OVERVIEW OF ORGANIC AGRICULTURE IN RWANDA AND OPTIONS FOR POLICY AND TRADE DEVELOPMENT
ABSTRACT FOR TRADE INFORMATION SERVICES

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International Trade Centre (ITC)
Overview of Organic Agriculture in Rwanda and Options for Policy and Trade Development.
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Report providing an overview of organic agriculture in Rwanda and options for its future development - outlines Rwanda's agriculture policies, and the status of the organic sector in the country; looks at organic agriculture sector in East Africa, focusing on production, markets, standards and certification; highlights market access issues in the main export destinations, and their implications for Rwanda; examines constraints and opportunities in Rwanda in the export market, and makes recommendations.


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ITC supports the development of exports in organic and natural products from developing countries through technical assistance to trade support institutions, government bodies, the private sector and producer organizations.

www.intracen.org/organics

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Acknowledgements

This technical paper was written by Gunnar Rundgren of Grolink (www.grolink.se). It is the outcome of a three day seminar in Kigali, Rwanda in October 2007 organized by ITC and the Ministry of Agriculture and Animal Resources of the Government of Rwanda.

The seminar brought together exporters, farm organization, trainers, public sector officials, donors and international organizations to discuss the opportunities for and constraints of the development of organic agriculture and exports from Rwanda. The paper provides an overview of organic agriculture in Rwanda and options for its future development. ITC is supporting this process during 2008 with a programme of technical assistance.

See http://www.intracen.org/organics/policy_support.htm

February, 2008
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<th>Acronym</th>
<th>Description</th>
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<tr>
<td>ADF</td>
<td>US African Development Foundation</td>
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<tr>
<td>EAC</td>
<td>East African Community</td>
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<tr>
<td>EAOM</td>
<td>East African Organic Mark</td>
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<td>EAOPS</td>
<td>East African Organic Products Standard</td>
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<td>ICS</td>
<td>Internal Control Systems</td>
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<td>IFOAM</td>
<td>International Federation of Organic Agriculture Movements</td>
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<td>ITC</td>
<td>International Trade Centre</td>
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<td>MINAGRI</td>
<td>Ministry of Agriculture and Animal Resources</td>
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<td>NOAM</td>
<td>National Organic Agriculture Movements</td>
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<td>NOP</td>
<td>National Organic Program (of the USA)</td>
</tr>
<tr>
<td>NUR</td>
<td>National University of Rwanda</td>
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<td>PGS</td>
<td>Participatory Guarantee Systems</td>
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<td>RBS</td>
<td>Rwanda Bureau of Standards</td>
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<td>RHODA</td>
<td>Rwanda Horticulture Development Authority</td>
</tr>
<tr>
<td>ROAM</td>
<td>Rwanda Organic Agriculture Movement</td>
</tr>
<tr>
<td>RSSP</td>
<td>Rural Sector Support Project</td>
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<tr>
<td>Sida</td>
<td>Swedish International Development Cooperation Agency</td>
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</tbody>
</table>
1. Purpose, Scope and Methodology

This report should be seen as an input to Rwanda’s Ministry of Agriculture and Animal Resources for the development of an action plan for organic agriculture and trade. It can also be an input to a more comprehensive policy for organic as well as giving some guidance for existing or future organic projects.

The report focuses on matters that are specific for organic agriculture. Many challenges in the agriculture sector are the same regardless if the products are organic or conventional. For instance, the need for good infrastructure, cooling facilities, and financial services is more or less the same for organic and conventional farming and is not delved upon here.

The report doesn’t elaborate on WHY Rwanda should support organic agriculture, or what the benefits are for organic production. There is a wealth of literature on that. A good summary can be found in Twarog 2006.

The report is based on the following input:

- Presentations at the Stakeholder meeting in Kigali 16-17 October 2007.
- Discussions and results of the Stakeholder meeting in Kigali 16-17 October 2007.
- Observations from a field trip 18 October.
- Internet searches.
- Official policy documents for Rwanda, notably:
  - The fertiliser policy, April 2007.
  - Strategic Plan For Agricultural Transformation In Rwanda, October 2004.

Other reports:

- Assisting Rwandans with entry into the international market place for tropical fruit. (Turner 2001)
- IFOAM study on organic markets in Africa. (Rundgren 2007)
- The UNEP UNCTAD CBTF report, Best Practices for Organic Policy - What Governments of developing countries can do to promote the organic agriculture sector (UNCTAD 2007), of which the consultant was the main author.
- The IFOAM report, Building Sustainable Organic Sectors (Källander 2007) of which the consultant was a co-author.
- Personal experiences from the development of the organic sector in a number of countries, including the East African countries.

Obviously, with limited field research the possibility for the consultant to make sound proposals is limited.
2. **Background**

2.1 **Agriculture policies of Rwanda**

The Government of Rwanda has developed a comprehensive Strategic Plan For Agricultural Transformation In Rwanda. This plan emphasise:

- Intensification
- Professionalisation
- Regionalisation
- Commercialisation

The Fertilizer Policy (April 2007) is largely about the increased use of chemical fertilisers. However, the policy does contain recommendations and actions targeting the better use of organic fertilisers:

- To improve extension system to create farmers’ awareness on the importance of organic fertilizer.
- To demonstrate better methods of producing and applying organic manure.
- To reinforce investment in soil erosion control measures particularly radical terraces that are efficient.
- To reinforce integration of livestock production with crop production. Animals produce manure for crop & crop by products act as feeds to these animals.

The Seed policy emphasis organic seeds. The programme «One cow per poor household » is an indirect support for organic farming. Soil Conservation and terracing are also promoted. (Muvara 2007).

The Government of Rwanda is engaged in promoting agro-business through (i) commodity chains development, (ii) transformation and competitiveness of agricultural products to facilitate access to markets (www.minagri.gov.rw). Organic market initiatives fit well into this.

All in all, Rwandan policies are not per se pro-organic, but they acknowledge that organic agriculture can play an important role, side-by-side with conventional agriculture, and some of the practices promoted are supporting organic agriculture.

