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Decoding Organic Standard-Setting and Regulation in Europe (1991-2005)



UNITED NATIONS
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Decoding Organic Standard-Setting and Regulation in Europe (1991-2005)

By

Peter Gibbon

Danish Institute for International Studies,
Copenhagen, Denmark

In cooperation with

Olga Memedovic

UNIDO, Strategic Research and Economics Branch



UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION
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Penelope Plowden and Georgina Wilde were the principal English language editors of the publication. Penny Butler was the copy-editor.

Comments and suggestions on the issues raised in this paper may be addressed to:

Olga Memedovic
Strategic Research and Economics Branch
UNIDO
P.O. Box 300
1400 Vienna
Austria

Tel: (+43-1) 26026-4676
Fax: (+43-1) 26026-6864
E-mail: omemedovic@unido.org

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Abstract

Standard setting and regulation have helped to transform organic agriculture in the European food market from marginal to mainstream over a period of less than 20 years. This study examines a US academic literature that argues that mainstreaming and regulation have been associated with a narrowing of organic farming practices to a series of techniques. By contrast, a mainly European literature argues that changes to the regulatory framework for organics are being driven by emerging bodies of expert knowledge and communities of experts, with a focus on management processes. This paper argues that while the European literature is the more illuminating, it overlooks the interaction between politics and conferment of expert status and fails to understand the technical rather than managerial focus of the emerging paradigm of standards content.

The paper reviews the main trends in European organic regulation from 1991 to 2005, discussing the influences on standards and regulations with particular reference to the changing role of expert groups. It considers the failure of the organic expert community in the EU to achieve official recognition of claims for the wider benefits of organic agriculture, and to acquire significantly larger public resources for organic farming. The paper discusses how the EU organic regulation has been implemented across member States and describes current developments in the certification market.

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1 ■ Introduction

The subject of this paper is standard-setting and regulation in respect of organic agriculture, with special focus on the European Union (EU). The organic sector is one of the few areas of growth in an otherwise saturated European food market, and as a result has enjoyed a transformation in status from marginal to mainstream over a period of less than 20 years. Standard-setting and regulation has played an important role in this process, by providing greater certainty for consumers about the unique properties of organic food.

A substantial body of US academic literature argues that mainstreaming and regulation have been associated with a depoliticization of organic agriculture and a corresponding narrowing of organic farming practices to a series of techniques. It is interesting to contrast this claim with some of the central propositions that have emerged in the recent, mainly European, literature on standards-based regulation. The latter argues that such regulation is *sui generis* in contemporary institutional life, and that it is indeed associated with depoliticization. However, the operation of the resulting regulatory frameworks is better illuminated by examining the roles of emerging bodies of expert knowledge and communities of experts than it is by searching for reflections of private economic interests. This literature further argues that emerging standards and regulations tend to have a common type of content, referring mainly to management processes.

This paper argues that while the second of these literatures provides a more interesting entry point to organic regulation than the first, it is deficient in important respects. Most notably, it fails to understand the interaction between politics and conferment of expert status. It also misunderstands the content of the emerging paradigm of standards content. At least in the case of organics, although process-based, the processes concerned are more technical than managerial.

The rest of this paper is organized in eight sections. The first describes the mainly European academic literature. The second traces recent developments in the organic agricultural sector and its mainstreaming. The third introduces the mainly US analysis of organic regulation, as well as some of the criticisms it has provoked, before going on to review the main trends in European organic regulation from 1991 to 2005.

The fourth section discusses the main influences on standards and regulations in Europe, with particular reference to the changing role of expert groups. The fifth section extends the discussion of the relation between politics and expert knowledge by examining the failed attempt of the organic expert community in the EU to achieve official recognition of their claims for the wider benefits of organic agriculture, and to acquire significantly larger public resources for organic farming. The sixth section discusses how the EU's organic regulation has been implemented across member States, while the seventh describes current developments in the certification market. A final section concludes.

2. The new European literature on standard-setting and regulation

Until the last few years, the only coherent analytical perspectives on standard-setting and regulation were found in economics. These perspectives, whether founded on a transaction costs or institutionalist approach or a convention theory one, were mainly concerned with the institutional functions of standards and how these differed by type of standard.¹ Issues such as the changing relation between standards and other processes of regulation, the multiplication of standards, changes in the form taken by standards and participation in the shaping of standards have not been central focuses of these approaches, particularly when considered as a group of interrelated issues.

Recently, an approach has emerged that ambitiously tries to provide answers to this group of questions. The approach designates itself as post-structuralist, although it is probably more usefully referred to as a “liberal governmentality” one, since this is its central concept. In essence, the heightened profile of standard-setting and particularly of economic regulation on the basis of standards, as well as the accompanying proliferation of certification and auditing, are seen as integral elements of a systematic trend. Liberal governmentality denotes the process whereby an increasing number of areas, previously subject to regulation by the sovereign will, become designated as realms of private self-governance, “sites of collective response” (Rose and Miller, 1990) or “systems of collective responsibility” (Desrosières, 2003). For each site or system, depoliticized objectives for self-government (standards) emerge, new bodies of expertise are elaborated in relation to them, and new systems for measuring the performance of human subjects against desired collective objectives (audits) are devised. Meanwhile, government in its more traditional guise recedes to a hub of information and resources at the centre of a network of self-governing fields. Linking the hub with these fields are shared vocabularies of expertise, methods for measuring performance and techniques for securing public accountability.

At the same time as the liberal governmentality approach has been elaborated (by, for example, Brunsson, 2000, Jacobsson, 2000 and Power, 1997), another literature has emerged which addresses a broadly similar set of questions, but which formulates different answers. This literature is diverse in its broader theoretical orientation. While it

¹The economic costs and benefits of meeting standards has been another theme, though it has not been as widely covered.

does not aspire to provide an alternative overall account to the first approach, the outline of such an account can be inferred.

The rise of liberal governmentality

Although those providing the most developed accounts of liberal governmentality (Miller and Rose, 1992; Rose and Miller, 1990; and ultimately Foucault) construe it as an underlying tendency dating back to the nineteenth or even eighteenth century, and see neoliberalism as only one embodiment of it among others, those focusing more directly on the liberal governmentality standards relation tend to see neoliberalism as its main expression. For Brunsson (2000: 32), the immediate context of intensified standardization in nation-States is the deregulation of the public sector and the replacement of public authorities by combinations of large numbers of independent self-managing units under single, over-arching advisory bodies. The latter set standards for the former's performance and derive their authority from claims to expertise. Power (1997) underlines how such new public management arrangements are underwritten by narratives of fiscal restraint and accountability, and how many of the resulting standards are linked to cost control on the one hand and competition for central funding on the other.

The authors sharing this perspective—among others—typically see the EU as exemplifying liberal governmentality in a starker form than nation-States, but for reasons that have little to do with neoliberalism or the new public management. The EU is depicted by Brunsson (2000), Jacobsson (2000), Majone (1996), Castells (1996) and Matli (2001) as an actor in search of standards and regulations, for four practical reasons. The first is that the original EU ambition of legal harmonization across member States proved inoperable (in terms of its time and resource requirements). Promulgating standards or regulations that state essential requirements is the most obvious alternative. The second is the negative one of the EU's legitimacy deficit. In this context, standards and regulations represent a voluntaristic alternative to seeking to override member States, and one that is capable of enrolling what Castells calls "subnational levels of government" (companies, "civil society", civil servants in member States) in the European project. The third reason is the EU's special concern with promoting the single market, in relation to which common standards are seen as critical. A fourth is that the area of standards is one where regional development is said to have run ahead of national, and where there can therefore be no legitimate challenge to promoting the role of regional institutions such as the standard-setting bodies of the European Committee for Standardization (CEN) and the European Committee for Electrotechnical Standardization (CENELEC).

Trends in standards

The liberal governmentality approach makes much of the rise of process as opposed to product-related standards. According to Power (1997), the detachment of standards and

narratives of quality from an engineering context and their attachment instead to management performance is linked to trends towards outsourcing, enhanced internal autonomy in large organizations and subsequent projects to establish internal order (broadly defined). Jacobsson (2000) remarks that procedural standards, as opposed to technical ones, also sit more easily with narratives of organizational self-interest, which lie at the heart of liberal governmentality. These same authors again give additional practical reasons why this trend should be more visibly embodied in the EU than elsewhere, namely that since process standards have lower sunk costs than product ones, it is easier to promulgate them on a regional or even global level.

Influences on the content of standards

The traditional literature on technical standards typically discusses influences on standard-setting in terms of an interplay between companies, public organizations and professional standardizers. The role of companies is typically seen in terms of market-related processes (market widening, exploitation of first-mover status). The liberal governmentality literature instead places strong emphasis on the elaboration of expert knowledge and the role of experts. Power (1997) traces the enhanced role of expert groups to the tendencies for regulation and standards to be based on self-regulation, and for standard-setting to be linked to the regulation of newly autonomous entities. In these contexts, experts are required to render internal order visible to the external world. In contrast, in contexts where regulation is seeking to penetrate organizations from the outside in order to secure specific outcomes, standards can be set administratively without recourse to such actors.

Again, the EU is seen as exemplifying a depoliticized and de facto decentralized governance system where fields are linked through a shared discourse privileging expertise, and where determination of the content of standards and regulation therefore tends to be routinely referred to those who possess the necessary knowledge (as opposed to representatives of identifiable political interests). This is supported by the argument that the expert networks, which are likely to be deemed to possess the required knowledge are less bounded by national (member State) frontiers than is the case with self-defined political interests.

Hallström (2000) adds that, in addition to being dominated by expert groups, standard-setting is acquiring an institutional structure that reinforces its reservation to experts. Giving the example of ISO, she notes that standards have been developed for standard-setting as such, with an outer layer of first-order procedures and an inner layer of second-order elaborations. It requires experts in standards *qua* standards to negotiate this labyrinth and mediate access to it, particularly to its inner layer where the issues considered pertinent include standards' internal structure and consistency, relations with other standards and harmonization.

An alternative literature

As noted, while there is an alternative literature in relation to the issues discussed above, it presents a series of interrelated qualifications to the claims of the liberal governmentality perspective, rather than a similarly wide-ranging general picture. The claims challenged are the general link between liberal governmentality and the proliferation of (international) standards (Thompson, n.d.); trends in standard setting (Tate, 2001); and the supposed influence of a coherent expert community over standard setting in the EU (Millstone and van Zwanenberg, 2002; Tate, 2001).

Thompson while not disputing the general validity of liberal governmentality as a description of the changing form taken by governance in developed countries, challenges the link between it and the heightened use of standards (particularly international ones) as a means of economic regulation. The latter project, as exemplified by efforts to promote international rules on bankruptcy enforcement and banking operations, was specific to the Washington consensus period, i.e. to the heyday of neoliberalism, and has subsequently evaporated. The period since the Washington consensus is characterized by a range of actions, mostly at the level of nation-States, to promote similar goals but on a piecemeal and decentralized basis. Greater public disclosure and encouragement of private-sector self-surveillance and self-monitoring—but in relatively non-prescriptive forms—have been preferred to the development of over-arching standards.

Tate meanwhile distinguishes management-related process standards from industrial process standards. He argues that, while there is indeed a general trend in industrial standards towards more process-based ones, adoption of management-related process standards at the expense of other types of standard is largely specific to the British context. Other national contexts have subsequently absorbed the management standards (e.g. ISO 9000 and 14000) favoured in the British one, but have seen more emphasis on product and process-based industrial ones. The British preference for management standards, especially ISO 9000 and 14000, reflects a specific project of imposing liberal features on international standardization, rather than exemplifying a generalized form of governmentality.

Tate relates this point to two others. The first is that there are plural national traditions in relation to standards, which are opposed to each other in certain important respects. The prominent role enjoyed in standard setting by experts and the tendency to develop looser, self-policed standards is specifically British. It reflects the British political preference for free markets (including ones in standards provision itself) and British legal traditions of risk and liability. Consequently, standard-setting in the British context has emerged as a commercial service, provided by specialized private actors, allowing firms to reduce exposure to liability claims. In the EU, the clearest alternative to this tradition is presented by the German case. Here a much more coordinated approach to standards has existed since the first world war, based on a system of industrial associations enjoying a public standard-setting monopoly and incorporating

standardization within broader projects of corporate cooperation for technological development. Independent experts play little or no role in this system, which favours a proliferation of detailed industrial standards.²

Tate's other point is that the tension between these two traditions (with France and Italy lying midway between them) has obstructed standardization at the EU level, which far from being a playground for new standards is actually largely bereft of them. Where EU-wide standards have been developed, this process has been led by the German standards agency, Deutsches Institut für Normung eV (DIN). But a majority of member States' standards remain non-identical with, not technically equivalent to or even not based on, EU ones.

