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Comment on the European GMO proposal

The proposed EU regulation on GMOs is considerably stricter than any previous laws. Its implementation could ease the pressure on certifying bodies when dealing with the issue.

In July the European Commission passed a legislative package concerning GMOs that will greatly increase the requirements regarding authorisation, traceability and labelling on food and animal feed. The European Parliament and the Council still have to agree to the proposal, and it is likely that in the process of consultation changes will be made; parts of the regulation seem not to be feasible and the hurdles that will be necessary for authorisation of GMO products are so high that the industry will barely accept it. However even if alterations are made, the legislative package will lead to more transparency in the handling of GMO products. This could relieve the organic industry of major problems caused by GMOs in food and feed additives.

For organic certification the relevant parts of the regulation are:

Scope: The proposal covers food and feed, food additives, flavourings and feed additives containing, consisting of or produced from genetically modified organisms. Although flavourings and additives fall under the mandatory labelling requirement, in regard

to the authorisation procedure only a safety assessment falls under the scope of the regulation, while the final authorisation is not regulated.

Labelling: The labelling requirement is triggered by the presence of DNA or protein resulting from genetic modification. Thus, the proposal extends the current labelling provisions to all genetically modified food irrespective of the detectability of DNA or protein. For example, whereas in the past highly refined oils of GMO origin did not need to be labelled, in the future they will fall under the mandatory labelling. Each ingredient of a product, or the product itself if it consists just of one ingredient, must be labelled with the words 'genetically modified' or 'produced from genetically modified [name of organism] but not containing a genetically modified organism'. Additional information has to be given where a food is not equivalent to its conventional counterpart.

Traceability: The proposal requires that food and feed business operators are able to identify from whom a

The legislative package will lead to more transparency in the handling of GMO products.

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DANISH ORGANIC MOVEMENT WANTS GMO THRESHOLDS

At a joint meeting between the organic organisations and the organic feed industry in Denmark, it was agreed that it is untenable to uphold a zero tolerance for GMO in feed stuff. The participants did not agree on a specific threshold, but have asked the Danish Plant Inspection Service (which is in charge of the organic regulation in Denmark) to set limits. Thresholds in the range of 0.1 to 0.5% were mentioned in the meeting. The Plant Inspection Service has found GMOs in 20 out of 48 samples taken of organic feed stuffs. In twelve of these samples there were levels below 1% while in eight it was above 1%. DLG, a leading organic feed stuff supplier, told Oekologisk Jordbrug, the Danish Organic magazine, that they have found traces of GMO soya in feed stuffs that supposedly contained no soya at all. Peter Rasmussen of Rasmussen A/S – from another major feed stuff supplier in Denmark – says that it will be hard for the industry to do better unless factories are completely dedicated to organic feed stuff. ■

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Error noted

An error was published in issue 4 of *The Organic Standard*. The article on the GMO proposal by the EU, page 17, stated that the proposal should come into force in 2001. It should have read that it will come into force in 2003.

product has been received and requires that they retain and transmit information concerning products to the next operator in the chain. The information must also be made available to competent authorities upon request. Operators who place products consisting of or containing GMOs on the market will ensure that the information on whether the product contains or consists of GMOs and the relevant unique code to identify the GMO is transmitted to the operator receiving the product. Thus, the basis for appropriate traceability and labelling of GMOs is provided. The codes facilitate the identification and detection of GMOs and may be used to access specific information from a register.

Imports: Operators importing from third countries will have to specify the identity of the products, in terms of the GMOs that they might contain. If this information is not available from the exporter then importers would have to determine the identity of the GMOs in the product which is likely to require sampling and analytical testing.

Thresholds: A threshold of 1% for minute traces in food or feed will be accepted without causing the requirements for labelling if the presence of such material is adventitious or technically unavoidable. Operators must be in a position to demonstrate to the competent authorities that they have taken appropriate steps to avoid the presence of the genetically modified food or feed.

The proposal provides high transparency within the flow of GMOs and as such enables the organic operator to identify GMO products at first sight. Certification bodies will be able to concentrate on seeking organic al-

ternatives rather than spend time investigating areas where genetic modification might occur. The necessity for sampling and analytical testing will decrease because the inspector can rely on the documents the operator or the supplier has to transmit. Even more importantly, there will be a legal requirement for documentation, and the operators and certification bodies will no longer have to fight to get certificates. Suppliers or manufacturers will be liable for damages and punished in cases of infringements of the provisions of the regulation. However, the organic certification will only be able to rely on the provisions of the proposed regulation if it is willing to accept the 1% threshold. The discussion on thresholds in the organic movement is still going on. For political and marketing reason is it difficult to accept traces of GMOs in organic products. On the other hand, the provisions for acceptable traces are strict in the Regulation; even the organic movement will find it be difficult to avoid 'adventitious or technically unavoidable' traces.

There are still many questions regarding the implementation of the proposed regulation and some weak spots are already obvious: products 'produced with a GMO' are not covered by the proposal. These are products produced with the assistance of a GMO, but in which no material derived from the GMO is present in the end product. Thus, cheese produced with a genetically modified enzyme that does not remain in the final product and products obtained from animals fed with genetically modified feed or treated with genetically modified medicinal products would not be subject to the authorisation requirements, or to the labelling requirements laid down in the proposal.

Except as part of a risk assess-

ment, there is no authorisation needed for flavourings and additives. Particularly in regard to the feed additives, the question remains whether the products derived from GMOs can be identified in a satisfactory manner with the existing regulations.

Adequate traceability schemes in such a complicated arena still need to be developed. Up to now such systems have only existed in closed production systems or for single products such as beef products that have been developed following the recent BSE crisis.

The weakest link in the proposed regulations is the limitation of the European Union. Attempts to implement similar requirements in the Codex Alimentarius recently failed. However, today the majority of GMOs are imported products. Besides the problem of undue trade barriers, samples and analytic testing will be necessary to identify imported GMOs and this could call into question the whole transparency achieved by the requirements inside Europe.

The proposed Regulation is not a law against genetic engineering but it is a proposal that strengthens security aspects for human nutrition and health and the protection of the environment through strict application, traceability and monitoring requirements. It should enable the operator and consumer to choose non-GMO products. In regard to international business, it should provide the EU the chance to fight for more transparency and strict safety assessments on international platforms such as Codex Alimentarius. Unfortunately, the problems arising from genetic engineering cannot be solved on a European level – they need a world wide solution. ■

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Austrian support for organic farming

‘Organic growth in organic farming shall be ensured and organic crop land shall be increased by 50% in the next five years’ stated the Austrian Minister for Agriculture and Environment, Mag. Wilhelm Molterer, while explaining the aims of the Austrian action plan for organic agriculture. The action plan had been developed by the Ministry along with organic farming associations and was presented at the end of July with Alfons Piatti, the chairperson of a working group of Austria’s private organic organisations and certifiers, ARGE Biolandbau.

Up to 113 Million € will be raised to fund organic farming. Austrian farms often have small buildings with restricted space for their livestock, which are incompatible with organic standards. As an important incentive for farmers to convert a special focus shall be given on subsidies for enlarging livestock housing.

