

Going Organic

Clarifying the complexities of organic certification for flavor and fragrance materials

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As new research reveals that 75% of US consumers buy natural and/or organic food, advocates claim that these findings dispel the myth that organic produce is exclusively for a small minority with steadfast organic principles.^a The organic market is now firmly positioned in the mainstream.

Increased awareness of the benefits of organic food and farming has also encouraged major retailers to take note with organic ranges widely available in supermarkets. Indeed, UK retailer Tesco has reported that a quarter of its customers buy organic produce once a month.^b These figures are supported by the findings of the Organic Trade Board research, which found that 64% of respondents buy organic food from supermarkets.^b

Although the economic downturn has had an impact on the food industry, the organic sector remains one of significant potential, which a growing number of producers are keen to capitalize on. And, while organic food sales dropped last year, it is important to note that sales of organic health and beauty products increased by one-third to £36 million.^c Many producers remain intimidated, however, by the seemingly unending list of rules and regulations they must comply with to supply organic produce.

Why Certify?

Over the last 30 years, organic certification has provided a legislated framework which has assisted in achieving greater consumer confidence in organic agriculture. Its importance was accelerated after the adoption of EU regulation 2092/91 in 1991. Further regulations and guidelines in the 1999 Codex Alimentarius, together with the publication of the US National Organic Program in 2000, have created what is now a well-regulated marketplace.

While the process of organic certification is not a simple one, its purpose is. Its primary aim is to independently verify that an organic product meets the specifications as stipulated by the applied organic standard. The product can therefore be legally sold within a regulated marketplace such as the European Union, the United States and other countries, including Japan. Organic certification also permits equivalence—a concept necessary to enable global organic trade and facilitate the marketing of organic products at point of sale.

In practice, organic certification also offers a tangible mark of assurance for consumers, as demonstrated by the

use of the Soil Association logo in the United Kingdom. This marquee is regarded as the most widely trusted and recognized organic symbol—a reputation built on the Soil Association's public profile and its commitment to high standards and rigorous inspection and certification protocols.

Understanding the Basics of the Regulatory Landscape

International level: This falls within the regulatory system and is covered by Codex Alimentarius. Created in 1963 by the Food and Agriculture Organization (FAO) of the United Nations and World Health Organization (WHO), the Codex Alimentarius Commission develops food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Program. Its main purpose is to protect consumer health, ensure fair trade practices in the food industry, and promote coordination of all food standards work undertaken by international governmental and nongovernmental organizations. It is the basic standard of the free market. Organic food standards, however, are modeled on EU regulation.

US level: The National Organic Program (NOP) is the regulatory system that covers the United States. Published in 2000, the NOP has helped to create a significant organic marketplace in the United States. The United States, in fact, contributes to the largest share of the worldwide organic market, which Organic Monitor estimates is worth some \$50 billion.

European level: In June 2007, the European regulations were updated and Council Regulation (EC) No. 834/2007 on organic production and labeling of organic products was published. It came into force on Jan. 1, 2009 and repealed the former regulation (EEC) No. 2092/91. On Sept. 18, 2008 the rules were published as Commission Regulation (EC) No. 889/2008, which established the requirements for the implementation of regulation No. 834/2007.

Each EU member state has different methods to implement the EU regulation at the members' state level. Most work through accredited private certification bodies. However, as an example, Denmark provides this through its own government department, "The Plant Directorate." Imports from other countries into Denmark are controlled by the Danish Veterinary and Food Agency.

UK level: Originally, UK certification was administered via the UK Register of Organic Food Standards (UKROFS). This was established in 1987 to define a UK organic standard, to hold an official list of organic operators, and to register all UK organic inspection and

^aFood Shopping Trends Tracker, Harris Interactive; www.harrisinteractive.com

^bOrganic Foods Popularity Remains During Recession; Organic Monitor, February (2010); www.organicmonitor.com

^cOrganic Market Report; Soil Association (2010); www.soilassociation.org

certification bodies. Operated by an independent board and administered by the Department for Environment, Food & Rural Affairs (DEFRA), UKROFS ensured quality controls through annual surveillance of certifier's offices, sample inspections of organic operators and registration of all UK organic inspectors. In 2003, the Advisory Committee replaced the UKROFS board of organic standards, with DEFRA continuing to administer EU regulation requirements.

