

InterBioNotes
March - April 2010
Special Issue

Certification and national accreditation: which future for organic products trade?

By

Antonio Compagnoni in collaboration with Eleonora Bergoglio and Juan Pablo Sciarano

With contributions from:

Michela Coli, Jan Deane, Ilaria Dozzo, Nadia El Hage Scialabba, Daniele Fichera, Silvia Forte, Oreste Gerini, Matthew Holmes, Jochen Neuendorff, Massimo Occhinegro, Lorenzo Peris, Davide Pierleoni, Piva Fabrizio, Massimo Roncon, Roberto Setti, Herman van Boxem, Guido Violini, Raffaele Zanolì

CONTENT

Introduction

Daniele Fichera, Federbio

Issues concerning producers

AlceNero & Mielizia, Nicola Pantaleo S.p.A, Agricola Grains

Problems of international regulations' harmonizations

Antonio Compagnoni, IFOAM EU

The access to the organic global market

Nadia El Hage Scialabba, FAO

Progresses of the new EU rules on import

Herman van Boxem, European Commission

The situation in the USA and in Canada

Matthew Holmes, OTA

The role of the International Accreditation Body

Jan Deane, IOAS

International Cooperation between Accreditation Bodies and Certification Bodies

Jochen Neuendorff, DAkkS

The Cert Cost Project

Raffaele Zanolì, Università Politecnica delle Marche

Experiences of group certifications

Lorenzo Peris, ICEA

Issues emerged from the Forum "Certification and International Accreditation"

Michela Coli, Roberto Setti, Davide Pierleoni

Control and Certification in Italy

Fabrizio Piva, Federbio

The role of the ICQRF

Oreste Gerini, ICQRF

The role of the Regions

Guido Violini, Regione Emilia Romagna

Accredited Certification: which opportunities in the new legislative framework

Ilaria Dozza, Accredia

^*^*^*^*^*^*^

Introduction

Daniele Fichera, Federbio

Italy is one of the main organic producers and exporters country worldwide, and is thus intensely working under the existing accreditation systems, with its own certification system.

The evolution of regulations, both at European and at international level, and the growth of the global market, ask for a moment of confrontation between the Italian certification system's main actors and subjects and institutions of the main accreditation systems currently existing in the world. Objectives of this comparison are a best knowledge of current systems and issues, in order to identify useful actions which are necessary to improve integration and cooperation between systems and actors involved, encouraging the trade of Italian organic products in the global market.

Under the INTERBIO project, coordinated by IAMB (Mediterranean Agronomic Institute of Bari) in partnership with Federbio and founded by the MiPAAF (Ministry of Agriculture, Food and Forestry) based on the National Action Plan for organic farming, a workshop has been organized on the topic: "Certification of Italian organic products in the global market: effectiveness of control systems in order to ensure the proper functioning of trade with Third Countries".

It has been a two days seminar, divided into the following sections:

Section 1: "Control and certification system of organic products in the global market: problems of harmonization of international regulations" where international experts have described the control and certification system in Europe, Canada and USA and related harmonization issues.

Section 2: "Reliability and effectiveness of the control and certification system of national organic production", where the issue has been analyzed and evaluated from the standpoint of producers, market operators, consumers, control bodies, regions, MiPAAF's inspectorate for Quality Control and scientific researchers.

Section 3: "Perspectives of certification in the global market", a roundtable with the aim of defining a final document entitled: Guidelines for an Action Plan for the improvement and reorganization of control system and organic production certification.

To succeed in the collection of all the views and issues related to this topic, the realization of the seminar has also been accompanied by:

- The opening of a forum on INTERBIO's website entitled: "The certification of organic products in the global market: the effectiveness of the control system to ensure proper functioning of markets with Third Countries"
- The creation of a Discussion Table on the topic: "International Certification and

Accreditation: which future for organic products trade". This Table, included in the two-day seminar has been attended by foreign experts, Italian public authorities, inspection bodies and other operators of the organic sector.

Issues concerning producers

AlceNero & Mielizia, Nicola Pantaleo S.p.A, Agricola Grains

Harmonization of regulations and certification recognition are problems which daily affects organic companies. Thanks to the speeches of the representatives of three important realities of the Italian organic world, which differ in their production activities, it was possible to obtain a fairly exhaustive list of these difficulties.

The first speech was that of Silvia Forte, from Alce Nero & Mielizia.

Alce Nero & Mielizia S.p.A is a company whose vocation to organic and to fair trade has been present since its foundation in 1978. The company, structured as a cooperative, includes two brands: Alce Nero (dedicated to organic farming and processing) and Mielizia (dedicated to the production of organic honey). This is an important reality in the organic sector, whose turnover abroad consists in about 11% of the total (approximately 3,700,000 euros). Their main export markets are Japan (51%), South Asia, China, Europe and the United States. 41% of the total production is made by Alce Nero brand, which consists of 200 products, all with 100% Italian ingredients, except for the Alce Nero Fair Trade line. These products are certified for the European Union, but also for the United States (NOP), for Japan (JAS) and for China (CQC). In particular, for what concerns the Chinese Organic Certification, it is to be reported how Alce Nero has been one of the first ever to obtain such a certification by carrying out negotiations and procedures itself, when in Italy there were no accredited Control Bodies yet.

Ms. Forte identified three main issues in relation to differences between international standards. First, the sourcing of raw materials. It is complex to find a full range of Italian raw materials, which must be certified for those foreign countries, that would be needed as ingredients for 200 different products. In fact, suppliers often are small farmers who don't want to spend time and effort to obtain additional certifications, except against a substantial and rapid economic return. This is a problem also for CBs, which are not necessarily willing to take a new course of accreditation only for one or a few companies (as in the case of China).

The second problem relates to labeling, a problem far from trivial, since labeling rules vary for each regulation in the different countries and vary continuously over the time. Consequently, a different label is required for each country of destination, an operation that involves a great deal of money, time and effort to acquire information and to support the substantial reprinting and graphic costs. The last problem is the market positioning. When it is not possible to get certified because of the different international standards, the company ends up with the necessity of selling an organic product as a conventional, which means, to sell a product obtained with the costs of organic production at conventional prices.

Massimo Occhinegro, from the Nicola Pantaleo S.p.A, took the second speech. The Nicola Pantaleo S.p.A is a company which produces organic and conventional extra virgin olive oil, and Mr. Occhinegro's speech was focused on foreign markets' trend and on the problem of active principles and multi-residual in the raw material purchasing phase.

Occhinegro explained how in terms of international demand, the consumption of organic extra virgin olive oil is undergoing a developing phase of sales, especially in those countries defined as "mature", i.e. where the conventional extra virgin olive oil is already widespread.

On the other hand, from a supply perspective, the situation was identified to be a bit more

problematic. The national offer of organic olives is growing, but it is highly fragmented and not very advanced in cooperation between organization of producers, traders and control bodies. Facing such a fragmented scenario, Spain's growth starts to be worrying. Last year in fact, Spain overreached Italy in terms of devoted hectares (1.3 million hectares against 927,000 in Italy). Of course, this is not organic olive oil's only problem. An important issue related to certifications is what Mr. Occhinegro defined as "changing the rules when the game has already started". To support this assertion, he brought a concrete example about the finding of Buprofezin's residuals, happened this year. Buprofezin had not been sought in the samples that had been analyzed before the oil purchase. Only later, when the productive activity was already under way, laboratories started seeking such a principle, but, at that stage, the most of the oil had already been bought. In addition, the residual limit allowed by the EU was of the 0,05%, that accepted by the customs was of 0,03% and that allowed by the certification body was of the 0,01%. This situation led to a re-check of all the oil that had been bought before that Buprofezin was sought, and led to the non conformity of a 25 tons batch. In addition, in the buying phase, carried out when most of the batches were not yet complete, the 60% of the selected samples have been judged as non-compliant because of the presence of other active principles (different from Buprofezin). It is believed that this problem is a direct consequence of the timing with which certification bodies are carrying out their inspections, which is perhaps not appropriated since in the last few years, due to climatic conditions, the production of olive oil is starting earlier than in the past. It is therefore evident that, with such a lack of certainty, exporting companies can not be reliable for their customers, and constantly run the risk that their products can be contested both when exported and when received in the destination market.

