FOAM recently presented a detailed comparison of the IFOAM Accreditation Criteria and ISO 65 (EN 45011). The comparison, conducted by Ken Commins, Executive Director of the International Organic Accreditation Service (IOAS), supports the argument that IFOAM accreditation covers the requirements of ISO 65 as well as many other additional items. Some of the additional requirements are sector specific to organic agriculture, but IFOAM Accreditation Criteria (IAC) also cover many additional topics that do not specifically relate to organic agriculture. For example, IAC implements risk-assessment as an integral part of each inspection, an issue that is not covered by ISO 65. IAC sets timelines, e.g. annual inspections, annual management review, while ISO defines the provision without a timeline. Other issues, such as sanctions, inspection requirements and certificates, are further developed in the IAC though not in ISO 65. For instance, IAC requires inspection reports, certificates etc. to be signed by authorised persons and applicants to give a statement regarding previous certification, in addition, applicants may not recommend or choose the inspector. These provisions are not included in ISO 65. Generally, the IAC is more specific, e.g. it regulates what kind of general information may be provided by the certification body, whereas ISO 65 just defines that the certification body shall not provide advice. For the training of personnel ISO requires training while IAC requires initial and ongoing training. Some additional requirements of IAC focus on issues only relevant to organic agriculture, for example it covers topics such as certification of wild products or smallholder groups.

In total the comparison revealed 114 issues that are addressed by IAC but not by ISO, and 32 issues that, though addressed by both, were covered more comprehensively by IAC. In contrast, there are only three issues addressed by ISO but not by IAC and eight issues where ISO 65 has additional requirements compared to IAC. The issues not covered by IAC are the following:

- ISO requires certification bodies to give notice of intended changes in their requirements for certification. IAC requires the involvement of interested parties in the development and revision of standards but for all other changes in the certification
requirements only requires notification of the changes after the decision.
• ISO demands review of the application for certification to ensure that any differences in understanding between the certification body and the applicant are resolved. IAC does not cover this.
• ISO expects the certification body to prepare a plan for its evaluation activities. IAC does not mention this.

An example of an item in which ISO has additional requirements is in the maintenance of records ISO 65 requires certification bodies to maintain records of the review of the application for certification. In addition, ISO requires that there be policies and procedures to distinguish between product and other certification, while IAC does not.

The comparison does not provide an assessment of each norm. Instead it uses a format that is based on defining the subject matter contained in both norms. These subject matters were crosschecked, i.e. the subject matter of the IFOAM Accreditation Criteria with the respective requirement in ISO 65 and vice versa. The requirements were categorized into ‘identical’ or ‘ident.’, where they were the same; ‘additional’, where one norm has additional requirements in the subject matter which were absent in the other; and ‘not addressed by’ if one standard did not address the respective issue in any form.

The comparison does not include the IFOAM Accreditation Criteria Guidance Notes published in the IFOAM norms; the International Accreditation Forum (IAF) Guidance on the Application of ISO/IEC Guide 65; or the related ISO Guidelines such as ISO 10001-1 Guidelines for auditing quality systems. This is a shortcoming, as for instance, it does not reflect ISO 65 as it has been interpreted by the IAF and as such implemented by most of the accreditation bodies worldwide.

The format of the comparison makes it difficult to make a quick overview on the major differences. In addition, a summary and an assessment of the variations of both norms are missing. On the other hand, the comparison enables the reader to make their own assessment and as such will be a valuable tool in the discussion and negotiations about recognition of IFOAM Accreditation. ■

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