Finally, and specifically in relation to food standards, Millstone and van Zwanenberg (2002) and Barling (2004) argue that traditionally independent expert groups never had much role in the formulation of standards or regulations in the EU or even the UK. While advice from groups designated as having expert status provided the basis on which decisions were taken, as in the German model, many of the experts concerned were employees of the food industry. As a rule, existing food industry practice formed the main guide for the content of standards. Furthermore, there was no clear separation either at EU or UK government level between regulation and industrial promotion. Only in the wake of the bovine spongiform encephalopathy (BSE) scandal was the liberal governmentality template imposed, although so far this has had few visible effects.

To date, the debate described has succeeded better in identifying some central questions to guide future research than it has in answering them unequivocally. Among these is the extent to which new generations of standards and regulations can be attributed to the extension of a model of liberal governmentality across an ever-widening range of sectors and locations, or whether proximate causes are more relevant in specific circumstances (and, if so, in which). A second question concerns how to characterize the content of the new generation of standards and regulation. While there is general agreement that the specification of processes rather than (for example) product characteristics now occupies central stage, there is much less agreement on whether the processes concerned are industrial or managerial ones, and whether the relevant standards are intrinsically loose or can be highly prescriptive. A third question is about the nature of the expertise that supplies the content of specific new standards and regulations. To what extent is this developed in independent expert communities or to what extent does it reflect classically corporate interests? Finally, how does the relationship between the regulatory process and expert knowledge become institutionalized over time?

²The UK is reported by Tate (2001) to have 40 per cent fewer industrial standards than Germany.

3. The organics sector and mainstreaming

Virtually uniquely as far as food products are concerned, organic consumption has grown rapidly in the markets of the developed world markets over the last 10-15 years, while production has expanded both in these markets and in middle-income countries in the developing world.

Market growth

The global market for certified organic food is thought to have been around US\$25 billion in 2003 (South Centre, 2005). Easily the largest two markets are the EU and the United States of America, with sales of \$10-11 billion each (Willer and Yusufi, 2005; Oberholtzer et al., 2005). In both cases, this represents a share of 1.5-2.0 per cent of the food market as a whole. The US market was growing at around 20 per cent annually in the five years preceding this date, while the market in the EU expanded faster in the early-to-mid-1990s and has been growing at half this pace since (Oberholtzer et al., 2005; Padel et al., 2003). There are notable differences between EU member States in regard to the market shares enjoyed by organics and rates of national market growth. Market shares range between about 1 per cent (France) and 3 per cent or higher (Denmark, Austria). In countries where market share is above 2 per cent, growth appears to be flattening out (Padel et al., 2003; FiBL, 2003). In all Northern European markets, fresh produce is the leading category by value of organic food sales, with around 40 per cent of total organic sales. However, probably the fastest growing category of organic food sales consists of more complex or “technical” packaged products.

Production

According to Willer and Yusufi (2005), the total area under certified organic production globally reached 26 million hectares (ha) in 2003. The EU share of the total was 5.6 million ha, accounting for around 3.4 per cent of the total agricultural area, having risen from 0.9 million ha in 1993. Eight EU countries had 4 per cent or more of their agricultural areas under organic production and three (Austria, Italy and Sweden)

had more than 8 per cent (<http://www.organic.aber.ac.uk/statistics/index.shtml>). The corresponding figure for the United States appears to be a fraction of this, although no data are available for the period since 2001. In 2001 0.9 million ha was under certified organic production, up from 0.4 million ha in 1992 (<http://www.ers.usda.gov/Briefing/Organic/Questions/orgqa3.htm>).

Although the area under certified organic production in the EU is still rising, the number of organic farm operations has declined slightly since 2001. The organic farm share of total farms in the EU 25 also fell, from 1.7 per cent in 2002 to 1.6 per cent in 2005. In all, there were 145,000 organic farm operations in the EU 25 in 2005 (http://www.organic-europe.net/europe_eu/statistics.asp). By contrast, there were just under 7,000 organic farm operations in the United States in 2001 (Greene and Kremen, 2003).³

Premiums

The rapid growth of demand for organic products and the tendency for production to have increased more slowly has meant that these products have attracted premium prices. In turn, premiums have been an important stimulus to conversion from conventional agriculture. It is hard to generalize about levels of premiums, as they vary so much between different crops, even at the same point in time. Furthermore, they vary between countries, with those in countries where the retail trade in organics is dominated by supermarkets on average 20 per cent lower than for the EU as a whole (Hamm et al., 2002: v).

Nevertheless, the general trend in the EU is that, after having been at very high levels in the late 1990s, premiums are now declining. This is particularly the case for products where organics established a high market share at an early stage, and where growth has now flattened out, such as root crops, milk and eggs. Hamm et al. (2002) cite data for eight EU countries and Switzerland for the range of premiums for all organic food sales. In 2002, the median range across countries was 15-40 per cent. Premiums seem to be considerably higher in the United States. Oberholtzer et al. (2005) give median wholesale market premiums for broccoli and carrots over the period 2000-2004 of well over 100 per cent.⁴ In the course of interviews in 2005, representatives of major EU-based organic trading companies stated that premiums in the EU for non-technical products were sinking to just below 10 per cent. There were few or no products remaining where premiums exceeded 40 per cent, and in most cases where they were above 10 per cent, this was because of product innovation, temporary shortages or lack of market transparency.⁵

³In 1993 there were 36,080 certified organic farms in the EU; in 1992 there were 3,587 in the United States.

⁴Premiums on the farmgate prices for these crops were about a third lower.

⁵The same sources confirmed that premiums in the United States were much higher, while in the Japanese market they were higher still.

Subsidies

In most EU countries, another stimulus to conversion has been the availability of subsidies for this purpose. In 1987, Denmark and some German *Länder* introduced the first public subsidies for conversion under the EU extensification regulation (4115/88), which allowed this at the discretion of member States. Over the next few years Finland, Sweden and Austria also introduced incentives. However, their scale was not great, and organic production began to benefit significantly from subsidies only after the 1992 MacSharry Reform to the EU Common Agricultural Policy (CAP).

The CAP was initiated in 1962 with the objectives of providing EU citizens with food security and EU farmers with a “fair” standard of living. It further had the objective of creating a single, well-protected EU-wide market for agricultural goods, both by removing internal border controls in this sector and by giving EU producers preference on the basis of common tariffs and other restrictions. Between 1962 and 1992 the main CAP instrument was price support, in the shape of an intervention system whereby the EU bought, stored and exported products on its account in order to ensure that market prices would not fall below administratively determined levels. This system created overproduction and spiralling expenditure. Spending on the CAP increased from Ecu 3 billion in 1975 to €41 billion in 1996, when it amounted to 70 per cent of the total EU budget. From the late 1980s onward, this pattern provoked a series of EU budgetary crises.

The MacSharry reform was introduced against this background. Its first element was to change the direction of the CAP market and price support system from heavy investment in the latter to a mixture of price support and direct payments to farmers, based on historical yields. Its second element was to use some of the savings made in this process to create a new category of subsidies, coupled to rural development objectives rather than market and price support ones. Henceforth, market and price support were known as the CAP’s “First Pillar” and rural development as its “Second Pillar”. From 1992, funding was made available under the Second Pillar to support organic agriculture as one of eight agri-environmental measures (regulation 2078/92). Nonetheless, EU funding for this Pillar was still a small fraction of that under the first, support to agri-environmental measures was only a part of the Second Pillar as a whole,⁶ and support to organic farming continued to remain 25-50 per cent by volume dependent on discretionary top-up funding by member States.⁷

The EU’s “Agenda 2000” (regulation 1259/99) signalled an expansion of the Second Pillar to 10 per cent of the total CAP budget by 2005 and opened some new headings under which support for organic farming could be provided. However, it was left up to member States to fund expansion of the Second Pillar out of reduced contributions to the First Pillar. In 2001, support to organic agriculture accounted for €275 million of

⁶Corresponding to about 2-3 per cent of total agricultural support in the EU (Grant, 1997).

⁷The amount that member States were supposed to contribute depended on the development designation of the region concerned.

a total EU agri-environmental expenditure of €1.7 billion. Häring et al. (2004) argue that even this should be seen against the background that organic farmers received on average 18 per cent less per hectare than conventional ones under the First Pillar, because of differences in specialization.⁸ Following the CAP Mid-term Review (2003, regulation 1783/03), some additional headings were established under which member States' support to organic farming could be provided, but it is not expected that there will be much additional expenditure as a result. Organic agriculture attracts few or no subsidies outside the EU.⁹

Market channels

As the market share of organic products has expanded, they have entered the mainstream food trade in Northern countries. Large-scale food manufacturing companies have established organic product brands and—in the EU at least—all the major supermarket chains have become involved in the trade. At the same time, some large specialized importing and trading companies have emerged.

Among the leading conventional manufacturing multinationals, General Mills has acquired or introduced organic lines in frozen fruit and vegetables, cereals, entrées and canned tomatoes.¹⁰ Unilever has done the same in icecream,¹¹ Kraft Foods in cereals and snacks, prepared foods and coffee,¹² and Nestlé in snacks,¹³ organic babyfood and powder formula lines; Kellogg's has introduced organic ready-to-eat cereals in two varieties;¹⁴ Groupe Danone has acquired the leading US organic dairy products manufacturer Stonyfield Farms, and the top-ranking US dairy firm, Dean Foods, owns the organic milk producers Horizon Organic and Alta Dena (with a 90 per cent plus market share).¹⁵

Meanwhile, at least one large mixed organic, natural foods¹⁶ and personal-care manufacturing conglomerate has emerged in the United States, Hain Celestial. Hain Celestial produces 1,500 food product lines as well as 80 flavours of tea, a variety of branded snacks, 60 "meat alternative choices" and ranges of branded frozen foods and body-care products. Its subsidiaries include the Belgian company Biomarché, which acts as a first-tier supplier of organic fresh fruit, vegetables and prepared meals to Ahold and other supermarket groups. In 2004, Hain Celestial's turnover was \$544 million. Before

⁸Throughout the CAP's history the intervention system tended to favour the (over)production of some products more than others, on the basis of intervention prices whose relation to market-clearing ones differed from one product to another. As a result, in 2002 arable crops (grains, oilseeds and protein crops) accounted for over half CAP expenditure, followed by beef.

⁹Michelsen (2001a) states that the conversion response to the introduction of the EU organic regulation was statistically more significant than in relation to the introduction of agri-environmental payments.

¹⁰Cascadian Farm, Muir Glen.

¹¹Ben and Jerry's.

¹²Jacobs Verano.

¹³Power Bar.

¹⁴Kashi.

¹⁵The only large food multinational to which this trend does not apply appears to be Sara Lee.

¹⁶Hain Celestial defines "natural foods" as "foods which are minimally processed, largely or completely free of artificial ingredients, preservatives and other non-naturally occurring chemicals, and are as near to their natural state as possible" (Form 10-K, 2004: 2).

its purchase of two brands from Heinz in 2004, the latter owned 16.7 per cent of its stock.¹⁷

Among the world's leading supermarkets, Wal-Mart now claims to have the largest single market share for organics in the United States (<http://terrafirmafarm.com/08053.html>). Its UK subsidiary Asda has an own-label Asda Organic range with 150 product lines. Other hyper/supermarket groups with dedicated organic own labels are Ahold (ICA's Sunda and Albert Heijn's AH Biologisch), Carrefour (Bio, with 130 product lines), Edeka (Bio-Wertkost) and Tengelmann (Naturkind). Others, such as the UK's Sainsbury, offer organic variants of a wide-range of products (in this case, over 1,000) without a dedicated range. Others, like the UK's Tesco, spread their own-label organic offering between organic variants within non-dedicated labels and distinct organic lines within broader health-related own labels (in this case, Healthy Living Club). Germany's Rewe has recently established a separate format, Vierlinden Naturmärkte, selling only organic and wholefood products.¹⁸

Super/hypermarkets recently accounted for just below 50 per cent of all organic food sales in the United States (Dimitri and Greene, 2003) and 40-80 per cent of all organic food sales in the EU, depending on the member State (UNCTAD, 2003). While sales through alternative channels remain important, there is also evidence of concentration, particularly in the United States. By the end of 2004 the mixed organic and wholefoods chain, Whole Foods Market, owned 172 stores in North America and the UK, eight distribution centres, seven regional bake-houses, its own coffee company and two seafood processing plants. Its annual turnover reached \$3.86 billion (www.wholefoodsmarket.com). Even direct sales channels are subject to concentration: in Denmark, the dominant player Aarstiderne A/S is owned by a partnership of four organic farms with a production area of 900 ha, with a turnover in 2003 of DKK142.7 million (\$21.7 million).¹⁹

Suppliers

In the EU, dedicated "first-tier" suppliers of organic, or combined organics and wholefoods have emerged. These manage product sourcing for manufacturers and supermarkets. Among the leading companies supplying manufacturers, packers and distributors are the Dutch-based Tradin Organic Agriculture BV (2004 turnover €65 million) and the UK-based Community Foods (2004 turnover £28 million). Among those supplying supermarkets are the fresh-produce specialists Eosta (Netherlands) and Organic Farm Foods (UK).²⁰

¹⁷Hain Celestial's 10-K form for 2004 gives no details of how this affected Heinz's stockholding.