2.2 **The status of the organic sector in Rwanda**

2.2.1 **History**

Like in many other countries (Källander 2007), organic agriculture has been developed and promoted in two parallel tracks, an NGO track and a commercial track, driven by companies. Quite uniquely for Rwanda the government is involved already in the early stages.
On the NGO side, organic farming idea was introduced 1999 by SEND A COW UK who had seen it working in Uganda and had appreciated the impact created on the lives of peasant farmers. One person was sponsored by SEND A COW UK for an organic farming training outside of Rwanda and various study tours to places like Uganda. That person, Richard Munyerango, came back fully inspired and in the year 2000, he started the first organic farming and demonstration centre in Gako of Kicukiro district. In the year 2001, they started community mobilization and thereafter, the first training course which lasted one month. (Munyerango 2007)

On the commercial side, the first organic production developed in the late nineties with production of organic fruit by Emballage Rwanda/Rwanda Volcano Export Produce. In 2001, a USAID funded project ADAR introduced support to emerging organic exports from Rwanda (Turner 2001). Some of the companies that were supported are still in business.

### 2.2.2 Extent of production and marketing

There are still very few organised commercial organic projects. Those identified are:

<table>
<thead>
<tr>
<th>Company</th>
<th>Products</th>
<th>Market/Volume</th>
</tr>
</thead>
<tbody>
<tr>
<td>Floris</td>
<td>Organic apple bananas</td>
<td>1-2 tons per week to Belgium, could expand to 10 tons per week if there was</td>
</tr>
<tr>
<td></td>
<td></td>
<td>demand</td>
</tr>
<tr>
<td>Urwibutso</td>
<td>Passion juices</td>
<td>1 tone per week and our export projections after the new passion juice and</td>
</tr>
<tr>
<td></td>
<td></td>
<td>concentrates plant, the volume expected is 10-15 tones per week to Uganda,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Kenya and Belgium and 10 tons to domestic market</td>
</tr>
<tr>
<td>Shekina Enterprise</td>
<td>Vegetables (Cassava leaves)</td>
<td>2 tons of dried cassava leaves per month to Belgium, Oman and 3 tons on local</td>
</tr>
<tr>
<td></td>
<td></td>
<td>market</td>
</tr>
<tr>
<td>Rchilex</td>
<td>Chillies</td>
<td>6 tons of chillies in Europe, but now stopped due to disagreement on prices</td>
</tr>
<tr>
<td>Ikirezi Natural</td>
<td>Geranium oil</td>
<td>Marketing just started. Market in the UK</td>
</tr>
<tr>
<td>Products</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Figure 1: At the Gako Training Centre*
After the support from ADAR project ended in 2005, the government has supported the certification process, by means of subsidies for the certification costs. It appears that many of the companies have substantial problems with their certification status, perhaps more to do with misunderstandings and lack of experience of how to manage the certification process, than that they don’t follow the standards.

Some claim that more or less all Rwandan farmers are “organic-by-default” unless they are involved in coffee or tea, while others state that quite a number of farmers use small quantities of agro-chemicals\(^1\). Then there are also farmers who are consciously organic farmers, even if they are not certified, often linked to an NGO project. The Gako Training Center has trained around 5000 individuals in organic farming practices. The consultant visited a group of 100 women farmers involved in organic horticulture production (in particular strawberries), who seemed to follow organic standards, without being certified.

\(\text{Figure 2: Distillation of Organic Geranium Oil at Ikerezi}\)

\textit{Fair trade}

A number of producer groups have got Fair Trade certification, mainly for coffee.


- \textit{Tea:} Sorwathe Sarl (http://www.flo-cert.net, 23 October 2007)

In most other countries there is a strong link between the organic sector and fair trade. This doesn’t appear to be the case in Rwanda.

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\(^{1}\text{The consultant has learnt over the years to be rather sceptic about statement that African small farmers are organic by default. Once a more serious investigation is done, one often find limited use of pesticides, if not in the main crops, then for termite control or fungicides for tomatoes and regular use of acaricides in livestock.}\)
2.2.3 Training and research
As mentioned above the Gako Training center has conducted many courses for farmers, NGOs and trainers. Just recently, also government extension workers have participated in such training. Few Rwandans have participated in training programs outside the country.

There doesn’t seem to be any research dedicated to organic farming at the moment.

2.2.4 Standards and certification
Certification in Rwanda has been supplied by Soil Association (UK) and EcoCert (Germany) (with the latter dominating). Currently Ceres (Germany) has got involved. It has close cooperation with UgoCert in Uganda, which act as an inspection agent for Ceres. This means that regional inspectors can be used.

The Rwanda Bureau of Standards has the ambition to become an organic certification body and is negotiating a training programme with Grolink AB, a Swedish based consultancy with a regional office in Uganda. The RBS is currently involved in the following:

- Sourcing funds from donor groups to cover external certification and training.
- Carry out visits to farms and help in implementation of organic standards.
- Organize general awareness of organic standards.
- Train stakeholders in organic standards (Rutagengwa 2007).

At the same time MINAGRI is “working with ADF &NUR to train local certifiers in an attempt to reduce cost of certification” (Muvara 2007). It is not clear if the initiatives of MINAGRI and those of RBS are coordinated.

Until 2007 there was no Rwandan standard for organic production. With the adoption of the East African Organic Product Standard (see more below), Rwanda now has a public standard. Still exports are certified to the EU regulation (see below) and in a few cases also to the US NOP.

2.2.5 Government policies and programmes
As been noted above, the Government of Rwanda is fairly positive to the development of the organic production and MINAGRI has involved itself in:

- Awareness raising.
- Capacity building among farmers organisation & decentralised structures.
- Support to the certification process.
- Seeds/Seedlings distribution.
- Working with ADF &NUR to train local certifiers in an attempt to reduce cost of certification.
- Aggressive aorestation, agroforestry & reafforestation programme to increase biomass for organic production.
- Radical & progressive terracing.
• General restocking of livestock (Muvara 2007).

Rwanda has banned the use of non-degradable plastics. While this might not have much direct bearing on organic agriculture, it is as interesting commitment to environment protection and can play a role in building the image of Rwanda as a progressive country in this regard.

2.2.6 Programmes and projects in the pipe
RHODA is planning a programme together with the Belgian Technical Cooperation, which will have a substantial organic component oriented to commercial organic production for exports.

The ITC assisted MINAGRI to organise the stakeholders meeting in Kigali in October. It will assist exporters to go to Biofach 2008 and plans further training activities.

