE

THE SC RECEIVED SOME COMMENTS ABOUT SECTIONS OF THE IBS THAT WERE NOT UNDER REVISION, AND WHICH THE SC HAD NO MANADATE TO REVISE. THESE COMMENTS ARE NOT RECORDED OR ADDRESSED BY SC IN THIS COMMENTARY. HOWEVER, THEY WILL BE RETAINED FOR FUTURE REFERENCE.

SOME KEY CHANGES IN THE FINAL DRAFT

- BOTH AQUACULTURE AND FORESTRY ARE NOW SEPARATE CHAPTERS.
- TEXTILE PROCESSING AND LABELING CONTINUE TO BE COVERED IN CHAPTERS 6 AND 7. HOWEVER THERE IS SOME NEW WORDING AND PLACEMENT OF STANDARDS IN RESPONSE TO COMMENTS.
- THERE IS A NEW LIST OF SUSTANCES FOR CLEANING AND DISINFECTING.
- CALIUM LIGNOSULFONATE IS ADDED TO APPENDIX 2 UPON THE SC'S POSITIVE EVALUATION OF A DOSSIER IN JUNE, 2004.

GENERAL COMMENTS ON 2ND REVISION DRAFT

IOAS: The IOAS notes and appreciates that many of the comments that the IOAS made regarding the previous revision round of the IBS have now been incorporated into this second draft.
The IOAS does not generally respond to the content of the IBS except in relation to accreditation and evaluation. Therefore these comments are restricted to issues of clarity; inspectability; scope and such like.

SC Response: Noted and appreciated.

Integration of Draft Standards: The IOAS feels that the organisation of forestry , aquaculture and textile processing standards will permit us to identify the standards that pertain to each category relatively easily, although we may have more comments/questions after we begin to use these standards in the accreditation process.

SA: The Soil Association would like to congratulate the standards committee in their treatment of the responses to the first round of consultation. We appreciate the commentaries and the measures taken to employ transparent rationale.

SC Response: Noted and appreciated.

BÖLW: As we are the german umbrella organisation, the BÖLW comment is based on the comments of different IFOAM members such as Naturland, Demeter and Bioland and is supported by other members such as Gäa, Biopark, Biokreis, Ökosiegel, Ecoland, Alnatura, BNN Herstellung und Handel, Bundesfachverband Deutscher Reformhäuser (refo) etc

Grolink
Forestry standards
To move and integrate forestry standards into the crop production standards is only bringing confusion. Reading the standards in full this proposal gives the impression that forestry is a huge part of organic production. How will the integration of the forestry standards in the plant production standards work out in relation to the IFOAM accreditation system? Will CBs have to include forestry standards into their plant production standards and producers with forestry have to include their forest land into their organic area even if still conventional but not any longer a fully converted farm? Should the forestry operations be inspected? Has the SC looked into these issues?

In our comment to the previous draft the following issues were raised and we see them as still valid.

The draft forestry standards should be scrutinised to identify if there are any differences to the FSC standards and to first make clear if IFOAM really should be active in the forestry area. We are at present not in favour of developing organic forestry standards for a number of reasons:
We (and IFOAM) lack a clear idea of what organic forestry is

We question the market relevance of organic forestry products. We feel that the market is not asking for these products, and in addition there are certainly enough of competing schemes for sustainable forest products already well established.
We think IFOAM lacks credibility in setting forest standards. Almost no forestry people are involved in IFOAM. There is a general rule that standards shall be developed by the concerned stakeholders. If IFOAM is going to be credible in the forest area it needs to get them into the dialogue.
There must be a consequence analysis made BEFORE any forest standard is set what will happen with the certification of wild products. Currently most “operators” organising wild collection has no management role of the forests, and the forest managers are no subject to certification. If wild products will have to come from certified forests we will get a completely new situation and an enormous increase of costs for wild product certification.

The last issue has been raised by us, not only in this round of revision but also in the previous one. The SC has never responded to this either directly or indirectly. We consider it not to be responsible to go on with this without proper clarification.

To sum up: we are generally not in favour of any IFOAM Forestry standards. If there should be such standards they should be in a separate chapter and not integrated in the crop production standards, and their relationship to the wild harvest standards must be absolutely clear.

SC Response: The SC agrees with concerns expressed by Grolink. However, it also feels that there should be some standards to cover situation of on-farm organic forest management (generally small scale producers), and small scale organic plantation forestry. In the final draft, there is a separate forestry chapter. The SC and FSC have recently undertaken discussions of how to reduce overlap and make the two sets of standards (FSC Principles and Criteria and IBS) as compatible as possible. Some ideas are already implemented by IFOAM in this draft. Other ideas are in progress.

NALA: We very much concentrated in this course of comments on the standards for aquaculture and forest management. We welcome the decision of the SC to treat the aquaculture standards as a separate chapter.
Comments on other parts of the IBS 2nd draft have been done by other IFOAM and BÖLW members and have been coordinated by the BÖLW. Naturland supports the comments on the IBS draft provided by the BÖLW members.

SC Response; Noted.

GROLINK:
General technical comments
It good that the previous standards appear in the same documents as the new proposals. Thanks!

Please next time present the draft as a word file as that will make it easier to make new proposals for standards.

SC: Noted.

2nd Revision Draft

INTRODUCTION AND COMMENTARY

Resource Use

Plant Breeding and Multiplication

Forestry

GROLINK: Take away the forestry standards. An IBS shall only be developed when there is a sufficient number of members that have developed their own standards. Has the SC any other standards then the draft standards to compare with?

The Forestry standard contain two distinctive set of standards; one for “natural forests” (2.4.2.) and one for plantations (4.7). None of these terms are defined! As the standards are quite different in the two sections, the lack of definition is disturbing. Many forests tends to be something in between, they are neither pure plantations nor “natural forests”. And that is probably even more the case with the kind of forests that the SC is targeting (“on farm or small scale forest” in the commentary p3). To try to force all different kind of forest management systems into two categories is not productive. We believe this again shows how inadequate the forestry standards are for IFOAM and organic operators.

Also see comments to the separate paragraphs.

SC Response: General comment was addressed earlier. The term “natural forests” has been deleted. The Forestry Chapter now refers to forest management when addressing the general practices, and there remains a subsection that addresses specific aspects of plantation forestry.

Processing Methods

Cleaning and Sanitation

GROLINK: We absolutely don’t want any lists of substances. How would this work on a global level?

SC Response: SC is still considering how to fully develop such a list. It is starting with the most basic substances that are already allowed on the other IBS lists.

GROLINK: We would like to see the possibility to give well based derogations to have both organic and conventional ingredients in the same product (food, feed, fibre, clothes, health care products etc). There are cases where the main ingredient also can be used as a carrier for a spice mix, organic corn flour as main ingredient and conventional corn flour as a tiny ingredient in a spice mix.
The whole discussion is a bit unclear also for textiles when it is actual blending in a woven product and when it is the full garment we discuss.
About the percentage we would like again to underline that a higher % of conventional would help the development through giving more possibilities for the textile industry to make clothes in qualities which they see as selling.
Don't publish lists of processing substances for textiles. This is a far too complicated and fast changing area for the process of IFOAM approval.

Questions

In response to the questions presented with the proposed revisions:

Should the same fiber be allowed from organic and conventional sources in a product labeled as "organic"?
SA: It would be in the interest of developing markets for certifiers to be able to derogate with the 5% allowance. Circumstances can arise where an organic option is not yet available in the correct form (e.g. woollen warp threads) and it is preferable to use a natural non-certified material, rather than resort to permitted synthetics to remain within the standards.

Should blends be based on organic and in-conversion product?

If non-organic cotton is permitted, what considerations should the standards give to the sources of GMO cotton?

Should synthetic fibers be allowed in textile products that are labeled as containing organic cotton? If so, why? Should there be any restrictions or limitations on what may be blended?

Please also consider the new draft section on Resource Use. This was drafted in part to broadly address subjects identified with more specificity and detail in the Draft Textile Standards (e.g. wet processing). Is this section appropriate and effective for textiles?

Should the Social Justice standards be revised if the IBS includes fiber and textiles? In particular, should child labor be addressed?

How should the standards address the substances used to process organic fiber? Should IFOAM publish an input list for textiles...?

Please consider the new section on cleaning, disinfecting, and sanitizing. Should this apply to fiber products as well?

Should IFOAM publish criteria to evaluate inputs used to process fiber...?
SA: We would strongly support any proposal to publish a well-defined and extensive positive list in the appendix that specifically considers the requirements of the textile industry, in the same

way as for additives and processing aids for foods. At the very least criteria such as biodegradability and toxicity should be set in the absence of a positive list if the IBS is to have any 'teeth'. We would feel uneasy knowing that certifiers were free to permit substances that fall outside the criteria originally described in 12.5 of the 2002 draft. The brief evaluation criteria at the end of Appendix 1 are very weak and wholly inadequate. It states that toxic substances shall be prohibited. Interpretations of toxicity could vary enormously.

Standards Revisions

Conclusion

Input Criteria

GROLINK: We don't want to have lists of animal products. This has to be developed in the different countries and regions of the world. The IBS are standards for standards and it would probably be better to take out lists and absolutely not enter into new areas.