There will be greater support in education, resulting in more organic farming courses in agricultural schools and at the Agrarian Educational Academy. In research, programmes dealing with organic agriculture will be strengthened. Marketing programmes for organic products in rural areas will be supported with up to 700,000 €. An information campaign run by Agrarmarkt Austria, the national marketing agency for Austrian agriculture, which is not the Ministry itself, together with organic

farming associations, will develop an organic marketing concept. Projects in direct and regional marketing will be further pillars for organic marketing.

Gabriele Moder, Manager of the Ernte organisation, Austria’s largest association for organic farming, feels this is a first step, but comments that ‘the action plan is still a declaration of intent’, adding that ‘The action plan must be put in concrete terms’. She points out that the funding given to organic farming in ÖPUL, the national programme to support environment-friendly agriculture, is only a 20% share, which is a relatively low figure considering organic farming is so compatible with the stated aims of the programme. She also believes that the non governmental organic farming associations should be supported in their efforts to offer professional advisory service.

The number of organic farmers in Austria is still declining. In 1999 there were 18,962 farmers managing 272,635 ha organically, whereas by 2000 the number had decreased to 18,388 farmers managing 271,388 ha. The decline in numbers has its focus in the west of Austria, and is attributed to weak prices and marketing problems in the dairy sector. It is also partly related to weak consulting in the area. In the east, where larger farms with crop land dominate, the cultivated organic land is increasing. ■

Beate Huber

A special focus shall be given on subsidies for enlarging livestock housing.

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NEW GERMAN GUIDELINES

Germany's competent authorities have revised their obligatory 'Guidelines' regarding the inspection scheme under EU-Regulation 2092/91. The revision was formulated by a working group of experts from the 16 German State authorities, but experts from the certifying bodies were not involved. All German States (Länder) are free to use these guidelines as instructions to their staff on how to interpret the EU-Regulation, although some have chosen not to fully implement them.

The guidelines include requirements for the authorisation and surveillance of inspection bodies, details on the inspection of the operators and procedures for complaints against inspection bodies. Some issues are dealt with in great detail, particularly the qualification profiles of inspectors where specific professional graduations and several years of experience in organic agriculture are required. According to the guidelines, board members and managers of organic associations are generally not accepted as inspectors due to a potential conflict of interest. In regard to unannounced inspection visits, a minimum of 10% of all inspected operators must be checked. Hanspeter Schmidt, a German lawyer with an interest on organic agriculture, considers some of the

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Uganda

Organic agriculture catches on

Our coffee is organic and we aim to sell processed coffee in niche markets where it should fetch high prices . President Yoweri Museveni's state of the nation speech to the Seventh Parliament, 27 July 2001

Uganda, located in eastern Africa, has a population that is estimated to be around 22 million, of which more than 90% are rural, with a GDP per capita of US\$ 240. The agriculture sector alone employs more than 80% of the population and contributes about 45% of the GDP. Agricultural production in Uganda is based on smallholder production with about 2.5 to 3.0 million households cultivating less than 2 ha each. Over half of the total agricultural GDP (56%) is subsistence production for household consumption.

Ugandan agriculture is characterised as 'traditional' because traditional farming techniques and practices are used far more than the green revolution technologies. In fact, improved planting and stocking materials, inorganic fertilisers, and chemical pest and disease control measures are rarely employed by the farmers as they are often not economical, not appropriate for the local conditions, not available and are beyond the reach of the majority of the farmers. For example, inorganic fertiliser use in Uganda is estimated at 1 kg of plant nutrients per hectare. It is clear how low this level is when compared to 9 kg/ha, the average for sub-Saharan Africa, which in turn is only 5% and 20% of that used in East Asia and Latin

America respectively.

From the mid 1970s to the mid 1980s Uganda's agriculture sector experienced negative growth rates. This was due to civil strife within the country resulting in economic mismanagement, disintegration of public infrastructure and services, lack of private sector investment, scarcity of foreign exchange for agricultural inputs and the collapse of the emerging commercial agricultural sector. However, political and economic reforms in the late 1980s and early 1990s reversed the trend, with the agricultural sector experiencing an average annual growth rate of over 7% per annum from 1992 to 1999.

Alongside the steadily strengthening agricultural sector, and favoured by the traditional farming systems and the recent reforms, organic production has grown rapidly. With an estimated 20,104 smallholder farmers managing 49,208 ha organically, which constitutes 1.6% of the cultivated land area (see footnote 3 for a comparison), Uganda has emerged in the last six years as the leading African country in organic production. The country now exports organic arabica and robusta coffee, cotton, sesame, fresh bananas, sun-dried sweet bananas, pineapples and mangoes. But how did it all come about?

NGOs have actively promoted organic agriculture in the country since the early 1990s. This was purposely aimed at reviving the productivity of degraded farmland through improved traditional management practices and use of locally available materials. The NGOs did not go into promotion of organic marketing and nor were attempts made to develop organic standards by either the NGOs or the Government.

Uganda's first certified organic products became available in 1994, produced from a small project certified by IMO. This was followed by a Swedcorp funded, market-based organic agriculture initiative, which was later taken over by Swedish International Development Agency (SIDA) under the 'Export Promotion of Organic Products from Africa' Programme (EPOPA). Agro Eco Consultants, from the Netherlands, implemented the EPOPA programme. The aim of the EPOPA was to facilitate the sale of smallholder farmers' produce on the international organic market

for a premium price that would increase the incomes of the rural farmers and hence alleviate or eradicate poverty. The underlying assumption of the programme was that 'farming practices in many places were naturally organic and that the agriculture systems are very suitable for conversion to organic farming'. The concept of the programme is commercial and the main motivation to participate, for both the farmers and the export organisations, was the direct economic benefit derived from the higher prices obtained on the international market. The farmers are paid an organic premium of about 20%.

In the EPOPA programme, exporting companies were provided with technical and financial support to mobilise and organise between 1,000 and 5,000 smallholder farmers into organic production and export projects. The main challenge, organising a certification system that is cost effective for the farmers, was solved by the establishment of an 'Internal Control System' (ICS) for group certification

(see below). The internal management of the ICS is then complemented by external inspections by a northern-based certification organisation.

The start up costs of the group certification project, such as setting up the ICS, are paid by the project operator, who then owns the certification. This guarantees operator access to the organic produce and hence recovery of the investment. This is probably the best approach when starting organic projects. However, it limits the farmers to selling their certified organic produce only to or through the project operator; produce that the operator does not deal in directly cannot be sold to other dealers as organic.

The first EPOPA project called 'Lango Organic Export Project' was operated by the Lango Cooperative Union (LCU). The LCU was responsible for the setting up and implementation of the ICS and the buying and processing of cotton and sesame. The project has now been weaned of donor funding and has developed a new

Group certification points of issue

The Internal Control System or ICS is a self-monitoring and regulatory system that ensures compliance with organic standards from production through processing to export. It is implemented by the farmers, the project operator and hired staff, including Field Officers and a Field Supervisor, who constitute the 'Field Organisation'.

In the absence of local certification organisations, the ICS serves to reduce the frequency and intensity of the external inspections, and hence the costs of certification. Without an ICS all the inspections would have to

be carried out by an external, northern-based certification organisation, which would entail prohibitive costs. Even if a local certification organisation were available, the costs for 100% farmer inspection would be prohibitive and a farmer group certification approach with an ICS system would still have to be employed.