IFOAM and the national organic agriculture movements in Kenya, Tanzania and Uganda are planning a follow up to the OSEA project (the project that developed the regional organic standards). That project, pending approval by Sida (Swedish development cooperation agency) has the following planned results:

• Improved certification services in East Africa.
• Appropriate conformity assessment systems for EA smallholders and local and regional organic marketing exist.
• Market access to the EU is improved.
• More comprehensive standard and standard revised according to practical experiences.
• Operators understand and implement the standards.
• Improved local market opportunities.
• The East African Organic Mark is well managed.
• Increased intra-EAC trade in organic products.
• Better government policies and plans for the organic sector.
• The sector in Rwanda and Burundi is further developed.
• Existence of comprehensive information about the development in East Africa.

The project will operate in all five East African countries and Rwanda will be included in all the activities. In addition, the special component for Rwanda and Burundi has the following activities:

1. Study of the actual situation in Rwanda and Burundi.
2. Establishing the proper network for information in the organic sector in Rwanda and Burundi.
3. Workshops to spread knowledge and get stakeholders together.
4. Organizational support to promising initiatives.
The UNEP UNCTAD CBTF project also plans future activities in Rwanda, probably starting towards the end of 2008.

The USADF supports one of the organic export operations (Ikirezi), and have also had a dialogue with MINAGRI about support of certification capacity.

2.3 Summary of stakeholders
The section below is completely based on Muvara 2007.

2.3.1 Government institutions for extension
RADA, RHODA, RARDA and RBS. Decentralized structures such as districts & sectors
Their role is to:

- Influence policy and legal instruments for organic agriculture.
- Provide technical assistance for organic agriculture.
- Diffuse appropriate training manuals/standards/materials.
- Provide guidance to comply with organic agriculture standards & certification.
- Mobilise and sensitise farmers on organic agriculture.
- Facilitate farmers to obtain inputs-org fertilizers & seedlings.
- Carry out M & E to ensure that farmers do not deviate from organic agriculture.

2.3.2 Financial Institutions
Microfinance – UPBR and Donors-RSSP, SPREAD. They:

- Provide Credit to farmers and SMEs.
- Provide Micro-credit services to small producers.
- Guide farmers & SMEs on project appraisals.

2.3.3 Research Institutions & Universities
ISAR, NUR, ISAE, KIST, INATECH & IRIST should:

- Develop improved organic agriculture technologies.
- Provide expertise to extension agents to facilitate technology dissemination.

2.3.4 Farmers, Farmers Organization & Cooperatives
Kamara, Tuzamurane, Rwanda Organic Agriculture Movement, Gako organic farm, with the role to:

- Provide technical assistance to fellow farmers.
- Provide inputs e.g. seeds/planting materials.
- Provide micro credits to farmers.
- Organise and mobilise farmers for organic agriculture.
- Carry out advocacy for organic agriculture.

### 2.3.5 NGOs / Civil Society

World Vision, Pelum Rwanda, Send a Cow, Vi Life, EER, RDO are responsible for:

- Mobilisation and advocacy for organic agriculture.
- Carry out extension services.
- Finances farmers innovations for organic agriculture.

### 2.3.6 Certification & compliance institution

RBS, EcoCert, Ceres, Soil Association:

- Facilitate farmers to comply to organic agriculture standards.
- Give certificates.

### 2.3.7 Business Development Services Centers & facilitators

PSF, CAPMER, CITT:

- Support farmers to develop business plans.
- Mobilize farmers for organic production e.g. BDS at local level.
- Mobilise funding and advise on appropriate funding sources.
- Fund farmers best innovations.

### 2.3.8 Agri-business entrepreneurs & exporters

RChillex, Floris, Rwandaflora, Urwibutso, etc.work with:

- Offering market to farmers produce through agro processing, export and local business sales.
- Farmers organisation and mobilisation for organic agriculture.
- Distributing inputs to farmers organisation/cooperatives.
- Carrying out extension services.
- Increasing use of scientific & technological knowledge in organic production.

### 2.4 Organic agriculture in East Africa

In East African the development of the sector has been very much a private sector driven activity, by commercial exporters (particularly in Uganda) and NGOs (especially in Kenya).

#### 2.4.1 Production

The numbers of certified producers and farmland under organic agriculture is increasing:
• Kenya: Farmers 35,000; Farms 181,500ha; Companies 18.
• Uganda: Farmers 60,000; Farms 250,000ha; Companies 34.
• Tanzania: Farmers 55,000; Farms 85,000ha; Companies 31.

More operators are investing in organic agriculture and the products lines are expanded. (Gama 2007)

### 2.4.2 Training and extension

In Kenya there are around 30 NGOs providing training in organic agriculture, some of them, e.g. the Kenya Institute for Organic Farming (KIOF) exist for twenty years already. There are also a number of NGO engaged in training in Uganda and Tanzania as well. Lately, universities have showed some interest:

- Sokoine University, Tanzania has a course in organic agriculture.
- Summer school with Makerere University, Uganda.
- Uganda Martyrs University has organic agriculture degree course.

The Organic Sector Development Training has been offered by EPOPA in both Tanzania and Uganda for five years, this course is now gradually taken over by Martyrs University and TOAM respectively.

Extension work has to a very large extent been done by NGOs and (export) companies. The public extension service has not really been involved in organic.

### 2.4.3 Research

There has been very little research in organic in the region. Sokoine University has just embarked on a 20-year trial together with FIBL (Switzerland). ICIPE in Kenya does applied research for pest control, most of it based on organic agriculture principles.

### 2.4.4 Policy

Governments have hardly paid any attention to the sector with a few exceptions, e.g. the Uganda Export Promotion Board has identified organic products as strategic products and the Uganda Coffee Development Authority has set a target that 10 percent of the Ugandan coffee should be organic. However, last years some policy developments have taken place:

- Uganda has opted for a specific policy for organic agriculture. The draft is at advanced stage.
- In Tanzania, organic agriculture has been included in National Agriculture Policy which on review for public comments. It is planned to mainstream organic agriculture in other agriculture policies such as Livestock.
- Kenya opted to mainstreaming organic agriculture in its Nutrition/Agriculture Policy. Later it will be included in other relevant policies or possibly a specific organic policy will be developed (Gama 2007).

