

Response from the Task Force on Principles of Organic Agriculture on the feedback given on 4th request for input.

Meeting May 1,2 and 3, 2005

In January 2005 IFOAM sent the second draft of the Principles of Organic Agriculture (POA) to members and external stakeholders along with a request for input. The draft and request were also posted on the IFOAM website. The following commentary is addressed to all persons and organizations that gave feedback to that draft. The feedback and this response will also be published on the IFOAM website.

The Task Force received 39 reactions from internal stakeholders (membership, IFOAM groups and committees). External stakeholders accounted for 11 additional reactions, mainly from the international task force on harmonization.

Region	Comments
African members	3
Asian members	8
Latin American members	5
European members	17
North American members	3
IFOAM Board and Staff	3
External	11
Total	50

The POA Task Force read every response and grouped the comments under headings. Most comments are addressed as a group rather than individually. The commentary explains whether the comments were accepted and provides the Task Force's reasoning.

Many suggestions have been put into the revised draft, and the Task Force believes that this response covers the inputs that are in most need of a detailed response. Members of the Task Force noted that many non-respondents contacted were generally supportive.

After reflecting on the input, the Task Force divided the response into two groups: general comments and specific comments. For each section the feedback that was accepted comes first and the feedback that was rejected at the end. Comments that were partly accepted or partly rejected are discussed in both sections.

General reflections on the input

Generally the Task Force considered the feedback positive and constructive. Most of the feedback confirmed the content of the draft of the Task Force as sent out in January. In particular there were not many suggestions to change the actual statements of the principles. However the feedback emphasized the importance of exact wording. Responses also indicated that the explanations in the January draft were sometimes stated in language that was dense, hard to understand, and difficult to translate.

Diverse and different kind of audiences must be able to understand the principles. Hence, the Task Force generally attempted to:

- Simplify the wording
- Include concrete consequences
- Accommodate the worldwide diversity of organic agriculture

Response to feedback of a general nature

Hierarchy in the principles

The preamble stated that the principles are the foundation of the organic movement and that they belong together. The Principle of Health explanation stated that this particular principle is the foundation of organic agriculture. Several responses objected to the establishment of the precedence of health over the other principles.

Reply:

The Task Force accepted the feedback and deleted the statement under the Principle of Health. The Task Force maintained the order of the principles.

Concreteness, level of principles

Several commenters indicated that the principles are too abstract, difficult to understand, and need to be made more concrete for readers to be able to see how the principles apply to their situation.

Reply:

The principles are overarching, apply to the whole diverse organic agriculture movement at present, and need to be adaptable to the dynamic change anticipated. Therefore, abstraction is necessary to cover all aspects of organic agriculture, accommodate the diversity, and anticipate the future. See the rationale under examples as well. The Task Force worked on simple wording, recognizing at the same time that this could go at the cost of the poetry in text.

Monistic versus pluralistic vision

Some feedback suggested that the January draft reflected only one perspective of many, and was too narrow to include the diversity of organic agriculture. Some said that the principles did not adequately represent particular points of view from specific regions of the world. Other responses suggested that the principles need to reflect one true vision and implied a more monistic approach.

Reply

As the comments came from all over the world the Task Force was not able to include specific points of view. The principles are monistic in their form—they are *the* one set of principles of organic agriculture—but they are intended to reflect the plurality of views in the organic movement. The Task Force considered how the formulations were seen from different perspectives and when practical sought to incorporate more inclusive wording to encompass diverse points of view.

Negative wording

Several responses criticized the use of negative wording and suggested that the principles express what organic agriculture should do, rather than what it should not do.

Reply

The Task Force welcomed this feedback. Because one function of the principles is to inspire, the Task Force deleted or inverted negative phrases. The Task Force found that sometimes such a reconstruction led to awkward syntax. In other cases, the meaning was intentional left negative. For example, the explanation for the Principle of Health stated: '[health] is not simply the absence of illness.' The Task Force justifies this wording as it thinks it adds something to the understanding of health consistent with previous comments that requested this specific clarification.

Difficulties in translation

Commenters, particularly those who are in non-English speaking areas, pointed out that some particular terms and sentences were difficult to translate to specific other languages.

Reply

The Task Force sympathized with the need to have principles that read well in translation. However, translations need to be addressed by engaged members inside each language and the best solutions sought out for each language. The Task Force removed the sentence on the shared origin of 'health' and 'whole' that was particular to English language.

