

Chapter 14

The European Union's Import Procedures for Organic Foods and Beverages

This chapter describes EU import procedures for organic foods and beverages. It describes problems that have arisen for the certification or accreditation of producers, notably in developing countries. Examples are taken from Uganda, Chile and Mexico.

Introduction

In June 1991 the European Union (EU) enacted a new, Community-wide regulatory framework for “organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs”. Council Regulation (EEC) No. 2092/91 (henceforth “the Regulation”) provides for:

- A set of minimum production and processing rules that must be satisfied in order for a product to be labelled “organic”.
- A specific inspection regime that is obligatory for all operators involved in the placing of products from organic farming on the market, whether they are produced in the EU or imported from third countries.

A major objective of the Regulation was to provide the organic farming sector with a precise, legal definition of the term “organic”, thereby harmonising the multitude of definitions existing at the time in EU countries. The adoption of Community-wide standards has made it easier for EU consumers to identify products of organic farming and has provided them with assurances that these products have indeed been produced organically.

The impact of the Regulation on developing country exporters has been mixed, however. On the one hand, it has created new opportunities for exporters. Besides being a major producer, the EU is also one of the world’s largest import markets for products of organic agriculture. About 80 countries, 60 of them developing countries, currently export certified organic foodstuffs to the EU (European Commission, 2000). Coffee, tea, bananas and other tropical fruits are among the products most commonly imported from developing countries.

However, the nature of the rules poses difficulties for countries where natural conditions differ significantly from those in Europe and for countries with weak governmental structures. Moreover, because much of the implementation of the Regulation has been left to the discretion of the EU’s member states, multiple interpretations of particular rules are possible. In particular, import procedures, introduced on a temporary basis to provide alternative routes for imports from countries unable to obtain an equivalency agreement with the EU, have led to delays in shipments and uncertainty about future access to the EU market. These problems have affected exporters in a number of developing countries. The examples discussed below involve Uganda, Mexico and Chile.

The European Commission has responded to these problems by developing a new “European Action Plan for Organic Food and Farming”. Among the changes in policy envisaged is increased support for capacity building in developing countries in favour of organic agriculture. The Commission is also exploring what further measures could be used to facilitate trade in organic products from developing countries.

Development of the environmental measure

Organically labelled products were considered with suspicion by many segments of the European industry during the 1970s and 1980s, including farmers that applied conventional technologies and practices, food processors and even some public administrations. Consumers also found the plethora of logos and product claims confusing and less than fully trustworthy. The lack of a clear definition of the term

“organic” in the European Union, and of a well-organised inspection system, were identified as major problems. In the 1980s organic farmers in the European Union initiated work on a legal framework for organic agriculture, which eventually culminated in 1991 in the publication of Council Regulation (EEC) No. 2092/91.¹

Although the objective of organic farming is to develop environmentally sustainable agricultural practices, the main aim of the Regulation was to protect consumers from dishonest marketing and to ensure fair competition among producers. However, the Regulation is also intended to enable farmers applying organic production methods to compete with producers that do not apply organic production methods, or who apply them only to a limited extent. The drafters of the Regulation felt that such protection was needed to encourage farmers to make the necessary investments, and undergo the transition period, required to complete the conversion from conventional to organic farming. To help them in this conversion process, many member states have provided financial support to producers, which is matched by the European Commission under its agri-environmental programmes.

Since the EU was the first legislative body to develop a national regulation on organic agriculture, it could not harmonise its rules with those of other countries.² There already existed, however, a set of “Basic Standards of Organic Agriculture and Food Processing”, which had been developed during the 1980s by the International Federation of Organic Agricultural Movements (IFOAM), a non-governmental federation of organic producers, processors, traders and institutions involved in research and training. Indeed, IFOAM had been one of the groups lobbying the European Community in the 1980s to ensure that its planned regulation of organic food production furthered the development of organic agriculture. Nonetheless, no formal procedure was followed to harmonise the two sets of standards.³

While the Regulation applies throughout the Community, many of the details relating to its implementation differ from one member state to another. For example, some countries apply additional public standards that affect organic production, especially with respect to animal husbandry. In the area of labelling, overlapping rules apply. The EU has developed a single logo for organic products (Figure 14.1), but it can only be used for products originating within the EU. At the same time, six member states have developed public labels of their own, and in several of them restrictions apply to the use of these logos on products originating from outside the EU. France’s “AB” (*agriculture biologique*) logo, for example, can be used on foodstuffs containing plant products produced in a third country only if the raw materials are unavailable or cannot be produced within the EU (Rundgren, 2002).