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2 Notably the policy has been in advanced stage more than one year already.
2.4.5 Market

Most organic products from EA are aiming at the export market. Notably most exports are made by an exporting company that contracts out-growers. However there are a few cooperatives exporting (e.g. KCU and KNCU in Tanzania) as well as a few plantations (tea plantations in Tanzania and Kenya). Products for the export market are e.g.:

- Bark cloth
- Cashew nuts
- Cocoa
- Coffee beans
- Dried fruits
- Essential oils
- Fish (sustainable wild fish)
- Fresh fruits (bananas, pineapple, passion fruit)
- Herbal teas
- Herbs
- Honey
- Instant coffee
- Juices
- Peanuts
- Sesame
- Shea nuts
- Spices
- Vanilla
- Vegetables (green beans etc.)

The main market is the EU, but exports also take place to the US as well as to closer markets in the Gulf and South Africa. A few products, such as canned pineapples, are processed (Örjavik 2007).

The East African market for organic products is relatively small but fast growing. Some supermarkets and green groceries are stocking organic products. There are a few dedicated organic shops, but also direct marketing schemes (box schemes and farmer markets), sales to restaurants, hotels, wholesalers and retailers. Most of the initiatives to develop local/national markets are either NGO supported grower groups, private companies and businesses, cooperatives or organised producer groups. Sales are mainly fresh produce; Processed products vary from honey, teas, jams, milk products, dried fruits, mushrooms and oils. Self-claim is the normal form for assurance about the organic quality, but PGS systems and third-party certification also exist (Kiarii 2007).
2.4.6 Certification

There are two organic certification bodies in Kenya, AfriCert and EnCert. UgoCert is based on Uganda and TanCert in Tanzania. EnCert has a clear focus on certification for the domestic market, while AfriCert is ISO 65 accredited for EurepGap. TanCert and UgoCert are both in the process of accreditation to ISO 65 and the IFOAM Norms. TanCert has agreements with IMO and bio.inspecta and UgoCert with IMO and Ceres. Both have been heavily supported by the EPOPA program, but support is now phasing out and will cease mid 2008. Otherwise, certification is offered by European based certification bodies such as IMO, Ceres, EcoCert, BCS, Soil Association and bio.inspecta.

Apart from third-party certification, the National Organic Agriculture Movements, often in cooperation with NGOs, are implementing guarantee schemes for smallholder along the lines of Participatory Guarantee Systems (PGS).

2.4.7 The East African Organic Products Standard

Local organic certification bodies were established in Uganda and Tanzania in 2003, with support from the Sida-financed EPOPA program (www.epopa.info). In Kenya two local bodies offer organic certification. The local certification bodies in Uganda and Tanzania developed local organic standards, and the Kenya Organic Agriculture Movement (KOAN) did the same in Kenya. In 2005, the Bureaus of standards in Kenya and Tanzania showed interest in this and started to develop own public standards for organic, in the case of Kenya they were completed and gazetted in 2006.

Already at a regional meeting in Arusha 2003, the stakeholders agreed that a regional standard would make sense. However it was not until end of 2005 that funds were made available from the EU and Sida and the process could start. Coached by IFOAM, UNEP and UNCTAD the stakeholders developed a regional standard in the period December 2005 to January 2007. The main work was done in a technical working group comprising representatives of national organic movement, certification bodies and bureaus of standards. RBS participated in this process. There were two rounds of consultations on the national levels and two regional meetings as well as field-testing of the standards. At the onset the stakeholders agreed to that the standards should mainly be for the local and regional market development rather than being for export purposes. The analysis was that it is easier to use the importing countries’ standards directly for exports than to seek equivalence, even if the stakeholders obviously in the longer term want the East African standard to be considered as equivalent to the EU regulation (see below). The main mover for the standard was the private sector, but ultimately it felt that a government involvement in the process would be of value. The East African Community (EAC) develops standards and that was seen as the appropriate “owner” of the standard. In April 2007 the council of the EAC approved the East African Organic Products Standard (EAOPS). At this time Burundi and Rwanda had joined the EAC and the standard therefore also applies there.

The three national organic movements in Kenya, Tanzania and Uganda further developed the East African Organic Mark. That mark is owned by the three movements and will be made available to all producers (for a very low nominal fee) that are

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3 The ownership will be extended to comparable organisations in Burundi and Rwanda once they are well established.
either certified by any local or foreign certification bodies or that are part of a recognised PGS system. The basis of recognition of PGS systems still has to be worked out. It can also be used for imports that are produced according to a recognised standard, e.g. the EU regulation, the Indian NPOP and or the draft South African organic standard. As this system is still new it is too early to evaluate how well it works. It contains interesting components of public-private partnership.

2.5 Market access issues in the main export destination

2.5.1 EU regulations for organic

Currently, exports of organic products from Rwanda get market access into the EU through a derogation (stated in article 11.6) in the EU regulation for marketing of organic products (2092/91). The regulation 2092/91 has been amended more than 50 times and is now due to expire end of 2008, when a completely new regulation (834/2007) will enter into force. Regarding imports the provisions in Regulation 2092/91 was thoroughly amended by the regulation 1997/2006. The Regulation 1997/2006 introduces requirements and procedures for the approval of imports that are more or less identical to the provisions in the Regulation 834/2007. The new regulation contains the following three options:

1. Products certified according to the EU regulation by certification bodies recognised by the EU Commission. The certification bodies shall be ISO 65 accredited (art 32). The exporter shall have a valid certificate.

2. Products certified to equivalent standards to the EU regulation or the Codex Alimentarius by certification bodies recognized by the EU Commission. The certification bodies shall follow equivalent rules to the ones in the EU regulation and needs to be under the supervision of an accreditation body or a competent authority. (art 33 par 2). The products must be followed by a certificate of inspection.

3. Products from countries put on a list of recognized third countries. Such countries need to have a system that ensures that the exported products are produced to equivalent rules and certification procedures as the EU regulation or the Codex Alimentarius (art 33, par 1 and 2). The products must be followed by a certificate of inspection. The last option is more or less the same as the current third country list, the only difference is the explicit reference to the Codex Alimentarius.

2.5.2 What are the implications for Rwanda?

The first option gives simpler access to producers that are certified directly to the EU regulation, and means that products certified by EU based organic certification bodies can get direct and simple access. However, also certification bodies that are ISO 65 accredited outside the EU, can be approved this way. Compared to the current situation (where Rwandan products are imported under article 11.6 provisions), the main benefits are that Rwanda based certification bodies can get a direct permanent approval and that exporters

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4 A more complete description is found in annex 3.
6 In East Africa, AfriCert in Kenya is ISO 65 accredited and TanCert and UgoCert have applied for it.
don’t have to supply the certificates of inspection for each shipment. The exporter can also offer the product to any importer instead of being dependent on a particular importer as is the case in the current system. The main disadvantage of this system is that the producer must follow the exact requirements of the EU regulation, some of which are less well adapted to the situation in Rwanda, e.g. the requirements for organic seed and the restrictions on what kind of manure that can be used. Group certification is also not possible under this option, according to representatives of the EU Commission at the European Organic Conference December 2007 (The Organic Standard 2007), which would mean that it will be without relevance for most developing countries.