Three Steps to Certification

As a general rule, the certification process involves three key stages. The first, application, requires operators to submit full details of their operations to the relevant organic certification body. To certify a farm organic, detailed maps that include non-organic areas must be submitted. For a processing facility, information regarding product flow as well as the separation between organic and non-organic sections must also be described.

It is important to note that a two-year conversion period is required before land can be certified organic. This extends to three years for existing perennial crops. Simultaneous (that is land and livestock together) conversion is permitted for livestock, provided full standards are followed. Full organic standards must be applied for the duration of the conversion period to qualify for organic certified status. The US NOP has a requirement of three years free of any prohibited inputs to qualify for organic status. This is effectively a three-year conversion period. The land must be organic before an organic crop can be established. Interestingly, processing facilities do not have to include a conversion period, though 95% of the ingredients used must be certified organic. The remaining 5% should be organic standard approved materials.

Inspection is the second step. As a minimum, inspections should take place annually. Operators must show, via records and practices, they have complied with all organic standards. Crucially, they should also demonstrate maintenance of organic integrity throughout the manufacturing process; this includes full traceability of product.

The final step is compliance and certification. This must be completed independently of inspection. It is con-

ducted by a certification officer and ultimately a certification committee, which reviews the inspection report against organic standards and issues a compliance form based on the findings. This lists any corrective actions necessary to comply with the standards and maintain organic status. Sanctions are based on the scale of any infringement of the standards and can ultimately result in organic status being withdrawn, removing the operator's right to market organic products. Any precedent decisions or those requiring closer scrutiny are forwarded to the certification committee.

Standard Selection

Although there is a largely uniform process to achieve organic status, there are, in fact, several types of organic

standards. Currently, the primary organic standards are covered by the various regulations such as (EC) No. 834/2007 and (EC) No. 889/2008, as well as the NOP in the United States. Included in the EU regulation, for example, are producers (including farmers and growers), livestock, cropping and inputs (fertilizers, composts and crop protection materials). Processing is also included under this umbrella—from simple packing to manufacturing of complex multi-ingredient products.

In general terms the principles are very similar across organic standards. But differences do exist. For example, cropping standards between the European Union and NOP do not vary significantly; there can be more substantial differences between standards on livestock, however. The EU has a number of what it terms “approved third countries,” such as India and Australia—this means the European Union has accepted these countries’ standards as equivalent to the European Union. Ironically, the United States and the European Union have yet to broker this equivalence. This results in the US certification body having to ensure EU requirements are met if products are to be exported from the United States into the European Union. While any products exported to the United States, either from within the European Union or a third country, must be certified to the NOP directly via the operator’s certification body.

Moreover, there are now organic standards and certification available for products not yet covered by the legally regulated framework, such as health and beauty, and textiles. These standards are set by private standard

setters, often in the NGO sector. The Soil Association and Ecocert both have standards for cosmetics for example, but there are also agreed cosmetic standards called Cosmetics Organic & Natural Standard (so-called COSMOS). A consortium of certifiers (including ICEA, BDIH, Bioforum, Ecocert and the Soil Association) sets these standards with the objective of harmonizing them. This creates consistency and ease of trade, enables further development of the organic market, and, importantly, provides additional opportunities for farmers, processors and retailers to develop a wider choice of organic products. It is unlikely that full harmonization will be achieved until cosmetic standards and others, such as textiles fall under EU regulations and programs like the NOP.

Conclusion

The organic market’s significant commercial potential makes it an appealing prospect for many. But its apparent complexities can deter. By equipping themselves with the relevant facts, and by working with organic experts, manufacturers can approach the organic certification process with confidence. As a result, they will be able to reap the rewards of this exciting and lucrative market.

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