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1. DG Agriculture, Unit for quality of agricultural products, Sub-unit for quality policy, is in charge of the Regulation 2092/91 and the Article 14 committee (which decides on amendments and implementation measures). Supervision of the Regulation is carried out by Food and Veterinary Office, SANCO D3. In addition, the DGs responsible for environment, legislative matters and labelling, and the internal market are consulted to a certain extent when new proposals are prepared.
 2. Lately, however, the European Commission reached an agreement with the Japanese government on the recognition of equivalence of the EU Regulation by the new regulatory system in Japan (at present one-way: only for EU exports to Japan); see *The Organic Standard*, Issue 2, p. 10. An equivalency agreement between the United States and the EU does not seem to be “on the immediate horizon” (Bowen, 2001).
 3. Although they differ in terms of structure and detail, the EU Regulation and the IFOAM Basic Standard are broadly similar in substance.

Figure 14.1. The European Commission’s organic logo



Another distinctive feature of the EU system is that both semi-governmental organisations and private bodies are involved in certifying organic production. However, private certification bodies are not automatically authorised to operate across the EU, and in Austria, Germany and Spain, certification bodies have to obtain separate approval from each region or state in which they operate (Rundgren, 2002). In Denmark and Finland, the inspection of organically produced food is integrated into the normal food inspection systems, rather than involving separate certifiers.

Responsibility for the “approval” and supervision of certification bodies (referred to as “inspection authorities” in the Regulation) rests with the designated competent authority, usually the member state’s Ministry of Agriculture or an agency designated by that ministry. The EU’s executive body, the European Commission, does not normally approve the credentials of certification bodies.⁴ However, private certification bodies have to fulfil the requirements of the EN 45011 norm. Basically, this is the European edition of the International Organization for Standardization’s (ISO) Guide 65, “General Requirements for Bodies Operating Product Certification Systems”; in four EU member states the competent authorities insist on full accreditation to EN 45011 as proof that the certifying organisations fulfil the norm’s requirements.

Except in Austria and the United Kingdom (which charges a GBP 339 initial application fee and a GBP 339 annual fee), the member states’ competent authorities do not charge private certification bodies for approving their credentials. By contrast, charges for accreditation — which many member states require of certifiers operating outside the EU and which is typically carried out by national accreditation bodies — can range from below EUR 5 000 to EUR 20 000 a year (Rundgren, 2002). No specific allowance is made for IFOAM accreditation. Nevertheless, eight certification bodies in the EU have already received IFOAM accreditation or have applied for it; these bodies all operate in countries where accreditation to the EN 45011 norm is not mandatory.

There is no evidence that developing country interests were explicitly considered in the design of, or in the process of amending, the rules. Initially, information about the rules reached exporters and exporting countries primarily via importers and certification bodies. An accessible brochure describing the rules, which devoted two pages to import procedures, was issued only in 2000 (CEC, 2000b). Nowadays, information is also provided in several languages on the Commission’s Web site (http://europa.eu.int/comm/agriculture/qual/organic/index_en.htm).

4. The main exception occurs when an EU member state requests the Commission to approve a third country’s inspection body and asks that it be added to the “list”. This Article 11(7) procedure has been used only once in respect of a certification body from Hungary (Kung Wai, 2001).