Aquaculture

With regard to aquatic feed the committee has accepted arguments from some members that standards could 'end all culture of carnivorous species' and has amended standards accordingly. The intent of other revisions is to recognise the current reliance on fishmeal and oil but to acknowledge that this needs to change.

BÖLW/NALA: is neither ecological/social need nor technical feasibility to end this reliance per se; an important part of world aquaculture always will depend on fishmeal/oil. The issue to be addressed by organic aquaculture is the origin and type of this fishmeal, as well as (for a number of species and culture systems) the quantity employed (calculated as percentage in the feed formula or per area).

It also recognises that such feeds, and oil in particular will become more difficult to utilise for a number of social and economic reasons. The standards acknowledge the international movement to reduce reliance on fishmeal and oil and instead to promote the development of alternative diets, particularly for carnivorous animals.

BÖLW/NALA: The development of "alternative diets" – usually plant based formulations that are enhanced by synthetic amino acids – cannot really be the main focus of organic aquaculture, particularly not for "carnivorous" animals. The question is whether this is appropriate to the species (by the way: the vast majority of aquatic animal species is "carnivorous").

The committee rejects arguments to allow all wild caught fish and is not convinced that by-catch even from sustainably managed sources is acceptable. Are economic levels of by-catch and sustainable management compatible?

BÖLW/NALA: The majority of fisheries have certain, unavoidable levels of by-catch. The main problem with by-catch is not that it occurs, but that this biomass – usually dead or dying – is uselessly discarded and that fishery goes on until the quota for target species are completed. It certainly would make sense instead to collect the by-catch and make use of it as feed. Still it would not be "economic" (because of the filling capacity of vessels with low-value product) to create much by-catch, but it could precisely be an element of sustainable fishery to keep the by-catch and utilise it.

Sustainable ”by-catch-management” is an integral part of existing capture fishery certification schemes (MSC), so that it is problematic to take a position that rejects “by-catch…even from sustainably managed fisheries”.

The committee is also concerned that allowing by-products of food fish could promote exploitative practices.
BÖLW/NALA: The requirement to use by-products, on the contrary, avoids that there is additional pressure on marine resources, since no fish is caught “extra” in order to produce aquaculture feed.

With regard to welfare and stocking densities an additional standard has been added which requires operators to demonstrate that welfare is not compromised e.g. by monitoring fin damage in finfish, but otherwise husbandry issues are described in 5.1

The standards committee is very grateful for the lively interest in this area and has adopted most, if not all, amendments to the text.

SC Response: The SC appreciates the responses to the questions it posed. It will not comment further on the individual responses, because this section was intended solicit a variety of opinions.

INTERNATIONAL FEDERATION OF
ORGANIC AGRICULTURE MOVEMENTS

N O R M S

SECTION A GENERAL

Definitions

IOAS: Definition Aquatic Plants needed

Aquaculture

ISEES: The proposed definition of aquaculture is still problematic. We recommend that you remove the wording “in an enclosed environment” and suggest either ending the sentence after “…salt water” or adding the words “…in a clearly defined area.” In this way, cultured organisms that are not normally produced in an enclosed environment (for example, molluscs) may still qualify for organic production.
ICS: Delete “in an enclosed environment.” The term “management” implies enough definition of the system, but restricting the definition with the term “in an enclosed environment” will be problematic for inclusion of virtually any aquatic system that has any access to or flow involved with ocean or river waters.

SC Response: SC agrees that systems should not be restricted to containers. We have changed the term to “ “circumscribed environment”. SC feels that wild capture should be excluded through this definition.

SA: Definition of Competent Authority (4.1.2) needed

SC Response: The term has been deleted in 4.1.2. Therefore, a definition is not needed anymore.

Hydroponics:

BÖLW: Please add at the end of the definition in brackets the clarification that the production of sprouts is not covered by ‘hydroponics’. Reason: The production of sprouts normally takes place in water or a liquid media. As the sprouts do not need to get any nutrition from the substrate they grow on, it is not necessary and not common to use soil in organic sprout production (e.g. cress Lepidium sativum L.).

Note: Hydroponics is a plant production practice, not an aquaculture practice. If this definition is made in relation to the chapter “aquaculture”, it should be deleted. See also our comment to 9.3.3.

SC Response: Hydroponics deleted in IBS. Therefore, no definition needed anymore. SC accepts that hydroponics is occurs in a wide variety of situations and practices. Topic is on SC work plan.

IOAS: Definition of Sedentary Aquatic Organisms needed

SC Response: This term refers to sessile animals. In the relevant section term will be replaced with sessile. No definition needed.

IOAS: Definition of Veterinary chemotherapeutants needed

SC Response: Term deleted in IBS. No definition needed anymore.

SECTION B GENERAL PRINCIPLES, RECOMMENDATIONS AND STANDARDS

1. The Principal Aims of Organic Production and Processing

2. Organic Ecosystems

SA: We understand and support the intention to integrate forestry into the general standards and also ntfp into the wild harvested products, however we feel that the separation of 2.4.2 (natural forest maintenance) from other forest management sections is not logical and leads to inconsistencies. Natural forests may not be on common or public land; much in 2.4.2 also applies to the other forest types and vice versa; and a single forest may well be composed of a mixture of natural, semi-natural (where does that fit in?) and plantations. We therefore propose moving all the forestry sections (2.4.2, 2.5 and 4.7) together.

SC Response: SC agrees and has now created a separate forestry chapter. See also previous response to Grolink comments.

Perhaps this also begs the wider question of the nature and intent of chapter 2. it seems that it is really trying to address 'organic in/and the wider environment' in which sections 2.1, 2.2, 2.3 and 2.6 sit very comfortably. Conversely the others basically define requirements for organic management of particular types of production systems (wild harvesting, ntfp, forestry). It would seem more logical to place them at the end of chapter 4, and perhaps also move 4.6 into chapter 2.

SC Response: SC needs to take up the concept of wild harvest for discussion. The organization of Chapter 2 topics may be taken up at a later date, but SC feels that this is not the right stage of IBS revision to deal with this content organization issue.

2.4. Wild harvested products and common/public land management

Grolink: 2.4.1 and 2.4.3
Please merge these two chapters. One is about wild harvested products and the other is about non-timber forest products. None of the terms are in the list of definitions and it is not possible to understand which production is covered by which standards...

The inserted reference to "tropical and subtropical" in the General Principle makes little sense. There is plenty of NTFP collection in temperate and arctic climate as well!

SC Response: NTFP was moved to the new Forestry Chapter and the section is not aimed at wild harvest. Forestry standards will not in general apply to public lands. NTFP and Wild Harvest are now defined. The inserted reference to tropical and subtropical was deleted.

SEFA 1: Remove

2.4.1 General principles, recommendations, and standards

2.4.2 Natural Forest Maintenance

2.4.3 Non Timber Forest Products

General Principle
ICS: change “their harvest is” to “their management is” or “their management and harvest is…”

SC Response: A new general principle was drafted.

Standards shall require that:

2.4.3.1
ICS: Change “products” to “product”

SC Response: Changed as per comment.

Grolink: 2.4.3.1, 3.2.1, 4.7.6
Why introduce the “management plan” for forestry when it is not a concept for agriculture. We see the management plan as a toll which might be useful but not as something to require in a standard for standards.

2.4.3.2
ICS: Insert “shall” after “Management practices”

SC Response: Changed as per comment.

2.4.3.3

2.5 Forest Ecosystems
KRAV: In general KRAV think it is not a good idea to mix the standards for forest production with standards for crop production, animal husbandry, and processing and handling. We think it is a problem for the reader of the standards to know which part of the standards that is valid for each type of production, and which is not.

We also think that it would be a better idea to not have IFOAM standards for forest production at all, but to work closer with FSC instead.

SEFA: Remove 2.5

SC Response: See responses to other commenters in the General Comments Section and Commentary section.

General Principle

BÖLW/NALA: Change to “Organic forest management recognizes ecosystem potential, conserves and enhances biological diversity and its associated values, and provides long term sustainable yields in particular concerning timber production.”

SC Response: Changed as per comment.

GROLINK: Forest management should be taken out of the IBS and they should absolutely not be mixed into the plant production standards. The standards were introduced as a supplement to FSC standards and seeing the development of FSC it would be better to let FSC handling forestry. There are very few CBs using these standards today so the knowledge base for making full standards is far too small.

SC Response: See responses to the General Comments and in the Commentary Section.

Standards shall require that:

2.5.1

BÖLW/NALA: Change to “Operators shall protect the soil *and the climate inside the forest stand* by avoiding large scale tree felling and destructive harvest events leading to massive soil disturbance, land slip, erosion and leaching.”

SC Response: Comment accepted and “micro” added to climate because “climate” considered to general.

2.6 Resource Use

KRAV: Acceptable level of ambition. The requirements could not be increased in the nearest future.

BÖLW: In general, we agree with the intention of this chapter. We think that it is important to have the proposition in the section of recommendations. We have no further additions.