¹⁸Rewe also has a dedicated organic own label, Fällhorn.

¹⁹Aarstiderne also sources from the big Danish organic farming cooperatives Biodania and Danorganic, as well as from a handful of independent growers.

²⁰Eosta and Organic Farm Foods are linked via a "strategic partnership in third countries" (www.eosta.com).

International trade

Organic products are not recorded as a distinct data category in any international trade statistics, and even the more ambitious attempts to estimate trade levels are confined to discussion of volumes rather than values. The most comprehensive survey is that by Hamm et al. (2002) on internal and external EU trade in 2000, based on interviews with market experts. According to this, the EU was a net importer of organic cereals (around 200,000 tons), vegetables (around 50,000 tons), oilseeds (around 55,000 tons) and meat (around 1,000 tons). It was a net exporter of fruit (around 140,000 tons), milk and milk products (27,000 tons) and eggs (27 million pieces).²¹ Naturally, it was also a net importer of non-temperate fruits and tropical commodities such as coffee. Giovannucci and Koekoek (2003) estimate EU organic coffee imports of 10,500 tons in 2001. Overall, the scale of the EU's external trade is not great, except for cereal imports and fruit exports. The main origins for cereals imports were Australia, Canada, the United States and central and eastern Europe (CEE).²² The main sources of oilseeds were Canada, CEE, Argentina, South Africa and Asia. The main sources for non-temperate fruit (and vegetables) were Israel, North Africa and Turkey. There were also high levels of counter-seasonal temperate fruit imports, from New Zealand, Argentina, Chile and South Africa.

²¹The authors' study excluded processed products and tropical beverages.

²²The main countries concerned are now EU members.

4. Trends in the development of organic standards and regulations

Since 1997, an academic debate has emerged concerning trends in organic standard-setting and regulation. Two broad positions are identifiable. The first, supported exclusively by US academics,²³ argues that the mainstreaming of organic agricultural trade just described implies a “conventionalization” of its institutional context. In regard to standards and regulations, this is reflected in two interrelated trends of narrowing. The first is for organic farming practice to be defined in terms of input substitutionism, i.e. in terms of prohibited inputs rather than domestication, control and monitoring of the habitat. The second is for organic agriculture to be defined in terms of farming practice alone, i.e. to be dissociated from norms concerning health, labour, small-farm survival, the energy costs of food and the equity of food distribution systems. The main empirical evidence adduced in support of this position concerns attempted modifications by the US Department of Agriculture (USDA) of the national regulation proposed by the National Organic Standards Board in 1997.²⁴

A second position, identified with non-US academics,²⁵ disputes this interpretation. According to it, the influence of the mainstreaming of organic agriculture on the institutional context has been rather limited. While organic agriculture has been indeed defined normatively mainly in terms of farming practice, this cannot be represented as a retreat since there were never grounds to ascribe such a broad political agenda to organic farming. At the same time, as far as farming practice is concerned, standard-setting and regulatory trends have been in the direction of formalization and documentation rather than narrowing. As regards attempts to weaken the US regulation, while pressure from agribusiness has existed, in most cases it has been repulsed.²⁶

This and the next section of the paper seek to resolve this debate. The remainder of this section identifies the main trends evident in the content of organic standards and

²³For example, Buck et al. (1997), Guthman (1998, 2004), De Lind (2000) and Reynolds (2004).

²⁴These modifications would have permitted the use of GMOs, irradiation and sewage sludge.

²⁵For example, Michelsen (2001b), Campbell and Liepins (2001) and Mansfield (2004).

²⁶For some subsequent unsuccessful attempts see Villalón (2004). One at least temporarily successful attempt occurred when a Congressman from Georgia succeeded in passing an amendment to a general appropriation bill, amending the regulation by removing the requirement for 100 per cent organic feed on occasions where the premium for organic feed exceeded 100 per cent of the price of conventional feed. The Congressman was acting at the request of a particular enterprise (Fieldale Farms) (“Furore erupts over changes to US organic standards”, *Organic Standard*, 23, 2003).

regulation in Europe over the last decade and a half, and describes the issues and debates these have given rise to. The following section will discuss the main influences over this content.

Regulation in the EU

Regulation of organic farming in the EU began with Council Regulation 2092/91 of June 1991. As of October 2005 this regulation had been amended 30 times. The area of the regulation subject to the largest single number of amendments is Annex VI on “Ingredients of agricultural and non-agricultural origin which have permission to be used during preparation”, which has been amended nine times and is still under discussion. In addition, five related regulations have been introduced over the period, which while not amending the original regulation cover the same issues.

Figure 1. Highlights of EU organic regulation, 1991 to the present

<i>Number</i>	<i>Subject</i>	<i>Implemented</i>
2092/91	Organic farming, processing and trade in EU member States, including principles of organic production at farm level (Annex I), products authorized for use in soil conditioning and fertilization (Annex II), minimum inspection requirements (Annex III), labelling (Annex IV) and ingredients and aids for processing (Annex VI)	Jul. 1991
94/92 and 3457/92	Rules for import of products from third countries	Jan. and Dec. 1992
207/93	Annex VI defined for first time	Sept. 1993
1935/93	Tightening of labelling rules	Aug. 1995
1804/99	Livestock regulations	Aug. 1999
1708/01	New rules on certificates of inspection for third country imports	Sept. 2001
223/03	Animal feeds regulation	Feb. 2003
1452/03	New seed regulation	Mar. 2003
392/04	Regulation bringing storage and warehousing under organic inspection	Mar. 2004

Source: Author.

When the author asked a number of leading figures in the organic sector in 2004-2005 what their impressions were of the main directions in which standards and regulations were moving, three main trends were repeatedly referred to: extension in range, tightening and proliferation. These will be discussed in turn.

Extension in range

In general, both private standards and public regulations originally covered only crop production, with a focus upon on-farm practices. If livestock production was covered, it was mainly on the basis of injunctions to ensure a link with the soil (implying

animals' free access to land and use of on-farm feedstuffs). The last 15 years have seen both processes of vertical extension (up and down the chain from the farm itself) and horizontal extension (to activities or sectors other than crop production). In private standards, there has been a strong emphasis on extension upstream of the farm, i.e. on the provenance of materials and animals used in farm production, as well as horizontal extension to non-agricultural activities such as textiles, aquaculture, woodland, and health and beauty products. Although the first of these emphases is found also in public regulation, here possibly greater stress has been placed on downstream extension to cover storage, processing, packing and labelling (see below). At the same time, public regulation has been much more comprehensively extended to livestock, but hardly at all to non-agricultural production. However, in its Action Plan of 2004 (see below), the EU announced that it was considering extension of regulation to cover wine and aquaculture.

In the field of EU public regulation it is generally acknowledged that the single most important development following the introduction of regulation 2092/91 governing crop production in 1992 was the promulgation in 1999 of regulation 1804/99 governing livestock production. This followed earlier extensions of the 1991 regulation to cover import rules, permitted processing aids, technical aspects of labelling and certification, and the operation of certification bodies.²⁷ The livestock regulation is given this importance not only because it extended regulatory coverage beyond crops, but because of the way it did so. This included extension beyond production activities to production and trade infrastructure (design of buildings and means of transport). Since 2004 this trend has continued. Under a new regulation (392/04), a requirement for inspection has been introduced to almost all premises and forms of transport at all stages of the organic supply chain, including for products that are labelled and packed.

A third sense in which extension has occurred is not vertical or horizontal, but conceptual, i.e. in terms of the range of criteria used to deem "organic" a given production method or material. In early generations of standards and regulations, inputs were permitted on the basis of criteria such as naturalness and simplicity. In recent years safety of handling has become an equally if not more important criterion, reflecting a partial extension of rules to worker safety issues. Another example is the amendment of the International Federation of Organic Agricultural Movement's (IFOAM) Basic Standard in 1990 to include fair labour conditions (although the extent to which this has ever been enforced is in question). The EU announced in its 2004 Action Plan (see below) that it was discussing whether to include energy use, biodiversity and landscape considerations in its list of criteria.

Tightening of livestock rules

Organic standards and regulations have been subject to tightening since the early 1990s, on the basis of a variety of public justifications. The 1999 EU livestock rules are again

²⁷Somewhat confusingly, EU regulations use the term "inspection body" rather than "certification body". In other international forums certification bodies are known as "conformity assessment bodies". The term certification body will be preferred here, as this is the most general designation.

widely referred to in this connection, this time because they specified production methods and input provenance requirements in more strict and demanding terms than had been the case for crop production. Whereas the crop production regulation required a general production method (multi-annual rotations involving legumes and use of green manure or deep-rooting plants), the livestock regulation laid down permitted stocking levels and required feeding regimes. Furthermore, whereas the crop production regulation permitted single production units undertaking both organic and conventional production, the livestock feed regulations require dedicated organic production lines for compound feeds. Finally, whereas the crop production regulations permitted the use of some inputs that were naturally occurring, rather than explicitly produced by organic production methods, the livestock regulation insisted in general on proof of organic production for all inputs, including bought-in animals, seeds and feeds. In a number of cases the proof required is very exacting, for example for two generations of organic husbandry in respect of bought-in animals.

The justification for being more prescriptive provided by EU officials rested on the extreme diversity of livestock production practices in the EU before 1999; by implication there was less variation in crop production claiming to be organic before 1992. In the short term, the strictness of the regulation was mitigated by five-year derogations in respect of the implementation of certain rules. For example, the regulation requiring that organically raised livestock be fed 100 per cent organic feed did not come into force until August 2005. However, the enforcement of time limits on derogations such as this tends to be perceived as further tightening.

Concerns about integrity

A second general set of circumstances and justifications for tightening are found in relation to concerns about integrity, either as a result of fraud cases or because of broader food safety scares. The main areas of EU regulation affected here have been those governing imports from third countries and the production of animal feedstuffs.

Before 2001, imports to the EU from countries deemed not to have regulatory systems equivalent to those in the EU were permitted only where importers had obtained authorization from member States. These could be issued if the importer could confirm that the relevant combination of exporter and crop had been certified in the exporting country by a reputable body accredited for this purpose to EU or ISO standards. Following two large fraud cases, regulation 1788/01 (2001) was introduced. This required, in addition, that every single consignment imported under a given authorization (normally issued for a five-year period) should be accompanied by an original certificate of inspection.

The new regulation on processed feedstuffs for animals from 2004 (223/03),²⁸ justified mainly on the basis of food safety concerns, entails stricter and more detailed quality

²⁸See Swedish Kommerskollegium (2003) and Hüber and Leibl (2004) for critical commentaries. The Kommerskollegium paper states that 223/03 will further require feed processors to have dedicated organic production lines, as opposed to following segregation procedures on common lines.

assurance and inspection methods than for organic food production. Producers are obliged to show that they have conducted risk assessments, implemented necessary precautionary methods and regularly monitor the effectiveness of these methods. They also need to define adequate measures for quality assessment based on identified risks, including by defining limit values for quality parameters and publishing a detailed catalogue of actions to be taken when these are not met. The regulation further requires certification bodies to grade companies into risk categories.

Tightening within a single authority, such as the EU, arguably generates a logic of further tightening within that authority. It does so because changes in one area give rise to calls for consistency across areas. Thus, the strict form taken by the 1999 EU live-stock regulation appears to have given rise to pressure to tighten up the crop regulations where these seem to deal with parallel issues. Hence, the 100 per cent organic fodder requirement was followed by a new seed regulation (1452/03) requiring that only seeds from certified organic breeders be used.

Tightening also affects regulations in third countries, where these regulations have been designed to facilitate market access to one of the main centres of consumption (the EU, United States and Japan). While many third countries have identified one or another centre of consumption as its most interesting market, and have therefore modified their national regulations in line with changes in the importing centre concerned, others aspire to export to two or more of these centres. In such cases they are obliged to incorporate in their regulations the latest requirements in each of the markets concerned.

A final source of tightening applies in the case of private standards, where it is typically justified in terms of market differentiation and development. At least one prominent certification body, the (UK) Soil Association, explicitly presents itself as aiming to “set the gold standard”.²⁹ This stance is justified, first with reference to developments in the conventional market, where large retailers promote standards such as EurepGAP³⁰ that “push at the organic profile from below”, second with reference to their potential value as a price negotiation instrument for operators, and third on the basis that high standards provide leverage in “allowing us to go into product areas not under regulation and promote credible organic standards there. This increases market access by widening market opportunities for operators” (author’s interviews).

