



**IOAS Third Country CB
Equivalence Assessment reports**

The IOAS offers

- IFOAM accreditation
- GOSA accreditation
- ISO 65 accreditation
- GOTS accreditation
- TE accreditation
- Approved CVB for the Canada Organic Regime
- Compilation of technical assessments for 3rd country CB equivalence

Structure of the IOAS

- Governing Board of Directors
- Accreditation Committee
- 2 Joint Executive Directors
- Business and Finance Manager
- Office Administrator
- 5 Client Managers

References

- Guideline on imports of organic products into the European Union
- Regulation 1235/2008 article 11.3

Application Guideline – section 2

Application form to include:

- Identification
- Geographical scope and product categories
- Technical dossier
- Signature and date

Assessment report Guideline – section 4

Assessment report must include:

Evidence that the Assessment body fulfills the requirements of ISO 17011

Qualification and training of assessment staff

Equivalence of standards as set out in Titles III and IV of regulation 834/2007

Equivalence of control measures as set out in Title V of regulation 834/2007

Assessment report Guideline – section 4

- Report of the document review of the documents describing the structure, functioning and quality management of the CB
- Report of the primary office audit and audits of offices in critical locations
- Report of witness and/or review audits
- Evaluation of local knowledge and languages

Article 11.3 – technical dossier

Overview of activities to include:

- Estimated number of operators
- Expected nature and quantity of products
- Description of the product standard and control measures
- Demonstration of the equivalence of standards and control measures
- Proof of notification to the authority in each third country of activity
- Internet website where list of operators can be identified

Assessment report Guideline - section 7

- References articles 8.2c & d and 11.3b
- Equivalent = different systems of measures that are capable of meeting the same objectives and principles ensuring the same level of conformity
- Comparison of objectives and principles
- Side by side comparison of the relevant requirements
- Inventory of substantial differences

What wasn't in the guideline or regulations

- Specific confirmation that only private standards could be assessed for equivalence and that the regulation could not be used directly by 3rd country CBs
- Necessity of witness/review audit for each scope in at least one country of activity

IOAS approach

Development of an EU report format which included:

- IOAS credentials
- Scope of the assessment
- Equivalence of grower groups
- Comparison of objectives and principles
- Report regarding document review

IOAS approach continued

- Report of the office audit
- Witness and review audits
- Foreign visits
- Evaluation of local knowledge and conditions
- Explanation of substantial differences table
- Explanation of how non conformities found by the IOAS had been handled
- Concluding statement

Document review

Relevant records of regs 834 and 889 entered into the IOAS database

CB standards and control measures screened against these

Non conformities raised and closed out.

Report on the substantial differences included as an annex (equivalences)

Equivalence

Used following criteria to judge the equivalence:

- Agroecology
- Alternative means
- Detail
- Legislative

Codex was also used as a reference point to determine equivalence – but only within the categories above.

Office audit

- Staff knowledge, qualifications, training and experience
- Complaints and Appeals
- Operator file checks
- Monitoring of non conformities
- Unannounced and follow up visits:
- Sampling
- Exchange of information with other CBs
- Interviews with control and certification staff
- Other office audits in critical locations

Submission

Assessment report and 3 annexes

Annex 1 - equivalence assessment of documentation

Annex 2 - substantial difference

Annex 3 – production standard used

IOAS Since 2009 application period

Updating some reports to regulations 834 and 889 as they had been done according to 2092/91

Preparing EU reports for new clients or for those CBs who have subsequently decided to apply for equivalence post

Doing aquaculture screenings, witness audits and where applicable office audits to apply for extension of scope

Summary and Way Forward

It is clear that there have been many different approaches to preparing the equivalence reports, some more successful than others

Almost all information could be found in the regulation and guideline on how to write the report – but a revised guideline setting things out more clearly would be welcome

Important to develop common requirements for supervision of CBs to ensure consistent approach by all assessment bodies.

Thank you

Jan Deane, Executive Director
IOAS