Standards shall require that:

2.6.1

ICS: While the intent of the standard is admirable, as worded it could be unreasonably onerous on certain operations, in particular processing operations. Amending the language with the following may ameliorate such problems: “The control body or standard-setting organization shall set minimum criteria and/or requirements for recycling operations by operators.”

GROLINK: This is a very good recommendation and CBs around the world can introduce what is possible in the area they are active in, but it is not possible to have it as a standard. On the farm level much can be done and this is already covered in the IBS. To force processors to recycle nutrients if they don’t have that

possibility (somebody must be willing/able to take care of them) they would just be forced to go out of certification.

2.6.2
SA: Depending on how it is interpreted, this is either an extremely tough requirement that is uninspectable, or so vague that it means nothing. Is even a small bit of conserving sufficient (eg having a system to recycle the workers' drinks bottles), or do all non-renewable resources have to be conserved? It would be better to state something like 'operators must draw up and implement a plan for the conservation of non-renewable resources used in their operation' .

GROLINK: The same goes for this. It is more an aim than an enforceable standard at this stage.
Both 2.6.1 and 2.6.2 will if they are left as standards either create huge problems for the development of organic production or they will just be "dead" standards which no one is following.

SC Response: 2.6.1 and 2.6.2 Wording changed.
Rationale: New wording is both more specific and flexible and can be applied across spectrum of operations.

3. General Requirements for Crop Production and Animal Husbandry

3.1 Conversion Requirements

GROLINK: 3.1 has the title "Conversion requirements" and is in 3.1.2 making a reference to 4.2 and 5.2 for the length of the conversion period. Reading 3.1 the understanding will be that this is the general chapter for conversion. But then 3.2 is a special chapter for conversion of forestry. This is quite confusing.

3.2 Conversion to Organic Forest Management

KRAV: It is surprising to find forest standards among the ones for crop production and animal husbandry. At least the heading of chapter 3 must be changed if Forest Management standards should be involved, but we prefer to have them separate.

SA: This section has been trimmed down to be little more than repeating the conversion period for perennial crops (which trees are), so we propose that it be absorbed into 4.2.

In addition we propose upgrading the recommendation to have a clear plan into a requirement to have a clear plan and moving it into the (proposed) newly integrated forestry section – it should apply to all forest production on an ongoing basis.

SC Response: Comments accepted. Conversion section reduced to one standard.

Standards shall require that:

3.2.1
Grolink : Why introduce the "management plan" for forestry when it is not a concept for agriculture. We see the management plan as a toll which might be useful but not as something to require in a standard for standards.

BÖLW/NALA: We want to make reference to the comment of Naturland to the first revision draft of the 2002 IFOAM basic standards and add some aspects.
What are the reasons for a conversion period of at least 18 month for organic forest management?
The conversion period according to 4.2 “Length of Conversion Period” is described as follows: “A conversion period enables the establishment of an organic management system and builds soil fertility”.
Forest ecosystems are based on a long term management. The age of the harvested trees in the middle of Europe, e.g. of a beech, is more than 50 years up to 150 years or more. This also means that one has to work very carefully with soil fertility.
As a result, it makes no sense to fix a conversion period of e.g. eighteen month for organic forest management (compare perennial plants).
In the long term thinking of forest management, a period of eighteen months is a very short time without any realistic chance to influence the ecological context, unlike the conversion period e.g. of crop production.
(And we don’t see any arguments which justify the extension of the period compared to the one for perennials. Input of fertilisers or pesticides in agricultural perennials is much higher than in forest systems.)

The paragraph 3.2.1 should be replaced by the following text:
“A conversion period of eighteen months is required in case of natural and plantation forest. This conversion period shall enable the forest unit to fulfil the standard requirements of organic management. If a forest unit can demonstrate the conformance to all requirements of the standards during the first inspection, the conversion period may be curtailed.
In new plantation forests or other forests which have received unauthorised fertilisers and pest and disease control, a conversion period that is no less than eighteen months is required. The start of the conversion period may be calculated from the date of last application of unapproved inputs, provided that standard requirements have been met from that date on.”

SC Response: Trees are perennial crops and should therefore be treated as such. Conversion period to remain 18 months.

4. Crop Production

4.1. Choice of Crops and Varieties

BÖLW: In general, we agree with the proposal to move the standards for multiplication from draft standards to standards and to leave the plant breeding issue as a draft. In the 2002 IBS, there is no definition for the terms ‘organic seeds’ and ‘organic plant material’. We think it is helpful to have a clear language what is meant by this. The requirements laid down for plant breeding in the draft chapter cover only a few aspects of this huge area. We feel that there should be more work on this chapter in order to address more completely the whole breeding process before considering upgrade this chapter to full standards. The proposed requirements in chapter 4.1 for the multiplication of seeds and plant materials reflect what is ‘good practice’ in the organic sector. We agree with this proposal. (See also D1)

Standards shall require that:

4.1.2

GROLINK: Please add “commercially” in When organic seed and plant materials are not commercially available, conventional….

To totally prohibit the use of treated seeds except for phytosanitary reasons will probably function well in Europe and US, but where the organic production is in a very early stage it still might be huge problem for producers to find untreated seeds. Give possibilities for organic production and especially vegetable production to grow to a stage where they can influence seed producers and seed importers to provide untreated seeds. We hope that the IBS are for the whole world.

OCIA: Concern has been expressed by our membership that current organic crop production standards do not fully address the needs of organic seed producers. Our membership is very aware of the need to develop the organic seed market. However, under the current standards, availability of competitive seed in organic varieties is not possible for all bioregions of the world. The concern is that much of the required seed genetics are only available from treated foundation seed. This foundation seed can only be used for one season to create a seed crop. The seed produced must be used for food, feed, or fiber and none of the crop produced from that seed can be saved for seed the following year. The result is that, as more and more foundation seed become available in treated form only, the amount of seed available to organic producers becomes smaller. Because seed cannot be saved, it is impossible to build an organic variety and these required seed varieties become available to conventional growers only.

I would like to suggest that an exemption be added to IFOAM Basic Standard 4.1.1 that allows an exemption for organic seed producers to plant treated foundation seed when the required variety is not available in an untreated form. By adding this exemption, we would be allowing organic seed producers to be able to work with and develop the competitive seed varieties much needed in the organic industry without being restricted to the finite varieties of parent stock available in organic form. Not only will this create a much larger and more competitive seed market for organic producers, but it will allow producers to meet the demands of many nations who would like to see all organic food entering their country to be from organic seed. The market cannot currently support this request. This exemption would allow the producers to better meet the demands for organic seed.

Operators shall use organic seed and plant materials of appropriate varieties and quality.

When organic seed and plant materials are not available, conventional materials may be used provided that they have not been treated with pesticides not otherwise permitted by these standards. Standard-setting organizations shall set time limits for the use of non-organic seed and plant material.

ICS: Does the change in the placement of this statement in the standards alter it’s meaning or directive? North America currently has no venue for ascertaining what organic seed or how much may be available, or even what the demand may be for any particular variety. Until published, regional lists of available organic seeds are established, no one will know how close or far we may be from meeting the organic seed needs of the farmers in any particular region. It is unrealistic to expect that a time limit can be set for the use of non-organic seed. Further, it is widely acknowledged that there will likely be needed exceptions to the use of

organic seed for the foreseeable future – the introduction of new varieties, the renewal of seedstocks from foundation seed, weather changes altering the varieties farmers may need to grow, failure of seed production due to disease, weather, etc.
KRAV: It is to early to set up time limits for the use of conventional seeds of all categories.

Chemically treated seed and plant material may be used, if chemical treatment is prescribed for phytosanitary purposes by the competent authority for all varieties of a given species in the area where the seed or plant materials are to be used.
KRAV: This is a problem in some parts of the third world where organic production is only in the beginning of its establishment.
SEFA: Living in an "marginal agriculture zone" with small commercial interest we have experienced the problems in finding adequate seed varieties. The commercial availability should also be added.

Is untreated seed really possible to buy in all countries?

ICS: If a seed treatment is required for the whole of a species in order to grow it in a particular region, then perhaps that crop should not be grown in that region until appropriate organic seed breeding techniques produce a variety which is adapted. Research has shown that the chemical used for treating the seed can be moved by the plant unaltered from the planted seed to the harvested seed. What is the difference between applying a prohibited pesticide on the growing crop, to the soil, or to the seed?

IOAS: Phytosanitary restrictions are generally done on a geograhical basis and it is unlikely that a certification organisation would be able to establish that all varieties of a particular species was affected and it is not clear how the IOAS would verify this. Additionally, the IOAS would also like to point out that such draconian restrictions placed on the use of chemically treated seed could lead to significant loss of biodiversity on organic farms, particularly in horticultural crops.

SC Response: Standards amended

Rationale: SC recognizes the difficulties with achieving full use of organic seed but feels reluctant to retreat on this important matter given the widespread use of organic seed and taking into consideration IFOAM's aim to foster the spread of organic seed. Accordingly based on at least one comment provision for treated foundation seed requirements for standard setters to facilitate proactive standards are proposed by the SC.

Competent authority was deleted addressing IOAS request for definition of the term

The request to add commercially was seen as unnecessary because redundant.