In general whole farm units are considered with no parallel production arrangements. This is necessary as the farm holdings are generally small and crop field boundaries merge into each other. It gets complicated where land

is fragmented, which is common, as all fragmented pieces of land have to be documented and inspected. Organic project areas covered by an ICS have specified geographical limits. In this way only fragmented pieces of land that fall within the specified area are included in the project. In theory, fragmented pieces of land outside the project area could be used for parallel production though this is not encouraged. The geographical limits also facilitates the effective monitoring of developments like the stocking and operations of agro-chemical stockists, or the chemical distribution activities of rival traders and input distribution projects.

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guidelines as 'improper', and states 'Where the guidelines set abstract minimum requirements which are stricter than the EU Regulation, this contradicts the supremacy of EU Law. And, where EU Law impowers Germany to set rules for organic certifiers on how to engage in their business activities, the use of such power is reserved to the law maker since the German Constitution does not allow such important powers to be exercised by the administration.' Inspection bodies of third countries can also be affected by the requirements: most German authorities judge applications for import authorisations on the basis of the guidelines. ■ www.prolink.de/~hps/#EU-kover_ordnung (written in German)

ECOCERT APPLIED FOR ACCREDITATION

In relation to an article on the new Indian regulation in the last issue of *The Organic Standard* (issue no. 4), Ecocert has notified us that they applied for Accreditation by APEDA at the end of June. Ecocert is now awaiting an evaluation visit, which will be carried out in September. Furthermore, Ecocert are making the necessary registration with the Reserve Bank of India. ■

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formal structure in the implementation of the ICS. The field organisation set up by LCU at start of the project to implement the ICS has become an independent NGO (see below). The NGO implements the ICS and holds the organic certificate on behalf of the farmers. Its costs are covered by the premium price offered for the organic produce. The LCU now only deals in buying organic seed cotton from the farmers, ginning and exporting (which is its core business). The other crops grown by the farmers, such as sesame, are sold to other interested buyers. In this way, the farmers are not tied to only selling the organic produce to the LCU as was previously the case when LCU owned the organic certificate.

The recent growth of organic projects in Uganda has enabled Uganda to break one of the serious barriers to international organic marketing. With European-based certifiers operating in the country it has become possible for other small scale privately funded organic export operations to access certification serv-

ices at a lower cost than it would have cost to contract a European based certifier who has no operations in the country.

In order to further reduce the costs of certification, in 1995 KRAV recruited and trained two local inspectors. The local inspectors conduct most of the inspections including project's first inspection, farm inspections and processing inspections. This enabled KRAV to reduce the frequency and duration of the inspections carried out by European-based inspectors.

In addition, other European-based certifying bodies, IMO, Ecocert and SKAL, opened up operations in the country, thus bringing the number of certifiers in the country to four and reducing certification costs even more. Furthermore, these increased certification activities have contributed to the building of local expertise in establishing ICS, implementation of ICS, organic inspection and certification. This was expertise that was greatly lacking before, but can now be harnessed to develop organic standards

The evolution of the 'Field organisation' into an independent NGO raises the following issues that require serious consideration as smallholder certification systems are developed and equivalency sought.

- What should be the organisational set up of such an organisation and what management systems should it have?
- Who should own and drive such an organisation?
- Should such an organisation be involved in provision of extension services?
- Should such an organisation be involved in market promotion for the farmers?
- Does contracted implementation of ICS to independent organisations lessen the importance of self-regulation among farming communities? Is self regulation necessary anyway?
- How should external inspections by certification organisations be conducted for projects whose ICS is implemented by an independent organisation?
- Should such an organisation evolve into 'local certification organisation' and what implications would that have?

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IFOAM BASIC STANDARDS DRAFT OUT FOR COMMENTS

The second revision draft of the IFOAM Basic Standards for Organic Production and Processing was out for public comment just last week. The full draft can be viewed and downloaded from the IFOAM homepage (www.ifoam.org). Comments are welcomed from all interested parties. Deadline for submission is 20 October, 2001. See guide for comment in the draft on the IFOAM homepage.

IFOAM, the International Federation of Organic Agriculture Movements, publishes and regularly revises the IFOAM Basic Standards (IBS). Several drafts of each revision are circulated for comment. This is the second and last draft for public comment for the current revision round. Comments will be reviewed by the IFOAM Standards Committee in preparation of a final draft for the IFOAM General Assembly in Victoria, Canada, August 2002. The current version was adopted at the IFOAM General Assembly in Basel, Switzerland, August 2000.

Significant changes proposed in this revision draft include draft standards on Landscape and Biodiversity; draft standards on Plant Breeding and Propagation; a change of conversion time to 18 months; an extensive revision of the section on Beekeeping; and a

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and a certification system for the country. In this way the EPOPA programme has succeeded beyond its original objectives. However, in spite of this success, the organic sector in Uganda faces numerous certification-related constraints and obstacles, some of which include:

Use of foreign standards: In all cases, the certification in Uganda is based on foreign standards of the mostly European certification bodies. While the certification bodies try to adapt their European standards to local realities in Uganda, their success greatly depends on how well their staff understand local agricultural practices. This adaptation is made more difficult by the relationship between the certifiers and the requirements of the competent authorities in the importing countries. This problem is best illustrated by the requirement for a mandatory conversion period and how that requirement is interpreted. Many Ugandan farms that have been managed along traditional lines do not actually require a conversion period. But there is confusion as regards to what is 'traditional agriculture' and how it complies with organic agriculture. Northern-based notions, which dominate the debate today, portray traditional agriculture as stagnant in time and lacking dynamism and therefore not organic. The situation is more complicated than that and while some traditional farming systems do cause degradation, others do not.

Lack of compatibility: The lack of compatibility of certification systems and mutual recognition between certifying bodies results in the need for double, triple or even more certifications. This situation greatly increases the cost of certification and creates inconveniences to the exporter.

Import requirements: Authorities in the different importing countries have different import requirements, including a multiplicity of standards.

Inspection costs: While the recruitment of local inspectors reduced the costs of certification, the costs still remain high and unaffordable for many aspiring farmers and exporters. There are opportunities to reduce these costs further. For example, the routine annual inspection visits conducted by the European-based inspection officers could be eliminated. Certainly after five years of experience the local inspectors should be able to be fully responsible for these inspections.

Early this year key stakeholders in Ugandan organic agriculture came together and formed the 'National Organic Agriculture Movement of Uganda' or NOGAMU, with the aim of addressing the numerous constraints and to promote the development of organic agriculture in Uganda. Top priority on NOGAMU's agenda is lobbying and advocacy, which should lead to an environment conducive to the further development

The local inspectors conduct most of the inspections including project's first inspection, farm inspections and processing inspections.

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complete rewrite of the section on Social Justice.