To conclude, the development of an organic olive oil market appeared from the report to be searching for certainty, which is not currently available.

The last speech was that of Massimo Roncon, from the company "Agricola Grains". Agricola Grains was officially opened in 1991, when the European Regulation 2092/91 legally recognized the organic production method.

Today, this company is an important international activity based on the harvesting and commercialization of cereals coming from 1150 organic farms in Italy and in the near European East. Roncon brothers' company is at the leading edge in control systems: from the fields controlled by GPS to the stage of receipt of the conferred product, where the product is sampled and analyzed by the internal laboratory, which performs tests in moisture, protein content, impurities, aflatoxines, DON, falling number, GMOs and multi-residual. In addition, the whole plant is managed by an automation software that monitors and records every step of the process. This company is also going through a process of innovation with the birth of a new line dedicated to the production of pellets, flour and oil from organic oily plants. Thanks to its international vocation, Agricola Grains has also taken measures to obtain numerous certifications in addition to the European one, such as NOP, Biosuisse, Naturland and Soil Association. As Roncon himself explained, those certifications are necessary for a company like his, as they give the opportunity to tick higher prices and greater assurance of continuity in a market which is subject to strong and sudden variations.

The issue of this company against certification was mainly found by Roncon in the not always beneficial relationship between the costs of those certifications and the price of the final product, which is variable and brought downwards from strong clients.

In this case it was clearly shown the need for harmonization between the various regulations in terms of direct costs of certification.

Problems of international regulations' harmonizations

Antonio Compagnoni, ICEA

The speech of Antonio Compagnoni begun with a description of IFOAM's history and mission, taking up organic agriculture fundamentals before moving to issues of regulation's harmonization, an ancient but still current problem, presenting possible solutions today and tomorrow's challenges.

IFOAM's fundamentals

From 1972, date of its foundation, IFOAM mission has been that of:

“leading, uniting and assisting the organic movement in its full diversity. Our goal is the worldwide adoption of ecologically, socially and economically sound systems that are based on the principle of Organic Agriculture”.

The principles of health, ecology, fairness and care are shared by over 800 associations in more than 110 Countries, and are the basis on which organic farming grows, since they express the contribution it can give to the world and provide a perspective of improvement for agriculture in a global context.

In 1980, IFOAM publishes the first Basic Standards for Organic Production and Processing as guidelines for its members which were involved in standard and certification definition.

Compagnoni brings to participants the greetings of Katherine Di Matteo, IFOAM's President, and recalls the definition of organic agriculture that has been adopted by IFOAM's General Assembly held in Vignola in June 2008:

“Organic agriculture is a production system that sustains the health of soils, ecosystems and people. It relies on ecological processes, biodiversity and cycles adapted to local conditions, rather than the use of inputs with adverse effects. Organic Agriculture combines tradition, innovation and science to benefit the shared environment and promote fair relationships and good quality of life for all involved”.

Organic regulation's harmonization: an ancient but still current problem

Following Mr. Compagnoni's report, the situation in the last 20 years appears to be substantially unchanged for what concerns regulation's harmonization. Compagnoni explains how, in 1990, he was president of a cooperative of organic producers in Emilia-Romagna: at that time, to sell their products also to Great Britain and to Germany the cooperative had to withstand three different inspections for the different certification bodies; today, producers have the same problem to sell to Switzerland, Sweden, USA, Canada, Japan, China, South Korea etc.

There are 70 Countries with organic Regulations (without counting private standards on organic and labelling), 488 control bodies worldwide (even if, in some countries, access to certification is low or zero). In addition, there's a small number of equivalence agreements or other mechanisms of market access facilitation. Those conditions often lead to barriers to the growth of organic market and in missed opportunities, especially for Developing Countries. In such a context, organic products are heavily discriminated against conventional products, which is a issue of great importance at a political and economical level.

These difficulties do not only occur in organic products' trade from Developing Countries to more developed countries, but also in the opposite direction and within Developing Countries.

Often, in fact, organic production is regulated only in order to promote export to EU or USA, but not for the development of an internal market, which would be favoured by a proper import policy.

Possible solutions today and tomorrow's challenges

Essential alternatives are based on the growth of collaboration between States and between

organizations of the organic world, continuing and expanding ITF and GOMA mission, using their tools (IROCB and EQUITOOL), recognizing International Accreditation (as IOAS) and supporting the public recognition of Private International Standards on non-food products (as GOTS for textile products, COSMOS for cosmetics, FLO for fair trade products).

Standards' sharing is a key step for cooperation, information exchange and organic development at a regional and international level, in the North and South of the world.

A strong agreement between different involved parties is required in order to leave the approach which leads to discrimination, while a strong commitment to harmonization is crucial to think of a possible future where the world gets really organic.

The access to the organic global market

Nadia El Hage Scialabba, FAO

Ms. Scialabba described the current situation as indeed very complicated, since there are 70 Countries which have regulations on organic productions, without counting private standards and specific rules on labeling.

There are 488 certification bodies in the world, with a paradox, since in some countries there is very little access to certification. Furthermore, in this complex landscape, equivalence agreements and market facilitations are very few; this practically results in barriers to organic products' international trade and in a loss of growth opportunities, especially for developing countries.

To search for solutions to these problems was established in 2002 the ITF, *International Task Force on Harmonization and Equivalence of Organic Regulations*. The Task force was created by a public-private partnership established by FAO, IFOAM and UNCTAD and it has been in force from 2002 to 2008, thanks to Sweden's financial support. This cooperation program was attended by 29 countries, 7 intergovernmental organizations and 27 representatives of civil society and private sector.

ITF main purpose was to reduce barriers to organic international trade and to facilitate market access for developing countries as well. In this context, ITF proposed itself as a dialogue platform between public and private institutions involved in organic regulations and trade, focusing on opportunities for harmonization, recognition, equivalence and other forms of cooperation between public and private.

Between 2003 and 2008, ITF worked in three stages across eight operational meetings: a first phase of analysis and review of the current situation, a second phase in which potential solutions were sought, and a third phase in which conclusions, recommendations and developed tools were collected.

In its recommendations, ITF emphasizes the need for international reference points.

For what concerns the development of new standards, ITF recommends to consider as a basis international existing standards such as Codex Alimentarius and the IFOAM standards (which may be a very efficient basis, since it offers a more dynamic view of the organic system).

International and common guidelines should also be followed to judge equivalence between national and regional standards, as international performance requirements should be used for the recognitions of certification bodies.

In addition another important action would be to promote cooperation between governments and privates. With this approach, for example, it could be possible for a certification body to allow import in case there is no regulation or when governments don't have equivalence agreements.

Two practical tools developed by the ITF are IROCB (International requirements for Organic

Certification Bodies) and EquiTool (a guide to establish equivalence of standards and technical regulations on organic farming).

IROCB establishes requirements for certification based on the ISO 65 standard adapted to the organic sector. This tool was developed by the ITF through the consultation of public and private stakeholders and it should be used by governments to recognize whether a foreign control body works in equivalence to established performance requirements, and consequently to assess if it can be recognized as equivalent. This tool could also be useful for the recognition of private inspection bodies, for example in procedures such as private labels'.

Governments (and Control Bodies) could get to use the IROCB in two stages: first, IROCB should be recognized as a reasonable common denominator for the approval of imports, and then it should be required to foreign control bodies to demonstrate whether they're compliant.

Using IROCB would make possible for control bodies to be assessed for equivalence once, but then they could be able to operate in more countries. It could also be used internally by governments which are still formulating their own organic regulations (but not intended to replace existing regulations).

The second tool, Equi-tool consists of the guidelines to establish equivalence between two or more standards for the production or processing of organic products, and consists of three main elements: the procedures to be used for evaluation, criteria used to determine whether differences in standards can be rationalized, and guidelines to determine which the common objectives are (this part is found in an annex which will be further extended). Equi-tool was created to enable governments (and private labels) which still don't have equivalence requirements not to develop assessment processes case by case, but at the same time for governments that already have experiences of equivalence but would refer to this tool to improve their products quality and efficiency (eg for what concerns transparency); in addition it could be used to seek convergence on assessment processes used by other countries and to negotiate multilateral agreements.