The Regulation allows two main procedures for allowing imports from third countries. The original intention was that imported products would be marketed as organic in the EU only if they came from countries with which the European Commission had established equivalence, *i.e.* countries able to guarantee that any organic product exported to the EU fulfils requirements equivalent to those of the Regulation [Article 11(1)]. In order to be included on this “third-country” equivalence list, the exporting country’s government must, among other things, adopt a national standard for organic production, supervise and approve inspection bodies (private or official), and set up a system to issue official certificates. Once the Commission has assessed and approved a country, it is the exporting country that guarantees that the products fulfil the EU requirements. At present, six countries are listed: Argentina, Australia, Costa Rica, Israel, New Zealand and Switzerland. In Argentina’s case, a favourable equivalence determination was made in 1996, almost four years after receipt of its request. Costa Rica applied for a determination of equivalence in February 1999 but only recently received it. About 20 countries have applied to be listed, and a larger number of countries have signalled interest but have not yet completed applications.

When the Regulation was introduced, it soon became evident that the process of approving countries was too lengthy to ensure an adequate and reliable supply of organic foods. An exceptional way of approving imports was therefore added, Article 11(6), known also as the “importer derogation”.⁵ Today, the large majority of imports still enter through Article 11(6) procedures. Under these procedures, imported organic products may be marketed as such if the importer can furnish the competent authority in the member state with satisfactory proof that the product was produced and inspected in accordance with the EU rules. Responsibility for import approval is thus placed on the member states. The exception was to be limited to a few years, but has since been extended several times, most recently to 31 December 2005.

In September 2001 the European Commission issued Regulation (EC) No. 1788/2001) which mandates that *original* certificates of inspection must now be presented at the point of entry⁶ into the EU.⁷ (Previously, the original copy of these certificates only had to be delivered to the premises of the first consignee.) The new Regulation, which went into effect on 1 November 2002, must also be used for imports covered by individual marketing permits.⁸

5. In total, since its introduction, Council Regulation (EEC) No. 2092/91 has been amended more than 25 times.

6. These certificates do not need to physically accompany the consignment of goods. However, the sooner the certificate reaches the competent authority, the sooner they can endorse it.

7. A proposal was also circulated to introduce requirements for “transaction certificates” for intra-EU trade, in order to prevent fraud; among other requirements, it would have required the same kind of documents as are now needed for all imports to the EU. The proposal has not been accepted, however, because it is seen as too costly and bureaucratic for traders (see *The Organic Standard*, Issue 4).

8. In detail, the certification body operating in the third country must issue the certificate of inspection as a single original, after checking the inspection documentation and the commercial documents of the consignment. In the case of marketing authorisations operating in accordance with Article 11(6), the competent authority of the EU member state must declare on this original certificate of inspection that the consignment is covered by such an authorisation before customs procedures begin. This task may also be delegated to the importer’s certification body.

Trade issues

The production rules in the EU regulation are detailed and designed in accordance with farming conditions within the EU. Importation is always possible, of course, provided that: the importer furnishes the competent authority of the importing member state with sufficient evidence that the imported products were produced according to production rules equivalent to those laid down in Article 6 of the Regulation; that the products were subject to inspection measures of equivalent effectiveness to those referred to in Articles 8 and 9; and that these inspection measures are consistently and effectively applied.

The system, however, especially its positive lists of authorised substances,⁹ is relatively inflexible and must be adjusted when it is to be applied, for example, in areas with climate conditions that differ from those in which the standards were developed. (Adaptation to local conditions is one of the principles of organic farming.) The nature of the rules is generally not a problem for exporters in listed countries, where only equivalency with the Regulation is required, although there are signs that legislators in exporting countries “copy” the EU Regulation instead of developing legislation more suitable to local conditions (Axelsson Nycander, 1999). This situation is more troublesome for exporters from non-listed countries, who must follow the EU Regulation more strictly.

The listing procedure implies that organic farmers in non-listed countries may be at a disadvantage. Organic producers in countries that lack a functioning state administration, or where the state does not feel it has enough resources to develop the necessary legal and administrative framework for organic farming, are barred from using Article 11(1) procedures, even if their products are certified and meet the EU requirements for cultivation. The Article 11(6) procedure has been offered as an alternative, but it entails much more paperwork for exporters, importers and inspection bodies. And, in contrast with the 11(1) procedure, specific import permissions need to be obtained for each consignment. Another problem is that, in practice, Article 11(6) procedures are applied differently in different member states. The result is arbitrary decisions, uncertainty and greater information requirements for exporters and importers, and distorted trade.