For more information about the IFOAM Standards Committee and the IFOAM Organic Guarantee System, log on to the IFOAM homepage or write to: Tim Marshall, IFOAM Organic Guarantee System Coordinator (t.marshall@ifoam.org) or Eva Mattsson, Chair of the IFOAM Standards Committee (Eva.mattsson@krav.se). ■

NO SB CONSIDERS INCLUSION OF FIVE MATERIALS

The National Organic Standards Board in the US is considering inclusion of the following materials in the National list:

- Sodium phosphates (processing)
- Copper sulphate (crops)
- Calcium chloride (crops)
- Cellulose (processing)
- Glycerol monooleate (processing)

Calcium Chloride is indicated as an approved product in IFOAM Basic Standards. Copper salts for disease control are under heavy debate both in IFOAM and the EU, but are currently allowed with restrictions. ■

More information at www.ams.usda.gov/nop and www.omri.org

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There is an increased understanding of organic agriculture and its potential among the political leaders.

of organic agriculture, and aims to persuade the Government to establish a regulatory framework for organic agriculture. The President of Uganda mentioned in his State of the Nation speech to the Seventh Parliament of Uganda that 'Our coffee is organic and we aim to sell processed coffee in niche markets where it should fetch high prices'. This indicates the increased understanding of organic agriculture and its potential among the political leaders. However, a lot remains to be done by the Government, including putting together an institutional framework for developing organic standards. The Uganda Government is constrained by lack of both technical and financial resources to undertake the task. NOGAMU is working hand-in-hand with the Government to develop National Organic Standards and certification system for the country. The possibility of developing regional standards with Ugandan's neighbours, Kenya and Tanzania, was explored, but proved to be impossible as each country has different priorities, determined by its comparative advantages. At the national level, Uganda has learnt from the European experience and is working to avoid a situation where there are parallel organic standards under the government and the private sector. Although NOGAMU has taken the lead in developing national standards, it is in collaboration with key Government agencies, namely the Ministry of Agriculture Animal Industry and Fisheries (MAAIF), Uganda National Bureau of Standards (UNBS) and the Uganda Export Promotion Board.

MAAIF has a mandate to set and enforce standards and regulations in agriculture production, and would therefore be the 'Competent Authority' (EU terminology) for organic agriculture in Uganda. It is hoped that with the participation of MAAIF, the Government will be able to adopt and modify the standards.

All the signs indicate that there is increasing support for and understanding of organic agriculture in Uganda from its political leaders, government bureaucrats, traders, farmers, NGOs and international development agencies. With that support, and given the still relatively intact agro-ecological status of the country, Uganda is likely to become one of the leading producers of certified tropical organic agricultural products within the next five years. This leading position is not likely to be restricted to organic production; intellectual and scientific leadership will naturally develop. ■

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GERMAN MINISTRY OF AGRICULTURE DISCUSSES THE NATIONAL ORGANIC SEAL

The German Ministry of Agriculture is currently discussing the proposal for the law regarding the national organic seal with the German States (Länder) and relevant organisations. The proposal should be passed by the Federal Cabinet in September. It will provide the legal basis for the implementation of the seal and authorises the Federal Minister to pass a regulation on its details. The design of the seal and particulars on its use including a sanction catalogue are not known yet.

With its uniform and concise logo the organic seal will enable consumers to recognise organic products at a glance. Products can be labelled with the seal if they fulfil the requirements of the EU Regulation on Organic Agriculture (2092/91). There will be no additional standards or inspection procedures. Infringements of the law can be punished with imprisonment of up to one year or a penalties of up to 3.000 €.

The Ministry has published the call for tenders for the marketing campaign, which will mainly target consumers, but also business operators and multipliers. The campaign has had 7.6 Million € allocated to it in 2002,

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History of organic legislation in the US

The process and politics behind organic regulations in the United States

The organic regulations, promulgated by the US Department of Agriculture (USDA) in December 2000, had their origin in the late 1980s when a few organic farmers requested help from Congress to establish legal protection for the organic label. The first result was a definition of organic that, without prior consultation with many organic farmers, was tacked onto the end of an unrelated piece of proposed legislation. The legislation did not pass Congress, but from that point on, the focus of the organic community turned to ensuring that national organic standards were consistent with the principles and philosophy that the organic community had developed.

The twists and turns of events that led to the regulations being promulgated in December 2000 reflect a mix of factors. Foremost is the sheer size and diversity of the US. Organic farming was developed almost independently by different groups of farmers in different states. During the 1970s these different groups began to write the principles of organic farming into standards, and several, such as CCOF and Oregon Tilth, began certifying organic farmers according to their standards. In the eastern US, small certification organisations grew up under the umbrella of the Northeast Organic Farmers Association (NOFA).

The size of the country and diversity of the organic sector were reflected in the situation at the begin-

ning of the 1990s. There were 44 organic certifiers in the country. Of these, 33 were private certifying bodies and 11 state certifiers. About twenty states had laws regulating organic agriculture – about 30 states have organic laws now. The California Organic Foods Act of 1979 was one of the earliest of these laws and probably the most comprehensive, setting out an overall system that still exceeds the federal law in some respects. Oregon, too, has a comprehensive law. In Texas, the State took the lead in writing standards and establishing a certification programme for the complete marketing chain from farmers to retailers. The State of Washington worked closely with a private certifier to establish a state certification programme. In contrast, some states simply had a few sentences describing organic production.

The many organic activists demanding to have input into any national legislation faced an immense task with few resources and little national organisation. However, the Organic Foods Production Association of North America (OFPANA), a relatively small private organisation and predecessor to the Organic Trade Association (OTA), was able to provide a forum for discussion. Organic farmers formed a national association and another association was formed by organic processors. The farmers had fewer resources, but they had many years of experience in developing organic principles and standards. In

■ Within a few days, as people had time to read the more than 1000 pages of the prologue and regulations, profound disbelief set in.

contrast, processors had no history of standards and started with a blank page to write organic processing standards that could be used in national legislation. The two associations were able to work together, as well as with OFPANA and a coalition of consumers and environmental groups. Several supportive Congressional representatives and their staff opened the door to input from the organic community. After several major rewrites, the Organic Foods Production Act (OFPA) was passed and signed by President George Bush in 1990. The Bill required USDA to write standards to implement the legislation. It also provided for the appointment of a National Organic Standards Board (NOSB) to advise on writing organic standards and evaluating inputs and processing materials. The Secretary of Agriculture was directed to implement organic standards by October 1993, a deadline that was never met.

The politics of writing organic regulations

Even after the passage of the legislation, the US could not have an organic programme until USDA adopted regulations to implement the Act. Throughout the legislative process, however, USDA had opposed legislation that would create an organic programme. After adoption of OFPA, it took two years for the Secretary to appoint the first NOSB. Once appointed, the NOSB undertook an open procedure to develop the regulations. The private organic community worked closely with the NOSB to develop consensus standards. None of the

USDA programme staff had previous experience in organic agriculture. The knowledge and expertise in organic farming was in the private sector. Leaders of the organic community worked hard to share their expertise with USDA in order to develop high standards under OFPA.

In 1994, after two years of meetings and much hard work, the NOSB submitted its recommendations for organic standards to the Secretary of Agriculture. The Department of Agriculture then took three more years to write proposed organic regulations. When the proposed regulations were announced in December 1997, no one expected what was to come.

On the day that the regulations were released, the organic community held press conferences in Washington and California, welcoming the long awaited proposed regulations. Within a few days, however, as people had time to read the more than 1000 pages of the prologue and regulations, profound disbelief set in. The proposed regulations bore little resemblance to the NOSB recommendations. The regulations had been rewritten to reflect general US agricultural policy rather than organic principles. Most well-publicised were the three proposals to allow genetic engineering, irradiation, and sludge in organic production, but many more problems existed with the proposed regulations.