Some aspects of tightening in private standards arguably also have a built-in logic of emulation in public regulation. An area where private standards (including those of the Soil Association) are often stricter than public regulation is animal welfare. In its 2004 Action Plan, the EU also announced that it was considering tightening its regulations here also.

²⁹“The Soil Association has the highest standards for production and processing in the world.” <http://www.soilassociation.org/web/saweb.nsf/Living/organic-standards.html>.

³⁰The EurepGAP initiative was started in 1997 by a group of retailers belonging to the Euro-Retailer Produce Working Group. It consists of norms for good practice in relation to fruit and vegetables, flowers, aquaculture and green coffee. The norms cover issues such as traceability, soil management, fertilizer use, crop protection, post-harvest treatment, waste management, and workers’ health and safety. See www.eurepgap.org

The debate on tightening

Writing shortly after the introduction of the original EU crop production standard, Tate (1994: 18) reported that this had been greeted with suspicion in the organic sector, at least in Northern Europe. Regulation 2091/92 was widely perceived as undemanding and as implying a lowering of standards, because of the leeway it would provide for Southern European operators through its delegation to member States of authority over the operation of certification bodies. A decade later, much of the organic sector was expressing the view that regulation and private standard-setting had gone too far. Even officers of the Soil Association, while defending the gold standard principle, believed that the strictness of some of the current generation of EU regulations was misguided.

A number of distinct groups of arguments against the perceived direction of standard-setting and regulation can be identified in the organic sector. In almost all cases their main proponents are prominent figures in IFOAM, the umbrella body for organics activists worldwide, which until recently broadly favoured the development of standards and regulation.

The first argument is that escalating standards and regulations present entry barriers to potential operators, both in Southern and Northern countries, in a period when IFOAM has determined that its main aim should be the expansion of organic production (Báchi, 2003; Rundgren, 2004; author's interviews). In the North, escalation can lead to exit from the sector because of increased costs. For example, both the 100 per cent organic animal feed rule and the new seed regulation (1452/03) oblige operators to purchase inputs which command premiums, while (in the case of seeds) reducing yields.³¹

Second, escalating regulations in the North are likely to intensify competition from third-country operators, since they widen an existing gap between practices inside and outside the EU. Furthermore, in some cases, they lock Northern producers into use of a more limited variety of inputs than is the case for third-country producers (Wai, 2004; Rundgren, 2004).

Other lines of criticism have also been raised recently, which are novel in the history of the organic movement, not least because they invoke principles more often found in narratives sceptical of organics. One of these is that strict standard-setting is a disincentive to innovation, since it reduces the range of options open to operators (Michaud 2004; author's interviews). Another claims is that certain of the new generation of standards, for example the seed regulation, lack scientific justification (Michaud).³² Last, and most interesting, the criticism is raised that contemporary standard-setting and

³¹A reason why organic fodder commands high premiums in the EU is that central EU funding for agri-environmental subsidies was available in greater volume for upland areas, where livestock and dairy farming was more common, thus creating an imbalance between supply and demand (Barling, 2003: 230).

³²Michaud's argument is that whether or not a seed has been bred organically will not effect its genetic material, since organic "can only refer to the tissue in which this material is wrapped". The requirement for organic breeding is therefore said to be irrelevant.

regulation in respect of organics contravene internationally recognized norms for standard-setting itself. Three such norms are referred to. One is that standards and regulations should specify outcomes, rather than means of arriving at these outcomes.³³ This argument is directed not only at the increasing focus of regulation on production methods, but also at the central place in the EU regulatory process occupied by the elaboration of positive lists of permitted inputs. Second, standards and regulations should be designed on the basis of harmonizing the practice of pioneers, rather than imposing rules from above that are based mainly on theoretical or administrative considerations. Third, impact assessments of proposed standards and regulations should be conducted before decisions about their implementation (author's interviews).

Proliferation

Two distinct historical phases can be identified, when organic standards and regulations have gone through a process of proliferation. The first was in the 1970s and 1980s, when the number of private standards increased rapidly, particularly in the EU and North America. This was followed by a period, lasting until the end of the 1990s, when public regulations were developed in the main centres of consumption: EU 2092/91, the US National Organic Program regulation (NOP) and the Japanese national regulation, JAS. Around the same time a series of national regulations was developed in most EU member States, but these were based mainly on 2092/91³⁴ and should not be considered instances of proliferation.

The second and current period of proliferation began around 2000, when the governments of countries anxious to secure market access to the centres of consumption started to develop national regulations, in order to assist in this process. By 2005, national regulations had been promulgated in 29 countries outside the EU 25, and a large number of others were in the process of developing them (Hüber, 2005).

Some observers have pointed out that regulation 2092/91 has not secured perfect market access even between EU member States (author's interviews). This is because, in some member States, dominant private standards function de facto as public ones since the certification bodies owning these standards combine a local certification monopoly with declining to recognize other standards as equivalent to their own. This was the case in Sweden until 2004, where the private certification organization Krav granted equivalence only to products certified by IFOAM-accredited certification bodies. It is also widely claimed that market access to the UK and the Netherlands has been difficult, because the Soil Association and Skal hold positions comparable with Krav's.³⁵

³³However, use of the exact opposite argument is also found within the sector. Hüber (2005), criticizing the introduction of mandatory testing for pesticide residues in Baden-Württemberg in the wake of the nitrofen scandal, states that organic standards are about production methods, not outcomes.

³⁴A number of national regulations, for example those of the UK from 1993, also covered livestock production, which the EU's would not until 1999. Some EU member States still apparently have no national regulation.

³⁵The same position applies in two non-EU countries, Switzerland and Norway, where Bio Suisse and Debio enjoy de facto monopolies.

Equivalency and harmonization

The presence of a number of well-differentiated and influential private standards in EU member States, the rise of three distinct public regulations in the core consuming centres (2092/91, NOP and JAS) and the recent proliferation of exporting country standards have given rise to a growing volume of problems concerning “recertification”. This term refers to certified organic products imported from one market to another requiring revalidation by an importing-country public body, or a private one enjoying public recognition, before they can be sold on the importing-country market. Problems arise because of discrepancies in public regulations or in private standards and certification requirements, or because of discrepancies in governments’ accreditation requirements for private certification bodies. Furthermore, even where all goes smoothly, recertification costs are typically high, and the proliferation of regulations means that their cost increasingly cuts into operators’ margins. The recertification problem has been amplified in recent years by the increased share of more complex or technical multi-ingredient products in organic trade.

To date, efforts to establish equivalency between and/or harmonization of rules have been pursued at several levels and in several different forums, but progress has been slow at best. When the IFOAM Basic Standard was formulated first in 1980, it may have been able to function as a basis for securing harmonization, but it was not promoted on this basis. Instead, IFOAM members appear to have had a preference for pressing national governments to adopt regulations (author’s interviews). It was therefore hardly a surprise that the first generation of discussions on equivalency and harmonization concerned governments.

In respect of problems arising from the existence of three distinct core consuming centre regulations, the EU and US have been engaged in equivalency negotiations for a considerable period, but these talks apparently have stalled. At present, both parties are said to be engaging in a detailed comparison between their own rules and those of Codex (see below). But both the EU and the United States have extended equivalency or quasi-equivalency status to a limited number of third countries. The NOP³⁶ has agreed to approve imported products certified by any certification body in the UK, Denmark and New Zealand, although it has not disclosed its criteria for doing so. Under Article 11 para. 1 of 2092/91 the EU has deemed that there are equivalent regulatory systems to its own in Argentina, Australia, Costa Rica, Israel, New Zealand and Switzerland, and it admits crop- or livestock-based imports (or both) from these countries on an unrestricted basis.³⁷ No formal rules are laid down for how countries may qualify under Art. 11(1), but it seems that they must possess a national regulation covering at least production for export; a system for administering and supervising certification bodies; and at least one local certification body accredited to EN 45011 norms (Martinez and

³⁶The NOP comprises the US organic regulation, an accreditation authority for certification bodies, and an enforcement agency, a combination of rules that has led to questions from within the certification expert community.

³⁷Prior to their admission to the EU in 2004, Hungary and the Czech Republic also enjoyed equivalency status.

Banados, 2004).³⁸ The process of determining equivalence takes up to four years and no new countries have been added to the list since 2003.³⁹

In 1992, IFOAM began what was to become a prolonged engagement with Codex Alimentarius, (Codex) in the hope of formulating international reference rules that would be the basis for future national standards, thus averting the need for equivalency or harmonization exercises.⁴⁰ A Codex crop production rule eventually emerged in 1999, and a livestock one in 2001. At the time of writing, annexes on permitted additives and processing aids are still not complete. Only a few national regulations appear to have been influenced directly by the Codex rules. Meanwhile, as trade in organic products increases, there is a growing awareness of problems of equivalency between private codes and a growing frustration concerning the costs and effectiveness of bilateral equivalency discussions.

By 2005 it had become clear that neither EU member States nor most private certification bodies could arrive at a common understanding of what equivalency or harmonization meant. In many cases, parties to the discussion were unwilling to distinguish equivalence from full compliance. Underlying these problems seems to be a common reluctance to release authority that has often been carefully nurtured over a long period.⁴¹

Within IFOAM, it was agreed in 2003 to return to the Basic Standard and its accompanying accreditation process for certification bodies as a possible international guarantee system, but there is widespread scepticism among prominent certification bodies about whether this is possible (author's interviews).⁴² IFOAM was also, together with FAO and UNCTAD, involved in 2002 in setting up an International Task Force on Harmonization (ITF). By 2005, this had formulated the goals of establishing a "single international model" for production standards and for the operation of certification bodies, and a single evaluation process for certification bodies (as opposed to a single set of accreditation criteria) (ITF, 2005). The main purpose of any new international production standard would be as a reference point for authorizing international trade, rather than to replace existing private standards or national regulations. The ITF had also agreed a work programme lasting until 2008, focusing in the case of standards mainly on the reconciliation of Codex Guidelines and the IFOAM standard and in the case of operational requirements for certification bodies mainly on developing the ISO 65 Guide. Assuming that this work programme bears fruit, two problems are likely to remain: (a) the widespread perception that both Codex and IFOAM standards (and

³⁸An interesting point is that Australian and New Zealand acquired equivalency status without having established national regulations.

³⁹Nine additional countries are said to be "under assessment". However, "the EU's physical capacity to get more countries into 11 (1) is zero. They always go around asking for volunteers from the member States. The individuals often lack training and they have to continuously re-invent the wheel" (author's interviews.)

⁴⁰The Codex Alimentarius Commission was created in 1963 by the FAO and WHO to develop food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Programme.

⁴¹An exception to this picture is the Swedish private label and certification body Krav, which has announced plans to make equivalency agreements with 60 other certification bodies.

⁴²According to some certification bodies, despite its claim to be "basic", the IFOAM standard is much more demanding than 2092/91, NOP or JAS in certain cases (e.g. for processor certification and inspection).

hence any international standard based on their reconciliation) have in the past been bases for standards at the more as well as less demanding end of the spectrum; and (b) the likely reluctance of governments to forego discretion in both this area and that of accreditation procedures for certification bodies.

Summing up

Returning to the academic discussion referred to at the beginning of this section, three observations can be made. One is that, rather than expressing a clear trend towards input substitutionism, standards and regulations on organic farm practice are indeed moving more in the direction of formalization, in the sense of greater detail and prescriptiveness. Second, there has been an accompanying trend towards regulation of the entire production chain, its genealogy and metamorphoses, rather than farming practice alone. This has been accompanied by increasing emphases on integrity, segregation and securing a closed loop. While not all organic standards and regulations have this emphasis, the extent of the trend towards closure exacerbates problems of equivalence. Third, while a critique has emerged from within the organic sector of some developments in standard-setting and regulation, this is mainly in terms of the consequences of particular standards on the one hand and the methods used to set standards on the other. While these concerns are certainly valid, they do not directly bear on the issue of the underlying logic of current trends.

5. Influences on organic standards and regulation

Broadly speaking, those academic commentators who see organic standards and regulations as subject to narrowing along the lines of an input-based definition of farming practice share the position of Millstone and van Zwanenberg (2002) described earlier, namely that these standards and regulations are heavily influenced by large-scale food-sector players such as supermarkets, processed food manufacturers and large farm operations. These are depicted as anxious to cash in on the opportunities offered by organic trade, while incurring minimal restructuring costs.

