



Global Organic Market Access
a project of **FAO**, **IFOAM** and **UNCTAD**

Study and Recommendations for Developing Regional Organic Standards in Asia

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1. Introduction

1.1 Project Summary

GOMA is facilitating key stakeholders in Asia to develop a plan for harmonization and equivalence for organic agriculture in Asia. At a workshop in May, 2010 in Shanghai, participating stakeholders expressed interest to develop a regional organic standard and asked GOMA for assistance. GOMA agreed to prepare a technical study for the work. It is envisioned that the Asia regional standard will function as a basis for equivalence among government standards in the region, and could be adopted as a local standard where none currently exists.

The key tasks of the project are as follows:

- 1) Undertake a comparative analysis of existing 12 Asian organic standards. This to be done through
 - a. using the EquiTool Annex Two, "Common Objectives and Related Requirements for Organic Standards" (CORROC) as the framework for comparison.
 - b. engaging respective governments and private standard owners to provide input for analysis with assistance from GOMA Project Manager
 - c. analyze alignment of the standards with the EquiTool Annex Two and highlight
 - how departures from EquiTool Annex Two are addressed
 - additional objectives and requirements beyond EquiTool Annex Two
 - d. summarize information in a comparative format
- 2) Prepare recommendations on common objectives and related requirements which could be used for developing a harmonized Asian regional standards based on comparison and analysis above.
- 3) Prepare recommendations to GOMA on the use of EquiTool Annex Two based on consultant's experience and feedbacks from stakeholders in the region
- 4) Prepare recommendations for process to develop harmonized Asian regional organic standards

1.2 The Scope of the Study

Geographically, the study was planned to cover 12 countries, i.e. China PRC, Taiwan State, Japan, South Korea, Thailand, Philippines, Indonesia, Malaysia, Vietnam, Laos, India, and Nepal.

For the standards scope, the study covers organic crop production, livestock (including bee keeping), wild harvest, processing and handling, and labeling of organic products.

2. Study Methodology and Process

2.1 Collecting National/State Organic Agriculture Standards

The GOMA project manager contacted authorities or stakeholders in 12 countries/state to collect relevant organic standards (see the list below). Ten countries/state submitted their standards and two countries (i.e. Indonesia and Vietnam) did not. The scopes of the submitted standards are:

Country/State	Scopes of Standards Reviewed				
	Crop	Wild-harvest	Live-stocks	Processing-Handling	Labelling
1. China PRC	Y	Y	Y	Y	Y
2. Taiwan State	Y	N	Y	Y	Y
3. Japan	Y	Y	Y	Y	Y
4. South Korea	Y	Y	Y	Y	Y
5. Thailand	Y	Y	Y	Y	Y
6. Philippines	Y	Y	Y	Y	Y
7. Malaysia	Y	Y	N	Y	Y
8. Laos	Y	Y	N	Y	Y
9. India	Y	Y	Y	Y	Y
10. Nepal	Y	Y	Y	Y	Y

Note: Y = having the scope, N = not having the scope

2.2 Assessment of National/State Organic Standards

The assessment was done by identifying relevant parts of the text in the national/state organic standards document against each CORROC point in the EquiTool Annex Two. Then the consultant/expert assessed whether the text from the national/state organic standards address the issues raised by each CORROC point. Comments where relevant are made for each assessment point.

After the consultant's assessment of each national/state organic standards, the result was set to the respective national stakeholders introduced by GOMA for comment. Each national stakeholders had around 2 weeks for comment. Out of the 10 studies, 4 managed to return comments, e.g APEDA Advisor in India, Japan Organic and Natural Association (JONA) in Japan, 13 public and private agencies in Nepal and the National Bureau of Agricultural Commodity and Food Standards (ACFS) in Thailand.

The returned comments were reviewed by the consultant and a final assessment was made for each country/state. Reports of the national/state final assessments are attached in Annex 3.

The comparative assessments of the 10 national/state organic agriculture standards can be founded in Annex 2.

2.3 Assessment of Codex Organic Standards

In addition to the project ToR, the consultant was asked to make an assessment of Codex Organic Standards against the EquiTool Annex Two. The results of this assessment is shown in Annex 4 and the summary is also included in the Annex 1 (second column) as part of the overall comparative analysis.

2.4 Overall Comparative Analysis of the National/State Standards

Based on (a) the assessment of the Codex's Organic Guidelines (see the second column of Annex 1), (b) the assessments of all 10 national/state standards (the third column of Annex 1), and (c) the consultant's own knowledge, an overall comparative analysis is made as to how the 10 national/state standards address the CORROC points in the EquiTool Annex Two and commonalities amongst them. The analysis is shown in Annex 1 (the fourth and fifth columns).

The analysis is then reviewed by the GOMA Steering Committee whose comments and suggestions are incorporated in this second draft of the report.