US law requires that proposed

regulations must be open for public comment before they are finalised. Federal agencies often consider that several hundred written comments indicate significant public involvement in the regulation-writing process. But in this case, hundreds and then thousands of comments opposing the organic regulations poured in. When the count was up to 10,000, USDA officials complained to the organic community, saying that it would take too long to respond to them all, as required by law. But the comments continued to pour in, and USDA began to understand the depth of opposition. In the end, USDA received 275,000 public comments. It was by far the greatest public input that USDA had ever received and only one set of proposed national regulations (on tobacco) had ever received more public input.

When the fate of the NOSB recommendations was analysed, it became clear that many federal agencies and special interests had been able to influence USDA's proposed regulations while the organic community was kept out. USDA's policy supporting genetic engineering, the Food and Drug Administration's policy favouring irradiation for food safety, and the Environmental Protection Agency's effort to dispose of sludge in agriculture were all reflected in the proposed organic regulations. The interests of large US corporations with huge investments in these policies had taken precedence over organic principles.

A new strategy — private sector organic standards

After an abortive attempt to rewrite the standards on an issue-by-issue ba-

■ Hundreds and then thousands of comments opposing the organic regulations poured in.

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and 6.6 Million € in 2003.

The Minister intends to introduce the seal in September. However, insiders assume that the trade will not use the seal unless the legal provisions are decided, and this will not happen before the end of the year. ■

FSC APPOINTS INTERIM EXECUTIVE DIRECTOR

The Forest Stewardship Council (FSC) has announced the appointment of Heiko Liedeker as Interim Executive Director, effective August 1, 2001. Based at FSC's headquarters in Oaxaca, Mexico, Mr. Liedeker assumed the post following the July 1 resignation of Dr. Maharaj Muthoo. Mr. Liedeker, is a native of Germany, has a Masters degree in Forest Ecology, and served as Chairman of WWF's European Forest Team. The Forest Stewardship Council is an organisation that develops criteria for sustainable forestry and accreditation of certification agencies. A number of certification bodies (SKAL, Soil Association and Naturland) in the organic sector are also accredited by the FSC. ■
fscoax@fscoax.org

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sis, some leaders in the US organic community began talking about repealing the law that gave authority to USDA to write organic standards. A 'dual-track' strategy was adopted, wherein the organic community would write its own standards based on the NOSB recommendations while continuing to try to improve USDA standards. If USDA's next proposed regulations were not satisfactory, the community could fall back on its own standards and attempt to repeal the law.

However, the organisational structure of the organic community had changed from the days the Organic Foods Production Act was passed. There was no longer a national association of organic farmers. The processors' organisation had folded into OFPANA, while OFPANA itself had changed its name to the Organic Trade Association (OTA) and established its role as a representative of the organic trade. Other members of the organic community had coalesced under the Organic Committee of the Campaign for Sustainable Agriculture, which OTA also participated in.

The Campaign had no funding for writing private standards, so OTA commissioned the writing of organic standards by the private sector in 1998. In about nine months, the private sector wrote and adopted the American Organic Standards (AOS).

Adoption of USDA standards

With the persuasive force of 275,000 comments, USDA changed its attitude

towards organic and promised to rewrite the organic regulations to respond to the organic industry. The former director of the organic programme in Texas was hired to oversee the process.

Almost two years later, in March 2000, USDA re-proposed the organic regulations with greatly improved standards for organic production. However, there were provisions that limited the role of the private sector and these alarmed many members of the organic community. Certified farmers were prohibited from holding leadership roles in the certifying bodies that many of them had established. Private certifiers, but not state certifiers, were prohibited from certifying to standards that were higher than the USDA standards. This provision would effectively extinguish the role of the private sector from updating organic standards other than through the tedious USDA process. Additionally, the standards excluded the possibility of recognising the IFOAM Accreditation Programme and instead required that all US certifiers be accredited by USDA. Foreign certifiers had to be accredited or approved by USDA if their government did not have an equivalency agreement with the US.

Strong opposition to these provisions was submitted, but the final regulations published in December 2000 were unchanged. The standards now prohibit certifiers from using their seal to indicate any standards

When the US Regulations go into effect

The US Regulations go into effect in October 2002. When they do all certifiers of organic products in the US market must have been accredited by USDA. Domestic and foreign certifiers have until October 2001 to apply for the first round of accreditation, which will be partially subsidised by USDA.

other than USDA standards. USDA officials give ambiguous and inconsistent interpretations of this provision and have refused to put any interpretation into writing.

Current situation — no regulations, no support

Eleven years after Congressional adoption of the Organic Foods Production Act, the US still will not have an organic programme until the regulations go into effect in October 2002. Until then, only state laws are being enforced and there is no enforcement of national standards.

The situation for organic farmers is not especially good. No government funding or payments of any kind have been made to organic farmers in the US. A recent bill in Congress that would have established a programme for payment to farmers to assist in the costs of certification did not pass. USDA research has paid very little attention to organic production, with less than 1% of the USDA research budget spent on organic research.

The majority of organic food is sold through natural food stores and cooperatives. The largest natural food store chain, however, is starting a 'sustainable' label, which will directly compete with the organic label.

Outlook for the organic sector

When the national organic regulations are implemented, it is expected that the organic market will grow at a greater rate. Many large companies have been waiting for the regulations to be adopted before entering the market. With the entry of more large companies, supply can increase signifi-

The outlook for small organic farmers is not as good as for large companies and consumers.

cantly, and organic products can become more available in conventional supermarkets. Consumer prices are likely to fall as supply increases.

The outlook for small organic farmers is not as good as for large companies and consumers. Most conventional supermarkets prefer to buy from large firms that can offer consistent supplies. Conventional supermarkets also drive down farm-gate prices. The farmers who developed organic farming are seeing their market begin to resemble the system that it was meant to replace and many are being squeezed out by low prices. There is no national organisation of organic farmers to lobby for better treatment, and farmers do not have the resources to establish one.

Other concerns face the organic sector as well. While some of the original organic processing companies and wholesalers have grown and been able to survive in the new market, others have been bought out by conventional companies, which have little or no understanding of organic principles. Exporters are worried about the lack of equivalency agreements with the EU and Japan. Certifying bodies are questioning whether they can afford to restructure and make the other adjustments required by USDA. Already an IFOAM accredited certifier has declared bankruptcy and at least one small certifier has given notice that it will not seek accreditation.

Conclusion

The extraordinary work of the US organic community has resulted in producing national organic regulations that closely resemble the standards developed by the pioneering organic farmers. But in doing so, the organic community may have lost its central role in defining organic standards. Moreover, many of the original organic farmers may not be able to survive in the market to enjoy the benefits of the national programme. Certifiers who developed the original standards may be prohibited from adopting new standards to incorporate continued innovations in organic farming.

More work needs to be done to protect the role of the private sector. The next two years are likely to bring continued uncertainties as the market and the organic sector adjust to the new situation and the USDA organic programme is finally implemented. Now that the regulations are finalized, the organic community can also address the other challenges that are facing them and the international organic community, including falling prices, the need to harmonise standards, and the sustainability of private certifiers.