4.5. Pest, Disease, Weed, and Growth Management

SA: There are numerous references in 4.4 and 4.5 to appendix 1, 2 and 3 which need amending to their new numbers.

Staff Comment: The referring references were already amended in 2nd revision draft.

4.7 Forest Plantations

SEFA: Remove 4.7
GROLINK: Please take out this chapter on forest plantations.
KRAV: As earlier commented, we think it is better to have a separate chapter for forest production, however, if it is included under chapter 4 the heading of that chapter would be: “Crop and forest production”, we think.

SC Comment: Although the section remains within the new Forestry Chapter, it and the forest management section have been reorganized and it is hoped that this will address concerns.

Standards shall require that:

4.7.4
SA: We are not clear how diverse planting can enhance social stability – it is difficult to comprehend and will be impossible to inspect.

SC Response: Amended accordingly.

SA: We would suggest that protecting local customary rights is a bit too cognitive for plantations! This should be the responsibility of the operators!

SC Response: Amended accordingly.

4.7.6
GROLINK: Why introduce the “management plan” for forestry when it is not a concept for agriculture. We see the management plan as a toll which might be useful but not as something to require in a standard for standards.

4.7.7
Replace “protect” with “respect”.

SC Response: Changed to “not impinge on”

5. Animal Husbandry

5.8. Transport and Slaughter

Standards shall require that:

IOAS:
5.8.9
Animal slaughter shall:
•Provide animals a recovery period after transport.
•Provide animals an interval between unconsciousness and bleeding.
•Use proper equipment to protect the quality of the flesh.
•Prevent contact between living and slaughtered organisms.
•Respect local cultural customs.

This standard, which was contained in the previous draft, now seems to have disappeared. Was this intentional?

SC Response: Yes was intentional.
Is partly covered in 5.8.3

6. Processing and Handling

6.3. Processing Methods

Standards shall require that:

6.3.5.
KRAV: KRAV finds it useful that the suggested standards for chapter 6 clarifies the conditions for use of substances in direct contact with organic food. However we do not think it is a good idea to have a world-wide list of which products that are allowed and which not. State the criteria that is enough.

SEFA: We have difficulties in understanding this new paragraph. What is a “functional effect” that is not already covered by 6.3.1?
KRAV: KRAV finds the first part of the sentence useful but considers that the second part "*and any substance that has a functional effect on food, such as ion exchange resins, must appear on Appendix 4.* " introduces a demand that already is covered in a more clear way in 6.3.1.
If an evaluation according to appendix 1 leads to the conclusion that an ion exchange resin "chemically reacts with or modify organic food" it has to appear in Appendix 4.
KRAV therefore would prefer this text: “6.3.5. *Materials, methods, and techniques used in organic food processing that have a functional effect or that modify, add, or remove constituents, or otherwise chemically change the composition of food shall be evaluated by the criteria in Appendix 1.”*
BÖLW: We think that the proposed wording is too wide. The current formulation includes a lot of processing methods and materials which are not addressed by the commentary. For example each application of heat changes the chemical structure of proteins. It is not possible to regulate all material and methods by a positive list. More clarity should be given which kind of techniques should be regulated and which not. There is a danger to regulate all "materials used for food processing and methods". We propose to describe concretely which issue has to be regulated and to give clear examples. If IFOAM wants to regulate the different methods for purifying of foods, like ion exchange, adsorbents resins, micro filtration techniques, ultra filtration techniques etc., this will lead to a very complex list. All these techniques are currently in use for the processing of organic food!

GROLINK: In your commentary you stated that all comments agreed to this standard – we didn’t!
We see this as a paragraph with good intent but to widely written. All normal food processing as boiling, freezing or even peeling is covered to our understanding. And what about the old example with lemon juice in milk. Please explain to us how you are interpreting it? Part of 6.3.1 is overlapped with 6.3.5. and they should be brought together.

SC Response: 6.3.4 and 6.3.4 have been changed.
SC is aware of the situation that Ion exchange resins (IER) are used for the production of organic food. We are facing the situation that these techniques can have a strong influence on the natural properties of organic food and there are serious problems to bring these techniques in compliance with the aims related to organic foods. However, there might be some applications of IER, which can be understood as “in compliance" with the principles of organic food. Therefore, the SC is strongly in favor of seeing Ion exchange resins in the scope of the IBS. Each possible application must be evaluated carefully. Accordingly, the IFOAM SC has proposed some additional and improved wording in section 6.3.4 and 6.3.5 of the IBS.
Language suggested by KRAV was accepted and reorganized. It is not in the recommendations.

6.3.6
GROLINK: Appendix 4 is for additives and processing aids. How can it be referred to in storage processes?

SC Response: New wording clarifies this.

6.4.2

6.4.3
GROLINK: These paragraphs (6.4.2 and 6.4.3) are not included in the revision but create confusion when trying to base new standards on the IBS. It is general written so that all what is included in the bullet points are prohibited, which is very hard. First bullet says all not included in appendix 3 is not allowed. Second bullet says that all included appendix 4 is not allowed. 6.4.3 then allows prohibited substances if they don’t contaminate the products! This can be formulated better.

SC Response: Not addressed in this revision. Will put on work plan.

6.6 Cleaning, Disinfecting, and Sanitizing
SEFA: We question the possibility to create adequate lists of approved substances that are relevant on a global level. Please reconsider how to deal with the issue.

BÖLW: We would like to give some remarks for further discussion:
1. We think that also substances which are used for cleaning and disinfecting of equipment, materials and machines should be regulated by a positive list.

SC Response: We agree with this statement and see that this is an issue of future actions.

2. We think that the following statement should be added: "Substances other than appearing on annex IV are only allowed if they are legally required".

SC Response: Added to 6.6.2

Recommendations

GROLINK: These recommendations are quite detailed, especially the last two paragraphs, please simplify.

Standards shall require that:

6.6.1
GROLINK: This is more a general paragraph on contamination and not only for the chapter cleaning, disinfecting and sanitizing. What is a foreign substance?

6.6.2
GROLINK: Appendix 4 has the heading “List of approved additives and processing aids”. For cleaning and disinfection hopefully the best adapted substances are used and not additives and processing aids just because they are on appendix 4. IF the intention is to list cleaners and disinfectants in app 4 there should be inserted special headlines for that in the appendix.

SC Response:

The Standards Committee understands that substances other than water have been used to clean food by various certified organic handling operations. Proper hygiene and good handling practices require that some kind of cleaning take place. In order to make it clear that organic standards permit the use of such substances; the SC has drafted Section 6.6.2. However, the SC recognizes that not every substance used in post-harvest washes is acceptable under organic standards. Some are pesticides that would be prohibited in the field, and are no less prohibited to be used on food post-harvest. Others are endocrine disruptors. Still others are persistent and leave residues on food that purchasers of organic food consider unacceptable. Thus, neither restriction only to water nor unrestricted use of any substance is desirable as a standard. Some substances that already appear on Appendix 4 as processing aids may also be used, but these are limited in their effectiveness as disinfectants.

In response to comments, the Standards Committee developed four proposed options to address concerns raised by members.

Proposal 1: Accredited certifying bodies or standard setting bodies are required to develop a list of substances allowed to clean or disinfect organic food based on the criteria in Appendix 1.

Proposal 2: IFOAM publishes a closed, positive list in Appendix 4 based on the draft standards.

Proposal 3: IFOAM requires that only water may be used to clean organic food, and permits derogations to be granted by the ACBs. The ACBs are required to record and report substances derogations used as disinfectants and cleaners to create a list on Appendix 4 in the next round of revisions.

Proposal 4: IFOAM publishes an indicative list of substances that may be used, but any substance that does not appear on the list may be used temporarily while a closed, positive list is being developed.

The SC received a comment that opposed putting a list, but also received other comments that if such substances were to be allowed, there needed to be a clear definition of items are allowed. The SC believes that the proposed list includes those cleaners and disinfectants used by most organic operations. Some jurisdictions require the use of specific disinfectants for the purpose of protecting human health. IFOAM Basic Standards do not preclude organic status for food treated with such substances, but it is important that such derogations be documented and discussed.

However, the SC recognizes that there may be some substances used of which it was unaware. In the interest of the to implement the standard in an orderly way on a global basis, to maintain certified organic status of operations, and to gather more information on what substances are currently being in organic handling, the SC has added a derogation to IBS 6.6.2.

6.6.2 will now read:

6.6.2
Only water and substances that appear in Appendix 4 , Table 2, as processing aids may be used after harvest as cleaners or disinfectants in direct contact with organic food.
Substances other than those appearing on Appendix 4 Table 2 are only allowed if they are legally required..