One of the consequences of Regulation (EC) No. 1788/2001, if applied as expected, is that the time period during which the third country's certification body must carry out the necessary inspections and issue an original certificate of inspection may be inconveniently short, especially for products that are normally sold in the fresh state. (Applications for marketing permits must be presented to the competent authority of the importing member states some months before products can be imported.) These new regulations are expected to limit flexible reactions to short-term offers in the organic marketplace, and companies that regularly split consignments will be faced with greater bureaucratic obstacles than those that keep consignments whole.

The fact that the Article 11(6) importer derogation is slated to expire on 31 December 2005 naturally generates a great deal of uncertainty, and normally would make it difficult for producers to make long-term investments in forging strong export relationships. In a

9. The substantive requirements in the EU Regulation are structured as positive lists, *i.e.* they set out in detail what methods and substances (*e.g.* wood ash) may be employed. There are no clear criteria or procedures for including new substances on the positive lists of authorised substances.

study on Uganda, however, it was found that no exporters were even aware of the fact that, formally, Article 11(6) would be closed within a few years' time (see below).

Smallholder group certification

In developing countries, where many farmers are poor and cultivate small plots of land, inspection and certification is excessively expensive. In most developing countries, therefore, group certification based on internal control systems (ICSs) is practised. Group certification is possible only when there are sufficiently large numbers of farmers growing the same crops by the same methods and under similar conditions. In early 2001 delegates at a workshop which brought together certifiers, producers' groups, traders and competent authorities from all over the world agreed on a definition of an ICS: "a documented quality assurance system that allows the external certification body to delegate the annual inspection of individual group members to an identified body or unit within the certified operator" (Elzakker and Schoenmakers, 2001). The idea is that the main task of the certification body is to evaluate the proper working of the ICS, rather than do the primary inspections. IFOAM has developed criteria¹⁰ for smallholder group certification.

The EU Regulation was developed for European conditions and does not give clear room for recognising the work of an externally inspected ICS and accepting group certification. According to EU rules, each farmer has to be inspected annually by an independent inspector. In practice, EU member states treat group certifications differently, again creating uncertainty among producers and in many instances causing shipments to be delayed or stopped. For instance, one member state has requested that at least 25% of all farmers must be externally inspected every year, where as others require 5% or 10% or no set figure (Elzakker and Schoenmakers, 2001).

Accreditation or conformity with ISO 65 or EN 45011

Accreditation — or quality control of bodies that perform inspection, tests or certification — is becoming more widespread but has not yet broken through in all areas. In the food inspection area, for example, there are typically only one accredited certification body in most European countries. Since 1 July 1999, all bodies inspecting organic production must conform to European standard EN 45011 (or equivalently, ISO 65). The guarantee that the bodies conform to the EN standard can either be given by an official accreditation organisation, or in the case of EU member states and "listed" countries, by the country's competent authority. The requirement has created acute problems for organic exporters in developing countries where accredited certification bodies are virtually non-existent owing to the length and cost of the process or because the country has no official accreditation body. In particular, it disqualifies a number of developing country certifiers (*e.g.* in Chile) that previously had been active in certifying exports to the EU (Twarog and Vossenaar, 2002).

Based on the ISO 65 criteria, IFOAM has developed an accreditation system specifically for organic farming. The accreditation is carried out independently by the International Organic Accreditation Service (IOAS). Unlike the EN or ISO standards, this

10. The criteria require annual internal inspections of all operators, as well as an annual inspection of the group by an external inspection body. The proportion of farmers that must be externally inspected varies depending on the number and size of the operations involved, as well as the degree of uniformity, the production system and the management structure.

system focuses on production rather than product certification, and it applies not only to the structure and processes of the inspection bodies but also to practical supervision activities. Discussions with the European Commission over the last four years about what is needed for the IFOAM accreditation system to be deemed equivalent to ISO 65 has not yet led to any clear result. In practice, however, IFOAM accreditation is accepted by several EU member states. In many markets, retailers think IFOAM provides the best guarantee that production inspections are carried out thoroughly. Again, different application of rules in different member states can create an uncertain situation for exporters.