Option 2 also gives the same opportunities but with more flexibility regarding standards and accreditation. The main advantage of options 2 (and 3) is that there is not a need to follow every detail of the EU regulation. Compared to the current situation, the official listing of certification bodies outside the EU as recognised by the EU give non-EU based certification bodies better opportunities and exporters certified by local bodies that are recognised will have market access. It is a bit unclear what kind of supervision or accreditation that will acceptable by the Commission, but it is quite obvious that ISO 65 accreditation will be accepted as it is accepted for option 1. Further one can expect that IFOAM accreditation and government approval will qualify. Exactly what kind of diversions from the EU standards for production which might be permissible is not possible to tell at this moment. Only time will tell how this is implemented in practise. A disadvantage with option 2 and 3 is that the individual shipments will have to be accompanied by a certificate of inspection, something that is also the case today and which cause extra costs and sometimes damaging delays for perishables.

Option 3 is more or less the same as today, with possibly a bit more flexibility. It is not possible to assess if it will be quicker or easier for Rwanda to be approved through this route than through the current article 11.1 route which has proven to be tedious (see annex 3).

The immediate response to the changed regulation would be for local certification bodies to seek approval either for option 1 or for option 2, or for both – the same certification body could very well be recognized under both options. Option 1 seems to be a clearer and safer route, but option 2 have the potential to give producers better conditions.

3. The Organic Sector in Rwanda: Constraints, Opportunities and Recommendations

The recommendations below are based on the perspective that Rwanda will embark on an ambitious path for development of the sector. If ambitions are low, then some of the recommendations will be off the mark.

3.1 Market development

3.1.1 Export markets

There are apparent opportunities in the export market. However, one must have realistic expectations and not believe that everything that can be produced in Rwanda can also profitably be exported as organic. Transport costs and quality control are major obstacles for perishable products and competition is fierce. The consultant doesn’t have sufficient
knowledge about the situation in Rwanda to recommend any particular focus crops or products. A good starting point is what has already been successfully exported as organic and as conventional.

Main challenges to address for exports are lack of capacity among exporters to deal with certification requirements; lack of market knowledge and market exposure. The government’s support for certification costs is commendable and should continue, but should also be linked to capacity building for dealing with the certification process and setting up Internal Control Systems. Participation at trade fairs such as the Biofach; Natural Products in Dubai and Natural Products in South Africa will build Rwanda’s reputation as an organic source and give exporters exposure. A consistent appealing image of organic Rwanda should be developed and good stories should back it up. Cooperation among the few exporters is recommended, this can take many forms: joint presentations at trade fairs, joint promotional material, shared containers for shipping; joint negotiations with certification bodies etc. It is suggested that exporters could use ROAM as their platform for cooperation.

To develop further processing capacity, e.g. drying or pulping, could be useful to cope with fluctuations in the market for fresh product.

3.1.2 Local markets

Main challenges for the local market development in the East African countries are:

- Transparency and Quality assurance.
- Inconsistent and unreliable supplies from farmer groups.
- Variety in the product range; livestock products are very few.
- Low consumer awareness.
- Capacity of farmers on production for the market place. (Kiarii 2007)

Currently the local organic market in Rwanda is more or less non-existent, and it will take quite some efforts to establish a domestic market. Most important is to build consumer awareness and recognition and to develop the supply. The existence of the East African Organic Product Standards and the Mark is an advantage that should be built upon. To facilitate access to the mark, ROAM should become a partner to the Mark agreement and licence it to producers in Rwanda. (re quality assurance see below). The Government could facilitate the development of a domestic market by giving it space in trade shows, stimulate public procurement and through public awareness rising. The linking of farmers to markets is critical and requires much attention. It is important to strengthen the farmers’ role as responsible actors in the value chain. NGOs and other organisations supporting farmer should assist in the development of supply-chains with a lot of emphasis on quality and reliability. The exporters should also offer their products in the local market. To

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7 The group work related in annex 2 identified some target crops, but the consultant doesn’t know on which grounds they were identified.
8 A group of organic exporters in Uganda are developing a brand for consumer-ready organic products from East Africa and are interested in partners, contact: UCIL, www.ucil-uganda.com
ensure a good supply, some imports of organic products could come from Uganda. Using the media to raise awareness is clearly a successful strategy.  

3.2 Standards and conformity assessment

3.2.1 Standards
On the standards level, the East African Organic Products Standard should meet the needs of the Rwandan organic sector. RBS and the stakeholders should participate actively in the future development of the EAOPS. Farmers and operators should be informed about the standards and they should be popularised, e.g. through posters and brochures.  

3.2.2 Certification for export markets
Re certification, RBS has initiated work to train inspectors. At the same time, MINAGRI has discussion with ADF for the development of certification capacity, possibly including laboratory capacity. This needs to be coordinated. The volume of organic production in Rwanda is currently far too small to be the basis for any commercial domestic certification body. It is costly to develop certification bodies and that it might take many years, if ever, before such an organisation can cover its own costs (Rundgren 2007a). However, there are obvious advantages with locally based certification bodies such as better accessibility; better understanding of the local conditions, perhaps lower price and in particular a sense of local ownership (UNCTAD 2007).

In the short-term it seems most interesting to develop local capacity for inspection combined with negotiations (by the sector or the government) with internationally recognised organisations to keep costs down and insist on use of the local inspectors. Those local inspectors shall preferably be organised in one body and their services be sold by that organisation and not by the individual inspectors, to build institutional capacity and not only individual capacity. It should be noted that persons trained as inspectors can also use their knowledge in assisting producers to comply with certification requirements or implement Internal Control Systems, so there can be merits in training more people than would be needed for inspection purposes alone.

RBS needs to choose among the many roles it currently assumes for the organic sector. To own the standard; train the farmers; help them with certification, and certify are just too many roles and contradicts in particular the international standards for certification bodies (e.g. ISO 65). If it wants to be a certification body it should let other partners take care of training and assistance to farmers, or alternatively it focus on the standards and the training and let some other organisation develop inspection and certification capacity.