Appendix 4, Table 2

For use as food contact cleaners and disinfectants*:*

Acetic acid

Alcohol, ethyl (ethanol)

Alcohol, isopropyl (isopropanol)

Calcium hydroxide (slaked lime)

Calcium hypochlorite

Calcium oxide (quicklime)

Chloride of lime (calcium oxychloride, calcium chloride, and calcium hydroxide)

Chlorine dioxide

Citric acid

Formic acid

Hydrogen peroxide

Lactic acid

Natural essences of plants

Oxalic acid

Ozone

Peracetic acid

Phosphoric acid (dairy equipment only)

Plant extracts

Potassium soap

Sodium carbonate

Sodium hydroxide (caustic soda)

Sodium hypochlorite (e.g. as liquid bleach)

Sodium soap

6.6.3

ICS: Why does 6.6.2 refer to cleaners and disinfectants and 6.6.3 refer to cleaners, sanitizers, and disinfectants? Both statements (or wherever else the terms are used) should be consistent, and include all three terms.
SC: Food is not sanitized. Therefore no change.

6.6.4.
GROLINK: Please rephrase or explain what an intervening event is!

6.6.5
IOAS: It is not clear to the IOAS why this standard is included in the section on cleaning, disinfecting and sanitising when similar statements are not to be found in the corresponding sections on crop protection and growth regulators or soil fertility. This standard may confuse certifiers into thinking that they may use materials not currently found in Appendix 4.

SC: This a new area of the IBS and SC believes that it is a good precaution to emphasize the requirement.

6.7 Forest Products

SEFA: Remove 6.7
GROLINK: Please take this out. What kind of basis do you have to set processing standards for wood products? Are any of the IFOAM certifiers active in the area? Leave the processing unregulated.

SC Response: Section left as is.
Rationale: If you have certified production and raw materials then there have to have standards for processing.

Recommendations

ICS: We agree with the statement made in the last recommendation, but it reinforces our opinion as expressed in our comments on section 2.6.1

6.7.2
ICS: Seems more like a recommendation than a standard, and is already expressed in the recommendations. If this is to become a standard, there needs to be more definition put in here, or a requirement that the control body or standard-setting organization provide more definition.

SC Response: Remains a standard. Amended so as to meet the comment: SC identified who is responsible and what the responsible body has to do.

6.7.4
SA: Processing, e.g. in organic paper products like tissues, will be key to seeing organic products on the markets. This is a huge area for further research but it would be good if IFOAM could take a lead and put this on their future work programme.

SC Response: . Will be taken on the work program

6.8 Textile Fiber Processing

General Principle
ICS: Perhaps it is better to change the term from “entire life cycle” – which implies the agricultural or livestock product only – to “all impacts,” which can include the organic products as well as any non-organic materials used in processing.

SC Response: Wording has been changed to address the comment.

Standards shall require that:

SA: Requirements for separation and hygiene, equivalent to foods, are not easily applied to textiles, but the complete removal of section 12.3.1 without alternative guidance seems to leave virtually no standard which refers to the handling of product. How can this be considered an organic standard for textile processing? CBs applying the IBS would be under very little obligation to expect processors to maintain the integrity of organic fibre products through the process

SC Response: New 6.8.1 has been added to address this comment.

6.8.1

ICS: Add “In such cases the product label must in some manner clearly declare the percentage of the fiber that is non-organic.”

GROLINK: This standard fits better under labelling then processing. It is unclear if the standard is formulated only for mixed fibre in a woven or knitted products or for the whole cloth (with linings and buttons etc) It is very likely that an organic textile will be mixed with non-organic details especially if you see that more of tailored clothes will be certified organic. If we want to stay at the T-shirt and towel stage this standard works out, it is a matter of what we want to be achieved. The 5% limit is stricter then for other products which is strange.

KRAV: Please add, “… fibres of the same kind may, however, not be mixed (e g conventional and organic cotton.).

SC Response: SC agrees to KRAV comment and has changed text accordingly.

6.8.2
KRAV: Good

6.8.3
GROLINK: This is what the certification of clothes are based on. Is it really a solid base for organic labelling?

KRAV: Please add, “This must be well documented. The operator must fulfill at least the environmental legislation in the country.”
ICS: Add “The control body or standard-setting organization will define how “proper treatment” is to be evaluated

SC Response: Wording amended

7. Labeling

7.2 Fiber, Textiles and Apparel

Standards shall require that:

7.2.1
KRAV: Good
Please add an extra paragraph: "Products made with organic fibers may be labelled with that, although they do not fulfill the standards about processing and handling of textiles, if and only if the processing and handling fulfill the requirements in another environmental labelling system.
GROLINK: Why is organic food mentioned here? We thought the labelling section where for all products covered in the IBS.

7.2.3
KRAV: Please add, "… fibres of the same kind may, however, not be mixed (e g conventional and organic cotton.).
SA: 7.2.2 and 7.2.3 net of the weight: For consistency and clarity we suggest this should be worded similar to 7.1.3 and 7.1.5.

SC Response: Language changed according to SA comment. KRAV comment addressed in 6.8.2.

8. Social Justice

General Principle

8.6.
NOFA: Change to "Operators shall not hire *full-time* child labor."
NRET: Recommend adding, 'Working children should not undertake hazardous activities'; examples would include night working, operating sharp or heavy machinery.
NOFA: Add "Under no circumstances may children be given tasks that expose them to hazards or potential hazards such as agricultural chemicals or machinery while on the farm. Children will not be kept from schooling in order to work on the farm or operation; the employer must facilitate the attendance of schooling programs by children of employees."

IOAS: The IOAS is concerned that the way that this standard is written is not verifiable unless standards
also define the age when a child becomes an adult. Also IOAS does not see how the allowance of
family labour can be utilised as a criterion when access to education and health care is denied in many parts of the world.
SA: Whilst we agree with the sentiment of this, children working is a normal part of growing up and happens all over the world. The important thing is that any such work does not compromise their schooling, or their ability to be children. We use the definition 'Child labour is defined as full time employment or any employment that interferes with schooling in accordance with national legislation' and suggest that this be added. In which case the exception to the standard becomes unnecessary and can be deleted.

GROLINK: Keep the old standards. Why is this changed in the 2nd draft? There are children which follows their parents as migratory labour. Is it not better to provide these children with the possibility to go to school instead of not allowing them to work?

SC Response: New wording was drafted.

9 Aquaculture Production Standards

KRAV: KRAV would like to thank for taking earlier comments into in account.

KRAV think it is a very good idea that the aquaculture standards are in a separate chapter.
We think it's very important that the definition of aquaculture does not exclude indoor conditions, and we are also pleased that the nutrition aspects have been positively treated.

ISEES: At ISEES, we firmly believe that environmentally sound, socially just and economically viable standards for organic aquaculture can be realized through ample opportunities such as this to address many of the challenging issues that are unique to this type of food production.

We are pleased by the response of the Standards Committee to the many comments given during the First Revision Draft. We are especially pleased that the Standards Committee has agreed to keep aquaculture as a separate chapter within the IBS. In addition, we support the revised chapter subheadings and clearer principles, recommendations and standards and the removal of redundant language.

9.1 Conversion to Organic Aquaculture

Standards shall require that:

9.1.1SA: We suggest the use of 'comply with' rather than 'meet' to improve clarity.
GROLINK: This is a non-standard. Organic aquaculture has to be developed on its own. Operators shall meet the relevant general requirements of terrestrial production and animal husbandry is extremely unclear. Rewrite or take away.

SC Response: Amended according to comments.

9.1.2
GROLINK: Why should aquaculture be stricter then animal husbandry? For an organism with a short lifespan as a shrimp it might be OK but for an organism with a long period it is a too hard standard. Old 10.2.3 is better.

SC Response: It needs to be a period in which an operator can demonstrate capability of managing organic aquaculture. The amendment gives flexibility for cases in which the lifespan of an animal is shorter than one year.

Based on the comments this is consistent with the animal husbandry standards.

9.2 Aquatic Ecosystems

General Principles
ICS: Insert "aquaculture management" or something similar after "Organic"
SC Response: Changed accordingly.

Recommendations

- Avoid the use of synthetic fertilizers, pesticides, and chemotherapeutic agents
  BÖLW/NALA: The use of such substances has to be strictly prohibited (not just "avoided"). In the case of chemotherapeutic agents, this is true at least for all invertebrates (shrimps, mussels), in the case of the other two classes of substances for all operations.
  Proposed wording: "Prohibit the use of synthetic fertilisers and pesticides and restrict chemotherapeutic agents. The latter only are permissible in finfish after diagnosis and prescription by a veterinarian, if natural curative measures provably fail." This whole point should be switched to "standards shall require" instead of "recommendations".

SC Response: Text of bullet point amended and moved to be new standard 9.2.4
Rationale: This important component is more then a requirement but a standard and is consistent with the remains of the IBS

- Provides for biodiversity through polyculture and maintenance of riparian buffers with wild and uncultivated areas.
  BÖLW/NALA: Change "Wild and uncultivated", since there can be – sometimes even greater – biodiversity through – adequate – cultivating measures. Proposed wording: "… with adequate plant cover."

SC Response: Text changed accordingly.

Standards shall require that:

9.2.1
BLÖW/NALA: We should not claim what an ecosystem "shall do": this is like saying "a coral reef should meet the requirements of a rainforest"… Proposed wording: "Management of aquatic ecosystems shall meet the same basic requirements of conservation and resource use as that of terrestrial ecosystems."
GROLINK: This is also a non-standard. Please change or take it away.

