

From principles to decision procedures and criteria



3 case studies resulting from
EU policy oriented research project work:
criteria for feed, for food processing
and for crop inputs



Overview

- Background
- Clarification of terminology and hierarchy
- Relevance of clear procedures and criteria
- Developing subject/area-related principles and area related strategic aims
- Case study 1: feed
- Case study 2: processing
- Case study 3: crop inputs
- Conclusions

Background: work in different EU projects

- IFOAM General Assembly 2005: New principles accepted
- European Action plan => proposal for principles in new draft Council regulation of December 2005
- Organic Revision Project: Identification of values discussion paper on evaluation criteria for feed materials Database on standards (www.organic-revision.org, www.organicrules.org)
- Organic Input project: Elaboration of a procedure for evaluating inputs / criteria for crop inputs (www.organicinputs.org)
- Quality of low input food Project, Subproject processing: concept papers - proposals for criteria for food additives (www.qlif.org)

Spheres and links between motives, ethical values, basic principles and norms

RELIGION, PHILOSOPHY, POLITICS, CULTURE

Value sphere:

- Ethical principles
- Societal /ethical values/Basic values
- Values of societal groups
- Personal values (underlying)
- Personal motives

Norms sphere:

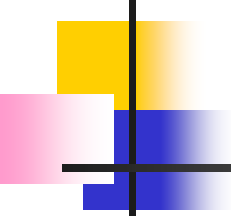
- Norm-setting (legal) principles (= Bridge to value sphere)
- Norms=> constitution => Laws =>public regulations/directives
- Private standards (e.g for organic agriculture)
- Private Code of Conducts/Code of Practise of sector groups
- Personal decision criteria
- Personal activities, preferences

PERSONAL LIFE SITUATION

Hierarchy between principles, aims, norms

- Overarching principles: are fundamental of essential nature for different areas (*e.g. fairness*)
- General subject/area related principles (*e.g. for animal health: prevention > treatment*) = **STRATEGIC LEVEL**
- Principle subject/area-related aims or means (*e.g. daily outdoor access*) = **OPERATIONAL LEVEL**
- Decision criteria – subject/area-related (*e.g. for inputs*) – for standard setting bodies as well as for operators
- Public or/and private norms for operators and control bodies (*national implementation rules/specific standard*)
- Private Code of practise => Code of conduct of a whole sector (contractual agreement), *e.g. social charta of*

Example of subject/area-related principles and aims (means)



- The basis for organic livestock husbandry is the development of a harmonious relationship between land, plants and livestock, and respect for the physiological and behavioural needs of livestock.
- This is achieved by a combination of providing good quality organically grown feedstuffs, appropriate stocking rates, livestock husbandry systems appropriate to behavioural needs, and animal management practices that minimize stress and seek to promote animal health and welfare, prevent disease and avoid the use of chemical allopathic veterinary drugs (including antibiotics).
- *Source Codex Alimentarius Guidelines GL 32, 1999, rev 1. 2001 rev 2. 2004*

How to develop new or verify existing decision criteria / norms

- Many of these hierarchies between principle-criteria have been developed historically over years in the organic movement as a result of many debates (*see hierarchy in IFOAM norms, Codex Alimentarius Guidelines, partly already also in EU regulation, e.g. animal health*)
- The consequences of new or reformulated principles must be understood and broadly discussed => **participatory process, which needs time / No top-down approach**
- Not necessarily each area has to be revised against new or reformulated principles as long as no conflicts arise: *contradictions, loss of consumer trust, market distortion*
- Principles however can give guidance in developing implementation rules for new or unclear areas (*e.g. for food additive list for animal products*)

Case study 1 feed: relevant subject/area-related principles

What subject/area-related principles are relevant:

- Health: no synthetic hormones; maternal milk etc.
- Ecology: Roughage > concentrates; local feed > global feed (feed miles), adapted to physiology of animals
- Fairness: Access to pasture
- Care: no “unnatural” growth promoters (no antibiotics, metallic substances), no GMO use (including derivatives)
- System approach: emphasis on land-based organic production, strengthen self-regulation properties as basis for good animal health
- Organic integrity/Consumer perception: 100 % organic feed (derogations must be very limited)