Additionally, the organic community must find ways to incorporate and pass on the principles and values of organic production that are not reflected in the USDA regulations. ■

■ No government funding or payments of any kind have been made to organic farmers in the US.

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news shorts...

OGBA CLOSSES DOWN

In late July the US-based certification body, Organic Growers & Buyers Association (OGBA) closed down its operations. The reason appears to be a serious financial crisis, however no official statement has been issued. The 500 operators certified by OGBA in the US have turned to other certification bodies, primarily FVO and OCIA. According to *The Inspectors Report* (the magazine of Independent Organic Inspectors Association) up to 14 inspectors are owed \$1,500 to \$10,000 by OGBA. Ray Yokiel, OGBA chairman, says that the organic community has been very helpful and that the International Organic Accreditation Service (*i.e.* IFOAM Accreditation) has cooperated by issuing emergency guidelines for how an orderly transition of operators to other IFOAM Accredited certifiers can take place. OGBA was IFOAM Accredited and one of the US certification agencies with overseas activities. ■

MORE IFOAM ACCREDITED CERTIFYING BODIES

Agrior in Israel (agrrior@netvision.net.il) and OIA in Argentina (oia@oia.com.ar) have both recently become officially accredited by IFOAM. ■

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The US National Organic Program

Moving towards implementation

The Final Rule of the US National Organic Program (NOP) became effective on 21 April, 2001, ending an eleven-year process that began with the passage of the Organic Foods Production Act in 1990. Full implementation of the program is scheduled for October, 2002. The program requires the production and processing of organic food sold in the US to meet the Rule's standards for such. It also requires organic producers and handlers to be certified by an agency that is accredited by the US Department of Agriculture (USDA), or by a foreign certification agent whose government has an agreement with USDA.

Implementation schedule

The USDA has called for applications for NOP accreditation from certification agencies. The application period for the first round of accreditation ends on 21 October, 2001.

According to the NOP, applications received by that date will be reviewed during the next six months, and the first group of NOP accredited certification agents will be announced on 21 April, 2002. Full implementation of the program is scheduled for 21 October, 2002, which is the date by which farmers and handlers of or-

ganic food sold in the US must be certified as fully compliant with the NOP standards.

Requirements for organic products imported into the US

As with domestically produced organic products, imports must comply with the production and processing standards and other requirements of the NOP Rule. The USDA will accept applications for accreditation from both domestic and foreign certification agents. Foreign agents are expected to meet the same requirements as domestic agents. The Rule provides two options for exemption from NOP accreditation to foreign certification agents. The USDA will accept a foreign certifying agent's accreditation to certify an organic production or handling operation if:

- 1) The USDA determines, upon the request of another government, that the standards under which that government authority accredited the foreign certifying agent meets the requirements of the NOP Rule.
- 2) If there is a negotiated equivalency agreement between the government that accredits the certification agency and the United States government concerning the government's organic programs.

The USDA has called for applications for NOP accreditation from certification agencies. The application period for the first round of accreditation ends on 21 October, 2001. ■

news shorts...

REVISION OF THE AMERICAN ORGANIC STANDARD

The Organic Trade Association (OTA) is seeking public comments on the revisions of the American Organic Standard (AOS). The revisions will be posted on the OTA web site for a 90-day comment period. Most of the revisions are meant to make AOS compliant with the new federal regulations and to promote global harmonisation of standards (i.e. IFOAM standards). The American Organic Standard is a private sector harmonised US standard, which most leading agencies in the US have committed themselves to following. The AOS should not be confused with the Rule of the National Organic Program, *i.e.* the federal regulation. ■ www.ota.com

TURNAROUND IN AGRICULTURE WILL COME

82% of the German opinion leaders believe that by 2011 the share of organic agriculture in Germany will be more than 10%. However, the retail trade and agriculture associations are more dubious, and do not take the turnaround in agriculture seriously. These are the results of the latest 'opinion poll barometer', a survey conducted under 250 opinion leaders in politics, economy and media by opinion poll institute Emnid. ■

Accreditation activity

In addition to applications from the 14 state certification programs and about 35 private certification agencies, the USDA expects to receive at least ten applications from agencies outside of the US. To date, few accreditation applications have been filed, and most that have were from outside the US. According to the NOP, most applications were incomplete and did not qualify for further processing.

Government-to-government negotiations

USDA representatives held a preliminary meeting with European Commission representatives in Brussels last February, but it is generally agreed that an equivalency agreement between the United States and the EU concerning their organic programs is not on the immediate horizon.

The agricultural departments of the Costa Rican, Argentinean, and Australian governments are reported to have contacted USDA, hoping for an agreement that would exempt their accredited organic certification agencies from direct NOP Accreditation. No results have been reported from these contacts and no agreements appear to be in progress.

Enforcement of the National Organic Program

The mechanics of NOP enforcement are not contained in the rule, or in any other public document. The USDA had been hoping that most states would establish organic programs and provide enforcement of the federal program. However, there is no federal funding for the states to conduct this enforcement, and most of the states are not intending to enforce without funding.

One notable exception to this is California, which has had a long tradi-

tion of enforcing its own organic requirements under the California Organic Food Act. Other possible avenues of enforcement include other federal agencies such as the Federal Trade Commission, which enforces 'Truth in Labeling' laws, and the Food and Drug Administration, which enforces other food labeling laws.

Information resources

The NOP maintains a website, www.ams.usda.gov/nop, that features the complete text of the Rule, frequently asked questions, and other information. Draft recommendations of the NOSB are now being posted to this website for public comment. Currently posted are recommendations for a statement of organic principles, and for detailed requirements on pasturing of livestock, and mushroom, greenhouse, and aquaculture standards, which the Rule does not currently cover.

The NOSB is working on other recommendations, including standards for honey production, which are due to be posted soon. The schedule and location for NOSB meetings are also available on the website.

Richard Mathews is the Acting Program Manager for the NOP. He and other NOP staff can be reached by phone at +1-202-720-3252. The current Chairperson of the NOSB is Carolyn Brickey. She can be contacted via the NOP.

The Organic Trade Association also provides updates on the NOP and NOSB via its website at www.ota.com ■

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Features of the US Rule

The Rule consists of seven Subparts . Below is a summary of the relevant points in each of those sections.

Subpart A: Definitions

This subpart contains 108 terms that are used in the Rule.

Subpart B: Applicability

In general, all producers and handlers of food labeled and sold in the US as organic must be certified by an NOP (the US National Organic Program) accredited or approved certification agency. Some key exemptions are noted. Operations with less than \$5,000 in annual sales are exempt from certification, but must be compliant with the standards. Retailers are exempt except if they process organic food in a commercial facility and sell it in multiple retail locations. Operations that only handle organic food in final packaging are also exempt from certification.

Subpart C: Organic Production and Handling Requirements

The centrepiece of this section is the requirement for producers of crops and livestock and for handlers (including food processors) to maintain an Organic Farm Plan.

A crop cannot be sold as organic until the land on which the crop is grown has been free from the application of prohibited materials for 36 months. There is a restriction on the use of animal manure, and a requirement for organically grown seed, seedlings, and planting stock. With only a narrow exception for emergencies and feed supplements, livestock must be fed 100% organic feed at all stages of production. Ruminant livestock must have access to pasture,

although a few temporary exemptions may be approved by the certification agent. Almost all synthetic drugs are prohibited for use on livestock at any stage of production. Exceptions to this requirement are materials that are specifically noted on the National List of Allowed Synthetics, found in Subpart G. Handlers must implement measures to prevent co-mingling of organic and non-organic products, and to prevent contamination of products with prohibited materials.