Developing-country responses

Since 1991 several countries have implemented laws to regulate production, sales and trade in organic goods (Vaupel, 2001a). Many of these, especially exporting countries, have patterned their laws on those of the EU, largely as a way to secure continued access to the EU market.¹¹

Uganda

Uganda has emerged over the last six years as the leading African country in organic production. Some 20 000 smallholder farmers manage about 50 000 hectares (1.6% of the cultivated land area), producing organic arabica and robusta coffee, cotton, sesame seeds and a variety of fruits (Walaga, 2001).

A case study on organic exports from Uganda to the EU showed that organic exporters face many constraints (Axelsson Nycander, 2000). Many of these, such as high transport costs, certification and separate handling of the products, as well as lack of access to specific market information, relate to bottlenecks in the early phases of market development. The study found, moreover, that the EU import regime was exacerbating a number of these problems. Most exporters that were interviewed complained that they lacked information about what rules applied. The three exporters that had already tried to ship certified foodstuffs had experienced delays in obtaining the necessary import licences. Since customers may lose interest if there are delays, and because the quality and value of agricultural products degrades quickly over time, such delays may have severe consequences. For instance, the products may have to be sold as conventional (*i.e.* non-organic) products at a much lower price.

One case in point was the first organically certified robusta coffee, which was ready for export by September 1999. Import clearance was held up for several months, and by the time the clearance was obtained, the customer had lost interest. In February 2000, the two containers were still at the factory in Kampala. The delays were due to the fact that certification by the Swedish certifier KRAV was not readily accepted by some EU member states. The problems were partly caused by general confusion about how the requirement that inspection bodies must conform to EU standard EN 45011 should be enforced. It is difficult to clarify exactly what happened in such cases, and to find out whether the exporter, importer, certifier or governmental authority in the importing country sent or did not send the necessary document at a certain point in time. Suffice it to note that, because so many parties are involved, and specific importing licences have to

11. For an account of the development of legislation on organics in Central America and India, see Soto (2001), Mahale (2001) and Center for Science and Environment (2001).

be obtained for each consignment, the risk is high that somewhere the flow of information and documents may be held up.

Early in 2001 key Ugandan stakeholders formed the National Organic Agriculture Movement of Uganda (NOGAMU). One of the aims of NOGAMU is to persuade the government to establish a regulatory framework for organic agriculture. NOGAMU is working in close co-operation with a number of government agencies and “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” (Walaga, 2001).

Chile

Chile has been actively involved in the marketing of organic food products (mostly fresh and processed fruits and vegetables) since 1994. According to estimates for the 1999/2000 season, organic exports accounted for approximately USD 4 million. The EU has been one of its main export destinations. However, between 1998 and 2000, the share of Chile's organic food exports shipped to the EU declined drastically, from 64% to 34% (Bañados and Garcia, 2001). The decline was due both to quality-related problems with some exported products (*i.e.* medicinal herbs and wild products) and to the fact that Chilean certification bodies were no longer recognised in the EU because of the new ISO 65 requirement. Owing to difficulties in obtaining information, a study of the impact of the EU Regulation on the Chilean supply chain was unable to determine which factor was most important.

In 1999 Chile established a national organic law, including a scheme of inspection, certification and accreditation, as a response to increasing demands by international markets. One of the law's objectives was to bring the Chilean system into compliance with the strictest organic regulations, *i.e.* those of the EU. During the same year, Chile requested that it be included in the EU's list of approved countries.