The intervention of Nadia Scialabba continued with the presentation of GOMA (Global Organic Market Access), a project carried out by FAO, IFOAM and UNCTAD. This project will last three years (from 2009 to 2012) and was founded by NORAD (Norwegian Agency for Development Cooperation). The Steering Committee is composed of six people (two from FAO, two from IFOAM and two from UNCTAD), while the project managed is by IFOAM.

The aim of GOMA project is to apply tools and recommendations drawn up by ITF, simplifying organic products' commercialization process through different control systems (public or private). For this purpose are designed activities such as presentations and discussions, general or targeted, with different stakeholders such as emerging markets in order to obtain a wider commitment to the use of ITS' tools. In addition, GOMA runs pilot projects for the application of these tools, providing technical assistance to governments and private bodies involved. GOMA is also responsible for facilitating cooperation on organic products trade in regions such as Central America (with projects of standard harmonization at regional level) and Asia, where strategies to support organic products commercial flow within the region are developed.

GOMA promotes its initiatives and provides more information through the website www.goma-organic.org.

Progresses of the new EU rules on import

Herman van Boxem, European Commission

The European Union recently created and is implementing a new set of rules for what concerns organic products' import regime.

The speaker was Herman Van Boxem, from the Agriculture and Rural Development Directorate

General Unit of the European Commission, who explained the current situation and the evolutions foreseen for the near future.

In the current EU legislation, import activity is regulated by the 834/07 Council Regulation (art. 32 and 33) and by 1235/08 Commission regulation, specific on imports. In addition, guidelines on organic products import into the EU have been defined (15.12.2008 rev.1).

Before January 2009, the import legislation was based on equivalence, a principle recognized to some Third Countries, included in a list, and by authorizations released from the Member States. From January 2009, this system is implemented: in addition to the Third Countries list, which is still valid, the concept of equivalence will also be applied to a list of Control Bodies. Moreover, to be introduced as well, is a list of Control Bodies which will be recognized for compliance. On the contrary, Member State authorization system is to be phased out.

At the moment, explained van Boxem, the list of equivalent third countries (defined by art. 33.2 of the 834/2007 Regulation) includes 8 countries (the last added has been Tunisia in June 2009). In addition, there are 19 applications. Next country to be added will be Japan, probably followed by Canada, while negotiations with the US are going on. Meanwhile progresses have been realized with other countries, such as China, Turkey and Peru.

For what concerns the creation of the Control Bodies list for equivalence, Van Boxem explained how the deadline to apply was set on 31.10.2009. By that date, 72 applications were received, coming both from inside and outside Europe. All of those applications will then be evaluated by the Commission, in order to publish this first list in 2010 or early 2011. Then, it will be possible to apply each year by October 31st.

Regarding Control Bodies applying for Compliance, the first deadline for requests is set on 31 Oct 2011, to be followed by more rounds of requests each year. In this case the first list will be published in 2012 or early 2013.

The system that is going to disappear thanks to this new set of regulations is the member State authorization system. At the moment, MS can approve authorizations on case-by-case issues, but those authorizations will be phased out between 2011 and 2013. In fact, even if MS will still be able to grant authorizations when the first list of Control Bodies for equivalence will be published, this possibility will end by 31.12.2012.

Last part of Van Boxem's speech was related to the new EU-logo and its use on imported products. In particular, he explained how its use will be optional (as defined by art.24 of 834/07 Reg.) and independent from the import system applied. In addition, when the EU-logo is used on imported products, it will be mandatory to show the non-EU origin and the code number of the Control Body; this code number definition will be coordinated by the EU Commission.

The situation in Canada and the USA

Matthew Holmes, OTA

Mr. Holmes presentation informed about the situation in Canada and the USA. In Canada, since

June 30, 2009, all food or livestock feed products for sale in the market have to be certified to Canada's mandatory standard and meet new labeling requirements under the "Canada Organic Regime" (COR). However, during the first two years (to June 30, 2011) a soft enforcement policy is in effect during the "Stream of Commerce" period. During this period, operators will be informed that their products are non-compliant and asked to provide Canadian authorities with an action plan and timeframe for coming into full compliance. Now is the time to become familiar with all of the requirements to ensure your products can continue to enter the Canadian market.

The Canadian Food Inspection Agency (CFIA) enforces the regulations and Canada's organic standard is maintained by the Canadian General Standards Board (CGSB) Technical Committee on Organic Agriculture, made up of approximately sixty organic farmers, manufacturers, consumers and industry representatives. The standards can be freely downloaded online.

To be sold on the Canadian market, your organic product will have to be certified to the Canadian standards by an accredited certifier. The approved international accreditors are: CAEQ (Quebec); International Organic Accreditation Services (IOAS); ACCREDIA; and Deutsche Akkreditierungsstelle GmbH (DAKKS). Currently, the fully-compliant Italian certifying bodies under these accreditors include Bioagricert Sri, CCPB Sri, Certificazione s.r.l., Istituto per la Certificazione ne ne Etica e Ambientale, Soil Association Certification Limited, QCertificazioni S.r.l., Quality Assurance International (QAI), and Suolo E Salute.

The COR labeling system is similar to most but has a number of unique details that should be noted. An "Organic" product is one which has 95% or more organic ingredients (the formula for this calculation can be found in Section 8 of the Canadian standards). Only Organic products may choose to bear the "Canada Organic" logo; if imported products use the "Canada Organic" logo they must indicate they are either "imported" or "Product of Italy". The use of terms such as "organically grown" or "organically raised" are also limited to the 95%+ category. Products made with 70-95% must indicate the specific percentage of organic ingredients they contain ("xx% organic ingredients"). This is a difference from EU and U.S. labeling. Both categories must be certified by an approved certifier, and must bear the full name of the certifier on the packaging. Products made with less than 70% are permitted only to indicate which ingredients are organic on the ingredients panel (and can make no other organic claims on their packaging).

Currently, Canada only regulates organic food, feed, livestock and primary crops. Therefore personal care, cosmetics, textiles or other items can be sold as organic in Canada only if this is not a misleading claim (i.e. they meet a private or other government's standard or can substantiate their organic claims somehow). However, these products are not eligible to bear the "Canada Organic" logo.

There is also a notable difference in Canada's approach to labeling wine. Canada does not allow the claim "made from organically grown grapes". Instead, the Canadian organic standard allows for maximum levels of added sulphites in a certified organic product. Therefore, for wine to carry any organic claim in Canada it must be fully certified by a Canada-accredited certifier, but may also include some added sulphites (see the standards for specific amounts, based on the sugar level of the wine). These wines are eligible to carry the "Canada Organic" logo.

Recently, Canadian and U.S. authorities signed a "Determination of Equivalency", establishing free trade between NOP and COR organic products. This means that NOP products can come into Canada and be accepted as organic under the COR, and vice versa. This will apply not only to products from the U.S. but to NOP products from anywhere in the world; similarly, COR-certified products from Italy will be allowed into the U.S. market and be allowed to use the "USDA Organic" seal without being certified to the NOP. Since both sides have identified a few significant variances in their standards (see more details below), in order to take advantage of this agreement your product must be certified as compliant to the terms of the agreement (the variances) rather than simply just NOP or just COR. Those that meet the terms of the agreement can choose to bear

either the “USDA Organic” seal or “Canada Organic” logo (except in the case of wine, where U.S. labeling rules are still in effect).

The variances between US and Canadian standards are as follows: For imports into the U.S., agricultural products derived from animals treated with antibiotics shall not be marketed as organic in the United States. For imports into Canada, agricultural products produced with the use of sodium nitrate shall not be sold or marketed as organic in Canada; agricultural products produced by hydroponic or aeroponic production methods shall not be sold or marketed as organic in Canada; and agricultural products derived from animals must be produced according to livestock stocking rates as set out in CAN/CGSB-32.310-2006 (October 2008 version).

Additionally, Canada and the European Union are at an advanced stage in talks towards an equivalency agreement. The standards have been formally compared and the authorities will hold a final peer-assessment and audit this spring. It is the hope of the Canadian sector that we will reach equivalency with the EU and thus better facilitate continued market access and better trade relationships in Europe. Ultimately, the entire organic world benefits when we succeed in removing unnecessary barriers to trade and recognize each other’s standards and systems as equivalent.