SC Response: Text changed accordingly

9.2.2BÖLW/NALA: "Cultivated" covers anyhow all species that can be addressed herewith; if you do not want to say that native species could be permitted to escape (what would not be unproblematic), it is enough to say that "escapees should be prevented from" (and it is not about escapes of species, but about individuals, what would become clear by the word "escapees").

SC Response: No Change
Rationale: SC believes that language is correct and that it represents a requirement for the general prevention of escape events

9.2.3.
ICS: Add "In such systems the control body or standard-setting organization shall set additional criteria for defining how such contamination threats are evaluated." This acknowledges the extra complications introduced to organic certification of such "open flowing" systems that may in certain cases be beyond the normal scope of terrestrial systems certification.

BLÖW/NALA: “Free-flowing” is not an adequate condition for every sedentary aquatic species – these two words should be dropped.

GROLINK: Fits better in the wild harvested products section.

SCResponse: Moved to wild harvest section.

Rationale: It is inconsistent with content of this section which deals with ecosystem management.

9.3 Aquatic Plants

Recommendation

GROLINK: The recommendation is about collection and would again fit better in the wild harvested section. The rest (except 9.3.4.) is about grown plants and would fit better in the farming part.

Standards shall require that:

9.3.1.

BÖLW/NALA: A big part of aquatic plants is not really cultivated, but collected; therefore it might be recommended to insert “…or wild harvest standards”

GROLINK: This is again a non-standard, change or take away.

SC Response: Reworded.

Rationale: This is a more precise means of conveying the content of this passage.

9.3.2

GROLINK: Does this cover wetland rice?

BÖLW: There are many aquatic plants that do not grow on soil but free floating, and there are various, potentially organic systems that are not “outdoor”. Recommendation: drop this whole point, just leave the prohibition of hydroponics sensu strictu.

SC Response: Deleted

Rationale: Doesn’t contribute to the meaning of the standard.

9.3.3

GROLINK: If there are aquatic plants that not need soil they should not be forced to have soil in the growing system. There are floating plants, if someone wants to grow them organic it should be possible. Are sprouts covered here or where do they fit?

ISEES: We recommend removing this sub-section because hydroponic production included as part of an aquaculture production can be extremely useful in managing nutrients. This exclusion could prevent these types of synergistic approaches to food production.

BÖLW/NALA: 9.3.3 can be deleted The chapter “aquaculture” deals with “the managed production of aquatic plants and/or animals…”, see chapter “definitions”. Terrestrial plants may also be cultivated in a hydroponic system. Therefore, the adequate place for requirement or restrictions for “hydroponics” is

in the chapter “plant production”. See also our comment to the definition of “hydroponics”.

SC Response: Deleted

Rationale: Does not relate to aquatic plants section.

On the SC work plan for the next revision cycle.

Definition of hydroponics has also been deleted.

9.3.4

GROLINK: Again a standard which would fit better in the wild harvested chapter.

9.4 Aquatic Animal Sources/Origin

General Principle

ICS: Change “animal” to “aquatic organisms”

SC Response: Kept it as animals, because changing to aquaculture organisms means that then plants also would be included.
SC acknowledges comment that most aquatic animals are not born and changes standards accordingly to “begin life ”.

Recommendations

BÖLW/NALA: This is a confusion of terms “locally adapted…native…indigenous…established in the region”. Proposed wording: “Autochthonous and/or regionally established species shall be preferred, no alien species shall be introduced by the organic operation. Breeds (not: “animals”) that are locally adapted shall be preferred.”

SC Response: SC adjusted the standard but did not follow proposed wording. “Animal” replaced with “breeds.”

Standards shall require that:

9.4.1

SA: The same comments apply as for 5.3.1. (= The SC deleted the time limits previously agreed by the GA and have put in nothing else, therefore these derogations to use non-organic replacements potentially could carry on indefinitely. This is an intolerable situation for organic integrity, is completely against consumer expectations and is inconsistent with plant production standards where *organic parents* must be used. We urge that standards setting bodies must be required to specify time limits for the ending of this derogation.)
BÖLW/NALA: There is no reason (and no technical background, since many species are much more difficult to breed) to be stricter in aquaculture than in other livestock (compare IBS 5.3.1. “… When organic livestock is not available conventional animals may be brought in according to the following age limits…”) – this must be clarified here. Otherwise, at least the impression is created that there cannot be an organic grow out in aquaculture without an organic hatchery, what is not viable. Proposed action: refer to IBS 5.3.1.
At this moment it is not possible to have all aquaculture species hatched (very few are “born” – e.g. guppies and whales…) by natural methods or under organic management. Proposed wording: “Wherever possible, animals shall be raised

organically from birth. Organic breeding programs using natural procreation methods shall be developed and established for aquaculture species. The certification program shall set a time frame to achieve this goal."

BÖLW/NALA: Why at once deviate from the 2/3rds lifespan requirement? This would weaken the standards severely, since it usually takes aquatic animals an over-proportional percentage of life time to reach the first 10% of weight. Proposed wording: "Animals shall spend at least 2/3rds of their total lifespan under organic conditions."

GROLINK: Why make this stricter at this stage, in the last proposal there was 2/3 of the lifespan. That is better.

SC Response: Language has gone back to 2/3 rule opposed to the 90% rule derogation. CBs also have to set standards and time limits.

Rationale: The same as for 4.1. (organic seeds)

9.5 Aquatic Animal Nutrition

Recommendations

BÖLW/NALA: This is not a true aquaculture feed requirement – no aquaculture areas are "grazed". Proposed: drop this sentence

SC Response: There are cases for grazing, e.g. Carps Graze. But sees the need to change the wording in a way that maintains the original intent of the sentence.

Standards shall require that:

Operators may feed a limited percentage of non-organic feed under specific conditions for a limited time in the following cases:

- *organic feed is of inadequate quantity or quality*

BÖLW/NALA: In fact, this only would apply to developing countries – in the rest of the world, there is sufficient availability to feed every species currently cultivated with organic agriculture products and fishmeal/oil. The risk here is that we get too weak, if not restricting to geographical/developing countries conditions. Proposed wording: "in a certain country there is provably not sufficient availability of feed stuff from certified organic origin".

SC Response: SC disagrees with BÖLW interpretation of global availability organic feed and their assertion that there is an abundance of fishmeal/oil.

- *areas where organic aquaculture is in early stages of development*

BÖLW/NALA: Proposed addition:" the certification program can make sure that the feed is not GMO or loaded with pesticides and other residues from conventional agriculture."

In no case may the percentage of non-organic feed exceed 15% dry matter calculated on an annual basis.
SA: We would like to see better clarification of the 15% dry matter figure. Does this not render all organic farming of carnivorous species impossible?
BÖLW/NALA: If we have fulfilled one of these 3 "exceptional cases", we cannot be that strict to set 15% (where should the organic feed suddenly come from? Should we really promote organic feed imports by developing countries?).
Proposed wording: "The aquaculture operation has to set up a plan how to ensure a (future) supply of certified organic feed in a time frame to be set by the certification program."

9.5.1
GROLINK: Define what can be counted as organic feed without that this standard is hopeless for all carnivorous species. If 9.5.2 is the definition of organic feed it can be acceptable. It is much more important that we get a standard that is based on the different aquaculture standards used by CBs then to make the aquaculture feeding standards similar to animal husbandry standards in the IBS.

9.5.2
Operators who bring in feed that contain aquatic animal protein and oil in a diet shall use only by-products from sustainably managed, food grade fisheries.
BÖLW/NALA: "Only" seems very problematic; why not permit independently certified feed grade fisheries and/or meal made out of by-catches (if available some day)? Positions regarding this don't seem sufficiently harmonised yet.

For a limited period, operators may use a limited amount of aquatic animal protein and oil from feed grade fisheries. Such components shall not exceed 50% of the fish diet and sources must have independent verification of their sustainable management.
BÖLW/NALA: This also is problematic: Why should we permit such a vague "for a limited period" deviation? Furthermore, we don't talk about 50% fishmeal/oil, but about 50% total diet. This would allow using a diet of 50% organic wheat and 50% of fishmeal/oil with "whatever" kind of sustainability verification.

Proposed wording: "The following sources are permitted:

- Fishmeal/-oil from fisheries certified independently as sustainable, taking into account as well, impact on target species as on by-catch species and the ecosystem
- Fishmeal/-oil from trimmings of fish processed for human consumption
- Fishmeal/-oil from by-catches of captures for human consumption.

The use of fishmeal/-oil from other sources may be applied for solely for the purposes of safeguarding quality and only up to a limited amount (e.g. 30% of total fishmeal/oil employed)."

ICS: Additional standards are necessary on the aspect of feed to ensure that aquatic animal protein is not from contaminated sources. As a minimum, the control body or standard-setting organization needs to set criteria on which is assesses the suitability of such sources as organic feed. Merely being from a food grade fishery is not, in our opinion, a sufficient criterion. The fishery itself must be evaluated or certified in its own right as being a sustainable and

uncontaminated source. The control body or standard-setting organization needs to have criteria for accepting such evaluations or certifications.
SA: Operators who bring in – does this mean that those who make the feed themselves are not so restricted? We suggest that sustainably managed should be deleted as it means nothing without independent verification, or it should be the same as with the exception, ie independently verified as sustainably managed. However this is then an extremely tough standard which the vast majority of by-product fishmeal will not comply with. We presume the exception should refer to non-feed grade fisheries. And why is there a time limit on the use of fish from industrial fisheries if they are verified as sustainable?