The report is then forwarded to all national stakeholders for review and comments. A regional meeting is organized by GOMA during 8 – 10 December 2010 at Mumbai, India for stakeholders to comment on the draft report. The final report will be revised based on comments received.

3. The Results of the Comparative Study

3.1 Commonality Among the reviewed Asian Standards

Commonality here refers to the extent in which the 10 standards share similarity in addressing a particular CORROC point¹ in EquiTool Annex Two. The 10 standards are deemed to have commonality if a clear majority (roughly more than 70%) of the applicable standards address or do not address relevant issues in CORROC points. Commonality does not necessarily mean that the standards address CORROC points in a similar way. No commonality means that no clear majority of standards address the CORROC point.

Despite the diversity of formats and styles, the comparison analysis shows that the 10 assessed standards share considerable commonality to the EquiTool Annex Two. As Table 1 below shows, there is commonality to 69 out of the total 92 CORROC points, i.e. 75%. High commonalities are found in EquiTool Annex Two section 3, 5, 6, and 10 while several non-commonalities are found in section 1, 2, 4, and 9. Details of the commonality analysis is shown in the Table 1 below (column 3 and 4).

As there is no clear pattern of commonality, it is not possible to make further analysis on this matter.

3.2 Alignment to EquiTool Annex Two

Alignment here means the assessed standard adequately address the relevant issues of the CORROC points in the EquiTool Annex Two. Assessed standards may have commonality but not aligned to the CORROC points. Vice versa, whilst the 10 standards may not have commonality to CORROC points in the EquiTool Annex Two as a group, some may be aligned to them.

For the analysis as shown in the Table 1 below (column 5), the 10 standards are commonly aligned in 59 of the CORROC points. This constitutes around 65% of CORROC points (60 out of 92 points) and 87% of the commonality points (60 out of 69 points).

A high alignment is founded in similar sections where there is strong commonality to EquiTool Annex Two, i.e. section 3, 5, 6, and 10.

3.3 Additional Objective/Requirement

Five additional requirements are identified. Two in section 1 and one each in section 4, 6, and 9. Below are all the additional objective/requirement:

1. Laos: The CB (DOA) may not certify a producer who invades public forest for organic farming. The CB (DOA) reserves the right to consider the use of public forest for organic production on a case by case basis.

¹ The EquiTool Annex Two is divided into 10 section, and some are further divided into sub-section. Each section or sub-section contains several points and altogether there are 92 points within the scope of this study, i.e. crop, livestock, wild product, processing-handling, labelling (aquaculture is excluded).

2. Laos: A: biennial crops has conversion time same as annual crops, i.e. 12 months
3. Taiwan State: simple packaging, not excessive and give preference biodegradable, recyclable, or reusable
4. Laos: wild collector must be member of the community and approved by the community as a producer or operator who has the potential to harvest the product in a sustainable manner.
5. Laos: prohibited to use styrofoam for packaging organic products

Table 1. Comparative Analysis of the 10 Asian Organic Standards

EquiTool Annex Two Section and Sub-Section	No of points in section or sub section	No commonality	Commonality	Aligned	Not aligned	Additional
1. Employ long-term, ecological, systems-based organic management						
1.1 General Farming Management Systems:	3	2	1		1	1
1.2 Crop Production Management Systems:	4		4	3	1	
1.3 Animal Production Management Systems:	4	2	2	1	1	1
1.4 Beekeeping Management Systems:	1		1	1		
1.5 Aquaculture Management Systems:						
1.6 Wild Collection Management Systems:	2		2	2		
1.7 Processing Management Systems:	1		1	1		
1.8 Transition/Conversion Requirements for Organic Production Management Systems:	3		3	3		1
2. Assure long-term, biologically-based soil fertility						
2.1 Soil Fertility Management:	5	2	3	3		
3. Avoid/minimize synthetic inputs at all stages of the organic product chain and exposure of people and the environment to persistent, potentially harmful chemicals.						
3.1 Crop Production:	3		3	3		
3.2 Animal Production	4		4	4		
3.3 Processing	4		4	4		
3.4. Contamination	2		2	1	1	
4. Minimize pollution and degradation of the production/processing unit and surrounding environment from production/processing activities.						
4.1 General	2	2				1
4.2 Farm Production and Beekeeping	10	5	5	3	2	
4.3 Aquaculture						