The role of the International Accreditation Body

Jan Deane, IOAS

An important factor in the certification of Italian organic products is the difficulty of harmonization with international rules is the International Accreditation Body. Jan Deane started with this sentence her intervention at the seminar. Programme Manager of IOAS (International Organic Accreditation Service), she gave a speech describing the role that international accreditation bodies can play, in particular the role of the IOAS.

Generally speaking, an Accreditation Body is a body that conducts and administers an Accreditation System, granting accreditation. Accreditation Bodies can be both national or international. IOAS belongs to this second category, being probably the largest and the best known International Accreditation Body.

Within Europe, National Accreditation Bodies (NABs) are restricted to one per Member State and have a near monopoly on the accreditation, since EU organic regulation enshrines that every Control Body must be accredited by its respective NAB. On the other hand, NABs often supervise activities only within national borders, which means that to supervise organic certification bodies outside national borders but within Europe, a cooperation activity with the NAB of the respective member state is required. Some difficulties can start when a NAB has to exercise a direct supervision on third countries, where there is little prospect of cooperation. This kind of direct control could actually be financially burdensome.

This means that a certification body has to struggle with this reality made of multiple standards, multiple set of certification, multiple assessments established by various authorities. This has created a sort of a “monster” which actually limits the expansion of organic productions because of the unnecessary financial burdens that it imposes.

The situation of an international Accreditation Body is different, since they do not have the same geographical problems, but are free to offer its services everywhere in the world. Therefore it is possible to create economies of scale in the constitution of new programs and in auditors' training, having a higher clients potential for each program. Today, there are 45 certification bodies under IOAS supervision, working in more than 80 countries.

Such an international system also ends up in a more efficient management of the visits' costs, since an IAB may control different CBs in each country, and consequently, it has the possibility to group

visits to offices and operators. In addition, the CB can also be confident that assessment criteria are evenly applied wherever the certifier is located. This is an evident harmonizing force and a way to reduce burdens for the CBs, and consequently for the operators.

IOAS has been established by IFOAM in 1997 as a non profit organization distanced from IFOAM's lobbying and representational work, and in which IFOAM doesn't exercise any decisional power.

IOAS' work is run by seven staff based in five countries, which are overseen by 8 members of the Board coming from different parts of the world, elected by IFOAM to represent a balance of interests and geography. In addition, there's an Accreditation Committee composed by seven people, with the same aim of interests balance.

IOAS runs many different programs: IFOAM accreditation, ISO 65 and GOTS accreditation, has a SAN pilot accreditation program, it prepares technical assessments for the recognition of third countries certification bodies based on equivalence to EU and it is an approved verification body for Canada accreditation. Other assessments such as NOP, JAS and Korea could be done, but those procedures will only start in front of a proved interest from the respective authorities in using IOAS services.

Aside this technical work, IOAS is engaged in the purpose of harmonization contributing to conferences and papers, and developing links with government authorities and representatives of the organic movements, in order to avoid or at least reduce the duplication of required efforts.

In order to maintain all those different activities, IOAS has developed an efficient surveillance system centered on a database which contains the main reference documents, which allows to manage multiple assessments efficiently and competitively.

The tools developed by IOAS enable transparency between different certification bodies requirements and technical standards, providing to both public and private sector necessary information to evaluate compliance or equivalence.

This approach places IOAS in the role of assessor, but not necessarily that of the accreditation decision maker. It places the process of certification body assessment in the hands of international experts, with the possibility of leaving approval or accreditation decisions to regulatory authorities.

For those reasons such an international approach is to be considered as a model towards simplification and harmonization of organic regulation worldwide.

International Cooperation between Accreditation Bodies and Certification Bodies

Jochen Neuendorff, DakKS

Dr. Jochen Neuendorff, from DakKS (Deutsche Akkreditierungsstelle – German Accreditation Body), gave a speech on the relevance of international cooperation among accreditation bodies on one hand and between certification bodies on the other side.

He explained his topic from a practical perspective. Organic trade becomes more and more international. Different legislations and private standards rule the organic marketplace. The complexity partially undermines transparency and acceptance of the standards by organic operators, and it provides space for fraud, as recent cases involving different EU-member states as well as Third Countries demonstrate.

The current situation doesn't require more rules, but a better implementation of the existing ones. It is vital to guarantee integrity and reliability of organic products to maintain consumer confidence.

For what concerns the cooperation between Certification Bodies, Dr. Neuendorff talked about the necessity of an effort to ensure effective international communication between certification bodies. In addition, he discussed how to deal with residues inspection and how to improve risk-orientation of inspection visits. This would also require a straightforward follow-up in case of suspects emerged from inspections and an implementation of cross check practices.

Dr. Neuendorff also presented proposals how to intensify the cooperation amongst Accreditation Bodies. A task force of European Cooperation for Accreditation worked during 2008/2009 on a common approach to the assessment reports required for certification bodies with activities in Third Countries. EA will soon start a formalized working group on Organic Agriculture. Accreditation Bodies might also cooperate exchanging assessors or conducting witness audits, thus lowering costs and guaranteeing effective implementation of organic standards by accredited certification bodies. In future, accreditation bodies (as well as governments) will need to develop and to improve follow up systems in case of suspects or complains.

The Cert Cost Project

Raffaele Zanoli, Università Politecnica delle Marche

Raffaele Zanoli, professor at UNIVPM (Polytechnic University of the Marches Region), presented the CertCost project (Economic Analysis of Certification Systems for Organic Food and Farming) goals and developments.

The project is a new initiative conducted at European level to improve the quality and efficiency of the certification system for organic farming. The project, founded by the European Commission, involves 10 units located in 7 Member States of the Union. In Italy, the operating units of reference are the Polytechnic University of Marches, with a research team led by Zanoli and the Control Body ICEA.

CertCost aim, explained Zanoli, is to combine researchers' expertise with that of the different organic sectors' stakeholders in order to acquire new scientific knowledge on the implementation of the certification system on organic farming, maximizing efficiency and effectiveness.

Project results should help to clarify some aspects related to certification system's costs and benefits, for which science-based information are still scarce and too fragmented. From the project will emerge recommendations to be sent to the European Commission, to the competent authorities in each member state and to public and private control bodies operating in the European Union.

The project did start on the eve of the entry into force of the new Council regulation on the production and labeling of organic products (EC regulation No 834/2007) which, among other things calls the committee to provide by the end of 2011, a detailed report about the functioning of the internal market and of the control systems, assessing that established practices don't result in unfair competition or in barriers to organic products production and marketing.

Our political landscape makes the CertCost project more than ever appropriate; given the importance and relevance of this topic, synthesis and dissemination of results will be treated through the implementation of a specific subproject. To achieve this goal, the research is divided into 4 specific sub-projects highly interconnected:

- Subproject 1 aim is to provide detailed data and information about the different certification systems now deployed in Europe. In particular, the subproject coordinated by the DARCOF (Danish Research Centre for Organic Food and Farming) aims at creating a public database containing all public and private actors involved in the establishment of standards, certification and inspection on organic farming.

- Subproject 2 aim is to analyze the implementation of the major certification systems adopted by European organic farms, in order to extract all the direct and indirect costs related to certification that occur along a range of different references. Access to information and specific data is made possible through the involvement of private partners such as ICEA (Institute for Ethical and Environmental Certification) and IMO (Institute for Marketology).
- Subproject 3 studies real benefits brought from certification to the organic sector. In particular, this subproject's aim is to understand the perception of organic certification mark for different targets of consumers through the study of their willingness to pay for representatives from many different brands, representing different standards and certification systems.
- The main purpose of subproject 4, coordinated by the Polytechnic University of Marches, is to study a model that can provide useful information to set up a new certification system based on targeted risk-based inspections. Implementing such a system which would be capable of an autonomous direction of inspections, could provide a significant improvement in the service's efficiency through a substantial cost cutting and without compromising the quality of the system. In particular, the role of the research group led by Zanoli deals to develop new quantification methods for the risk of regulations' violation, and to support the CBs on the drafting of the inspection visits' plan. The next step is the quantification of resulting potential improvements for the certification system, and a comparison of results between different European countries. For what concerns the quantification of the risk of breaches of organic farming Community rules, there will be an evaluation of any single variable on the risk (at a single operator level, considering its structural and managerial characteristics). The process of the collection of data to be used in subproject 4 resulted in a great effort to obtain information from control bodies in the different countries (Italy, Germany, Switzerland, Great Britain, Denmark, Czech Republic and Turkey). The database now includes about 17.000 certified organic operators (53% Italian for each year from 2007 to 2009). Those data include structural variables (firm size, economic size, altitude, location etc.), managerial variables (cropping system, use of subcontracting, etc.), and the record of non-compliances and penalties collected during this report period.