3.2.3 Certification/quality assurance for the local market
Currently, most organic products sold in the domestic markets in East Africa are self-claim. That is also the case for the very few organic products sold in Rwanda. So on the one hand there is production for exports that is certified with high costs and all kind of

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9 For more on local market development see Rundgren 2007.
10 This is one of the components of the OSEA project
11 Laboratory tests play a very small role in organic certification and it shouldn’t be a priority. There may of course be many other reasons for Rwanda to develop laboratories (e.g. sanitary and quality control)
procedures and there are local sales where there is absolutely no certification or quality assurance mechanism. Third-party certification is already very hard for the exporters and it is not likely, and hardly desirable, that small initiatives for local markets will go for that. However, also the local market would benefit from quality assurance regarding the organic integrity, i.e. that products claimed to be organic really are that. The NOAMs in Kenya, Uganda and Tanzania are developing simple systems for this modelled on the PGS concept (IFOAM 2005, Rundgren 2007b). It is recommended that ROAM and the NGOs supporting organic participate in this development work.

3.2.4 Organic regulation
There is no apparent need to introduce an organic market regulation in Rwanda, neither to facilitate exports nor to regulate sales of organic products in the domestic market. The disadvantages of such a regulation combined with the substantial resources needed to develop and implement it outweigh any possible advantages (UNCTAD 2007).

3.3 Production
The consultant didn’t see sufficient production to have any qualified opinion on the needs on the production level. The group work in the stakeholder meeting identified needs to facilitate the supply of organic pesticides and fertilisers, credits and seeds. It should be noted that in most production it is a better (and more organic) solution to use local resources for nutrient management than to import them for high costs. Also, a number of organic pesticides can be produced by farmers themselves, so caution is recommended before embarking on programmes to subsidise or support input supplies. The use of Travertine for liming as recommended in the fertiliser policy is as relevant, or perhaps even more relevant, for organic farmers as for conventional. The main support to production would be to ensure good training opportunities.

The issue of organic seeds is frequently raised. The EU regulation for organic requires the use of organic seeds, but it allows that non-treated conventional seeds are used, if organic seed of an appropriate variety is not available. Taking into account the size of the organic sector in Rwanda, it is hard to expect that organic seeds of good varieties will be made available to Rwandan farmers. But this should not pose any short-term problem. More important is that seeds are un-treated; have good quality and that they have resistance to prevailing pests.

For seedlings the situation is different. Here concerted efforts are needed to ensure that organic farmers can get organic seedlings for annual plants and for plants that give yield within three years of planting.

12 The consultant doesn’t know if the Rwandan Travertine might contain any harmful substances, literature suggest that it sometimes can contain Strontium or lead.

13 For other plants, e.g. Macadamia nuts, conventional seedlings can be used, and the crop can still qualify as organic.
3.4 Extension, training and research

3.4.1 Extension
Currently the NGOs are driving the organic capacity building and training of farmers. To some extent also export projects are delivering extension to the farmers. Government services seem hardly to be involved. In the short term it is probably better to build on the work of the NGOs and the exporters, and gradually get the public extension services involved\(^\text{14}\). A priority should be to build capacity among those that are already a bit engaged in organic. It should be noted that it is important that organic extension services are build on participatory approaches and the real needs of the farmers\(^\text{15}\). To link the extension service more closely to market initiatives, be it for domestic or export purposes, contributes in making the service more result-oriented and has proven to be rather successful e.g. in the EPOPA programme.

3.4.2 Education and training
As most of Rwanda’s population is rural, it would make sense to integrate organic farming in primary and secondary school curricula\(^\text{16}\). Even more important is to include it in curricula of agriculture training institutions. However, in order for that to happen, the teachers first need to be trained. The existing training institution, Gako Training Center appears to be well-managed and something to build further upon, especially for training of trainers. Similar centres could be established regionally to train farmers.

3.4.3 Research
There is no indication of that there is any special organic research conducted in Rwanda. It is also not at all clear what the research needs are. A starting point should be to make a participatory assessment of the research needs, so that any research is initiated actually corresponds to the needs of the farmers. To initiate cooperation, possibly some staff or student exchange programme, with organic oriented research institutes in East Africa and further a field, will contribute to capacity building of research institutions.

3.5 Sector organisation
The Rwanda Organic Agriculture Movement is just founded and its role and actual relevance can therefore not be assessed. However, in many other countries a unified organic sector organisation has proven to be very useful for development (Källander 2007). All parties should unify within ROAM to make it strong. The government and development partners should support ROAM, both directly and indirectly.

A regular annual event (a conference, a fair etc.) on organic could be initiated by the stakeholders to serve as a focus point for activities, communication and networking, raising public awareness, collection of data etc.

\(^{14}\) The consultant is not well informed of the general status of the public extension service in Rwanda and what the future plans are for it.
\(^{15}\) Far too often extension work is trying to instruct or dictate how farming should be practiced.
\(^{16}\) The consultant doesn’t know if farming in general is incorporated in curricula for normal schools.
3.6 Government and policy framework

3.6.1 Agriculture Policy

General

Most current policies appear to be rather friendly to organic. However, even if not intentional there might be issues that amount to discrimination against organic. E.g. the subsidisation of chemical fertilisers puts organic in a disadvantaged position unless organic producers can benefit from similar support. MINAGRI should assess if there are biases against organic production in various government policies and if so, try to clear them or compensate organic producers.

Zoning, regionalisation

There seems to be the idea that the government should define certain parts of the country to be suitable for organic production. This seems to be driven by the perception that organic can only be grown in areas where there is almost no use of pesticides or fertilisers. This perception is misinformed; organic standards do not define organic products as being absolutely free from residues. Of course it is good to avoid, as far as possible, contamination of organic crops, but in reality organic is practised side-by-side with conventional in all parts of the world, even in irrigated paddy farming in Asia (where irrigation water goes in and out of conventional and organic fields).

To support organic production with special efforts in certain regions as pilot areas can be useful, but it should not amount to discouraging organic farming in other areas.

