



Bonn, 2. March 2005

Motions on the Final Revision Draft of the IFOAM Basic Standards (IBS)

Dear Voter,

As mentioned in the invitation e-mail to the electronic ballot, below you find the 5 motions received by IFOAM on the Final revision Draft of the IBS that could not be resolved or could only be resolved with substantial changes to the text of the Final Revision Draft. You are now asked to vote on these remaining issues. So as to allow you to make an informed decision IFOAM provides you below with the

- changes to the text of the Final Revision Draft as proposed by the motion maker,
- rationale underlying the motion and
- IFOAM Standards Committee response to the motion.

To identify the motion on a heading has been assigned to every motion. This heading includes a character (A-F), the motion maker (e.g. Naturland) and a brief description of the requested change (e.g. Delete Chapter 10).

Text as per final revision draft

A) GROLINK and Ekologiska Lantbrukarna (Swedish Ecological Farmers Association) Motion: *Amend second derogation of IBS 4.1.2.*

In their motion Grolink and Ekologiska Lantbrukarna requested to change the text of the second derogation regarding the *use of chemically treated seed and plant material* as in the Final Revision Draft back to the wording as in the current IBS.

New wording as per motion:

4.1.2

Operators shall use organic seed and plant material 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. To promote and establish the use of organic seed and plant material, standard-setting organizations shall set appropriate standards and/or time limits for the selected use of non-organic seed and plant material.

~~*Chemically treated seed and plant material may be used:*~~

~~*1) for foundation seed or*~~

~~*2) 1) if chemical treatment is legally required for phytosanitary purposes*~~

Where untreated conventional seeds and plant materials are not available, chemically treated seed and plant material may be used. The certification body shall establish time limits and conditions for exemptions that permit use of any chemically treated seeds and plant materials.

Rationale of Motion Maker:

Good seed from suitable varieties is fundamental for all farming practices. Of course organic and untreated seed should be used when possible. Unfortunately the organic sector today have little influence over the seed industry and the commercial availability of organic and chemically untreated seed and propagation materials.

Already the current standards are seen as very strict and difficult in all parts of the world where organic is in early stages of development. Instead of suggesting amendments to the new text introduced by the SC it is better to revert to the existing standard. The option in the draft left for treated seed when legally required has no relevance for the operators. For them the question is if they can get untreated seeds or not. In making the IBS too strict in this aspect many farmers will face a situation with no access to accepted seed.

Standards Committee Comment on Motion:

In the Final Revision Draft IBS 4.1.2 was changed for the following reason:

In chapter 4.1.2 of the Final Draft there is the requirement that organic seeds and plant materials shall be used if available.

As a first derogation seeds and materials that are not organic may be used under special conditions, if organic seeds are not available.

As a second derogation chemically treated conventional seeds may be used if untreated seeds and plant materials are not available, but only for "foundation seeds" or "if legally required".

The Standards Committees position is, that it is consistent with the principles of organic farming not to use pesticides not even for seed treatment. Therefore, derogations should be well defined and handled restrictively. But the discussion in the contact group has shown that it is very difficult and in some regions of the world impossible to buy untreated seed because it is definitely not on the market. So the SC supports the motion to change the language of the second derogation back to the wording of the current IBS.

B) Naturland Motion: Amend provision c) and final sentence of IBS 9.5.1

In its Motion Naturland requested to amend number c and the final sentence of IBS 9.5.1c as in the Final Revision Draft.

New wording as per motion:

9.5.1

Animals shall be fed organic feed.

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

In no case may the percentage of non-organic feed of agricultural origin exceed 15% dry matter calculated on an annual basis.

Operators may use non-organic aquatic animal protein and oil sources provided ~~that such sources~~ they:

- a) are harvested from independently verified sustainable sources;
- b) are verified to have contamination levels below limits established by the standard setting body; and
- c) do not constitute 100% of the diet exceed-50%.

~~Non-organic feed sources may not exceed 50% of the ration. The Standard Setting or Certification body shall set~~

- ~~• an appropriate percentage requirement of organic ingredient as diet~~
- ~~• an implementation date for requiring at least 50% of diet be of organic ingredients.~~

Rationale of Motion Maker:

There is no single source for organic fishmeal! And it doesn't make sense to set 50% as an absolute limit for all species, if the source is fine (but not certified organic). By establishing a time-frame-setting, we give both a direction and space for development.

Standards Committee Comment:

The SC acknowledges that the requirement of 9.5.1. (50% organic feed) is likely to remain a difficult challenge for aquaculture operations, of diadromous fish (principally Salmon and trout), for many years.

The SC cannot accept that the term organic can be applied to livestock, which do not receive at least half of their feed as organic. The 'lead-in' concept is a well understood tool in organic livestock production but it is usually used to approach a 100% organic diet.

The SC does not support this motion.

C) Naturland Motion: Amend wording of IBS 9.6.3

In its Motion Naturland requested to amend wording of IBS 9.6.3 as in the Final Revision Draft to read as follows.