Mexico

UCIRI (Union of Indigenous Communities in the Istmo Region) is an organisation of almost 3 000 small farmers in southern Mexico, with 15 years of experience in exporting organic coffee to Europe. The organisation complains that on several occasions containers have sat in ports for months because of documentation problems. Once, for example, they were finally able to get the coffee in through another EU member state, but almost lost their customer. The strict treatment of group certification seems to have been one of the reasons for the problems. Now, they say, they have to be certified by two different certification bodies (one of them Swiss) in order to continue exporting to Europe. Many smaller organisations cannot afford this, and try to be certified by US bodies and export to the United States (however, when US regulations come into effect, the situation may change). They add: “our main concern is that the new regulations create more interest in paperwork than in the actual ecology. Instead of curbing possible fraud they only increase the possibilities of fraud.” (Van der Hoff, 1999, 2000)

Responses to developing-country concerns

In June 2004 the European Commission adopted a new “European Action Plan for Organic Food and Farming”. The Action Plan puts forward a list of 21 concrete policy measures that it wants to see implemented, including several that would positively affect

imports from developing countries. Relevant text from Action 19 and Action 20 are given below (CEC, 2004):

Action 19

Step up efforts to include third countries in the equivalency list, including on-the-spot assessments.

Amend Council Regulation (EEC) No 2092/91 on organic farming, replacing the current national derogation for imports by a new permanent system making use of technical equivalency evaluations by bodies assigned by the Community for that purpose. This could include, following appropriate consultations, developing a single and permanent Community list of inspection bodies recognised as equivalent for their activities in third countries not already on the equivalence list.

Continue to ensure that the definition of equivalence with third countries takes into account the different climate and farming conditions and the stage of development of organic farming in each country.

Upon entry into force of this system, offer all imported products access to the EU logo.

Action 20

Establish a systematic comparison between the Community standard on organic farming, Codex Alimentarius guidelines and the IFOAM standards (see also Action 2). Step up efforts towards global harmonisation and development of a multilateral concept of equivalency based on the Codex Alimentarius guidelines in cooperation with Member States, third countries and the private sector. Support capacity-building in developing countries under the development policy of the EU by facilitating information on the possibilities offered by more general support instruments to be used in favour of organic agriculture. Further measures to facilitate trade in organic products from developing countries will be considered.

This plan came in response, in part, to strong demand from consumers in recent years, but also from an awareness of the limitations of the original legislation. It is based on extensive consultations, which included an on-line consultation in 2003, a public hearing in January 2004, and meetings with EU member states and other stakeholder groups.

Concluding observations

The promulgation in 1991 of a EU-wide regulation on the organic production of agricultural products, and of procedures for certifying those products, helped to harmonise within the European Community what until then had been a highly fragmented and largely unregulated market. Consumer confidence in organic products has accordingly increased.

However, implementation of many details of the Regulation was left to the discretion of the member states, which added to the information requirements of exporters. Procedures for importing organically produced products to the EU were initially expected to be facilitated by the negotiation of equivalency agreements between the European Commission and the governments of the exporting countries. It is now evident that obtaining equivalency requires several years to negotiate, especially for developing countries. The main alternative procedure, which allows products from third countries to enter the EU if the importer submits documentation that the products have been produced

and certified according to standards equivalent to those of the EU, is more burdensome (as each consignment requires a separate authorisation), and has led in some cases to shipments being delayed. Finally, the temporary nature of this “importer derogation” added to uncertainty over future market access.

Recognition by the European Commission that the conformity-assessment procedures for importing organic produce, especially from developing countries, needed fixing, is leading to fundamental changes in its regulations. These changes, combined with a more active policy of supporting capacity building, should go a long way towards facilitating trade in organic products from developing countries.