For what concerns data collection, many issues related to harmonization of variables were found: very often it was not possible to gather information on the economic size of the operators, on the extension of cultural areas (such as in Czech republic) or on the numbers in reared animals (as in the case of Germany). Nevertheless, the main problem was found on coding and managing non-compliance. This figure was very uneven among the different member states. Actually the 834/07 Regulation doesn't give a clear definition of "irregularities" and "infractions", leaving space to interpretation of the same classification. Approaches of the different Countries involved were very different:

Germany's and Czech Republic's CBs encode non-compliance referring to the specific article of the 834/07 that has been violated; while German CBs also provide a description of each non-compliance, the Czech CBs doesn't guarantee any information about non-compliances' severity. In Switzerland, although there exists a detailed description of each non-compliance identified by the CB, classification system is unclear and of difficult interpretation. Much more concise is the classification system adopted in Great Britain, which doesn't distinguish between irregularities and infractions, using a severity scale to four values (minor, manifest, major, critical). Opposite problem compared to Denmark, which distinguish 62 different types of non-compliance and 13 different types of sanctions. In Italy, the situation is much easier since ACCREDIA technical report RT16 compensates many of the listed above shortcomings, providing a very precise classification of non-

compliance and a very clear link between non-compliance and sanctions. In light of specific issues raised in each country and considering the impossibility of having a document equivalent to RT16 for the interpretation of non-compliances in the 6 Countries involved, it was decided to consider the variable “sanction” instead of “non compliance”, and then to proceed to an homogenization of the latter, as more manageable in the database.

Therefore it was decided to consider four classes of penalties: light, moderate, severe and extreme. For Italy, Germany and the Czech republic there were not particular problems of homogenization; in the UK, considering the lack of penalties in the database, it has been sufficient to use the four classes of non-compliance and to use them as sanctions. A major effort has been required for Switzerland and Denmark. The database provided by Swiss counts 19 different types of sanctions with problems of definition, while the Danish presents 13 different types of sanctions with difficulties to distinguish between ministerial sanctions and sanctions applied by public Cbs.

Experiences of group certifications

Lorenzo Peris, ICEA

Lorenzo Peris, agronomist, inspector and auditor for ICEA, held a speech on his international experiences in organic and fair trade projects promoted by ICEA, IFOAM and various NGOs, in order to introduce the topic of group certification and its related issues and benefits.

Peris started from the experience of mango cultivation in the Bobo-Dioulasso area (Burkina Faso), run by a second degree cooperative. It consists of more than 4000 members, who use 2 processing laboratories, involving 9 villages in which are living and working 117 organic and conventional farmers.

This organic production, certified as organic (EU) by Ecocert and certified fair Trade by FLO, is sold both fresh and dehydrated. In this situation has been strategic an organization and improvement of traceability and administration in order to guarantee a better identification system and to avoid bureaucratic duplicates for Ecocert and FLO certifications.

In another case, it has been necessary to implement a control system for the constant identification of the collectors under contract and for the mapping updating of collection areas. It's the case of wild fruits exported from Ukraine and certified organic by ICEA until 2006. In the sites of Volin and Zakarpacie operates a company which selects, freezes and exports the product. Harvesting operations are coordinated by a Leader, which commits to collectors and their families the collection of blueberry, cranberry, elderberry and mushrooms.

A second case introduced by Peris was related to the Vietnamese green tea certified as organic (EU, NOP) by ICEA in the villages of Thien Hoang, Song Cau and Phuc Xuan in Hanoi. In this case, the certified operator is a company that manufactures and exports the product, which is grown by about 50 small organic farmers. In this situation is possible to verify the difficulties of covering internal control systems' costs and the costs of group certification.

Other experiences of group certification run in Europe and led by IFOAM in 2005-2007 were indicated by Peris as “pilot projects”. A work that involved four groups of producers: “The Tarn” and “Nature et Progres” and has involved ECOCERT as certification body in France, the producers of “Sierra de Segura” and CAAE as CB in Andalucia, Spain, the “Consorzio Biogargano” and ICEA in Foggia, Italy, the organization “Rapunzel” and the certification body IMO at Aydin, Turkey.

Considering those cases, a key question was rising: group certification, which is not allowed by EU Regulation, is a choice or a necessity?

It can be considered a choice in order to self qualify products to be sold within the group, as in the case of “participatory guarantee system”, which organizes a self-managed internal control of the certified operators, or it can be considered as a necessity when a certification is necessary to sell the product, but a single operator cannot afford the cost of a certification system on its own. How could small farmers, often illiterate, give the required formal guarantees if not together? In this case, the Control Body requires the group or to the exporter to have an internal control system; by doing this, required inspection time may be drastically reduced, together with direct inspection's costs.

For what concerns regulated organic certifications, for product to be imported to Europe, group certification is allowed only for product coming from developing countries, but minimum requirements for internal control system are not defined.

NOP Regulation took another direction: group certification was allowed in 2002, than it has been denied from 2006 to 2008; today it is allowed, but an internal control system has to be present.

Those are some of the main features of group certification:

- Individual operators must be linked to the Project Manager in meeting the required standards through a formal commitment (according to different cultures and societies).
- Inspection and evaluation activity is conducted by an internal control system organized by the group itself
- The external certification body certifies the group as a whole
- The external certification body has to assess the reliability of the internal control system and to monitor that the management of the group works with daily effectiveness.
- The external certification body shall control and assess risks connected to environment, social context and internal functioning (pressures of the executives, customers etc..)

For what concerns the internal control system, it must be documented and transparent and it has to guarantee the respect of the rules enshrined by the chosen production standard.

Minimum requirements include:

- competence (technical but also linguistic) and reliability of the staff
- suitable inspection and verification procedures
- Constant update of control activity to the Direction/Manager

In addition, for an effective supervision it is necessary:

- Real and practical expertise of managers and internal inspectors
- Reasonable working conditions, with an adequate salary, covering of transport's cost, suitable equipment for inspections and adequate training for the staff.

It should be noticed that those aspects can affect the quality of the system without resulting from the documentation at all. Of course this risk has to be monitored both for what concerns group certifications and individual operators.

In conclusion, verifying its good functioning makes a control body similar to an accreditation body, since it assess the effectiveness and efficiency of a system.

For example, the delicate decision of the conversion period's duration or the decision of the conversion period's starting date itself will be a responsibility of the internal control system and it's not decided by the control body.

In addition, the “third party” certification body, after an assessment of which groups/projects meet the standard(s), will declare them as guaranteed by the internal control system, and therefore certifiable for the entire validity of the issued certificate.

Issues emerged from the Forum “Certification and International Accreditation”

Michela Coli, Roberto Setti, Davide Pierleoni

On March 25th, a meeting was dedicated to a debate on the issues emerged from the forum of InterBio's website, in which it was possible to leave a comment about three main topics: barriers to international market of organic products, market and organic zone in the Mediterranean area, and information exchange as a way to prevent international frauds.

The results of the debate about barriers to international market were exposed by Michela Coli, ICEA responsible for foreign certifications. In this section of the forum the question was “how can small standard differences impede international commerce”, trying to understand if those differences are useful for the consumers or if they only contribute in creating confusion, considering that consumers don't seem to be particularly aware of these differences between standards. This means that most of those contentious only belong to insiders. This definitely is a central issue, since it represents problems with which exporting companies have to deal daily. In fact, those small, often insignificant differences bring, at least, to an important growth of costs, both for the companies, which are “obliged” to obtain specific certifications to export, and for the control bodies, which have to support accreditation costs. This problems result to be quite important especially for what concerns regulated systems such as EU, NOP, JAS, CQC etc, because those systems have the effective power of constraining the market. The coexistence of many standards and certification systems, regulated or volunteer, could be considered as a source of work, and consequently of earnings, for the CBs. Actually, those are contributing to complicate a CB's job. In addition, the costs to get and to maintain international accreditation are huge and make the management of those schemes economically burdensome, often without being balanced by sufficient incomes.