New wording as per motion:

9.6.3

Use of chemical allopathic veterinary drugs and antibiotics is prohibited for invertebrates.

Rationale of Motion Maker:

Otherwise, this is not viable – big, long lived fish, if getting ill, should have the chance to be treated, if need be also with antibiotics. The general requirements for health treatments of animals are fine for aquatic vertebrates.

Standards Committee Comment

The SC considers the use of antibiotics in aquaculture to be especially controversial because of the 'leaky' nature of aquaculture systems. For example antibiotics are often incorporated in feed which can be lost to the environment and stock would normally be treated in batches rather than as individuals. For this reason the general prohibition of the use of antibiotics for organic livestock in the IBS (5.7.2.) was strengthened for aquaculture without a derogation (9.6.3.). Since the aquaculture operators must meet the general requirements of 5.7. the issue is whether or not a derogation is allowed for organic animals.

The SC has no further comment on the motion from Naturland.

D) International Certification Services (ICS) Motion: *Amend wording and delete second sentence of IBS 9.7.5*

In its Motion ICS requested to amend the wording of the first sentence and delete the second sentence of IBS 9.7. as in the Final Revision Draft.

New wording as per motion

9.7.5.

Animals shall be handled, transported and slaughtered in a way that minimizes stress and suffering, and respects species-specific needs. ~~Finfish shall be anaesthetized before bleeding out.~~

Rationale of Motion Maker:

ICS agrees with the General Principle as written in IBS section 9.7. We also agree with the first part of the second Recommendation, which calls for minimization of suffering of the organism. It appears that there is consensus on the primary objective of practices employed during slaughter, i.e. that suffering and stress on the organism are minimized. Addition of the words “and suffering” helps complete the concept in 9.7.5. How this objective is achieved is, in ICS’ opinion, a matter of debate and can vary depending on the organism, operator, and production unit. ICS does not agree that anesthetization of a finfish would definitely accomplish that which the General Principle and Recommendation put forth. Anesthetization does not, according to our reading of the dictionary (Webster’s New Collegiate Dictionary) necessarily mean the organism is unconscious. What the organism experiences during that state of anesthesia is not known. We also question how and by what means said anesthesia would be administered, and what suffering would occur in the interim between the catch and the administration of the anesthesia. Regardless of whether anesthesia is administered, variance in technique employed by the operator can override specifics about the state of consciousness (or lack thereof) of the organism with respect to how much stress or suffering it experiences during the entire slaughter procedure. In some cases, depending on the production unit and operator the steps needed to render the organism anesthetized or unconscious could be done in such a manner that actually increases stress and suffering compared to a quick and effective killing. Furthermore, there appears to be conflicting opinion among operators (and others) as to how effectively a fish bleeds out once it has lost consciousness. Speed and effectiveness of bleeding in some cases directly affects product quality, which is a secondary concern of ours, expressed to us by a variety of operators, and is often at least partially dependent on the slaughtering process. ICS respectfully suggests that the SC needs to construct the standards in a way that is not unduly proscriptive without having a deeper understanding or breadth of experience in this topic. We feel the proposed wording change achieves the commonly held goal expressed otherwise in this section of the IBS. The second Recommendation’s promotion of unconsciousness of the organism offers a clear suggestion to operators and allows control bodies to evaluate operators’ compliance with both the General Principle and our proposed revision of 9.7.5.

Standards Committee Comment

SC understands the rationale of the motion maker and accepts that the intention is not to undermine the principle and the second recommendation of 9.7.

Whilst there are arguments around what anaesthesia means, how it might be administered and what the fish might experience, the SC feels that the requirement for finfish, to be in a state without sensation before slaughter, should remain.

E) GROLINK and Ekologiska Lantbrukarna (Swedish Ecological Farmers Association) Motion: *Delete Chapter 10.*

In their motion GROLINK and Ekologiska Lantbrukarna requested to **delete Chapter 10 “Forestry”** as in the Final Revision Draft.

Rationale of Motion Maker:

- We question the market relevance of organic forestry products. The market is not asking for these products, and in addition there are enough competing schemes for sustainable forest products already well established.
- IFOAM lacks credibility in setting forest standards. Almost no forestry people are involved in IFOAM. IFOAM's general credibility as standard-setter will be damaged by this.
- There should be a impact 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 not subject to certification. If wild products (from forests) will have to come from certified forests we will get a completely new situation and an enormous increase of costs for wild product certification.
- In standards development we would like IFOAM to have a close co-operation with other private standard setting organisations active in other areas, eg FSC. This is a way of using resources efficiently and IFOAM can focus and act more forcefully in the areas where our main competence is.

Standards Committee Comment

The SC was mandated by the IFOAM membership at the last General Assembly to advance the current Forestry Draft Standards to a full standard. The SC has no opinion whether IFOAM should adopt Forestry Standards or not. The membership is the body to take the decision on whether to adopt the proposed standards or not.