But those who see standards and regulations moving more in a direction of formalization and documentation see the organic community or sector as occupying the driving seat. These terms cover all those whose primary interest (ideological, scientific and/or professional or commercial) lies in organic as opposed to conventional production and trade. In relation to standard-setting, the literature sees the community as appearing in this process first in the guise of pioneers, then later in the guise of experts. In other words, the community leads throughout, but organic professionals displace organic farmers in influence within the community.

Hence, in relation to New Zealand, Campbell and Liepins (2001) argue that large conventional players switching to organics deliberately refrained from seeking to dilute or even directly influence standards, since they feared that this would leave the trade open to accusations of bad faith and fraud. While these players did favour formalized standards, pioneers took the lead in the process. On the other hand, the nitty-gritty content of these standards only emerged because of face-to-face and written interactions between operators and inspectors working for the de facto monopoly certification body. This also had started life as a vehicle for the sector's pioneer operators, although the latter's role declined noticeably as a formal standards review process was initiated. Clearly, this line of argument connects to that advanced by the liberal governmentality literature, on influences on standard-setting in general.

This section of the paper opens by briefly considering influences over private organic standards in Europe. Its focus however is the development of public regulation in the EU. Hence, the role of national governments and of the EU as a set of political institutions will be more in focus than in the work of Campbell and Liepins, where

national regulation hardly features. In relation to the EU, it describes the situation in the 1990s before examining the current position. Since little or nothing has been written in this area, the account is based on the author's interviews, except where indicated.⁴³

Private organic standards

As far as can be determined, most private organic standard-setting in Europe—or at least in Northern Europe⁴⁴—developed in a similar way to that described by Campbell and Liepins in relation to New Zealand. The process was generally initiated by different groups of pioneers and then taken over by “those interested in standards”. These included some pioneers, but also academics, consultants and employees of certification bodies. Finally, this constellation of participants tended to be institutionalized, and an internal hierarchy established between them, when the standard-setting process itself became subject to rules that are more formal and procedures such as rolling reviews and a committee structure dedicated to formulation of standards in new areas.

In this process a standards “committology” has typically emerged, with representation granted on a formal basis to experts from different fields. Operators, both in terms of producers and processors, are normally represented in the different committees concerned, as are consumers. But the role of operators is generally to serve as a reality check—to answer the question whether it fits with the operators—rather than as a source of content for new draft standards. The committee system tends to become dominated by “those who want to change things”, while the formulation of a new standard typically relies mainly on commissioning expert inputs. These biases are said to be found in even clearer forms in international private standard-setting for organics.

Among the factors underlying this trend seems to be the wider institutionalization of organic farming. This has been associated with the elaboration, formalization and increased specialization of a wide range of structures surrounding the movement, which initially were only weakly differentiated. With each of these structures has emerged an accompanying group of professionals, professional practices and professional bodies of knowledge, distinct in each case from operators. It is hardly surprising that such professionals should see pursuit of more formal, consistent and better-documented standards as merited in its own right.

The extent to which these observations are relevant for Southern Europe is not clear. It is worth observing that the organic movement in this region is often said to have a different character from that in the North. Rather than being mainly linked to the broader environmentalist movement, as in the North, it tends to be linked more to concerns about defending and promoting the more extensive forms of agriculture

⁴³Statements in quotation marks in this section are direct quotes from interviewees.

⁴⁴By “Northern Europe” is meant the English-speaking countries, the Netherlands and the Benelux countries, the Nordic countries and the German-speaking countries.

characteristic of the traditional production of the region. This perhaps implies stronger links to producers, rather than to intellectuals, and hence different trends in private standards and in influences over them. The wider institutional linkages of the movement in Northern and Southern Europe seem also to be rather different. (It was not further possible to pursue this line of enquiry in the research reported here, however.)

Influences over EU regulation in the 1990s

Sources within the organic sector are agreed that the initiative for public regulation, first at member State level and then at the EU level, arose from the community itself.⁴⁵ It reflected two concerns: that an independent public initiative offered better prospects for establishing a common basic standard (and hence reducing consumer confusion) than the split-prone movement itself; and that public standards could lead to more effective enforcement than private ones in relation to cases of free-riding and fraud.

Michelsen (2001a) and Barling (2003) argue that, at least at EU level, the movement was pushing against an open door. This was less the result of a general EU proclivity toward regulation in principle, than it was of developments at the beginning of the 1990s in relation to a series of broader political questions. In the first place, CAP reform created a policy space for organics, since the reformers were politically isolated in relation to mainstream farmer organizations. At the same time, from the Commission's side, there was a belief that EU-wide common regulation could promote trade integration and an awakening interest in establishing wider claims to legitimacy in terms of occupying a consumer protection role.

Sources within the movement (and in this case within the EU itself) are also in broad agreement that the original content of regulation 2092/91 was based largely on the IFOAM Basic Standard of the time. So too were those member State regulations which preceded the EU one. However, after having helped establish a regulation reflecting its own standards agenda, the influence of the movement then receded, within the EU centrally and also in certain member States. The main explanation offered concerned the movement's lack of consensus, which declined further with each step the EU took beyond the IFOAM Basic Standard. An IFOAM EU Regional Group had been established contemporaneous to 2092/91, whose mandate included coordinating policy interaction between IFOAM, the EU administration and EU member States. But it had difficulty in reaching internal agreement on regulatory issues, and even when it did it frequently found that the decisions that it made lacked backing among Group members' domestic constituencies. Against this background, the main influences on the evolving content of the regulations during the 1990s were the EU Agricultural Commission (DG Agri) and the member States, in the latter case through the

⁴⁵Sources are less clear concerning which organizations and persons within the movement exercised most influence in this respect.

⁴⁶Article 14 committees are committees of representatives of member States, established in a wide variety of areas of EU policy-making, where decisions are taken by qualified majority voting.

Article 14⁴⁶ Standing Committee on Organic Farming (SCOF). The SCOF, which met (and continues to meet) roughly monthly, has some executive powers that DG Agri lacks. But DG Agri, like the other DGs in the Commission, has sole rights to make initiatives, restricting the role of the SCOF to providing “supportive advice” and amending, delaying or throwing out DG Agri’s proposals.

At member State level, the influence of the movement also receded somewhat after 2092/91, although this process was very uneven. Member State regulations promulgated in the wake of 2092/91 tended to take this regulation as their model, rather than the IFOAM Basic Standard, and ministries of agriculture in member States started to appoint their own specialist staff. In relation to member State regulation, the main subsequent impact of the movement was to secure minor variations to 2091/92 in the national regulations, or in at least one case (that of Sweden) to persuade government that a distinct national regulation was not necessary.

As for member States themselves, these were divided along three separate axes in how they related to regulation and the processes around it. The first line of division reflected decisions, such as that described, concerning the respective roles of private and centralized public regulation. Certain countries, notably Denmark, France, Spain and Finland, strongly emphasized public regulation and control over enforcement. Others (most notably Sweden) emphasized the role of private standard-setting and surveillance. It is worth noting in this regard that both Denmark and Finland incorporated their organic regulatory and enforcement systems within their broader food-sector control systems, rather than setting up dedicated apparatuses.⁴⁷ The second line concerned the orientation of domestic organic movements, along North-South lines, between environmentalist and extensivist emphases. While member States’ positions only indirectly reflected those of their own movements, they were still an important factor. In the third line, member States differed among themselves in whether there were established forums or processes of consultation between the specialist ministry staff who represented them on the SCOF and the domestic organic community. These forums/processes appear to have been (and still are) far better developed in Northern Europe, including the Northern European “centralizers”, than they are in the South.

The first axis of difference is said to have been associated with preferences for more detailed regulation on the part of centralist systems and less detailed regulation in decentralist ones. The second and third were associated with preferences for different kinds of content in the regulations, and with mobilization of different sorts of expert knowledge (intellectuals associated with the movement in the North, intellectuals associated with government in the South) in support of arguments about detail and content. The partly systematic and partly cross-cutting nature of these differences meant that the SCOF frequently delayed decisions, slowing down the regulatory process rather than giving more control to DG Agri over its direction.

⁴⁷I owe this point to Gunnar Rundgren.

Influences over EU regulation since 1999

In 2005, the Organic Farming Unit in DG Agri still had only three expert staff. Most of its effort over the previous three years had been spent formulating an Action Plan on Organic Farming (see below), rather than on regulatory issues, although the Action Plan also contained regulatory proposals. In respect of regulation, the unit was responsible for technical formulation, drawing up the agenda of the SCOF and acting as a conduit between DG Agri and various non-state stakeholders. The latter were supposed to be represented by a special advisory group, but this barely functioned. The main influences on regulation included DG Agri more broadly, the member States via the SCOF,⁴⁸ and—of outside interests—the organic movement, which steadily reasserted itself from around 1999 onwards.

Since the promulgation of 2092/91 in its original form, DG Agri's regulatory agenda has been to extend the scope of the organic regulation to include all agricultural production and processing and all internal and external trade in organic products. This has implied an extension to livestock production and to certain crops or products with unique production methods, such as mushrooms and honey, as well as completion of the different annexes on permitted production and processing inputs, and finding long-term solutions to the regulation of external trade. In line with the objectives of deepened internal market integration and establishing a higher profile for the EU itself, it also has been to promote a common EU organic logo. Finally, particularly over the last few years, it has been to phase out all derogations delaying the implementation of particular provisions, or leaving their implementation up to member States. One of the main arguments deployed in support of this is the need to reflect standards development in international trading partners, primarily the US NOP, where regulations have typically been implemented without derogations.

As the regulatory framework has been extended and elaborated, the differences between member States along the lines described above have become more pronounced. This reflects the fact that the regulatory cycle has moved from areas where agreement was relatively easy to areas where differences in orientation have always been more pronounced. For example, differences between member States concerning the weight that should be given to extensivist priorities are typically wider in respect of livestock than crops, because European livestock farming practice tends to closely reflect climatic and cultural differences along North-South lines.

These differences are also evident in respect of the phasing out of derogations, or their replacement by new regulations. Usually, derogations had been included in the regulations in the first place at the insistence of a minority of member States, and had often been opposed at the time by others. Their phasing out thus resurrects original differences in a sharper form. At the same time, member States have tended to be united

⁴⁸Minutes of meetings of the SCOF, dating back to 1998, are available online at: <http://europa.eu.int/comm/agriculture/minco/regco/agbio/index.htm>. However, they generally record only the subjects under discussion, decisions reached (with voting figures) and attendance. The positions of national delegations are recorded only rarely and their arguments hardly at all.

in what they see as too much trespassing in realms they regard as sovereign. As will be seen, this is reflected in the priorities that were eventually attached by the European Council to the various recommendations of the Action Plan.

Proposals that may fall within the remit of other units within DG Agri or other EU directorates are sent to them for comment as a matter of course. These units and directorates can play a blocking role where a proposed regulation appears to run directly counter to a policy they have determined or even to a well-established administrative practice. However, different units and directorates are said to be more or less sensitive or active in this respect. Proposals are also remitted to the Commission's legal services. This is perceived by some as often leading to their tightening, although officials at the Commission prefer to describe what happened in terms of "reductions in ambiguity".

The organic movement has restored its original influence in the regulatory process by turning the IFOAM EU Regional Group into an effective lobbying organization. This rests on the Group's re-casting itself as a source of technical expertise, combined with adopting a more professional approach to interaction with the Commission and with member States. It rests also on DG Agri's frustration with the decision-making process in the SCOF since 1999. Both DG Agri and the IFOAM EU Group saw the latter's main recent impact in terms of helping to promote consensus on the SCOF, by working concertedly with member-State representatives across the EU to develop common positions. This work took place in member States themselves and around SCOF meetings in Brussels. In this way, the Group could claim legitimacy with DG Agri on the basis of securing a common ground that would otherwise be lacking. Of course, the positions that it seeks to establish consensus around are its own.

At the same time, the group has been a natural working partner for DG Agri for two other reasons, namely its combination of pan-European status with technical expertise. The EU Commission gives priority in dialogue with stakeholders to those who represent a common set of organizations across the EU generally, preferably on a federal basis, as in the case of the apex organization for European farmers' unions, the Committee of Professional Agricultural Organisations (COPA). Correspondingly, the group's members are supposed to be mandated by national umbrella organs of all organic sector organizations in the different member States.⁴⁹ Second, the EU has an institutionalized structure for calling upon expert advice. The group includes a number of specialists who provide this advice both on a personal basis, as representatives of expert institutions such as FiBL⁵⁰ and through the medium of the group itself.

DG Agri's Organic Agriculture Unit began to organize all-day meetings with the group in 1991. Since 1999-2000 these meetings have become more frequent, more structured (with the group circulating briefs, position papers or written proposals in advance) and with the Group increasingly preparing the agenda. The unit also meets COPA, or rather

⁴⁹It is not clear how well this works in some member States. In the UK it was not working well in 2005.