Occasions in which those standards are substantially different are a very few, as in the case of the strict prohibition to the use of antibiotics in NOP certificated breeding, or in the case of the limitations to use of copper and nitrogen enshrined by Naturland and Bio Suisse. On the other hand, most of the time those differences are motivated by “political”, cultural or commercial motivations. In those cases, barriers are even more unjustified, and they could be overcome through respect for the differences and through agreements of equivalence. The positive aspect of this “regulations bio-diversity” is that it brings to an increase in competition, which helps research and development of new values for organic movement, sometimes even filling some lacks in the regulations, giving new ideas for regulations' development.

Despite the debate's premise, users' comments have been more specific, asking for more transparency and uniformity for what concerns analytical thresholds for GMOs and pesticides accidental or technically unavoidable contaminations, an aspect which is actually neglected from all the standards and certification systems. In fact, the European Regulation only defines an analytical thresholds for GMO contamination (which has unfortunately been brought at the same level than conventional productions), while on pesticides, the only analytical threshold has been established by NOP Regulation, which fixes this thresholds at 5% of the limit for conventional products. Italian control bodies usually fix this limit at 0,01 ppm (parts per million), limit that is often questioned from public authorities.

The harmonization of the analytical thresholds at national and international level seems to be a felt need in order to fill a widespread “legal uncertainty”, which cannot be considered as an ideal base for international commerce and which may cause a sensation of low reliability of the organic movement in the consumer, who can't find clear and unambiguous answers.

The second moment of discussion concerned the exchange of information as instrument of

prevention for food frauds, and it has been exposed by Roberto Setti, responsible for the CCPB s.r.l technical office and Federbio's technical committee coordinator. This topic has also been developed as a result of a series of seminars called AFI - Anti Fraud Initiative, held in different European cities, Bologna included, from 2007.

The EU 834/07 Regulation, art.31, indicates how the competent authorities, control authorities and control bodies, justified by the necessity to guarantee that a product has been produced in accordance with the Regulation itself, shall exchange relevant information on the results of their controls with other competent authorities and control bodies; they may also exchange such information on their own initiative. 91 and 92 include as well the duties of operators, control authorities, control bodies and member states in case of suspicion of infringements and irregularities: in case of doubt, the operator shall immediately inform the control body or authority. The control authority or Control Body may require that the operator may provisionally not market the product with organic reference for a time period to be set, and by this time, if the suspicious has not been confirmed, the decision may be cancelled. In case that the irregularity is certain, the operator is obliged to cancel any reference to the organic production method. Where a Member State finds irregularities on products coming from another Member State, it shall inform the Member State which designated the control body or control authority and the Commission thereby. What is not defined by Regulations is the modality and timing in which those communications are supposed to take place. This gap often brings to slowness which undermines those dispositions' efficiency.

AFI seminars were activated to improve such a condition, and they were a moment of meeting between operators, control bodies and authorities and member states. Proposal born from those meetings were the creation of formats to be used in case of suspicious, harmonized at a European level, the activation of a fast alert system specific for organic production, the creation of web archives to better manage a data-base of complains, residuals, problematic productions, the activation of more conferences and working sessions in this topic.

Frauds probably cannot be defeated, not even in the organic sector, which at the moment possesses one of the best systems of quality management; but any single case of fraud that is discovered contributes to a growth of the sector, since this system of quality management is adaptable if the information flow improves in effectiveness and efficiency.

The last speech, by Davide Pierleoni, Vice President of the Mediterranean Institute for Certification, was concentrated on markets and standards of the Mediterranean area. Pierleoni explained that problems of coexistence between international standards, regional standards and national standards are emerging again: technical barrier to trade, the increase of price for consumers (which indirectly supports the financial costs of the different certifications), the requirements for control bodies to monitor an increasing number of documents and inspections, obligation for producers to follow different rules for labeling and segregate organic products from other organic products, creating a paradox.

Mediterranean countries of the Southern shore have not yet adopted national standards for organic production, except for Tunisia (whose regulation is to be considered equivalent to the European) and Turkey. Nevertheless, in these and other countries, it is to be considered how standards should primarily be the result of a revision that takes into account local needs and the interests of the stakeholders that are part of it, rather than the interests of large exporters. To get into the problem is asked a question: "Could the European standard be applied without modification to the Arabian countries? If not, what are the rules that cannot be applied, or vice versa", which processes applied in those countries are not complying with the Regulation? It's easy to bring an example of how it would be difficult to apply rules on animal husbandry, such as Article 20 or Reg. 889/08 setting how for herbivores, housing systems should be based on the maximum

use of pasturage according to the availability of pastures throughout the year. In this case we would be facing desert areas, high temperature, no grazing, drought.... Similar problems would be found to be consistent with article 12 of Reg. 834/07 which says how the fertility and biological activity of the soil shall be maintained and increased by multi annual crop rotation including legumes and other green manure crops, and by the application of livestock manure or organic material, both preferably composted, from organic production. Again, the absence of water, high temperatures, short growing seasons, lack of adequate plowing machinery, radical competition and high water mineralization make this rule difficult to implement. In short, a single standard is certainly difficult to create, but not impossible, if we focus more on the final objective of organic respect of the diversity that makes up different areas. Regarding this example, the creation of a common standard for the Arab countries and consequently a larger market would certainly be preferred to the development of five or ten national standards. A “pan-Arab” regulation would lead to increase foreign investment, a greater number of end users and a stronger commercial position against other international markets as Europe and America.

Control and Certification in Italy

Fabrizio Piva, Federbio

For Fabrizio Piva, FederBio vice-president, the seminar constituted an important opportunity to investigate the effectiveness of the control system and national production system towards a growing global market.

The national control and certification system works –stated Piva- for an area that represents one of the main actors of “Made in Italy” worldwide; almost 60% of the Italian organic production crosses national borders towards European Countries and other markets, which are far but extremely interesting, such as the “Far East” and North America.

For this reasons, national certification system guarantees to maintain and enhance the credibility and reliability of the manufacturing national activity. The private certification system is a point of reference for the activity of the operators, for the guarantee of Central and Regional Public Authority framework, for the activity of the public supervision bodies and for the voluntary accreditation system, which became mandatory from 01.01.2009 in order to provide an additional assurance about the characteristics required to authorized certification bodies.

In 2009, national certification systems ran over 63.000 inspections, collecting and analyzing nearly 6.000 samples from different production sectors, and observing nearly 12.000 irregularities and 1.200 infractions. In these years, this activity allowed to contribute not only to support a growing market, but also to improve production conditions and the quality of the products. This is a central element in a certification system, because its main task is not to repress or to punish, but rather to help an improving quality of both processes and products.

At an international level, this has led to a connection between national and international systems. Remember that in Italy, over 12 authorized certification bodies, 6 are authorized by the USDA for NOP, 5 in accordance to JAS for Japan, 4 by COR for Canada, 5 in accordance to the iFOAM standard, 5 applied for the recognition as a equivalent bodies under the EC Reg 1235/2008, and 5 work in countries with specific organic legislations and perform verification activities on private standards.

However, production standards, whether public or private, cannot become a protection instrument as a “non-tariff barrier”; the “benchmarking” enforced by EU with the EC Reg 1235/2008 goes in the right direction to create mechanisms of equivalence and mutual recognition, especially in situations where standards overlap by 98%, differing in marginal elements that do not invalidate the concept of organic. For this purpose, it's necessary that Member States, in particular Italy,

which has an highly internationalized activity, work together with the EU Commission in order to accelerate the recognition of equivalence. But this concept of equivalence must also be reciprocal: recognizing the equivalence of Japan means that Japan must recognize equivalence to organic products from EU. The EU must speed up the process towards countries such as Canada, South Korea and U.S. with the same principle. The absence of such negotiations results in excessive and unnecessary costs for the production system, which reduces its competitiveness in global markets. Competitiveness also implies a better organized monitoring and certification system, and Public Authorities play a vital role in this. In fact, the role of public authorities is not to ensure production, but to ensure the framework, with rules and a surveillance activity which can provide certainty to the various players involved, including certification bodies.