EquiTool Annex Two Section and Sub-Section	No of points in section or sub section	No commonality	Commonality	Aligned	Not aligned	Additional
4.4 Wild Collection	1		1		1	
5. Exclude certain unproven, unnatural and harmful technologies from the system.						
5.1 Genetically Modified Organisms	2		2	1	1	
5.2 Ionizing radiation	1		1	1		
5.3 Breeding Techniques:	1		1	1		
6. Avoid pollution from surrounding environment						
6.1 Wild collection	1		1	1		1
6.2 Beekeeping	1		1	1		
6.3 Aquaculture						
7. Treat animals responsibly						
7.1 Living conditions	2	1	1	1		
7.2 Physical Alterations	1	1				
7.3 Breeds and Breeding	1		1	1		
7.4 Transport and Slaughter, and Honey Harvest	2	1	1	1		
8. Promote the natural health of animals						
8.1 Nutrition	2		2	2		
Beekeeping:	2		2	2		
Aquaculture						
8.2 Health Care	2	1	1	1		
Beekeeping:	3		3	3		
Aquaculture						
9. Maintain organic integrity throughout the supply chain.						
9.1 Production						
Seeds and Seedlings	4	1	3	2	1	
Parallel and Split Production	2	1	1	1		
Animal Production	1	1				
9.2 Processing and Handling	9	3	6	6		1
10. Provide organic identity in the supply chain						
10.1 Labeling	6		6	6		
Summary	92	23	69	60	9	6

4. Recommendations

4.1 Improvement of EquiTool Annex Two

Based on the experiences working with the EquiTool Annex Two in this project, the consultant has the following recommendations on how to improve the it:

- (a) Less objectives for each CORROC point: Several CORROC points contain several objectives within one point. This makes it difficult to use it as an assessment or comparison tool. Each CORROC point should be revised to preferably have only one objective for each point.
- (b) Formulation of objectives: Some CORROC are written as general principles rather than as objective. The clearer the formulated text as objective the more effective it will be as an assessment tool. Where needed, explanation of the rational for each objective should be included.
- (c) Fewer prescriptive requirements: Some of the CORROC points are written in a prescriptive manner, particularly those specifying minimum requirement. With such prescription, it would not be possible to use them for making equivalent determination anymore, it can only be used for compliant determination.
- (d) Verifiable indicators: All requirements must at the end be verifiable. Formulation of the objectives and requirements should keep this in mind and indicate the appropriate indicators where relevant.
- (e) Organization of EquiTool Annex Two : For the purposes of assessment, it would be more logical and more easy to handle if the organization of EquiTool Annex Two and structure of the document follow the typical organization of organic standards, e.g. crop, wild-harvest, livestock, etc.

4.2 Developing A Common Regional Organic Standard

Based on the above analysis, the following are the proposal for the process and methodology that GOMA should adopt for developing a common regional organic standards.

Step 1. Clarification of the scope of the common standards

The scope of this comparative study covers organic crop, wild-harvest, livestock, processing and handling and labelling while organic aquaculture is excluded. Participants attended GOMA workshop in Shanghai recommended that the scope of the common standards should contratate on organic crop production and leave livestock production out.

The consultant also recommend that the scope of the common standards to be developed should first cover organic crop, wild-harvest, processing and handling and labelling while organic livestock and acquaculture may be added at the second stage. Rationals behind this recommendation are:

- the works are less complicated and could be accomplished in a shorter time
- there are very fewer organic livestock and acquaculture productions in the region and thus thus limited local knowledge to be drawn out from practical experiences to be used for developing organic standards
- organic livestock and acquaculture productions should be based on local organic crop productions, especially for the production for organic feedstuff. With exception of few countries, most of the Asian countries are at the early stage of organic agriculture

development where organic crop productions for human foods are still inadequate. The needs to have organic livestock and aquaculture standards are therefore not so urgent.

Additional objectives and requirements identified by this study seem to be quite specific issue of the country and not necessarily to be included into the scope of this common standards.

It is also recommended that the clarification of the scope should be done in consultation with countries interested to use the common standards. And the consultation should be as participatory as possible where national stakeholders are given the opportunities to be involved in this development process from the beginning.

Step 2. Review and revise the EquiTool Annex Two

The EquiTool Annex Two should be reviewed and its revision should be done with the following approaches:

- taking into consideration the findings of the comparative analysis done by this project;
- special attention be paid in areas where there are commonalities among the 10 standards but not in alignment as well as where there are no commonalities;
- the revision take notes of the recommendations in 4.1 above;
- no new objectives or requirements are added except in the areas where there are no existing alignment of standards and new objectives are needed.

This revised EquiTool Annex Two should then really reflect the core common objectives of the Asian standards and it would be ready to be used as guidance for developing common regional standards in the next step.

Step 3. Developing the common regional standards

The drafting of the common regional standards should

- begin by adopting the structure, organization, and the standard text of one of the international standards, e.g. the Codex Organic Standards or the IFOAM Basic Standards. The IFOAM Basic Standards are slightly more preferred because it was written for the use in conformity assessment while the Codex Organic Standards were written more as guidelines;
- use the revised EquiTool Annex Two to reformulate the base text or formulate new text as appropriate;
- strictly follow the revised EquiTool Annex Two where (re)formulated text address the core objectives;
- delete the base text not addressing the core objectives;
- no new requirements can be added beyond those set in the revised EquiTool Annex Two.

When relevant and appropriate, the ISEAL Code of Good Practice on Setting Social and Environmental Standards should be adopted for the common regional standards development process.

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