⁵⁰Forschungsinstitut für biologischen Landbau, based in Frick (Switzerland).

COPA's organic farmer subgroup, on a similar basis. Besides this it interacts with academic researchers, independent research centres and "people who come on their own initiative and who are hard to get out of the door". However, the main influence, albeit within the framework of DG Agri's broad set of priorities, is the group's.

Summing up

With the reservation that public institutions limit their influence, in the case of EU regulation, it appears to be independent experts who play the leading role in forming private standards and public regulation for organic products. In private organic standard-setting, they play this role individually, because they have the strongest convictions about standards and their importance. Here, their expert status rests on their backgrounds as advisers and academics, as well as on their histories of personal association with the movement. In public regulation, experts play this role collectively, as the result of a conscious strategy by a leading stakeholder group to present itself not only as a stakeholder but also as a source of expert knowledge. Here, their status rests partly on their individual professional (as opposed to movement) backgrounds, but mainly on their political role as vehicles for consensus formation. Hence, while within the EU there is indeed a shared discourse privileging expertise, there is no royal road whereby those possessing it are routinely referred the task of making regulations. This seems to occur only on the basis of strategic action by experts, securing their influence on a basis partly independent of their expertise alone. As for the "market opportunity people", "these tend to wait and see what the regulations are".

6. Limits to expert influence—the case of the EU Action Plan

In the wake of increased resources being made available for organic farming following the MacSharry reforms, the IFOAM EU Regional Group decided to try to exploit upcoming CAP reform exercises to further increase these resources. Since this decision came too late for the group to have any effect on the content of Agenda 2000, it was determined that efforts should focus upon the Mid-term Review exercise scheduled for 2001-2002. At this time (1999) the focus was upon opening up funding for organic farming under the CAP First Pillar, and increasing the volume of funding available under the Second. The proposals mooted in respect of First Pillar funding concerned making area payments equivalent across all crops (they tended to favour crops in which organic operators did not specialize), and making organic grassland eligible for set-aside payments.⁵¹ Given the success of some member-State Organic Farming Action Plans in the 1990s in establishing dedicated budgetary support at national level, the most promising strategy was seen as campaigning for an EU Action Plan linked to the Mid-term Review (author's interviews).

In Brussels there was a strong initial impetus for an Action Plan with a budget line from the then Commissioner for the Environment, Ritt Bjerregaard, who continued to vigorously support the idea when she returned to Denmark as Minister of Agriculture in 2000, but from this time on the idea of linking the Plan to CAP reform lacked any powerful supporters in the EU Commission. DG Agri in general and the Agricultural Commissioner, Franz Fischler, in particular, were lukewarm, despite intensive and well-coordinated lobbying by the IFOAM EU Regional Group.

The main arguments of the Commission against linking the Action Plan to the restructuring of CAP expenditure were that there was no new money available in the CAP (the Mid-term Review would signal a phased long-term reduction of expenditure); that—even if there was money—a specific budget for organic farming would unleash demands for special funding from other types of farming system; and finally that a specific CAP budget line for organic farming would be WTO-incompatible, since it would involve singling out a particular method of production for special treatment⁵² (author's

⁵¹There was also a proposal not involving extra funding, involving exempting organic farmers from set-aside requirements.

⁵²Barling (2005) supports this argument, stating that the WTO Agreement on Agriculture and the Agreement on Technical Barriers to Trade prohibits the use of distinct production methods as eligibility criteria for non-trade-distorting subsidies.

interviews). When it appeared in July 2002, the Mid-term Review (COM [2002] 394 final) redefined the CAP's overall purposes in terms of multifunctionality, and supplemented the two Pillars metaphor with that of three foundations. One of these was environmental sustainability, but this was defined in a highly general way excluding any special status for organic farming.

As a result of the general momentum created by the IFOAM EU Regional Group in 2001, the Commission was nonetheless committed by this time to develop an Action Plan. The main effect of the failure of IFOAM in its central objective in relation to the Plan was therefore to shift the latter's focus, mainly in the direction of regulatory issues. When the Plan (COM [2004] 415 final) was finally published in June 2004 it embodied 21 proposals, of which 14 fell under this heading (broadly defined). The remainder covered market promotion, data collection, research and optimizing the use of already existing CAP funding possibilities.

Figure 2. Timetable of events concerning the EU Organic Farming Action Plan

May 1999	DG Agri-supported conference on "Organic Farming in the EU", organized by Austrian Ministry of Agriculture, Vienna
May 2001	DG Agri-supported conference on "Organic Food and Farming", organized by Danish Ministry of Agriculture, Copenhagen
June 2001	Initiative of the EU Agriculture Council to develop an EU Action Plan
2001-2002	National workshops on the EU Action Plan, organized by IFOAM EU Regional Group and national SCOF representatives
October 2001	Questionnaire from DG Agri to member States and stakeholders on the need for an Action Plan, its objectives, expected results, timing and potential link to the CAP Mid-term Review
Spring 2002	Formation of EU Commission inter-service working group and stakeholder group on the Action Plan
July 2002	CAP Mid-term Review (COM [2002] 394 final)
September 2002	Commission "Non-papers" on consultation with stakeholders and "Organic Farming: a Challenge for the Future"
December 2002	Commission Staff Working Paper "Analysis of the Possibility of a EU Action Plan" (SEC [2002] 1368)
February 2003	DG Agri-organized on-line consultation on the Staff Working Paper
January 2004	DG Agri-organized public hearing on "The Future of Organic Farming"
June 2004	"European Action Plan for Organic Food and Farming" (COM [2004] 415 final)
October 2004	Decision by the EU Agriculture Council on prioritization of Action Plan proposals

Source: Author.

The eventual focus on regulatory issues is perhaps better seen as a third-best outcome for supporters of organic agriculture, both in IFOAM and in Brussels, than a second-best one. Some supporters of the Action Plan had hoped for funding for market development as a fall-back position, if subsidizing organic production further was rejected. Indeed, some even argued that funding for market development was more important than for production, since there would only be demand for the latter if the public were better informed about the nutritional, safety and quality advantages of organic food. If

the influence of “conventionalism” in shaping of the politics of organic agriculture in the EU can be detected anywhere, then it is in the blocking of references to the advantages of organic food in the Action Plan and in the relegation of discussion of even the environmental advantages of organic farming to the Plan’s background section.⁵³

Turning to the regulatory proposals, which came to form the main content of the Action Plan, it is clear that a large majority of these originated in the Organic Farming Unit in DG Agri: six concerned tightening and harmonization of the organic farming supervision system across member States and three recapitulated the Unit’s built-in agenda for completing existing standards and ending derogations. IFOAM EU Regional Group members claimed equal or partial credit for just under half of the proposals, and were strongly opposed to one.⁵⁴

Two of the proposals for which the Group claimed credit were seen by it as opportunities for extending IFOAM’s influence in DG Agri. One suggested the creation of a pan-European expert group which could advise the Commission on technical issues and which could provide it with authoritative advice when the SCOF failed to agree. The Unit saw this group’s role as “allowing us to draw on experts who aren’t speaking for member States or for specific interest groups”, while members of the IFOAM EU Regional Group saw themselves as likely to provide the bulk of its membership. The other proposed a new system for authorizing imports from third countries whose systems of regulation had not been granted equivalency status under Art. 11 (1). The new system would base all new authorizations on a check whether the relevant exporter-crop combination had been certified by a body mentioned on a common EU list. This proposal and a related one concerning harmonization of accreditation requirements for certification bodies operating in the EU itself were seen as an opportunity for promoting the market share of IFOAM-accredited certification bodies. This could occur if IFOAM accreditation was accepted as the criterion for EU-wide accreditation, including for admission to the common list for third-country import certifiers.

In the months immediately following the publication of the Action Plan, both supporters of organic agriculture in the Commission and members of the IFOAM EU Working Group expressed reasonable degrees of satisfaction with it, despite the failure to attract any funding. A formal policy had been created where none previously existed, heightened interest in organic agriculture had been created across the whole EU Commission and IFOAM’s long-term influence on the regulatory process may have been strengthened.

However, IFOAM’s influence over wider policy issues seems to have increased only marginally, if at all. When it came to wrestling significant resources away from systemically

⁵³Claims about the advantages of organic food have met unsolicited critical attention from at least one of the new generation of food safety authorities in Europe. Barling (2004) contrasts the seemingly gratuitous reaction of the UK Food Safety Authority to these claims, with the Authority’s stout defence of the safety of GM products.

⁵⁴This was for a harmonization of thresholds for the adventitious presence of GMOs across organic and conventional agriculture in the EU. Here, the Commission insisted that a special zero threshold for organic agriculture would create costly bureaucratic problems, while—because the thresholds for conventional production were already extremely low—the additional protection afforded would be negligible. (*Organic Standard*, 43, November 2004).

powerful players such as COPA, or making claims seen as damaging by champions of conventional agriculture, the outcome was defeat. At the same time, while it was the Commission rather than the movement which determined the content of most of the proposals that entered the Action Plan, many of the regulatory changes the Commission favoured were to be downgraded in priority by the member States, when the latter considered the document at a meeting of the Agricultural Council in October 2004. Among the proposals not given priority were the ending of derogations; more coordinated supervision of certification bodies by member States; requirements that member States report annually on their supervisory activities; a harmonized formal criterion for accreditation of certification bodies across the EU; adoption by member States of additional measures to monitor and enforce operator fraud; and establishing the new expert group. Presumably, all of these were seen as taking power away from member States. While the latter could tolerate (or simply not notice) this occurring on a molecular basis through the EU regulatory process, they were highly resistant to it when it became expressed in explicit policy actions.

7 ■ Implementation

In the European context, there are at least five instances in relation to standards and regulations for organic farming, where differences in implementation may arise. First, operators may interpret standards or regulations in different ways. Second, inspectors or certification bodies may interpret them differently during inspection or certification. Third, accreditation bodies may interpret them differently when accrediting certification bodies. Fourth, EU member States may interpret their overall supervisory role differently in relation to the operation of certification bodies, authorization of imports and enforcement of provisions on fraud. Finally, EU member States may decide for themselves how to implement areas of the regulations to which formal derogations apply.

There are very few academic studies of any of these instances, and little or no publicly available documentation on them. The only study of the first two instances is Seppänen and Helenius's (2004) work on inspection in Finland, where the governmental Plant Production Inspection Centre has an official monopoly. Their work shows that inspectors did not systematically distinguish between inspection and advice, and at the time of the study used inspections to suggest system design changes to organic farmers. There is no study of the third instance. On the fourth instance, there are publicly available reports of surveillance visits conducted by the EU's Health and Consumer Protection Directorate (DG SANCO) of seven EU member States, between 1998 and 2001. These surveillance visits also covered one example of the fifth instance, namely how member States were implementing Art. 11 (6) of the regulation, on licensing imports from third countries deemed not to have a system of regulation equivalent to that of the EU. Finally, there is no study or publicly available information on member States' interpretations of derogations. Appendix I summarizes the content of the DG SANCO inspection reports, as regards how the seven member States in question were implementing their general supervisory obligations. The reports varied in what they covered, but besides a common focus on operation of import authorization systems, they reported on the identity and internal organization of the "competent authority", systems for supervising certification bodies, practices of random testing for pesticide residues and enforcement of labelling requirements.

In brief, competent authority status was in some cases occupied by sections of central government agriculture ministries, in some cases divided between different central

government bodies, in other cases devolved wholly or partly to regional government and in one case (the Netherlands) delegated to a semi-private certification body. The extent to which competent authorities actively supervised and audited certification bodies differed widely, as did methods, supervision and auditing where these existed. Generally, competent authorities suffered from under-staffing and problems of internal communication. Conformity of operators to regulations on labelling and pesticide use was checked and enforced very unevenly and in some cases not at all. Procedures for granting import authorizations were also highly inconsistent. The information collected by authorities before making decisions, the extent to which this information was checked and the criteria used to evaluate it varied considerably from one member State to another. Some states had processes so lengthy, or devoted so few resources to the process, that they authorized very few imports indeed. Other member States completed the process quickly, leading to a concentration of EU imports in a handful of countries. In short, where there was room for differences in the implementation of regulations, these tended to be substantial.

DG SANCO ceased its programme of inspection visits in 2001, despite appeals from the organic farming unit in DG Agri.⁵⁵

The extent to which implementation has remained highly inconsistent across member States is therefore largely unknown. The only area where more up to date information is available is that of import authorizations. The EU makes available on its website lists of all authorizations granted since 1997.⁵⁶

The data recorded in these lists cannot be taken completely at face value, particularly in the 1990s, since a number of member States (Finland, Greece, Ireland, Portugal and Spain) did not report any authorizations that they granted to the central authorities in Brussels. There were also differences between member States in how approvals were formulated and the lengths of time for which they were granted.⁵⁷ Having said this, the data do suggest a growing degree of convergence in implementation (including reporting) particularly after 2001-2002. However, Portugal had still issued none at all by the end of 2004 and Ireland and Greece were issuing only one each annually. Belgian, Denmark, France and the Netherlands issued significant numbers of authorizations throughout, but until the end of 2002 these were almost without exception recorded centrally as having been withdrawn rather than confirmed. As a result, even as late as 2002 over 90 per cent of all confirmed authorizations were issued by only two countries, Germany and the UK (table 1).