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Acronyms

APHIS	Animal and Plant Health Inspection Service (US)
AQIS	Australian Quarantine and Inspection Service
ASEAN	Association of South-East Asian Nations
BAuA	Federal Institute for Occupational Safety and Health (Germany)
BGA	Federal Health Office (Germany)
BMZ	Ministry of Economic Co-operation and Development (Germany)
CAA	Clean Air Act (US)
CASCO	Committee on Conformity Assessment (ISO)
CBI	Centre for the Promotion of Imports from Developing Countries (Netherlands)
CFC	Common Fund for Commodities
CFC	Chlorofluorocarbons
COLEACP	Europe-Africa-Caribbean-Pacific Liaison Committee
CREM	Consultancy and Research for Environmental Management (Netherlands)
CsC	Commonwealth Science Council
CSE	Centre for Science and Environment (India)
CTE	Committee on Trade and Environment (WTO)
CTF	Consultative Task Force (UNCTAD)
DSB	durian seed borer
EEA	European Economic Area
EFTA	European Free Trade Association
EIA	environmental impact assessment
EPA	Environmental Protection Agency (US)
EPE	European Partners for the Environment
ESA	Endangered Species Act (US)
FAO	Food and Agriculture Organization (UN)
FDA	Food and Drug Administration (US)
FDI	foreign direct investment
FSC	Forest Stewardship Council
GAA	Global Aquaculture Alliance
GATS	General Agreement on Trade in Services

GATT	General Agreement on Tariffs and Trade
GTZ	Agency for Technical Co-operation (Germany)
HACCP	Hazard Analysis and Critical Control Point
IAF	International Accreditation Forum
ICSF	International Collective in Support of Fishworkers
IDM	integrated disease management
IFC	International Finance Corporation
IFCO	International Fruit Container Organisation
IFOAM	International Federation of Organic Agricultural Movements
IGEP	Indo-German Export Promotion Project
IGG	Intergovernmental Group on Tea (FAO)
IGO	intergovernmental organisation
IIED	International Institute for Environment and Development
ILAC	International Laboratory Accreditation Cooperation
ILO	International Labour Organization
IOAS	International Organic Accreditation Service
IPCS	International Programme on Chemical Safety
IPM	integrated pest management
IPPC	integrated pollution prevention and control
IRA	import risk analysis
ISEAL	International Social and Environmental Accreditation and Labelling Alliance
ISO	International Organization for Standardization
ITF	International Task Force on Harmonisation and Equivalence in Organic Agriculture
ITTO	International Tropical Timber Organization
IUC	International Union Chemical testing
JAS	Japan Agriculture Standards
JETRO	Japan External Trade Organization
JWPTE	Joint Working Party on Trade and Environment (OECD)
LDC	least-developed country
LOD	lower limit of analytical determination (or limit of detection)
MAFF	Ministry of Agriculture, Forestry and Fisheries (Japan)
MAP	Mangrove Action Project
MEA	multilateral environmental agreement
MLV	maximum limit value
MRA	mutual recognition agreement
MRL	maximum residue limit

MSC	Marine Stewardship Council
NGO	non-governmental organisation
NMFS	National Marine Fisheries Service (US)
NOP	National Organic Program (US)
NOSB	National Organic Standards Board (US)
NTAE	non-traditional agricultural export
ODS	ozone-depleting substance
OFPA	Organic Foods Production Act (US)
PCP	pentachlorophenol
ppm	parts per million
PVC	polyvinyl chloride
RCO	Registered Certification Organisation (Japan)
RFCOs	Registered Foreign Certification Organisations (Japan)
RIA	regulatory impact analysis
SCS	Scientific Certification Systems, Inc.
SGS	Société Générale de Surveillance S.A.
SMEs	small and medium-sized enterprises
SPS	(WTO Agreement on) Sanitary and Phytosanitary Measures
STIC	Sustainable Trade and Innovation Centre
TBT	(WTO Agreement on) Technical Barriers to Trade
TEAP	Technology and Economic Assessment Panel (UNEP)
TED	turtle-excluder device
UNCED	United Nations Conference on Environment and Development
UNCTAD	United Nations Conference on Trade and Development
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
UNIDO	United Nations Industrial Development Organization
USAID	US Agency for International Development
USDA	US Department of Agriculture
VOC	volatile organic compound
WHO	World Health Organization
WSSD	World Summit on Sustainable Development
WTO	World Trade Organization
WTTC	World Travel and Tourism Council

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