So we propose the standard be amended to:

"Where feeds contain aquatic animal protein and oil these shall only be from the by-products of food grade fisheries. Operators may use a limited amount of aquatic animal protein and oil from non-feed grade fisheries. Such components shall not exceed 50% of the fish-derived part of the diet and sources must have independent verification of their sustainable management."

SC Response: New 9.5.2 drafted

9.5.3
The following are not allowed in diets of organic aquatic animals
BÖLW/NALA: Problematic see 9.5.2

- Fishmeal and oil from by-catch from food grade fisheries

SA: We are not in favour of the use of by-catch as it places a value on it which may justify its continued exploitation, but we acknowledge that many believe it is sensible to use it.

SC Response: Deleted, because we have defined that fish meal and oil must be derived from sustainable source (9.5.2), and by definition by-catch is not a sustainable source.

- Fishmeal and oil from unsustainably managed fisheries.

SC Response : Deleted because already covered in derogation (9.5.2)

- Fishmeal and oil from sources known to contain high levels of persistent organic compounds which can accumulate in tissue .

BÖLW/NALA: Drop the words "which can accumulate in tissue" - redundant

- Slaughter products of the farmed species.

SC Response: Insert similar clause in 5.6.2.

SA: We see no problem in the use of fishmeal and oil from farmed species, especially if they are farmed organically (or is that implied as acceptable in 9.5.2?). The critical issue is more to not feed such material back to their own species. We therefore propose this be amended to:

Fishmeal and oil from farmed fish, provided that the production system is extensive and the products therefrom are not fed back to the same species.

SC General Response to 9.5 comments:

SC wants to see aquaculture standards that are consistent with the principles and principle aims that underlay the IBS particularly that the way aquatic and terrestrial animals obtain their nutrition should be as similar as possible.
Discussion has focused on a single species on top of food chain and not the organic production of other species.
The production of carnivorous, omnivorous and filter feed species is entirely feasible within the IBS and the SC have received no contrary comments. SC does not agree to focus more on what other CB's are doing rather than on the text of the IBS and cites as rationale IFOAM's current emphasis on the principles.
The comments have focused on carnivorous species. SC acknowledges the economic importance of salmon production but sees that the foundation of the organic standards goes beyond the economic factors.

Definition of organic feed is one that is very strict and in line with the principles of the IBS. SC developed a new derogation. SC sees a derogation as more appropriate to fulfill the requirements of the IBS.

9.6 Aquatic Animal Health and Welfare

General Principles
BÖLW/NALA: "Stress-free living conditions" are not a true objective of organic management. Proposed wording: "living conditions appropriate to the species".

SC Response: Wording has been changed accordingly.

Standards shall require that:

9.6.1
GROLINK: This is again a non-standard. Change or take away.

SC Response : A more concrete reference inserted.

9.6.2
BÖLW/NALA: Prohibition of antibiotics etc. in shrimp aquaculture is essential; no "prophylactic use" is not enough. Proposed wording: "In invertebrates, any use of veterinary chemotherapeutants and antibiotics is prohibited."

SC Response: No change. SC only partly follows argumentation in comment.

9.6.3

SA: The same applies as in 5.7.4. (= We would welcome a transparent and early debate on the use of so-called GM vaccines in standards for organic livestock production. This is a very complex area and this prohibition is too simplistic and does not distinguish the very different risks between live and dead vaccines, etc. If vaccine technology continues its present direction it may be that animal welfare will be compromised from such a broad prohibition and this needs to be taken into account in the debate.)

SC Response: 9.6.3 has been deleted.

9.6.5
SA: We feel it is a matter for the standards setting body to set appropriate stocking densities that do not compromise welfare, and should not be left to the operator to demonstrate. Therefore we propose to amend it to:
"Standards setting organisations must set maximum stocking densities consistent with the rest of these standards and operators must ensure that animal welfare is not compromised."

SC Response: The current language is a requirement for the standards setting body. SC has referred the issue of monitoring requirements to the Criteria Committee.

9.6.6
SA: We propose to amend to "Operators shall have a regular water analysis programme and adjust water quality, as necessary, in case of irregular behavior by the organisms."

SC Response: Standard has been re-worded accordingly.

9.7 Aquatic Animal Transport and Slaughter

Recommendations

ICS: Change the second recommendation to "Suffering of the target species during slaughter should be minimized." In some species, bleeding and slaughter can occur simultaneously, thereby minimizing suffering and also producing a better quality food product.
SA: Organisms ' must be in a state of unconsciousness' to avoid unnecessary suffering – this must be a requirement
BÖLW/NALA: Not applicable for all invertebrates that don't "bleed out" and that usually cannot be made "unconscious" before slaughter. Proposed wording: Finfish should be in a state…

SC Response: Standard has been re-word. The suggestion to require "state of unconsciousness" is not taken because it is too specific to apply across all aquatic species.

Standards shall require that:

9.7.1
GROLINK: This is again a non-standard. Change or take away.

9.7.3
Most of these bullet points are also valid for the production, especially the one about escape.

9.7.5.

.
SA: Why the inclusion of local customs? We believe that such customs can often conflict with animal welfare and instead, compromise positions should be sought which address the needs of local customs but still ensure the integrity of global standards.
BÖLW/NALA: In the paragraphs above, there seems to be redundancy and too many details that just refer to certain finfish operations.
It would be enough to say: “Animals shall be handled, transported and slaughtered in a way that minimizes stress and respects species-specific needs. Finfish shall be anaesthetized before bleeding.”

SC Response: Wording has been changed accordingly.

SECTION C APPENDICES

Appendix 1 Procedures and Criteria for the Evaluation of Inputs, Additives, and Processing Aids for Organic Production and Processing

GROLINK: We find that the revision of the text that is introducing the lists and clarifies the role of the lists vis-a-vis the certifiers’ standards has failed. The existing (2002) text is better than the one proposed.
The existing introduction makes clear that the lists are a guideline for certifiers and that they are not intended to be comprehensive. The proposed text makes clear statement that the lists are “closed”. Later on it says that the lists are broad categories and are not comprehensive or detailed. Maybe you wanted to create clarity, but that has not been achieved.
We insist on that there is brought in a formulation making it absolutely clear that the lists are not limiting the right of the certifier to add new products on their list, and whatever procedures they are supposed to follow.
Our general opinion is that the lists are not so productive and too much energy is spent on lists. We question the wisdom in prioritising work on the lists.

BÖLW: In general: The criteria as they are written down in appendix 3 and 5 are not satisfying. We agree with the approach to bring the criteria for all inputs together in one appendix and to make the language more clear and consistent.
The question whether the inputs for animal husbandry should be added to the scope of the criteria is not easy to answer. On the one hand, animals are an important part of the organic agriculture system and animal products play an important role on the organic market. Therefore, the rules for the animal production should be clear and transparent and should include the various inputs coming from outside into the system. On the other hand, this is a very broad area and includes feed stuff including additives and processing aids, veterinary medicine, brought-in animals, disinfecting agents ... For all these inputs, requirements have been laid down in the animal husbandry chapter 5. We think that it is very difficult to develop ‘closed lists’ and new appendices for all these inputs. Following the procedures, a huge amount of dossiers would have to be prepared and evaluated.

The conditions how animals are kept and what kind of feedstuff is in use in the different regions of the world are varying very much, this must be taken into consideration. So we propose not to develop new appendices for animal husbandry.

SC Response: Don't have to work develop a livestocklist, but the criteria are still a tool for those CB's that want to develop a list. Comments over the years have been split over whether an IBS livestock list is needed.
There will be no list in the current work plan.

General Principles

BÖLW: We do not agree to create new appendices for livestock inputs. Therefore the reference to livestock as it is written in this draft should be deleted and replaced by a statement such as: "The criteria for inputs shall be taken into consideration when the relevant chapters in the animal husbandry section are revised or interpreted."

Input Lists

BÖLW: It is helpful that (the nature of) these lists now are described in a clear way that avoids misinterpretation.

Revision Procedure for Appendices

Recommendation for Change of Relevant Appendix. IFOAM informs the applicant that the change is recommended by the IFOAM to be included into the IBS. The input then follows the procedure established to revise the IBS.
IOAS: At this point, the IOAS also needs to be informed as there may be a considerable lag before publication in an internal newsletter or the IFOAM homepage. The majority of dossiers are submitted to the SC because the IOAS has set a condition on the material in question.
GROLINK: Move this out of the standards. It is also a procedure to change the lists.

Crop and Livestock Criteria

BÖLW: Delete the references to livestock in the title, in 1.1 and in 6.3., see above.

2. Source and Manufacturing Process

2.1

2.2

2.3 Synthetic substances from non-renewable resources are generally prohibited. All of the criteria below shall be fully and positively documented in a dossier and review for an input to be allowed in organic production.
SA: This sentence seems superfluous as it merely repeats previous instructions about the dossier to be provided, therefore it can be deleted.