Ministries and Institutions involved in organic

It appears that MINAGRI sees RHODA as the key institution to move the organic agenda. Perhaps this is because horticulture seems to be the most promising export opportunity. However Rwanda has an important coffee sector as well as some tea, and it would be a mistake not to include these sectors in the organic developments. Further, institutions such as the RBS have also got engaged in organic. To ensure coherence, avoid duplication and redundancy and to ensure further mainstreaming, it is recommended that one agency or ministry is given the clear leading role, but that there is a formal or informal working group established where all relevant ministries/agencies are represented, including also representatives of the private sector.

Capacity building

The general low knowledge of organic in research institution and extension services constitutes a barrier for organic production. MINAGRI should ensure that all staff is oriented about organic production and that some key staffs in relevant departments and agencies are given more thorough training.

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17 the organic regulation in the EU has no requirement for a specific distance between organic and non-organic fields while the US NOP has a 25 feet buffer zone as a requirement.
3.7 Monitoring
In almost all countries, lack of data of the sector is a major hurdle for the organic sector. It is very hard to monitor the development and to measure the impact of various initiatives if there is no data. MINAGRI and ROAM in cooperation should develop a system to collect relevant data on production and marketing.¹⁸ 

3.8 Developing the action plan
In order to ensure a good development of the sector it is recommended that MINAGRI – together with the stakeholders and relevant government agencies - develop an action plan (development plan or strategic plan) for the organic sector. It should include:

- A clear vision for the sector linked to Rwandan policies in general and in particular to agriculture and environmental policies.
- Clearly formulated, strategic objectives.
- Targets.
- Activities.
- Financing of its implementation.
- Monitoring and Evaluation.

Such a plan can build on this report and the results of the stakeholder meeting in Kigali October 2007. The consultant is of the opinion that some research is needed, in particular on the production level, including not only existing export projects but also all other initiatives that are involved in organic production, in order to better assess where key bottlenecks are. More involvement from (Ministries and agencies for) Environment and Trade is also needed to ensure alignment with other policy efforts. Supply-chains also need to be analysed. Finding how organic initiatives in the pipe (e.g. the programme supported by the Belgian Technical Cooperation; the ITC and OSEA) can integrate into one concerted action would also be of high relevance.

¹⁸ This is also part of the follow up OSEA project.
4. References


MINAGRI (2004), Strategic Plan For Agricultural Transformation In Rwanda, October 2004, Kigali.

MINAGRI (2007), The fertiliser policy, April 2007, Kigali.


Rundgren, G. (2007a), Building Trust in Organic, a guide to set up organic certification bodies, IFOAM, Bonn.


## Annex 1
### Result of SWOT analysis Stakeholder meeting in Kigali 16-18 October 2007

<table>
<thead>
<tr>
<th>Strength</th>
<th>Weakness</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Specific Organic</strong></td>
<td><strong>Specific Organic</strong></td>
</tr>
<tr>
<td>• Existing (export) market for organic production</td>
<td>• High cost of certification and lengthy difficult process</td>
</tr>
<tr>
<td>• Government support</td>
<td>• Absence of local certification bodies.</td>
</tr>
<tr>
<td>• National organic movement (just established)</td>
<td>• Lack of organic markets/outlets in the country</td>
</tr>
<tr>
<td>• Engaged farmers</td>
<td>• Lack of awareness about organics amongst consumers</td>
</tr>
<tr>
<td>• East African Organic Mark</td>
<td>• Lack of market information about prices, market trends</td>
</tr>
<tr>
<td>• East African Organic Products Standards</td>
<td>• No guarantee of consistent supply</td>
</tr>
<tr>
<td>• Regional certification</td>
<td>• Limited supply of organic inputs</td>
</tr>
<tr>
<td></td>
<td>• Farmers not yet organized</td>
</tr>
<tr>
<td></td>
<td>• Lack of knowledge about organic farming techniques amongst farmers.</td>
</tr>
<tr>
<td></td>
<td>• Lack of organic in state extension service</td>
</tr>
<tr>
<td></td>
<td>• Limited capacity at technical level (extension staff)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>General Rwanda</th>
<th>General Rwanda</th>
</tr>
</thead>
<tbody>
<tr>
<td>• High participation of women</td>
<td>• Lack of foreign investment</td>
</tr>
<tr>
<td>• Government projects that support agriculture</td>
<td>• Lack of cooperative spirit. Farmers want to work as individuals.</td>
</tr>
<tr>
<td>• Cheap labour</td>
<td></td>
</tr>
<tr>
<td>• One language facilitates information</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Opportunities</th>
<th>Threats</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Specific Organic</strong></td>
<td><strong>General Rwanda</strong></td>
</tr>
<tr>
<td>• Rwanda has good natural resources for farming, soil conditions are good, not much use of pesticides, fertilizers.</td>
<td>• Import of inorganic fertilizer often subsidized.</td>
</tr>
<tr>
<td>• Rwanda and donors wish to support vulnerable people (widows etc). Can be combined to promote OA.</td>
<td>• State Extension system promotes conventional farming</td>
</tr>
<tr>
<td>• Government is involved in cooperative development.</td>
<td>• Policy of the country to grow certain crops in certain areas could cause a problem when crop rotation has to be carried out (disputed).</td>
</tr>
<tr>
<td>• Quality products are already produced so there is good quality awareness among some crops that can be built on.</td>
<td></td>
</tr>
<tr>
<td>• Government is involved in promoting good environmental and soil conservation practices so introducing OA is in line with government policies.</td>
<td></td>
</tr>
<tr>
<td>• People have expressed the will to work together to develop the organic sector.</td>
<td>• Climate change – farmers can’t plan, impact on yields</td>
</tr>
<tr>
<td>• International and National organizations want to support Organic</td>
<td></td>
</tr>
</tbody>
</table>
The results have been somewhat edited and when there were two similar issues they have been merged into one. The consultant also tried to separate issues specific for organic from issues that apply to all farming in Rwanda. Some issues were moved, e.g. from Strength to Opportunity or from Threats to Weaknesses following the logic that if they are Internal for the sector they are Strength or Weakness, if they are outside of the direct influence of the sector they are Opportunity or Threat.