We – the perspective from presenting the principles

A lot of comments noted the use of the word 'we' in the preamble. Commenters pointed out that the use of the pronoun 'we' did not consistently refer to the same group of persons throughout the document. The word 'we' was used in some places to avoid the passive voice. However, some assigned a divine or quasi-religious meaning that suggested an almighty perspective of 'the godfathers of organic agriculture.' Some feedback asked to use only active voice and to avoid passive voice.

Reply

The Task Force was pleased to receive the 'godfather' comment, as it was not aware of it before. The new text deletes or replaces the word 'we.' The result is that the text carries the passive voice to avoid 'we.' For example, 'Given the incomplete understanding of ecosystems and agriculture care must be taken.'

To include the role of science, to make principles more science based

Some commenters expressed concern over the lack of 'scientific seriousness' of the principles.

Reply:

Some members of the Task Force agreed that science should be given a more prominent place in the principles so that outsiders will take the organic movement more seriously. However, the Task Force rejected the characterization of 'science' as ethically neutral. Conventional agriculture and the science upon which it is based (philosophical and ethical perspective) is difficult to reconcile with the Principles of Organic Agriculture. The Task Force was also concerned that 'scientific sentences' might make the text more difficult to understand and conflicted with comments to simplify and remove abstraction. The Task Force affirmed the scientific validity of the practical experience of farmers. The roles of science and of tradition are mentioned under the Principle of Care. A sentence was added to emphasize that science can play a positive role for organic agriculture.

Inclusive or exclusive principles?

Some comments pointed out that IFOAM must choose principles specific to organic agriculture or develop principles for all of agriculture. The Task Force noted a general discussion of organic agriculture 'going mainstream' and grouped such comments under the heading of inclusive v. exclusive principles.

Reply

IFOAM's mission and the preamble of the principles express the aspiration of what organic could be for all agriculture. The principles are necessary to identify the potential contribution that organic agriculture can make to the world. The Task Force does not see a contradiction between principles specific to organic agriculture and principles for all of agriculture. The organic movement can be ambitious on its role in the world and at the same time being specific on its own principles. The Task Force finds that the preamble states clearly both that these are the principles of organic agriculture and that they are a vision to improve all agriculture.

Titles of the principles

The Task Force noted many comments that suggested changes to the titles of the principles.

- 'Ecological principle' was considered inconsequent with the titles of the other principles 'principle of ...'
- The title 'Principle of Care' was criticized as being hard to translate and not as good as 'principle of precaution'. Another commenter suggested adding 'and responsibility.'

- The 'Principle of Fairness' received a suggestion to extended with '...and solidarity'.

Reply:

The Task Force accepted the suggestion to revise the second principle to be the "Principle of Ecology" and did not accept the other suggestions. In the January draft, the Task Force considered ecology to be a discipline in science that went beyond the Principles of Organic Agriculture in scope. Upon further reflection the Task Force considered that the adjective 'Ecological' has the same effect, with the context clearly that of agriculture. The Principle of Ecology has the same meaning with greater clarity and consistency.

The other suggestions were not accepted for various reasons. Task Force decided to keep the 'Principle of Care' rather than return to 'The Precautionary Principle' because 'precaution' is too narrow to express the dynamic and active management and involvement of the practitioners.

The Task Force considered 'solidarity' beyond the reach of OA. The word has a strong connotation of trade union involvement. While some might consider the word uniting in its meaning, others might find it divisive. The characterization of fairness with 'stewardship of the *shared world*' is according to the Task Force pointing in the same direction, however better expressing the responsibility of organic agriculture.

Examples in the text?

Many comments noted implicit issues that commenters preferred to make explicit, often in the form of lists.

Reply:

There are risks in explicitly listing examples:

- The Task Force found it difficult to construct lists that were collectively exhaustive, and was concerned that a list would omit an important item.
- Lists become fixed and cannot accommodate dynamic situations. Principles with lists of examples are more likely to become outdated.
- Long lists can be difficult to read and undermined efforts to simplify simple statements and explanations.

The Task Force attempted to construct lists and examples, but ultimately removed them for simplicity.

Normative or positive?

In its questionnaire the Task Force solicited for ideas on a different kind of wording that is as strongly normative as 'should' but otherwise formulated. Respondents were divided as to whether the principles were more appropriate formed in normative or positive terms. Among those who favored normative, several suggested alternatives to the word 'should' to address possible misinterpretations.

Reply

The Task Force found adequate support to keep the principles as normative statements, and recognized more advantages to such a formulation. The feedback did not reject the ethical statement and no respondent came up with a better suggestion than 'should.' The Task Force decided to keep the phrasing with 'should.' The word 'normative' has been deleted from the preamble for greater clarity.