While regulation 1788/01 (see above) is reportedly also implemented in different ways in different member States (author's interviews), its introduction does seem to have

⁵⁵This seems to have been the result of the emergence of new priorities within DG SANCO rather than a rejection of the usefulness of the exercise. It was not possible to interview representatives of DG SANCO to clarify this matter.

⁵⁶The lists give the reference number of the authorization, the country granting it, and the crop, certification body and exporting country involved. The list for 2004 alone is 790 pages.

⁵⁷I owe this point to Gunnar Rundgren.

Table 1. Confirmed authorizations of imports from third countries under Regulation 2092/91, Article 11 (6), by member State, 1997-2004

<i>Member State</i>	<i>1997</i>	<i>1998</i>	<i>1999</i>	<i>2000</i>	<i>2001</i>	<i>2002</i>	<i>2003</i>	<i>2004</i>
Austria	19	30	45	51	60	90	90	86
Belgium	4	4	5	5	7	8	68	180
Czech Rep								18
Denmark						20	42	90
Finland						2	2	11
France				4	5	5	126	179
Germany	202	225	280	401	500	677	926	1,449
Greece					1	1	1	1
Ireland							1	1
Italy	2	2	24	23	14	20	87	157
Netherlands							293	770
Spain							29	64
Sweden			9	11	4	25	36	51
UK	64	102	251	371	575	860	1,059	1,292
Total	291	363	614	866	1,166	1,708	2,760	4,349
CR2	91.4%	90.1%	86.4%	89.1%	92.1%	90.0%	71.9%	63.0%
CR3	97.9%	98.3%	93.8%	95.0%	97.3%	95.3%	82.5%	80.7%

Note: Withdrawn authorizations have not been counted.

Key: CR2: share of two leading member States in all authorizations granted; CR3: share of three leading member States in all authorizations granted.

Source: generated 10-18 August 2005 from the EU's annual "Pre-defined Reports" of Art 11 (6) import authorizations at: http://europa.eu.int/comm/agriculture/ofis_public/r9/ctrl_r9.cfm?targetUrl=reports

coincided with a greater degree of uniformity in the implementation of Art. 11 (6) of regulation 2092/91. In 2003-2004 there were very steep increases in the number of confirmed authorizations by Belgium, Denmark, Italy, Spain, Sweden and in particular the Netherlands. As a result, by the end of 2004 the share of confirmed authorizations attributable to Germany and the UK had fallen to 63 per cent. Overall, while there is thus insufficient evidence to reach a clear conclusion concerning discrepancies in implementing the regulations between member States, where time series information is available it seems to suggest a trend towards convergence over time.

8. The certification market

Certification of organic production occurred first, on the basis of informal on-site inspections, in the 1970s. Specialized certification bodies emerged in the mid-1980s, almost without exception from trading cooperatives or campaigning organizations that were part of the organic movement. The first steps toward accreditation of certification bodies occurred around the same time, when the French government set up an authority to review certification bodies in 1983 (Tate, 1994). A requirement that EU member States supervise certification bodies based in their territory was introduced as part of regulation 2092/91. No specific requirement that certification bodies be accredited to any broader EU or international standard was introduced at this time. In 1995, regulation 1935/95 amended 2092/91 by stating (inter alia) that as from 1 January 1998 these bodies “must satisfy the requirements laid down in the conditions of standard EN 45011”. In some member States this was interpreted as entailing they should be actually accredited to EN 45011, in others not. There is still no requirement for such accreditation in Germany and Sweden.⁵⁸

EN 40511 refers to the requirements that certification bodies normally have to fulfil in order to be recognized as such in the EU, whatever their field of operation. In addition, certification bodies are normally accredited to certify conformity to specific labelling programme requirements. In Europe, these may be the relevant organization’s own private label (for example, the Soil Association’s), the EU’s 2092/91 requirements and requirements in other leading centres of consumption (NOP, JAS). In practice, certification to 2092/91 is mostly to the national standards of the EU member States where certification bodies operate. In 2005 in Europe, there were 129 certification bodies accredited to certify for 2092/91 programmes, 34 to certify for NOP and 16 to certify for JAS. Fourteen European certification bodies are also accredited by IFOAM’s accreditation service, IOAS (International Organic Accreditation Service), to certify conformity to IFOAM labelling programmes (*Organic Certification Directory*, 2005).⁵⁹

The *Organic Certification Directory* reports the existence of 419 certification bodies worldwide, as against 383 in 2004 and 364 in 2003. Because its recording method involves some double counting, the real number is probably around 370. Of the 419,

⁵⁸I owe this point to Gunnar Rundgren.

⁵⁹Thirty-one certification bodies worldwide are accredited by IOAS.

157 are based in Europe, 84 in North America and 117 in Asia. In Europe, the number of bodies varies widely from one country to the next. There are national monopolies or near monopolies (both public and private) in Denmark, Finland, the Netherlands, Norway, Sweden and Switzerland. In countries where supervision is devolved to the sub-national level, there tend to be a much larger number—in Germany as many as 31. A general impression is that the number of certification bodies both in the EU and the United States rose immediately after the promulgation of regulations, and then fell back considerably. However, the number is now growing again in the EU.

Certification bodies in EU member States vary greatly in size, from fewer than five employees covering only a few dozen operators to over 100 employees covering several thousand. While the great majority of bodies still have their roots in the movement, a small number of certification generalists have entered the market. The most successful of these have been Bureau Veritas, through its subsidiary Qualité France, and Integra.⁶⁰ SGS, Bureau Veritas's great competitor globally, has also entered the organic certification market but so far with little impact. Despite offering services in a number of developing countries it accounted for only 23 EU import authorizations in 2004, of a total of over 4,000. A further new entry is the privately owned Control Union World Group, another competitor of Bureau Veritas and SGS. This has entered the market through acquisition of the international division of an existing player, Skal.

All the most spectacular expansions in activity have been by organizations emerging out of the movement. Interestingly however, these are organizations either without their own private standards (IMO, BCS), or which possess their own standards but apparently make little effort to promote them (Ecocert, Skal). This seems to reflect a general decline in the market share of private label certifiers more generally. While no hard data are available to measure the extent of this phenomenon, it seems to reflect the growing weight of market access and cost criteria in operator decisions concerning certification. Private label certification costs are generally higher than those for certification to public regulations, since private standards are typically more demanding.

In 2001 the *Organic Standard* provided an estimate of the size of the global organic certification market, based on estimated numbers of certified operators in different categories, the value of global output by each of these categories and certification costs as an approximate share of unit output.⁶¹ This gave a market size of around \$300 million. Using the same method, the market in 2004 would be worth \$430 million, of which around \$180-185 million would be in Europe.

The structure of the certification market is characterized by strong fragmentation along national and regional lines. Certification bodies tend to be mainly active on a national basis. A few are active on a regional basis and these tend to combine regional

⁶⁰Qualité France has around 35 per cent of the French market (Sivardière, 2004), while Integra appears to be the largest certification body in Belgium. The leading player of this kind in the US is SCS/Nutriclean, although in 2004 the major US not-for-profit certification organization NSF International acquired the largest US organic certifier, Quality Assurance International.

⁶¹"What cost is organic certification?", *Organic Standard*, 7 (2001).

activity with the activity in markets where production is mostly for export. Activities by the major EU bodies in the United States, and vice versa, are very limited. Hence, Quality Assurance International (QAI) of the United States, which describes itself as the world leader, is active in the EU only in relation to certifying imports from North America, and to a lesser extent Latin America and Asia. Neither QAI nor its parent publishes figures on turnover.

In Europe itself, the largest players appear to be the Ecocert group, with an estimated turnover in 2004 of around \$8 million,⁶² and BioSuisse, whose turnover cannot be far short of this. There then follow a group of certification bodies with estimated turnovers in the range \$6-8 million. These comprise Skal, Krav and the Soil Association. IMO and BCS probably fall just below this range.⁶³ Thus the leading eight certification bodies would have a combined European market share of about 25 per cent, which is low in comparison with most sectors and very low in comparison with other segments of the food sector.

Table 2. Confirmed EU import authorizations under regulation 2092/91, Article 11 (6) by certification body, 1997-2004

<i>Cert. body</i>	1997	1998	1999	2000	2001	2002	2003	2004
Ecocert	23	27	54	104	159	267	517	886
IMO	77	98	157	217	255	308	470	751
BCS	20	28	35	62	149	166	324	552
Skal	9	15	31	51	74	117	208	420
Lacon	0	2	7	14	19	28	55	101
Soil Ass	6	7	12	12	28	51	73	90
Qu Ass I	10	14	41	64	75	100	164	226
Cal Cert	11	17	28	35	60	89	111	133
Ocia	30	34	38	45	51	67	97	102
Inst Bio	3	4	8	13	19	38	77	137
Total	291	363	614	866	1,166	1,708	2,760	4,349
CR2	36.8%	36.4%	34.4%	37.1%	35.5%	33.7%	35.8%	37.6%
CR3	44.6%	44.1%	41.0%	44.5%	48.3%	43.4%	47.5%	50.3%

Note: Withdrawn authorizations have not been counted.

Key: Soil Ass: Soil Association; Qu Ass I: Quality Assurance International; Cal Cert: California Certified Organic; Inst Bio: Instituto Biodinamico.

CR2: share of two leading certification bodies in all authorizations granted; CR3: share of three leading certification bodies in all authorizations granted.

Source: generated 10-18 August 2005 from the EU's annual "Pre-defined Reports" of Art. 11 (6) import authorizations at: http://europa.eu.int/comm/agriculture/ofis_public/r9/ctrl_r9.cfm?targetUrl=reports

It is largely, but not entirely, the same group of players that are active in the EU import trade (table 2), except that regarding this branch of activity levels of concentration are quite high and increasing. Since the value of the EU import trade is not known, the

⁶²The Ecocert group contains several different companies, of which easily the largest is the French one. The figure given here is a result of adding together the estimated turnover of all members of the group.

⁶³The figures here are again based on estimates of the combined turnovers of EU and international operations of the certification bodies concerned. This may be problematic in the case of Skal, since Skal and Skal International now appear to be under separate ownership. No data of any kind have been published by BCS, and those published by BioSuisse and IMO are limited.

extent to which concentration in its certification is promoting concentration more generally is hard to say.

A factor, also sometimes mentioned in promoting concentration, is the nomination of certification bodies by the end-market client. Some large importers (for example Eosta) list preferred certification bodies on their website, and a few supermarket chains at different times have expressed preference for IFOAM-accredited certifiers. But this does not seem to be a significant or growing trend.

At the time of the author's interviews, three broad strategies could be detected among the certification bodies interviewed, in various combinations. A similar range of strategies were identified already by Bowen (2003) in an earlier survey. The first is to seek multiple accreditations in order to offer a menu of standards. This has been adopted sometimes as part of a broader strategy of internationalization, sometimes to resist competition from new entrants such as SGS (or Cmi⁶⁴ in the UK) competing both on price and ranges of standards offered. In the EU the main add-on standards offered are NOP and JAS. However, some certification bodies in the EU and in the United States also offer certification to EurepGAP or other farm assurance, environmental or sustainability schemes (table 3). While the number of bodies offering the certifications listed in table 3 more than doubled between 2004 and 2005, it is still a very small proportion of the total population of certifiers.

Table 3. Add-on standards offered by certification bodies, 2005

Bird Friendly	3
British Retail Consortium (BRC)	4
EurepGAP	12
Forestry Stewardship Council	2
GAP (unspecified)	1
GMP (unspecified)	5
Geographic origin	1
HACCP	5
International Food Standard (French and German retail consortium's version of BRC)	3
Marine Stewardship Council	2
Starbuck's programme	2
(Tesco's) Nature's Choice	2
Utz Kapeh	1
Total	43
Number of certification bodies concerned	22

Source: based on *Organic Certification Directory*, 2005.

A second strategy is internationalization. In the EU's recently published list of inspection bodies operating in third countries (http://europa.eu.int/comm./agriculture/ofis_public/pdf/r8_0000_en.pdf), Ecocert is listed as operating in 55 non-EU countries,

⁶⁴Cmi plc is one of the largest specialist food assurance and consulting companies of its type, working across the entire supply chain. The company operates in the UK and internationally through two principal divisions, Consulting and Technical Services and Certification and has operations in 11 countries.