Case study 1 feed – organic revision project recommendations

Sundrum & Padel 2006

- In general, it is **possible** to formulate diets for pigs and poultry **without conventional ingredients**.
- There are **problems of availability** for some organic ingredients, especially high quality protein sources, in various regions and countries. Studies necessary.
- In order to assess the necessity for supplementary feed within an organic farm system, **farm gate feed balance sheets** are necessary, including analysis of the home-grown feedstuffs, and formulation of feed rations according to the requirements of the farm animals in their different stages of life.
- Based on the farm gate feed balance sheets **farm-specific feeding strategies** should be developed => improve the efficiency in the use of home-grown feedstuffs and prevent imbalances that may cause harm to the animals.

Case study 1 feed: General criteria for feed

Example of criteria for the establishment of lists by competent authorities or private standards setting bodies

General Criteria for feed (from Codex Guidelines, inspired from IFOAM norms)

- substances are permitted according to national legislation on animal feeding;
- substances are necessary/essential to maintain animal health, animal welfare and vitality; and such substances:
- contribute to an appropriate diet fulfilling the physiological and behavioural needs of the species concerned; and
- do not contain genetically engineered/modified organisms and products thereof; and
- are primarily of plant, mineral or animal origin.



Case study 1 feed: Specific criteria for feed

Specific Criteria for Feedstuffs and Nutritional Elements (Codex)

- feedstuffs of plant origin from non-organic sources can only be used, if they are produced or prepared without the use of chemical solvents or chemical treatment;
- feedstuffs of mineral origin, trace elements, vitamins, or provitamins can only be used if they are of natural origin. In case of shortage of these substances, or in exceptional circumstances, chemically well-defined analogic substances may be used;
- feedstuffs of animal origin, with the exception of milk and milk products, fish, other marine animals and products derived therefrom should generally not be used or, as provided by national legislation.
- In any case, the feeding of mammalian material to ruminants is not permitted with the exception of milk and milk products;
- Synthetic nitrogen or non-protein nitrogen compounds shall not be used.



Case study 1 feed: challenges and strategies

Challenges and difficulties:

- How to define criteria for availability – on which level (local versus global)?
- How to come to 100% organic feed with some flexibility for special situations and countries in early stage of Organic Farming without creating market problems
- Traditional way of feeding animals (e.g. Japan: access to pasture very limited)

Strategies:

- Define better criteria for local availability e.g. with distance cercles. (*Sundrum & Padel 2006*)
- Develop and apply criteria for feed additives (see IFOAM and Codex) for establishment of national lists.

Case study 2 food processing: relevant subject/area-related principles

What principles are relevant:

- Health: additives lowest but still effective quantity (e.g. sulfites in wine), maintain “vital” properties of the food
- Ecology: energy saving technologies, minimum environment management
- Fairness: minimal social standards in processing
- Care: no allergenic substances, no GMO use (and derivatives), careful/minimum processing
- System approach: functional ingredients > additives (e.g. milk protein instead of thickeners)
- Organic integrity/consumer perception: little use of additives (E-numbers), “natural” > nature-identical additives (e.g. Ascorbic acid)



Case study 2 food processing: recommendations

- Results of a Broad consultation of 100 processors and processing specialists
- **Other tools** than regulating everything in the EU regulation are proposed: e.g. Code of Practise for organic food processing
- **Use and restrictions for additives** was the only area, where the majority of processors clearly want this to be regulated in the EU Regulation
- at least **clear criteria for substances** for establishment of positive lists are needed as in IFOAM norms and Codex Alimentarius Guidelines

Case study 3: crop inputs (fertilisers, soil conditioners, plant protection products)

What subject/area-related principles are relevant:

- Health: Nitrogen fertilisers in organic form (feeding the soil to feed the plant),
- Ecology: Cultivation measures > organic pesticides; protect crops > kill organisms (pests)
- Fairness: allow low risk substances, e.g. plant extracts as plant strengtheners (of traditional medicine)
- Care: no GMO use, low-level copper applications
- System approach: Strengthen self-regulation
- Organic integrity/consumer perception: no synthetic pesticides or only natural substances, "no" residues from direct application (consumers)

Case study 3 crop inputs – results from EU project Organic input evaluation

Recommendations Final Conference in Brussels 2005

Challenges and difficulties:

- How to define appropriate criteria for crop inputs
- “No direct contact clause” in EU Regulation = obstacle
- Problem with national legislations: some inputs not allowed
- Re-evaluation of “organic” pesticides in the EU (Render 4): huge financial barriers for small firms,
- Issue of a certain flexibility without harming the integrity and creating market distortion

Strategies:

- Define better criteria: see proposal of project for EU
- Development of a evaluation procedure with a elaborated decision matrix and expert panel

Case study 3 crop inputs – General criteria for evaluation of substances – proposal to EU

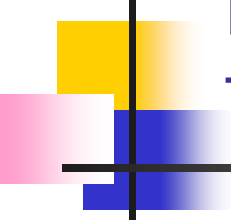
- **Origin:** plant, animal, microbial (no GMOs) or mineral origin but exceptions possible
- **Processing:** physical treatments (milling, heating, purification), microbial and enzymatic treatments (fermentation, composting or hydrolysis) exceptionally **simple chemical treatment**
- **Environment:** no harmful effects on the environment along the life-cycle
- **Human health:** lowest negative impact on human or animal health and quality of life
- **Public perception:** no negative socio-economic impacts or unfavourable public perception
- **Consistency:** their use is consistent with the principles of organic farming;



Case study 3 crop inputs – specific criteria for fertilization

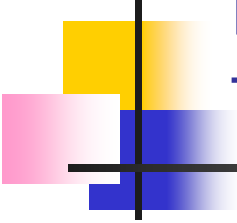
- 1. if they are used for **fertilization or soil-conditioning** purposes, they are essential for specific nutrition requirements of crops or specific soil-conditioning purposes which **cannot be satisfied by the practices mentioned in Annex I**

Case study 3 crop inputs – proposal for improved criteria for evaluation of substances



2. if they are used for the purpose of **plant pest or disease control, for animal nutrition** or cleaning and disinfecting livestock buildings and installations or **for other purposes related to crop production (ex. mulching materials, growth or plant health promoters...)**

they are essential for the control of a harmful organism or a particular disease, or to achieve the intended purpose for which breeding alternatives or management practices are not available or less effective, and alternative substances are not included in Annex II;



Case study 3 crop inputs – proposal for improved criteria for evaluation of substances

3. Products obtained by **chemical processes** and not identical to their natural form may be authorized only if their conditions for use **preclude any direct contact** with the edible parts of the crop;



Case study 3 crop inputs – questions to the audience

1. Are the revised **criteria for crop inputs acceptable**? If so, do they completely reflect the principles of organic agriculture?



Recommendations to EU

- At least 2 additional steps are necessary to come from very general overarching basic principles to decision criteria:
- For the most important areas the relevant (working) principles have to be formulated:
=> translate
subject/area-related (operational) aims as basis for norm setting
- Participatory procedure with stakeholder involvement is important, which needs time
- Criteria should be precise enough (clear priority, exclusion criteria, criteria for derogations) – for operators and control bodies

Summary of the approach and related main questions

Ethical principles (overarching)



General (overall) norm-setting principles



Subject/area-related principles



Decision criteria related to subject



Subject/area related rules

Are these ethical principles broadly supported and have been elaborated in a participatory process?

Do the overall norm-setting principles adequately reflect the ethical values?

Are these subject related principles appropriate and understandable for operators and the public?

Are the decision criteria precise enough to give a frame for norm-setting in this subject area?

Are the detracted norms clear enough for the operators, and inspectable by the inspection/certification body?



Many thanks for your attention!