Gender, humans, people and persons

Many languages assign gender to words that are gender-neutral in English, and sexism might get introduced through translation. Some feedback suggested that words like 'workers' and 'producers' only refer to men. The word 'human' again refers to 'man' and was suggested to be replaced by 'people.'

Reply:

The Task Force appreciated the attention to gender and affirmed the intention to honor the women as much as the men of the organic movement. Specifically, 'workers' and 'producers' are gender neutral in English and it was the intent of the Task Force to use it in that way. Where literal translations imply

gender specificity, where appropriate one could choose to use a neutral form or include forms that explicitly mention both sexes.

The Task Force alternated the use of 'human', 'people' and 'persons' as appropriate to give specific meaning, avoid repetitive use and stilted phrasing.

Human based or nature based?

It was stated that the principles in general and the one on fairness in particular were anthropocentric instead of 'earth centered.' Commenters suggested the principles should recognize the intrinsic value of nature.

Reply

The Task Force agrees that nature and earth have their own integrity. 'Integrity of living systems' is used as a notion to explain what health is. The Principle of Ecology roots organic agriculture within living ecological systems. However the Task Force did not change the perspective to one that is 'earth centered' for the practical reason that organic agriculture is a human endeavor. The Task Force believes that the principles should be considered in relation to the 'human scale.' The Principles are formulated to inspire and motivate people in the organic movement, and to encourage those outside the organic movement to join it. The orientation toward humans does not exclude considerations of other living systems and beings. The Task Force finds that a good balance between the two has been found in the present draft. The Task Force considered 'intrinsic value.' Because the notion is subject to debate and is not universally accepted even within the organic movement, the Task Force did not accept the suggestion. The text implies that things other than human and animal have value, but stops short of explicitly recognizing that value. Any explanation required a considerable amount of detail.

Response to feedback on specific issues

Innate and learned behavior of animals

Respondents suggested that '...conditions and opportunities of life that accord with ... innate behavioral characteristics..' is not enough to be fair to animals. Animal husbandry includes learned behavior and just treatment of animals must respect learned as well as innate behavior.

Reply

The Task Force accepted the comment and used the notion of 'natural behavior' as a reference point. Learned behavior is at a certain point part of the nature of the animal.

Objections to using the term 'natural behavior' for domesticated animals were noted and considered, but the Task Force rejected suggestions to remove 'natural behavior' because animals still have innate characteristics and learned behaviors that can meaningfully be referred to as their natural behavior.

Water and air, aquaculture

In the feedback were several requests to include (clean) water and air both as resources and as 'products' of organic agriculture. Some comments expressed a concern that might construe that 'agriculture' excludes 'aquaculture.'

Reply

Although not in favor of listing for reasons mentioned above, the Task Force considered water and air so important that these notions are explicitly listed as part of the common environment under Principle of Ecology. Where 'resources' are mentioned in the text, air and water can be considered implicitly. The scope in the preamble now includes aquaculture.

Pastoralism and wild production/harvest

Respondents suggested that pastoralism be included as a considerable part of organic agriculture, particularly in terms of the proportion of land.

Reply

The Task Force sought to apply the principles as broadly possible. The preamble stated that 'the principles apply to agriculture in the broadest sense, including the way people tend soils, water, plants and animals'. Pastoralism is implicitly included. The Principle of Ecology now explicitly mentions 'pastoralism' as it fits with the natural cycles and ecological balance.

Biodiversity

Respondents suggested that biodiversity needed to be given more attention and be addressed in a positive form.

Reply

The Task Force formulated specific references to maintain genetic and agricultural diversity, and to protect biodiversity in organic agriculture.

Processing and consumption

Some comments stated that the principles seem to apply mainly to production and leave out processing and consumption.

Reply

The Task Force has revised the explanation to make the roles of processing and consumption more explicit under the principles of ecology and of fairness. The Task Force tried not to 'de-personalize' processing and consumption because these acts are performed by individuals. To address these comments, the Task Force explicitly added the phrases, 'those who produce, process, trade and consumer organic products should protect and benefit the common environment ..' and '..fairness at all levels and to all parties – producers, farm workers, processors, distributors, traders and consumers.'

Definition of health

A professional in the area suggested that the description of health in the draft was not accurate enough. According to this feedback illness is not just only part of health, but a way to build up immunity, a process to acquire better health, in the sense of resistance and resilience. Other comments requested that the principles add the health of ecosystems.