IMO in 47, BCS in 38 and Skal International in 32. Several others are listed as operating in 10 or more. Patterns of internationalization tend to follow a regional logic, even in some of the cases above. Internationalization may be organized through different forms: opening of offices in third countries, developing a federal structure with local associates, or establishing strategic alliances with local certification bodies or other international ones in one or more third countries. Whereas the first strategy discussed was clearly based on seeking to benefit from economies of scale, depending on how the second is pursued, economies of scale may sometimes fail. This is because the volume of business available in some of the countries to which expansion takes place is often rather small.

In any event, in the light of the aggressive international expansion undertaken by Ecocert, etc. as well as because of the rise of local certification bodies in a number of developing countries, certain certifiers have decided to freeze or reduce their level of international involvement, either by withdrawing wholly from countries covered earlier or by withdrawing from the more resource-intensive activity of inspection there. A notable example here is Krav, which has withdrawn from inspection in East Africa, Latin America and the Balkans. Some certification bodies have also or instead retrenched from offering standards that they added to their menus only a few years ago, in order to focus on greater price competitiveness in relation to a perceived core private or public standard.

Besides estimating the size of the organic certification market, the *Organic Standard* (2001) article referred to reported average figures for costs of certification. Based on replies from 18 bodies, it cited fees for certification of a 6-ha horticultural operation as \$530 (2.7 per cent of imputed average turnover); those for a 30-ha dairy operation as \$672 (3.5 per cent of imputed average turnover); and those for a coffee or cocoa grower scheme involving 500 farmers as \$4,500 plus travel costs (3.7 per cent of imputed average turnover). The last of these questions was repeated to certification bodies heavily involved in international certification in late 2004, generating replies stating a range of prices rather than specific prices. However, the range in each case was almost identical, around \$5,000-10,000.⁶⁵ This suggests an increase in unit prices over the intervening period. It is against this background that discussion of alternatives to certification has emerged, although to date there has perhaps been as much discussion as there has been activity in this field (Lernouel, 2004; <http://www.naturallygrown.org/farm-list-detail.html?state=WYandcountry=227>).

⁶⁵When asked about the cost of certifying a large-scale commercial farmer operation of 2,000-3,000 ha in Africa, prices were also similar in range, but much lower (in a range of 1,250-2,300).

9. Conclusion

Organic standards and regulation in the EU have become steadily more detailed and prescriptive over time. Far from narrowing the original vision of the organic movement, they have systematically elaborated it. This formalization includes greater precision about permitted inputs, but its main direction has been to secure a closure of organic production from non-organic influences. That is, far from moving towards conventionalization, the central tendency has been to seal more completely the frontier between organic and conventional farming. This has taken the scope of regulation increasingly upstream and downstream of the farm itself, so that conformity is verified through examining the genealogy of inputs on the one hand and the integrity of the supply chain from “farm to fork” on the other. At the same time, regulation has extended from farmers and traders to the infrastructures of farming and trade.

The organic community was initially a central support of the regulatory process and to a large extent remains its most important stakeholder. But as the process has unfolded it appears to have acquired a logic of its own. This is not a grand logic, but an incremental one, resting on a variety of circumstances. These include a perceived need to close loopholes that fraudsters could exploit, a practice of resolving differences in national practice by specifying greater detail, and the tendency to return to the most difficult issues only when the simpler ones are all resolved.

While not grand, this logic still has real consequences, whose negative side is commanding increasing attention in the community. By 2004-2005 IFOAM had moved on from seeing harmonization as a cure-all for standards problems to officially opposing EU plans to add additional, more holistic conditions to the qualification of organic products.⁶⁶ It was also officially promoting discussion of alternatives to certification. Some of its leading members were also hoping that a reference in the EU Action Plan to “making the regulation more transparent by defining the basic principles of organic agriculture” (COM [2004] 415 final, proposed action 8) could be interpreted as “trying to establish what is absolutely necessary and then leaving space to work out what

⁶⁶Energy use, biodiversity and landscape. See *Organic Standard*, 43, November 2004.

sustainability means in specific circumstances” (author’s interviews), although it is not clear whether the experts in DG Agri all interpreted it in this way.⁶⁷

But however ambivalent IFOAM now is regarding the regulatory process, the IFOAM EU Regional Group remains intimately associated with it, as it has been since around 1999. It has achieved and maintained this status as an expert group. While the EU system is perhaps uniquely open to expert influence, who occupies this position is by no means given. The group achieved its position initially because of their status as pioneers in standard-setting. Later, as the EU Commission and member States acquired their own experts, and as a wider range of political forces and processes filled the arena, their expert status could only be maintained on the basis of fresh claims. Those that proved effective in this regard included ones to privileged access to new technical knowledge, but more importantly entailed a demonstration that the group could orchestrate an otherwise elusive pan-European consensus. In other words, their expert status only became fully institutionalized when they were able to facilitate specific political outcomes.

Influence based on expert status and knowledge also seems to have a self-limiting character. While EU policy-making may be expert-driven in part at least, territorial boundaries between expert claims are closely guarded. As soon as organic regulation began to touch on other EU regulatory regimes (e.g. GMOs, trade) or on the prerogatives of member-state governments, these claims became sharply contested. This experience was repeated when organic experts sought to access financial resources reserved for conventional agriculture and to assert claims for organic food that reflected adversely on conventional products.

Although the template of liberal governmentality throws more light on the processes described above than that of corporate-driven conventionalization, its illuminative powers are limited. Probably, it is a better guide to understanding deregulation than it is to new areas of regulation such as organic agriculture. Almost all the example referred to by Power, Miller and Rose and others focus on what happens when the state withdraws from the direct management of particular spheres. Arguably, this creates a bias toward emphasizing managerial inflections of expertise and management standards. Where hands-on control is rolled back, then the standards most likely to be articulated are ones like ISO 9000 about self-management. Simultaneously, the specialists most likely to be considered expert are professional managers. In the case of new areas or regulation, particularly where there are already private standards, the standards articulated are more likely to be technical, and the specialists considered experts are likely to be technicians. In the case of organic regulation, it has been the same technicians throughout. In their first coming this was in the guise of autodidact pioneers, in their second it was as scientists cum political fixers. Next time it may indeed be as managers, since it seems likely that pressures towards deregulation are now mounting.

⁶⁷An alternative interpretation is that the action entails producing a clearer explanation of organic farming for consumers, rather than having a bearing on the nature of the regulations themselves.

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Annex I Implementation of supervisory and import authorization functions by EU member States

<i>Country</i>	<i>Implementation of supervision</i>	<i>Implementation of Art. 11 (6)</i>
UK	<p>Single Competent Authority</p> <p>No annual reporting by certification bodies</p> <p>Competent Authority audits certification bodies and undertakes re-inspection of 8 per cent of operations</p> <p>No sampling of operators for residue analysis</p>	<p>Competent Authority gives preference to applications where the exporter is certified by a certification body recognized by another member State or which is IFOAM-accredited</p>
Spain	<p>Single Competent Authority</p> <p>No proper supervisory system</p> <p>Some certification bodies not EN 45011 accredited</p> <p>Variations in quality and detail of certification body inspection reports</p> <p>Sampling for residue analysis undertaken, but no record of results</p> <p>No enforcement of labelling requirements</p>	<p>Only 19 authorizations granted, 1994-2000, all for products already authorized elsewhere in the EU</p>
Italy	<p>Competent Authority status shared by central and regional government, but little communication between them</p> <p>Supervision commenced only in 1998 and is carried out differently from region to region</p> <p>Supervision consists mainly of study of certification body manuals and other documents</p> <p>Certification body practices vary widely</p> <p>No sampling of operators for residue analysis</p>	<p>Only one official deals with requests for authorizations. Formal procedures exist, but the process takes up to 6 months. Only 59 authorizations 1994-2000. Procedures hampered proper inspection of importers, and these performed in perfunctory way even in relation to available paperwork</p>
Germany	<p>16 regional Competent Authorities, with a central coordination group</p> <p>Certification bodies audited according to standard parameters, but poor communication of results</p> <p>Little sampling for residue analysis</p>	<p>Well-developed formal procedures, although documentation varies between regions</p> <p>Decisions based on evaluations conducted by IAOS. Authorizations in another member State taken as a positive indicator.</p> <p>Authorizations granted within 1-3 weeks, in some cases on an indefinite basis</p>

<i>Country</i>	<i>Implementation of supervision</i>	<i>Implementation of Art. 11 (6)</i>
France	<p>Two Competent Authorities, of which one involved in supervision; understaffing problems</p> <p>Audits of certification bodies undertaken, but by two other bodies</p> <p>Some certification bodies fail to enforce operator documentation requirements</p> <p>Weak enforcement of labelling requirements.</p>	<p>Complex system with high levels of personal discretion</p> <p>Certification body in exporting country sometimes not identified</p>
Austria	<p>Competent Authority status shared by Ministry of Agriculture and regional government</p> <p>No full-time dedicated staff at regional government level</p> <p>Lack of enforcement of certain regulations</p> <p>Deficiencies in labelling system</p> <p>Only "very rare" sampling for residue analysis</p>	<p>Authorizations granted by regional governments. Provisions concerning certification body accreditation not enforced in one region</p> <p>Very few authorizations, but provisional authorizations given where evidence deemed incomplete</p>
Netherlands	<p>Competent Authority and monopoly certification body status granted to a single organization (Skal), which also manages its own label (Eko). The relation between the Ministry of Agriculture and Skal "poorly defined and untransparent"</p>	<p>Competent Authority gives preference to applications where the exporter is certified by a certification body recognized by another member State</p> <p>No check for accreditation of certification bodies in third countries; instead they are required to sign a declaration of conformity to 2092/91</p> <p>Formal procedures involve limited disclosure requirements, but Skal checks all documentation at importers' premises on a regular basis</p>

Source: http://europa.eu.int/comm/food/fs/inspections/fnaoi/reports/organic_farming/index

Annex II Policy recommendations for developing countries and UNIDO

Developing countries' administrative resources should be concentrated on supporting the development of a local resource base of qualified consultants and organic inspectors, rather than on developing national regulations and national certification bodies as seems to be the case at present. It is highly resource-intensive to develop national regulations and national certification bodies, and ultimately unnecessary in relation to gaining market access. Access to the EU, US and Japanese markets can be gained most easily by using certification bodies based in these end-markets. At the same time, use of local inspectors provides the greater part of the savings that would be made if local certification bodies were created. A more serious supply constraint in developing countries is the absence of well-qualified consultants in organic agriculture, who are specialized in tropical crops and tropical agricultural conditions. Many organic agricultural consultants working in developing countries are generalists in organic agriculture or have a technical knowledge of tropical agriculture but lack sufficient expertise to function properly as consultants. With donor support, specialized training could be usefully undertaken in both these areas, with economies of scale realizable if this could be done internationally.

While certification and related costs (e.g. those for running internal control systems for smallholder-based exporting) are higher for meeting international organic standards and regulations than they are for meeting many other international food standards, the major obstacles facing developing-country suppliers are broadly similar. The principal competitiveness factors are scale, reliability, quality, finance and detailed knowledge of end-markets. In sectors other than organic production, donors have commonly supported North-South firm-to-firm partnership arrangements as a means of transferring some of the expertise and financial resources necessary for firms in developing countries to meet these challenges. The record of these partnership schemes is mixed, but there is now sufficient critical literature on them for their worst drawbacks to be avoided in the design of new programmes. Moreover, such partnership arrangements function already in some areas of international trade in organic products, on a purely commercial basis. There are few examples of them including firms from developing countries, however. UNIDO could consider working with some of the bilateral donors with better track records in this area to create an international scheme of this kind dedicated to developing countries' organic export operations.

In the light of the developments described in this paper, IFOAM has recently directed attention to alternatives to certification, particularly in developing countries. This is linked to the idea of promoting internal trade in products that are produced in conformity with organic standards but not certified. While this is an interesting and feasible strategy in some larger and better-off developing countries, which UNIDO might consider supporting, it is not realistic for developing countries where domestic markets for organic products are likely to be tiny. In the case of developing countries it is arguably more relevant to increase their voice in international standard-setting and regulatory forums. Currently there is only a very weak representation of developing countries in IFOAM and Northern private-label standard-setting bodies, and none at all in respect to public regulation. Possibly, supporting a stronger developing-country voice in IFOAM, including in relation to the work of the IFOAM EU Regional Group, would be a stepping-stone in both regards, which UNIDO could explore together with IFOAM.



UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION
Vienna International Centre, P.O. Box 300, 1400 Vienna, Austria
Telephone: (+43-1) 26026-0, Fax: (+43-1) 26926-69
E-mail: unido@unido.org, Internet: <http://www.unido.org>