Putting the Criteria into Practice

A Description of the Criteria & Evaluation Matrix

Christopher Stopes
EcoS Consultancy, UK
Outline

- Purpose
- How Criteria Matrix is used
- Structure - Application, Evaluation, Comparison: Criteria, Recommendation
- Critical cases - values & definitions
- Key questions
Purpose

• Provide a structured approach to evaluation of inputs
  – Working within a defined procedure
  – Transparent
  – Available to all
  – Clear criteria, based on principles

• Allows differences between MS & regions in organic practice to be clearly stated & understood

• Assist in highlighting key issues
  – Enabling resolution of critical issues (for or against)

• Formulate clear recommendations for decision making
How criteria matrix used

• Applicant MS - provides information on product for all criteria
• EU Expert Panel comments and provisionally evaluates according specified evaluation criteria - with scoring to highlight key issues (both positive and negative)
• All MS comment & evaluate (with scores to highlight key issues)
• Recommendation by MS
• Recommendation by Expert Panel to SCOF
Structure
Excel Workbook - 6 Worksheets

1. Read me first
   - Explanation of worksheets & description of process

2. Application
   - Criteria 1 - 9
   - Key issues
   - Applicant statement
   - Experts’ comment

3. Screening
   - Identify key issues
   - May stop the application process

4. Evaluation
   - Expert evaluation
   - MS comment
   - Score
   - Recommendation

5. Comparison
   - Compilation of scores
   - Identify areas of disagreement

6. Definitions
   - Defines all terms used in matrix
   - Legal basis

EcoS Consultancy
Application & Evaluation I

• Applicant (MS) submits completed application form
  – Every criteria specified - statement for each
  – Expert Panel comments where necessary

• Evaluation by Expert Panel
  – Statement for each criterion
  – Specific requirements - based on principles
  – Score (-2 to +2) for transparency, help participation,
    overcome language barriers in defining critical issues

• Evaluation by (all) member states
  – Comment & score
  – Identify key issues (particularly negative)
### Application & Evaluation II

**What is the difference? Example – Hydrolysed proteins**

NB: Case study fully explained later

<table>
<thead>
<tr>
<th>Application provides the facts about the input</th>
<th>Evaluation interprets facts &amp; offers a judgment</th>
</tr>
</thead>
<tbody>
<tr>
<td>– Potential levels of impurities (e.g. Chromium in tannery waste)</td>
<td>– Are the environmental effects minimal, is this an avoidable source of Cr?</td>
</tr>
<tr>
<td>– Source of the material derived from factory farming</td>
<td>– Is this use of material from factory farming acceptable?</td>
</tr>
<tr>
<td>– How the substance is used within organic systems</td>
<td>– Does use conform to principles of fertility supply and rotation?</td>
</tr>
</tbody>
</table>

• **FACTS**

• **INTERPRETATION**
Evaluation criteria & scoring

- Required &/or recommended limits for each of the criteria
- Based on principles (Organic Revision Project)
- Scoring indicative - identify critical (positive or negative) issues
  - +2 Very good, beneficial
  - +1 Good
  - 0 Neutral - no effect
  - -1 Some negative impact
  - -2 Very poor, does not meet requirements
    - -2 represents critical issue - use would require exceptional ??
      Really special reasons
    - Scores are not additive, average not used, non-commensurate

- Experts evaluation statement & score
- MS comments & score
Criteria – both ‘hard’ and ‘soft’

- **Soft**
  - Mostly qualitative
  - May be value based
  - Necessity
  - Economic importance
  - Perception (consumption, farming system)

- **Hard**
  - Mostly quantitative
  - Hazard (intrinsic properties of substance)
  - Risk (likelihood of harm)
  - Some may be critical (e.g. GM)
# Criteria - Summary

Matrix on website
www.organicinputs.org

- Identification ✓ ✓
- Origin
- Manufacturing
- Use & necessity ✓
- Environmental impact ✓ ✓
- Human health impact ✓
- Animal welfare impact
- Socio-economic aspects
- Other information
- Key issues

Existing requirements

✓ = Pesticide evaluation
✓ = Article 7 of 2092/91
Evaluation Criteria Example:
5. Environmental Impact