Far from this goal is the supposed bureaucratic simplification through a computerization process which continues without coordination between central and regional authorities, with the result that each region is implementing different systems. This only brings to bureaucratic and economic difficulties for the productive system.

A coordinated action is needed, as in a concert: each person must play its instrument in a set of rules established in order to reach an harmony that sounds pleasant and not awkward to ear. But a good conductor is needed.

The role of the Regions

Guido Violini, Regione Emilia Romagna

Guido Violini, who would have taken a speech on behalf of Emilia-Romagna Region, unfortunately did not manage to participate to this convention. Nevertheless the InterBio coordination has decided to include a synthesis of what would have been his speech, since it is complementary to the topic. In fact, it regards the role of the Regions for what concerns national system's reliability and effectiveness, market's globalization, with the analysis and evaluation of the current situation and of the problems to solve.

The role of the Regions ranges on four main areas, which are those of regulation, support to development policies, promotion and supervision.

For what concerns regulatory activity, Regions had a voice in rules' development, influencing organic system. In the past, this regional expertise has led to situations of "separate application" with respect to certain requirements, contributing to the perception of a "differentiation" on the market as well, with the risk of creating some distortion effects.

With the new EU Regulation, the 834/07, clearer dispositions about the concept of flexibility have been obtained (art.22), as well as through the 889/08 Regulation, which sets possible extraordinary application rules (chapter 6). These provisions ensure to Regions a sufficient leeway to ensure their jurisdiction in agriculture, with more consideration of local territorial specificities.

In particular it is recognized to the Regional Authorities a competence in matters such as the exception to the use of copper (art.5), origin and use of non-organic animals (art. 9 and 42), areas of common grazing (art. 17), maximum number of animal per hectare (art. 15 and annex IV), retroactive approval of the conversion period (art.36) and actions in case of catastrophic circumstances (art.47).

The access of the Italian organic production to a global market is guaranteed by some key elements, such as firm size, aggregation practices, competitive factors and reliability. A public administration can have a strong influence on each of those factors by means such as Rural Development Programs (of regional competence), and by guiding and promoting organic farming through professional training, incentives for companies' modernization, policies on the added

value of agricultural products and forestry, inclusion of the farmers into food quality systems, support to producers' associations for information and promotion activities.

In the case of Emilia-Romagna Region, the Rural Development Plan for 2007-13 foresees a total of 934 millions of euro of public funds from Europe, State and Region (75 millions more than the 2000-2006 plan). Counting private co-financing, budget reaches 1.5 billion euro. In 2007, 74% of the regional organic area has received funds for environmental measures from the Rural Development Plan.

Another important activity at Regional level concerns promotion. Promotion may be direct, even at international level, or indirect, through sponsorship for participation in national and/or of internationalization programs, or through targeted information campaigns.

Regarding the work of supervision, this is undertaken together with the ICQRF (*Central Inspectorate for Quality Protection and Fraud repression*) both on inspection bodies (in their national or local offices) and on the operators producing in the Region. The fact that the supervision activity is shared between regions and ICQRF (national level) certainly brings benefits, since a greater presence on the territory is granted aside a more precise knowledge of local realities. On the other hand, critical issues can be found since coordination and information exchange is often inefficient and a lack of clarity on institutional role can be experienced (especially on the management of sanctions). It's therefore necessary to standardize the vigilance through a definition of roles and functions, including an enhancement of the Accreditation Body's action (ACCREDIA) to ensure system's reliability and transparency.

In the case of Emilia-Romagna, regulations for the organic sector are established by regional law 28/97, in which criteria to undertake the supervision are enshrined. Specifically, monitoring consists of annual visits to control bodies' local and central offices and of a number of annual visits to operators on the regional list (under article 5 of the regional law 28/97), 3% of the total. The region also plays an asset of regulation management through the establishment of a regional official list of organic operators, which is then placed on a national list. Some regions, as Emilia-Romagna, have implemented computerized procedures for the operators' notification. In Emilia-Romagna, in those days, the new Internet based system, AGRIBIO, is entering on force.

Data on operators in Emilia-Romagna show that organic farms are 2772, with a trend in constant decline since 2002. Nevertheless, proportionately, the contraction of cultivated areas is small compared to decline in number of operators, indicating an increase inorganic farms' average size. 70% of the total area (80,469 ha in 2008) is cultivated for fodder, 17% consists of cereal grains cultures and 8% is devoted to fruit cultivation (vines included).

For what concerns organic farming, regional livestock estate is of nearly 600 companies, of which more than 65% consists of cattle. In addition there are sheep and goats breeding (180 farms), poultry breeding (60 farms), bee-keepers (80 companies). The interest of the market for organic products is confirmed by the significant presence of workers involved in the preparation and marketing of organic products. Their number is constantly growing in recent years, and brings the total number of certified organic operators in Emilia-Romagna to over 3800.

In conclusion, national control system has to ensure the maximum confidence in the national organic production. This can only happen when all the actors involved (authorities, accreditation bodies and inspection bodies) could perform their duties in co-operation.

As regards the Italian situation, the challenge of global organic market can only be overcome by focusing on reliability high quality production.

Accredited Certification: opportunities in the new legislative framework

Ilaria Dozza, Accredia

That of accredited certifications is a nationally and internationally deep-seated concept, said Ms. Dozza, especially in areas known as volunteers (i.e. regulated by reference standards whose application is based on an individual voluntary choice and not by national or supra-national legislation). Several factors brought to a growth of this concept: the proliferation of certificates whose value was often not recognized by the user, the spreading of normative references more or less recognized and shared on a national and international level, market's globalization with the establishment of economic free trade areas, which are extensive, and for this reason require a product value that has to be globally recognized.

For all those reasons is more and more widespread the need for users to get a reasonable assurance of quality, safety and compliance with the requirements expected from goods and services bought, but also for producers and suppliers to provide these guarantees to the market.

To meet those needs, the concept of accredited certifications of conformity has developed, a concept in which "impartiality", considered as the independence of the assessor from the assessed and/or from the assessed and certified object, it's one of the basis for system's reliability. Accreditation, which is the final control in the chain of control assessment, is "Third party attestation of a conformity assessment body that involves the formal proof of its competence to perform specific tasks for conformity assessment" (definition by ISO/IEC 17000).

In particular, the Accreditation Body (hereafter AB) attests the ability to conduct an activity in compliance with the principles of:

- Impartiality: representation of all the stakeholders within the Body/Laboratory (uniformity of behavior for anyone applying for certification and/or supervision).
- Independence: absence of interests' conflict between the organization to be certified and the auditors/decisional committees which releases a conformity declaration.
- Correctness: European standards prohibit the provision of advices either directly or through associated companies.
- Competence: the staff involved in the evaluation of compliance must be culturally, technically and professionally qualified.

Those principles can be summarized in the broader principles of reliability, a continuous guarantees during time of validity of the third party certification to protect the market.

To do so, an AB operates (ISO/IEC 17011 for AB) verifying the conformity of conformity assessment bodies' management system and competences, in compliance with internationally recognized regulatory requirements (ISO/IEC 17021 or EN 45011 or ISO/IEC 17020 for conformity assessment bodies, depending on whether they're certification bodies for management systems, for products or Inspection Bodies), providing international recognition, or mutual recognition of the granted accreditations, as a fundamental step towards the mutual recognition of certificates and/or certificates issued. If of those principles there was an absolute awareness within the voluntary, until a few years ago the legislation only provided that the conformity assessment bodies had to work in accordance with the conditions specified in the internationally recognized regulatory requirements (as said above).

In Europe, the process of evolution from this concept to the one of accreditation was first established by the hygiene rules by the EU Regulation 882/2004 relating to official controls to verify compliance with laws on food and feed, and on animal health and welfare, which provides:

- art.5: the delegation of specific tasks related to official controls on condition that the control body works and is accredited according to EN 45004 (now 17020) "general criteria for the activity of various types of bodies performing inspections" and/or another standard

if more relevant to the delegated task

- art.12: is required that official laboratories work, are assessed and accredited in accordance with European standards EN ISO/IEC 17025, EN 45002 and EN 45003.