Reply

The Task Force accepted the inclusion of 'immunity' and added the health of ecosystems.

Rights and ownership

The Task Force noted a strong reaction to the statement under the Principle of Fairness that '.... rights and ownership are temporary and are ultimately held in trust for all living organisms and future generations.' Some interpreted that it would lead to a perception of organic agriculture as anti-capitalistic or that human rights are temporary.

Reply

The Task Force deconstructed the statement and notes that private ownership of land, animals, or other property is consistent with organic agriculture. The Principle of Fairness is also consistent with the charter on human rights. However, the intention is to maintain that future generations have rights as well as current ones. The new draft removes the phrase 'rights and ownership.'

Livelihood

Several comments, particularly Asia, Africa, and Latin America indicated that 'livelihood' needs to be explicitly mentioned under fairness.

Reply

The Task Force interpreted this remark as that there was not enough attention to the economic aspects of organic agriculture, particularly for farmers on smallholdings. In the new draft the Task Force included therefore that 'organic agriculture should provide everyone involved with a good quality of life.' 'Quality of life' includes, but is broader than livelihood.

To feed humanity

Respondents suggested adding the 'principle to feed humanity with this way of production.'

Reply

Feeding humanity is a goal, not a principle. The Principles of Organic Agriculture are consistent with the ability to feed humanity. Lack of food is not the cause for starvation, rather lack of access to resources. Many other factors determine whether people can have their daily meals. The Principle of Fairness addresses the need to see that organic produces sufficient food: '[Organic agriculture] aims to produce sufficient high quality food and other products'. However, it is beyond the scope of the principles of organic agriculture to be able to guarantee access to food.

Animal welfare

Commenters were divided in their responses with respect to animal welfare, with the comments geographically divided. Commenters who wanted to strengthen or emphasize animal welfare considerations were from Europe and North America. Commenters from Africa, Asia, and Latin America commented that the distinction between animals and other organisms was artificial, and that the emphasis on animal welfare was overdone.

Under the Principle of Fairness it was stated that 'organic production systems should be constrained by the animal's needs'. Feedback indicated that 'constrain' is too strong a word in context of (even organic) agriculture. Commenters suggested that animals should be included in the Principle of Care.

Reply

Organic agriculture is distinguished from industrialized agriculture by attention to animal welfare. Consumers expect organic agriculture to take animal welfare into account. The Task Force agreed with the argument on 'constrain' and decided to delete the whole sentence as where the former sentence already captured the essence. The explicit mention of animal welfare is justified and the comments to remove animal welfare considerations were not accepted. The suggestions to add a separate principle on animals was also not accepted out of respect for the diversity in the movement and the general nature that applies to animals, people and other living systems and beings.

One commenter from Asia mentioned the lack of a mention of 'plant welfare.' Taking the comment as sincere, rather than ironic, the comment was not accepted, but the Task Force believes the intent is captured in the statement on living systems.

Animals are mentioned specifically in both the preamble and the Principle of Health and are therefore considered to be part of 'future generations.' Thus, there is no need to mention animals explicitly in the statement of the Principle of Care.

Principle on ethics?

Respondents suggested inclusion of an additional principle on ethics.

Reply

The Task Force considers all principles to be ethical. Therefore an extra principle on ethics is redundant and the Task Force rejected the suggestion.

Trade

One suggestion was that the Principle of Fairness should include that 'trade in organic products must not be carried out to the disadvantage of local agrarian systems.'

Reply

The Task Force thinks that this phrase can be interpreted in different ways, and reworded what was considered the more positive intent. '[O]rganic agriculture should ensure fairness at all levels and to all parties' including traders and consumers. Organic products should be traded fairly. Export at prices below the cost of production is clearly unfair, particularly when it is less than what is necessary to sustain the lives of all those who are producing. However, at least some members of the Task Force consider erecting technical barriers to trade and denial of market access to be just as unfair. The Task Force prefers the revision of the January draft over the proposed wording on 'disadvantage on local agrarian systems.'

Patents

Some respondents wanted to see an explicit statement to forbid the patenting of living organisms in organic agriculture under the Principle of Fairness.

Reply

The Task Force was sympathetic with the suggestion, but considered the issue to be dealt with in the statement on fairness ('..fairness with regard to common environment..'). To include one sentence on patenting would not do justice to the complexity of the issue. The suggestion is a negative one and contradicts comments on focusing on the positive. The Task Force decided that 'ecological justice' and 'future generations' express clearly the intent to exclude patents on life form in the common environment.