Subpart D: Labels, Labeling, and Market Information

There are four categories of organic labeling. They are:

1. Products labeled as 100% organic
2. Products labeled as 'organic,' which must contain at least 95% organic agricultural ingredients, with the remaining 5% documented by the certification agent as 'commercially unavailable'
3. Products labeled as 'made with organic ingredients,' which must contain at least 70% organic agricultural ingredients
4. Products with less than 70% organic ingredients, which may only use the term 'organic' to describe certain ingredients on the ingredient label. This last category of product is exempt from the certification requirement.

Also presented in this section is the USDA Seal, which can optionally be used on labels and packaging. Use of private certification marks is also optional. The name of the agent that

certified the producer of the associated product, however, must be on all organic labels.

Subpart E: Certification

This section describes how certifying agents must conduct the certification process. It includes requirements for accepting and processing applications, conducting inspections, and granting and denying certification. ISO 65 is not specifically cited, and some key elements of this Guide are absent from the Rule. This situation has caused concern among US certification agents, who are required to meet the ISO 65 norm in order to find acceptance for their seal on products imported to the European Union.

Subpart F: Accreditation of Certifying Agents

This section deals with the accreditation of certifying agents.

Applicants for accreditation will be required to demonstrate their competence and independence. The application must be accompanied by a package of documents, which include procedures for the certification process, record keeping, maintenance of confidential business information, prevention of conflicts of interest,



The USDA Seal.

[Please note, the logo presented as the USDA Seal in The Organic Standard (issue 3, page 2) was incorrect.]

■ Accreditation is for a period of five years. Certification agents whose accreditation has been revoked will not be eligible for accreditation for three years.

retention and provision of certificates, certified operator lists, and lab reports.

The NOP will review the information in the application package prior to determining whether the applicant meets accreditation requirements. Site audits by USDA evaluators are also part of the process, but these may not be conducted until after initial accreditation. Site evaluation may include visits to certified operators, which as all the certification activities of an agency will be evaluated, would include visits to certified operators beyond the applicant's home country if relevant. Should the USDA find any major non-compliance during the application or the site visit, the applicant will be given an opportunity to correct the non-compliance within a reasonable time period. Failure to correct the non-compliance will result in denial,

suspension, or revocation of accreditation. Agents whose accreditation has been revoked will not be eligible for accreditation for a period of three years. Accreditation is for a period of five years.

In the course of conducting NOP certification and reviewing products certified by other agencies, an NOP accredited certification agent must accept the work of any other NOP accredited agent without additional review of certification documents. This mandated recognition does not apply to additional claims that a certification agent may also certify. The agent may still require review of another certification agent's documents to verify that the requirements of all additional claims are met.

Finally, this section provides for a Peer Review Panel, composed of or-

ganic stakeholders, who will periodically review the NOP and provide feedback to the USDA administration on its adequacy.

Subpart G: Administrative

Included in this subpart are the National Lists of Allowed and Prohibited Substances. The National List is divided into sections for crop production, livestock production, and handling. Each of these lists are further divided into two categories, a list of 'synthetic substances allowed for use' and a list of 'nonsynthetic substances prohibited for use.' Many of the listed substances are annotated with additional guidelines and restrictions. Fees for Accreditation are also described here.

The NOP will waive most fees for this initial round of accreditation. All domestic and foreign applicants will be required to pay a \$500 application fee and the travel expenses of the USDA site evaluator. ■

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Comment on the accreditation of certifying agents

The section in the US Rule that deals with the accreditation of certifying agents has caused more controversy than any other part. Non-profit producer associations and their supporters are alarmed about a requirement that prohibits certified parties from serving on the governance boards of the agencies that provide their certification.

Many of the existing US based producer associations are struggling to find an avenue for compliance, while some of the regional associations that also conduct organic education and advocacy, have decided to abandon their certification programmes.

Another controversial requirement in this section states that a certifying agent cannot require, as a condition for the use of its seal,

'compliance with any production or handling practices other than those provided for' by the NOP regulation.

The NOP has since stated that it will provide flexibility for certification agents to certify 'additional claims,' which may include the requirements of other governments' organic regulations or the requirements of IFOAM Basic Standards. However, certification agents must offer a choice to applicants to be certified just to the NOP provisions or to the NOP provisions plus additional claims. ■

Keeping GMOs out of organic systems

Although there is little dissent that GMOs have no place in organic systems, there have been wide discussions about whether it is possible to keep all contamination out and if so, how.

Around the world, the organic movement is in consensus that the use of genetically engineered processes, materials, or seeds are not appropriate in organic production, or in the manufacture of organic products. This conclusion is based partially on the recognition that the genetic engineering of food producing organisms (1) is imprecise and uncontrolled, (2) can impact biological functioning unpredictably, and (3) can lead to unintended harm to health and the environment. The potential health hazards recognised by the organic community include allergenicity, toxicity, and reduced nutritional value of genetically modified foods. Potential environmental risks include loss of biodiversity, reduced soil fertility, increased agrochemical pollution, and generation of new, or more problematic, varieties of pathogens, pests, and weeds.

However, the incompatibility of genetic engineering with organicsystems goes deeper than risk considerations. It can be traced back to first principles of organic agriculture. For instance, organic production excludes the use of synthetic materials, while genetically engineered seeds are clearly synthetic, being produced through a complex series of laboratory processes that includes many chemical modifications. Genetic engineering conflicts with other fundamental principles of organic agriculture, as well.

As the use of genetic engineering in industrialised agriculture has ex-

panded during the last few years, the challenges related to preserving the traditional, natural genetics of organic products has come to the forefront. This spring, discussions within the organic community reached a new level of intensity when members of the community in the US publicly expressed their concerns, and called on the organic community as a whole to address the issue.

In the ensuing discussion, the overriding message that was communicated to the public was that organic products, at least in some areas of the world, could no longer be considered 'GE-free'. What was not communicated clearly was that, in the vast majority of cases, the actual levels of GMO (genetically modified organism) contamination in organic products were minute, just a fraction of a percent.

When one considers that the average amount of genetically engineered material in North American soy and maize is in the range of 50%, we come to the conclusion that organic producers and manufacturers have been quite successful in keeping GMOs out of their products. For consumers who are concerned about GMOs, organic products still are a haven, since conventional products will, on average, contain 500-fold higher

levels of GMOs than organic products. Of course in other areas of the world, Europe, Asia, and some areas of South America, where little or no genetically engineered crops are being grown, organic is still very close to being 'GE-free'.

The success of US organic farmers in excluding GMOs from their crops is not surprising, actually, because standard organic production systems, functioning as they have for years, include almost all the elements needed to protect from contamination. If growers, handlers, and processors strictly follow organic procedures for segregation, identity preservation and sanitation, the battle to exclude GMOs is more than half won.

