



International Federation of
Organic Agriculture
Movements

5 November, 2004

Dear IFOAM Affiliates and other IAC Stakeholders:

IFOAM and the Criteria Committee (CC) want to thank all commenters for taking their time to comment on the first revision draft of the 2002 IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing (IAC). Taking into consideration these comments the CC has developed the following documents which are enclosed in this mailing:

- the second revision draft of the 2002 IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing (IAC). The draft includes two documents, which are the 2nd draft of the Criteria themselves and the 2nd draft of the Guidance Notes that accompany the Criteria.
- the CC responses to the comments received on the first revision draft (Criteria Committee commentary). These are also two documents, which are the commentary on the Criteria and the commentary on the Guidance Notes. See also Introduction in both documents.

As an affiliate/member of IFOAM or otherwise an interested party, you are now invited to comment on the second revision draft of the Criteria and the Guidance Notes.

Instructions for Commenting:

- It is essential that you cite the relevant section and subsection numbers when making detailed comments. This is the case for 2nd revision draft of the Criteria and the 2nd revision draft of the Guidance Notes.
- IFOAM encourages you to make comments as specific as possible, and include suggestions for new wording in the form of edited text, along with rationale for your suggestion.
- If you are making a very general comment about the whole Criteria or about an entire Section, please indicate that with a heading.
- If at all possible, please submit your comments in Microsoft Word or Rich Text Format, as this will be easiest for the IFOAM staff and Criteria Committee to handle. We can also quite easily handle very short comments sent in the text of an email.
- Email submissions are strongly encouraged. Please send these comments to Matthias Fecht, M. Fecht@ifoam.org.
- If you are unable to use email, please mail your comments to Matthias at the IFOAM Office (see address below).
- There is a 90 day period for comments. ***The deadline for submissions is 01 February 2005.***

All comments received will be promptly acknowledged. If you have not received an acknowledgement to your comments by the 01 February deadline (or shortly thereafter if you comment very close to the deadline), then please contact Matthias Fecht to verify that your comments were received by IFOAM.

The CC would like to draw your attention to the following issues.

- *The Guidance Notes*

Following a comment on the nature of the guidance notes the CC decided to incorporate all the notes that are not just of explanatory nature into the main Criteria. They are still called guidance notes and are marked accordingly. The former guidance notes document now only includes notes that are of explanatory nature and was renamed accordingly. For further information on this change see the new introduction section of the 2nd revision draft of the IAC and the CC commentary.

- *Section 7.5 – Scheduled Inspections*

Following a comment on current IAC 7.5.1 the CC decided to move from the current principle of annual inspections of every operator to a risk based system. The CC feels that this new system would allow certification bodies to better focus their inspection efforts.

- *IAC 9.2.2*

The CC incorporated **in brackets** the proposed wording for a new section under point e of this criterion. The CC is disinclined to include the new section but wants to invite comments – especially from the ACB's – on this issue.

The Criteria Committee will consider all comments on the second revision draft and publish a commentary explaining its responses to the comments along with a final revision draft of the IAC.

If you have any questions about the process or the meaning of the draft document, please contact me by email, m.fecht@iffoam.org, or by telephone at 0049 228 926 5018.

With best regards,

Matthias Fecht
Coordinator, Organic Guarantee System