- **Principle**: manufacture, use & disposal of the substance do not result in or contribute to, harmful effects on the environment & at least maintain or ideally improve agroecosystem health
  - **5.01 Manufacturing**: The manufacturing process should not result in, or contribute to, harmful effects on the environment (scores: No harmful effect = 0, harmful effect = -1 or -2)
  - **5.03 Effects of impurities**: Levels of contaminants such as xenobiotics (e.g. antibiotics, pesticides, biocides, persistent substances or other substances of concern), microorganisms & heavy metals should be minimal & not pose environmental risks at normal application rates (scores: no risk = 0, risk = -1 or -2)
• Identification
Principle: Product must be clearly identifiable

1.0 Name
1.1 Characterisation
1.2 Legal status & status in organic farming standards
1.3 Purpose & intended use
2. Origin

Principle: Plant, animal, microbial or mineral origin; other maybe exceptionally included; must not be of GMO origin

2.01 Materials
2.02 GMO origin
2.03 **Factory farming**
2.04 Plant material
2.05 Renewable resources
3. Manufacturing
   Principle: Physical treatment, microbial, enzymatic; exceptionally simple chemical process; no GMO

3.01 Manufacturing methods
3.02 Use of GMOs
4. Use & necessity

Principle: Necessary for intended use, only if methods in Annex 1 insufficient for nutrient supply, crop protection or other purposes

4.01 Traditional use
4.02 Alternative methods
4.03 Efficacy
4.04 Economic importance
4.05 Likely extent of use
4.06 Resistance
5. Environmental impact

Principle: Manufacture, use & disposal do not result in or contribute to, harmful effects on environment, & at least maintain or ideally improve agro-ecosystem health

5.01 Manufacturing
5.02 Environmental fate
5.03 Environmental impact of use
5.04 Effects of impurities
5.05 Release of biocontrol agents
5.06 Effects on animals
5.07 Effects on plants
5.08 Effects on soil
6. Human health impact
Principle: Lowest negative impact on human health & quality of life; contribute to production of healthy food

6.01 Impacts on human health
6.02 Risks of manufacturing process
6.03 Risks of application
6.04 Residues
6.05 Risks from residues
7. Animal welfare impact
Principle: Lowest negative impact on animal health & quality of life

7.01 Effect on animal health and welfare
8. Socio-economic effects
Principle: Lowest possible impact on society, including public perception by stakeholders

8.01 Public perception: consumption related
8.02 Public perception: farming practice related
8.03 Public perception: other stakeholder views
8.04 Effects on rural development
8.05 Social justice
8.06 Cultural, ethical, religious issues
9. Other information

10. Key issues

9.01 Other supporting information - annex all relevant

10.01 Key issues in favour
10.02 Key issues causing concern
Recommendation - by MS & Expert Panel

A  Recommended for inclusion with no restriction or conditions of use
B  Recommended for inclusion with restriction or conditional requirements - these must be stated
C  Not possible to complete evaluation - further information required
D  Not recommended for inclusion or recommended to withdraw
Comparison & final recommendation

- The Comparison Worksheet includes Expert Panel and MS score
- Shows differences between MS and Expert Panel
- Highlights critical issues between MS & with Expert Panel
- Help prioritise critical issues to resolve - positive & negative
  - Organic practice varies, principles should be consistent
- Recommendation by expert panel to SCOF
  - 1. Product in Annex II - Yes/No
  - 2. If yes - in Annex IIA, B or F
  - 3. If yes - state any specific restrictions or conditions of use
Values

• Public perception (Criteria 8 - socio-economic)
  • Consumption related
  • Organic farming system/practice related
  • Other views - Ethical, environmental, fair trade, animal welfare
  – Hard to quantify but essential to maintain (or develop) confidence in the ‘integrity’ of organic - risk from inputs
  – Organic varies - different regions & traditions
    • Ultimately it is a ‘political’ decision
    • Take account of the full range of views - minority
    • Give justification for decision
Key questions

- Evaluation guidelines & limits - appropriate?
- Scoring - a help or a barrier?
- Can the application & evaluation procedure respect:
  - wide range of conditions,
  - traditions,
  - organic systems,
  - values & attitudes of all stakeholders?