SC Response: Agreed and amended accordingly

2.4

3. Environment

All dossiers shall consider the substance's environmental impact.
SA: A dossier cannot consider as this is a cognitive process – it should document or detail, etc. This also appears several times in subsequent sections.

SC Response: We agreed and amended accordingly.

6. Social, Economic, and Ethical Considerations

6.1
6.2

6.3 Inputs used for animal feed and livestock production shall be evaluated for the impact on animal health, welfare, and behaviour. Medications must either alleviate or prevent animal suffering. Animal inputs that cause suffering, or have a negative influence on the natural behaviour or physical functioning of animals kept at the farm may be prohibited or restricted.

SEFA: We foresee big difficulties in establishing this new documentaion. Is this really relevant? Lists for approved animal products can easily be counter productive and hamper development by increased and detailed regulation.

SC Response: There will be no list.

Processing and Handling Criteria

BÖLW: 1. In general, we want to state that the evaluation criteria are not fitting to the structure of Appendix IV. The concept is not consistent!
We totally agree with the sentence: "Each substance shall be evaluated with respect to its specific uses." We see, however, that appendix IV does not comply with that intention. Therefore we think that it is not realistic to establish criteria based on specific uses and applications and to have a corresponding positive list with only few restrictions. Most part of the substances listed in appendix IV has no indication for specific uses and can be used for all applications. In general, we are much in favour to have product specific standards. We have good experience with such a tool.
2. We think it would be helpful to develop a wording which enables to give a clear answer to the statements and will therefore be helpful for the assessment. Formulations like "may be" are not accurate enough. We think that it is important to be as precise as possible.

SC Response: This will go onto the work plan of the SC. The product and functional use restriction was recently addressed in the Organic Working Group of the Codex Alimentarius. SC will take into consideration the Codex developments.

Introduction

SA: This (last) sentence seems superfluous as it repeats what is already in the general introduction, so should be deleted.

SC Response: We agreed and amended accordingly.

1. Necessity and Alternatives

SA: Second paragraph and shall be used only… These criteria are about adding substances to the appendix, not whether or not they can be used.

SC Response: We agreed and amended accordingly.

1.1. None of the following options are technically feasible:

ICS: The wording of the heading is confusing as is. Change 1.1 to something like “The following order of preference is established:”SA: Yes they are! We are not sure what this means.

SC Response: We agreed and amended accordingly

a. Whole foods that are organically produced according to the IBS.
b. Foods that are organically produced and processed according to the IBS.
c. Purified products of raw materials of non-agricultural origin, e.g. salt.
d. Purified products of raw materials of an agricultural origin that have not been organically produced and processed according to the IBS but appear on Appendix 4.

BÖLW: 1.1. This sentence is addressed towards the operator. For being considered as criteria, the wording must be changed.
Example: "1.1 It must be demonstrated that it is not possible for the specific application to use a substance which belongs to one of the following categories:
a.) organic whole food
b.) organic food
c.) non organic food
d.) purified products of raw materials of non organic origin
e.) purified products of raw materials of an agricultural origin."

1.2 If a processed food product requires an ingredient to make a product to independently established minimum technical specifications recognized by consumers and no organic substitute is available, then a non-organic ingredient can be deemed essential.
ICS: This is a dangerous criterion to allow. Just because something exists in the conventional food chain and consumers are used to it does not mean that it should necessarily exist in an organic form. Part of the challenge of the organic movement is in re-educating consumers as to what food production and consumption should be. Trying to mimic the conventional market and food processing stream is a way to undermine the very mission. We suggest deleting this criterion entirely. Criterion 1.4 says enough about making such allowances already, and is in itself potentially dangerous for these same reasons.
SA: If a processed food product requires an ingredient…
Again, rather too cognitive for a food product.

SC Response: This is only one of the criteria and is not considered in isolation. The range of criteria still provides a balanced perspective on adoption of food processing aids and/or additives. Wording has been changed according to SA comment.

1.3 .

1.4 A substance is considered essential if a processed food product requires that substance in order to meet established standards of identity, governmental regulations, or widely accepted consumer expectations.
BÖLW: The consideration of a substance as essential in order to fulfil "widely accepted consumer expectations" can also be critical.
The use of flavouring agents in organic fruit yoghurt is often justified with the consumer expectations for taste. Therefore, the addition of critical additives like flavouring agents would deem essential.
As a result, there should be no unreflected assumption on consumer expectations.
The "consumer expectations" should be proved by scientific evaluation with consideration of organic quality understanding.

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2. Source and Manufacturing Process

2.1
2.2 .
2.3 Synthetic nature-identical products that are not available in sufficient quantities and qualities in their natural form may be allowed.

ICS: We suggest adding the phrase “provided all other criteria are satisfied.”

SC Response: Good suggestion even though it might be redundant. Change made.

5. Quality (in processed products)

ICS: Add the following two points into one or more of 5.1-5.5: (i) “The material is not used only to alter the speed of the process and/or improve product handling during processing.” (ii) “The material is not used to create characteristics not normally found in the food product without the addition of said material.”

SC Response: Important comment but it is already addressed in the overall criteria.

SA: and shall be used… The same applies as in 1 above.

BÖLW: In general, we have a problem with this chapter. We understand the intention. We think, however, that the wording and the different words like "overall quality", "detract from" "compromise the authenticity" are unclear and weak. These terms can only be used if a clear definition is given.

SC Response: Agreed, but SC will only be able to work on definitions later. Existing terminology is adequate.

Evaluation Criteria for materials used in organic fiber processing.
GROLINK: There is in the textile standards a reference to that the criteria should be used without that there are substances in an appendix. This is a good way to handle inputs to textiles, but then it doesn’t work out to say that the IBS are closed to lists. The additive and processing lists are not broad, they are comprehensive and detailed!

GROLINK: Last sentence says that if a substance is toxic it is not allowed. This is much stricter then in the other criteria. The question is also toxic for whom? And in what way?

SC Response: Stays as it is. Term is adequate.

Appendix 3

Crop Protectants and Growth Regulators

Substances Description, compositional requirements and conditions for use

I. Plant and Animal Origin

- pyrethrum *(Chrysanthemum cinerariaefoliu*m), (The synergist Piperonyl butoxide is prohibited. Where certification bodies have previously permitted its use, it shall be prohibited after 2005)

SA: Does this mean that PBO will be prohibited for pest control in processing operations? It is in all formulations of natural pyrethrins used for pest control in the UK.

SC Response: Pest Control usage was put on the workplan..

IV. Others

- iron phosphates (for use as molluscicide)
  BÖLW: We strongly support to add "iron phophates (for use as molluscicide)" to this list.

Appendix 4

List of Approved Additives and Processing Aids
Where the substances listed in this annex can be found in nature, natural sources are preferred. Substances of certified organic origin are preferred.

[1]Int'l Numbering System	Product	Additive	Pro. Aid	Limitation / Note
INS 296	l-malic acid	X	X	ICS: We oppose the allowance for any synthetic forms of this material SC Response: We are not prepared for a change because we are not sure about the consequences of this modification.

Flavoring Agents

Preparations of Micro-organisms and Enzymes for use in food processing (see 6.2.4.)

SECTION D DRAFT STANDARDS

D1. Plant Breeding Draft Standards

Explanatory Note: This section refers to breeding of organic varieties, not simply use of organic seed

KRAV: Generally we think it is a very long way to go to start organic plant breeding and that many other issues are of much more importance. If conventional breeding without GM-techniques is strengthened by also serving organic agriculture what is the problem?
SC Response: Mandated by GA, but due to complexity, it is on a slow track. Would take a new GA decision to delete this from the work plan.

BÖLW: In general, we agree with the proposal to move the standards for multiplication from draft standards to standards and to leave the plant breeding issue as a draft. In the 2002 IBS, there is no definition for the terms 'organic seeds' and 'organic plant material'. We think it is helpful to

[1] Food additives may contain carriers which shall be evaluated

have a clear language what is meant by this. The requirements laid down for plant breeding in the draft chapter cover only a few aspects of this huge area. We feel that there should be more work on this chapter in order to address more completely the whole breeding process before considering upgrade this chapter to full standards. The proposed requirements in chapter 4.1 for the multiplication of seeds and plant materials reflect what is 'good practice' in the organic sector. We agree with this proposal. (See also 4.1)

Appendix D1 Draft Standards

List of plant breeding methods Draft Standard

	Variation induction techniques	Selection techniques	Maintenance and multiplication
Suitable and permitted for organic plant breeding	• combination breeding • crossing varieties • bridge crossing • backcrossing • hybrids with fertile F1 • temperature treating • grafting style • cutting style • untreated mentor pollen	• mass selection • pedigree selection • site-determined selection • change in surroundings • change in sowing time • ear bed method • test crossing • indirect selections • DNA diagnostic methods	• generative propagation • vegetative propagation - partitioned tubers - scales, husks, partitioned bulbs, brood bulbs, bulbils - offset bulbs etc. - layer, cut and graft shoots - rhizomes • meristem culture

Final compilation: Diane Bowen
Date: October,2004