Then, into regulations to be applied only to food industry (Reg (EC) No 509/2006 art.15 in force from may 1st 2010 relating to the traditional guaranteed specialty, Reg. (EC) No 510/2006 in force from may 1st 2010 relating to geographical indications and designations of origin, Reg (EC) No 834/2007 art.27 in force from may 1st 2010 concerning the organization of wine market). And finally with the release of the EC Reg No 765/2008, in force since 1st of January 2010, by which the European legislator attempted to standardize the approach across Member States relating to market surveillance, inspections from third countries, CE marking and accreditation in a EU territory with boundaries that are ever wider and increasingly regulated by different legislative references.

In this regard, it is considered useful the 'Considering 13' of the regulation, where it's stated that an accreditation system which functions in reference to binding rules helps to increase mutual trust between Member States, in the competence of conformity assessing bodies and, consequently, in the validity of the certificates and reports issued by the same . Thereby, the principle of mutual recognition is enhanced and, therefore, the provisions of this regulation on accreditation should be applied to bodies carrying out conformity assessments in both regulated and voluntary sector. Since this is to ensure the quality of certificates and of test reports whether they fall in either sector, there should be no distinction made between the regulated and the voluntary sector.

The Regulation provides that each Member State, where it doesn't carry the accreditation of conformity assessment bodies itself (and in this case it has to provide to the Commission evidences of fitness to perform the activity), must identify a uniform national accreditation body to carry out the accreditation as a public authority activity, to which it gives formal recognition, regularly monitoring of its compliance with the conditions laid down in regulation, which recalls, among the others, the principles defined in international standard ISO/IEC 17011. The organization must be a nonprofit, according to a principle of non competition with other national accreditation bodies and conformity assessment.

The same Regulation also stresses the need for the Body , in order to guarantee the free flow of goods and for the recognition abroad of its certificates, to adhere to international bodies for accreditation (EA, IAF, ILAC), through the subscription of international agreements on mutual recognition of accreditation. In addition there also are agreements known by the acronym EA/MLA (Multi Lateral Agreement) where the accreditation body may participate only after succeeding in a peer assessment or peer review; it's a transparent evaluation system designed to ensure compliance of the accreditation body to the conditions of art. 8 reg. CE n 765/2008, or ISO/IEC 17011: competence, impartiality, independence, confidentiality. It consists of evaluations conducted by inspection teams whose members are qualified auditors coming from other organizations which must be members of the supra-national EA organization or must have signed an EA/MLA agreement.

Participation in MLA Agreements (International Agreements of Mutual Recognition) therefore provides:

- Competence and procedural rigor of the accreditation body signatory
- Uniformity in the way of working for all the signatory agencies (Peer Assessment).
- Validity and recognition of accreditation as an effective tool for qualification of operators of conformity assessment (and consequently of products certification, systems and staff management, as well as of the issued inspection reports) on the European and international market, in all the countries which are members of EA (European cooperation for Accreditation), IAF (International Accreditation Forum), ILAC (International Accreditation Cooperation). This results in a reduction of technical barriers which create difficulties to

international commerce, as enshrined under GATT (General Agreement in Tariffs and Trade, now WTO).

What is said above has been completed within the national EC Reg No 765/2008, with the Inter ministerial Decree of the 22.12.2009 and published on the Gazzetta Ufficiale No 20 of the 26.01.2010: "Designation of ACCREDIA as the only Italian body authorized to play the activity of national accreditation and of market surveillance in accordance with regulation (EC) No 765/2008, art.4, paragraph 4, law n. 99 of 23.07.2009".

The administrative order has been published contextually to the decree which identifies the requirements for the operation of national accreditation. The texts of these two decrees have been signed by all the nine Ministers involved.

ACCREDIA has been found on the initiative of the existing SINAL (AB for testing laboratories) and SINCERT (AB for Certification and Inspection Bodies) with a process started in the far 2002. ACCREDIA is a non profit institution, which gathers between its major stakeholders many institutional, scientific and technical, economic and social subjects involved in the accreditation and certification activity, for a total of 59 associates. Examples of these stakeholders are: 9 Ministries, which are members of law (Ministry of Economic Development, Ministry of Environment, Ministry of Defense, Ministry of Interior, Ministry of Infrastructure, Ministry of Labor, Ministry of Agriculture and Forestry, Ministry of Health, Ministry of Education University and Research), other National Public Administrations, research institutes, all the major Business Organizations, Associations of accredited subjects, several consulting services Associations, consumers Associations and major Companies providing public utility services.

ACCREDIA's activity is divided into four departments that provide accreditation for:

- Certification and Inspection of management systems, products and personnel
- Calibration Laboratories
- Testing Laboratories
- Testing Laboratories for food safety.

It is based in a system of subsidiarity, on which Public Authority has the Control, address and responsibilities, and relies on Accreditation Bodies for defined tasks on the basis of specific agreements. In particular, ACCREDIA will work under the supervision of the Ministry of economic Development, identified by the decrees as the National Authority for accreditation activities in Italy and as a point of contact with the Commission; it will also work with all the other Ministries and Public Administrations involved in accreditation, ensuring their full participation.

In the international context, the following dates have to be noticed:

- 27-28 May 2009: EA General Assembly accords to ACCREDIA the role of EA's full member, transferring to this new body the International agreements which were signed by Sincert and Sinal.
- 16 October 2009: ACCREDIA officially became signatory of International agreements for mutual recognition EA MLA for the following schemes: QMS (quality), EMS (environment), PRS (personnel), PRD (products and services), ISP (inspections), LAB (testing laboratory).

For what concerns the PRD scheme for agro industrial sector, are to be noticed the activities taken in the regulated sector for the accreditation of CBs involved in the certification of PDO and PGI products (with a deadline to fulfill accreditation requirements at 10 may 2010) and for those involved in the certification of organic production (deadline was on 1 January 2009).

However, in organic farming, first accreditations were requested by inspection bodies on a voluntary basis already in the '90s, when the legislative reference was the EC Reg. 2092/91. In this context ACCREDIA (former Sincert) found itself confronted with a reality where the EU Reg. 2092/91, which is the basis for all conformity assessment activities, mainly contained organic agriculture requirements, and only summarily requirements regarding the establishment of the

control system.

On the other hand, internationally accepted standards of reference for accreditation provided that a certification system, in addition to defining certification requirements (product description, certificated specifications, methods of measurement, acceptability values, uncertainties, quality system), had to define certification rules, such as type of control (inspection and/or testing), frequency of inspections, frequency and abundance of tests (both for operator and for CBs), sampling plans and methods, non conformity management, corrective actions, contractual relations with testing laboratories. These activities have an essential role in system's transparency and reliability, in stakeholders' interests, including consumers.

From the comparison with this reality, and given the requirements of the ISO/IEC 17011 par. 4.6.2 (reference standard for Abs) which provides an opportunity for the Abs to take applicative documents or guidelines and/or to participate to their development, in the 90s was born, and it's still alive, the Organic Working Group.

This working group is coordinated by ACCREDIA and its players are the same accredited bodies. In 2004, it has issued a document, the RT 16, which is now under revision. It's main contents are:

- Creation of databases gathering analytical results and surveys issued by ACCREDIA during its audits.
- Homogenization of classification modality, in order to get a uniformity of non-conformity management and of they're sanctions.
- Documentation certifying certification's status
- Criteria for the identification of risk classes in order to determinate the riskiness of operators and to develop control programs
- Managing modality of contractual relationships with testing laboratories and of analytical results.

RT 16 introduced an approach that appeared into Community legislation only later, which is based on risk analysis in order to guarantee grater efficiency and effectiveness.

The experience gained by ACCREDIA allowed it to be a member of the EA Task Force for harmonization of organic CBs activity together with other ABs working in those country were organic production is relevant in the primary sector.

In order to create a more efficient system for operators to achieve conformity assessment certificates of validity for their business ACCREDIA:

- Established in October 2009 a Conformity Verification Body (CVB) for CBs accreditation which operates according to COR, the Canadian standard. The certification scheme is managed by the CFIA Canadian Food Inspection Agency (an audit agency of the Ministry of Agriculture, the Canadian competent authority) which holds the final responsibility of accreditation issuing, in the work stock and on the opinion expressed by a CVB.
- From October 2009 it prepares the annual evaluation relationships enshrined by art. 33 of EC Reg. 834/2007 for the import of products which offer equivalent guarantees to those obtained from productions in accordance with the EU requirements.