Only two additional measures are needed: the grower must use clean, non-GMO seed, and cross-pollination must be prevented. Finally, after preventative measures have been carried out, testing can be used to verify that any given product is non-GMO. Cross-pollination can be prevented or minimized by using both physical and biological isolation. Physical isolation can make use of distance, as well as natural and man-made barriers. Biological isolation is actually much more powerful and important than physical isolation. Simply put, if the pollination date of an organic crop

The incompatibility of genetic engineering with organic systems goes deeper than risk considerations. It can be traced back to first principles of organic agriculture.

can be offset by 7 to 10 days relative to the pollination date of genetically engineered crops grown near by, cross-pollination can be virtually prevented. Achieving this requires forethought and experience, and since pollination is affected by the weather, results are not perfectly predictable. However, this is a powerful tool that many experienced growers and seed breeders are using with success.

Finding clean seed is probably the most critical challenge for the organic grower. In most instances significant contaminations of organic products are not due to cross-pollination, but either to the use of seed that has been accidentally mixed with genetically modified seed, or due to errors in segregation of the product itself. Cross-pollination may result in low-level contamination, but higher levels must be accounted for by other mechanisms.

Seed is critical. If the grower starts with contaminated seed, the game is lost before it has begun. Although conventional seed varieties are not genetically engineered, simply purchasing a conventional seed variety in order to avoid GMOs is not sufficient. This is because seed standards allow 2% of the seed in a given lot to be 'off variety'. Thus, a conventional seed variety could contain as much as 2% GMO contamination and still meet current seed standards.

Last year an experiment illustrating the challenge of obtaining seed was carried out in the US by Genetic ID NA, Inc. Single bags of five different conventional corn varieties were obtained from each of four major seed producers in the US. These 20 bags of

It can be argued that the biotech companies should be held responsible for the work and cost of ensuring that the organic movement has access to the seed that organic farmers need. However, that is certainly not happening today.

seed were tested for GMO contamination, and it was found that for each seed producer one or two bags were completely clean, and one or two contained 0.5% GMO or more, while the remaining two or three bags contained some traces of GMO. This clearly shows that a grower cannot depend on buying conventional varieties as a strategy for avoiding GMO seed.

How can clean seed be obtained in countries where GMO crops are grown? It can be argued that the biotech companies should be held responsible for the work and cost of ensuring that the organic movement has access to the seed that organic farmers need. However, that is certainly not happening today. At present, it is left up to the grower to handle this challenge. Many have their seed tested before they purchase it, which can be expensive. In some cases, growers have banded together, agreeing to use a single lot of seed, and sharing the cost of the test. Ideally, growers should not have to deal with verifying seed purity. It should be left to seed producers or distributors to verify seed as non-GMO.

Until recently distributors were very hesitant to do this because there was no established mechanism for verification. Now, there is a non-GMO seed certification programme as part of a larger Cert ID Non-GMO

certification programme in the US. Technically strong independent seed producers have been located, and Genetic ID NA, Inc. has been working with them to certify their seed as non-GMO. The first of these seedsmen is Jim Miller, Horizon Seed, of Greenview, Illinois, who will be offering certified non-GMO corn seed for the 2002 planting season. He has 30 years of experience in speciality seed production, and is already providing non-GMO seed and other specialised seed varieties to some of the largest food corn producers in North America.

In conclusion, it is certainly the case that the entrance of GMOs into the food production system has not made the lives of organic farmers and processors easier. However, through the systematic application of organic principles, in conjunction with a few additional tools, organic farmers and processors are successfully keeping GMOs out of (or very low in) organic products even in areas of the world where production of genetically modified crops is taking place large scale. As a result, people around the world are seeing organic as the reliable alternative to genetically engineered foods, which is creating a huge new opportunity for expansion of organic agriculture. ■

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Genetic ID NA, Inc. deals with GMO testing and non-GMO certification. Its services are available through laboratories on five continents.

Finding clean seed is probably the most critical challenge for the organic grower.

Conference on Development of organic horticulture

Supporting the diversification of exports in the Caribbean/Latin American region

*at Port-of-Spain, Trinidad and Tobago,
8—10 October 2001*

The Food and Agriculture Organization of the United Nations (FAO), the Technical Centre for Agricultural and Rural Cooperation (CTA), the Inter-American Institute for Cooperation on Agriculture (IICA) and the Centre for the Development of Enterprise (CDE) are organising a Conference on 'Supporting the diversification of exports in the Caribbean/Latin American Region through the development of organic horticulture'.

The Conference is also being supported by the International Trade Centre UNCTAD/WTO (ITC), CAB International and co-hosted by the Ministry of Food Production and Marine Resources, Trinidad and Tobago. The Conference will focus on the market situation and outlook for organic horticultural products and on the ways in which countries in the region can take advantage of market opportunities.

The conference will cover the main issues related to the marketing of organic horticultural products, including outlets, logistics, certification and standards. Some production issues will also be addressed as they re-

late to exports. The debates will focus on the specific situation of the Caribbean/Latin American countries.

The crops covered will be organic fruit and vegetables, both temperate and tropical.

Conference Highlights

- Presentation of findings of a new study (to be released about the time of the conference) on the major markets for organic horticultural products world-wide: current situation and prospects.
- Analysis of opportunities offered by these markets
- Analysis of constraints to overcome in order to successfully export organic horticultural products.
- Examining strategy options for the development of the organic export horticultural sector.
- Organisation of a forum to facilitate private sector exchanges and business contacts between exporting and importing countries.
- Field visit for interested participants.
- A forum for business contacts that will take place during the three days of the conference.

Venue: The Conference will be held at the Hilton Trinidad and Conference Centre in Port-of-Spain, Trinidad and Tobago. Tel: +1-868-624-3211; Fax: +1-868-624-4485 (hotel), +1-868-623 9702 (guests); email: hiltonpos@wow.net

Language: The Conference will be held in English and Spanish with simultaneous interpretation. Conference documents will be circulated under separate cover.

Registration Fee: US\$260. This includes conference admission, a copy of the new study, *The World Markets for Organic Fruit and Vegetables* (300 pages), conference papers, daily morning and afternoon coffee/tea, 3 lunches, 1 satchel, optional field trip on 11 October.

Display Space: Space will be provided at the Conference venue for speakers and delegates to have a display or poster presentation.

Requirements should be indicated on the registration form.

Hotel Accommodation: Special accommodation rates have been arranged for Conference delegates at the Hilton Trinidad and Conference Centre.

The deadline date for hotel reservations is 21 September 2001. Reservations must be guaranteed with a credit card.

Conference Website: Information on registration and how to book accommodation is available on the website: www.fao.org/organicag/horticonf2001.htm ■

The Food and Agriculture Organisation of the United Nations (FAO) is the main organisation involved in the conference preparations



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Advertisements

The following types of advertisements are accepted in *The Organic Standard*:

- Job offers
- Calls for consultancy tenders
- Conference announcements
- Publications

Within these categories every advertisement must be clearly related to the scope of the journal. Grolink reserves the right to limit the number of advertisements in each issue.

Prices:	Full page	500
	Half page	300
	Quarter page	175
	1/8 page	100

(all prices quoted are in US \$)

Instructions for submission of adverts

All enquiries should be directed to the main office.

The Organic Standard is a monthly journal, available on the first week of every month. Copy deadline for initial enquiries is on the 15th of the preceding month.