Some statements were not included as they were not so clear, too detailed or so general that they don’t give enough direction (The consultant apologizes for any misunderstanding):

- Lack of competitiveness (W) (very general)
- Limited structures in place to identify, coordinate and facilitate (potential) organic producers. (W) (vague)
- Decentralization system (S) (?)
- GMOs particularly to smallholder farmers (T) (not very clear)
- Because of geographical nature (hills) Rwanda has same special straw berries (O) (very detailed)
- We are belonging in East African community (O) (very general)
- Small size plots is a constraint (Homogenous production from many small plots;)
- Competition with food crop production). (W) (not clear about how this impacts organic, food production is also organic)
- Environmental protection like banning plastics (O) (covered by other point)
Annex 2
Result of Action plan group work Stakeholder meeting in Kigali
16-18 October 2007

Below is recorded the results of the group work for the development of an action plan for organic in Rwanda. Participants were asked to develop Objectives, Actions and targets for the following areas:

a.) Markets
   - Domestic
   - Export

b.) Production and products
   - Technology
   - Inputs, finance etc

c.) Institutional framework
   - Sector organisation
   - Extension service
   - Training and education
   - Regional cooperation

d.) Standards and conformity assessment
   - Standards
   - Certification (also PGS) for:
     o Domestic Market
     o Exports
   - Labelling

They were asked to make the plan based on the SWOT analysis and their own experiences. What follows below has only been slightly edited by the consultant. It was apparent that there was not sufficient time allocated in the meeting agenda for this exercise.

Market
Objectives
   - To have quality products for the Market.
   - Increase quantity for marketing both local and export.
   - Having value added.
   - Improving post harvest management.
   - Identify the market needs.

Identification of target crops
   - Coffee
• Tea
• Passion fruit (maracuja)
• Pineapple
• Avocado
• French beans
• Chillies

Activities
• Improving organic production methods.
• Increase export management.
• Sensitization of organic consumption.
• Creating Marketing channels.
• Using the eastern Africa organic mark.
• Sensitize people on organic mark.
• Building marketing capacities ROAM.
• Creating collection centres.
• Identify buyers and link them to the producers and exporter.
• Provide market information to the producers and exporters.
• Innovation and adopt new technologies for value addition.
• Provide information on requirements post-harvest.

Production
Objective
Organic Agriculture production grows to 5% of the overall production by 2012

Activities
• Capacity building of Extension staff.
• 416 sectors 2 agronomists per sector.
• Training of trainers for the cooperative 1 per sector.
• Encourage the identification of specific area for organic production and protection of those that are already in the organic sector.
• Support the development of Organic training centres (1 in each province).
• Facilitating the provision of organic inputs to farmers.
• Credit line for bigger producers/facilitate.
• Free inputs for small scale farmers.
• Encourage private sector to import and stock organic inputs.
• Encourage production of organic pesticides, fertilizers.
• Develop Seed/Seedling production in Rwanda.
Technologies

- Support irrigation.
- Support post harvest technologies.
- Research of appropriate production and use of organic input.
- Lobby Ministry of Education to include Organic Agricultural training courses.

Institutional framework

Objectives

- Increased knowledge about organic production.
- Better coordination and flow of information between the actors.
- Strengthen the existing organic movement.
- Sensitize producers and consumers on organic production.
- Introduce OA in public school system.
- Extension services available in OA.
- Common platform for the different player in the
- To have one voice from the organic sector on policy issues.
- Identify research need in OA.

Actions

- Identification of all players in the organic movement in Rwanda.
- Compile the contacts for all actors.
- Conduct trainings for key persons among the main players.
- Introduce OA into the curriculum.
- Develop training materials and handouts to support the education.
- Make as many as possible to join the national movement.
- Introduce membership fee to get income and show commitment to the organisation.
- Government to make budget allocation to support the national movement.
- Study trips to neighbouring countries to learn form their experiences.
- Radio programmes to be aired on OA.
- Publications to be made on OA.
- “Gov inst” to offer extension services in OA.

Targets

- Organic association mid 2008
- 30 organisations and 50 individual members in association
- 3 trips to EA countries during 2008
Standards and Conformity assessment

Overall objective

To establish recognized and sustainable certification system that is affordable and accessible to facilitate trade in organic products at the domestic and international level.

<table>
<thead>
<tr>
<th>ACTIONS</th>
<th>WHO</th>
<th>TARGET</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create awareness about the standards among the farmers</td>
<td>ROAM &amp; Min of agriculture</td>
<td></td>
</tr>
<tr>
<td>Develop inspection capacity</td>
<td>ROAM &amp; RBS as lead actors</td>
<td></td>
</tr>
<tr>
<td>Establish a certification body</td>
<td>RBS</td>
<td></td>
</tr>
</tbody>
</table>
Annex 3
Exports of organic products to the EU

The regulatory environment for organic in the EU is subject to changes. The current main regulation 2092/91 has been amended more than 50 times and is now due to expire end of 2008, when a completely new regulation \textsuperscript{19} will enter into force. Regarding imports the provisions in Regulation 2092/91 was thoroughly amended by the regulation 1997/2006. The regulation 1997/2006 introduces requirements and procedures for the approval of imports that are more or less identical to the provisions in the Regulation 834/2007.

Both in the old system and in the new system organic products can be exported to the EU provided that:

- The product has been produced in accordance with production standards equivalent to the production rules laid down in EU 2092.
- The operators have been subject to inspection measures of equivalent effectiveness to those referred to in EU 2092.
- The product is covered by a certificate of inspection issued by the competent authorities, certification bodies \textsuperscript{20} or authorities of the third country. The original of the certificate must accompany the goods to the premises of the first consignee.

The EU allows access by third countries to their organic food market through equivalence. This means that documentation and inspection processes for the producing country must be equivalent to that of the EU. This does not necessarily mean identical procedures, but there should be a fundamental similarity in the procedures. However, in reality the concept of equivalence is not very clear, and it remains sometimes a subjective exercise to determine if one system is equivalent to another.

The main difference in the new system is that certification bodies outside the EU can seek direct approval/recognition by the EU, something that was not possible under the regulation 2092/91.

The situation up to end of 2006

Article 11(1)

Under Article 11(1), third countries can be recognised as having a system equivalent to the EU. This list is held as a commission regulation and is published as a law. The list may have restrictions, such as a limit on the products, or limits on the region within the country from which they originate. To be listed under article 11(1), the countries production standards and inspection arrangements are equivalent to those applied in the EU. Few countries supply the EU through this path, as it in reality has proven to be slow and very resource demanding.

Countries Exporting to the EU through the Article 11(1) Procedure

\textsuperscript{19} Its complete name is Council Regulation (EC) No 834/2007
\textsuperscript{20} The terminology used in 2092/91 is “inspection body” and in the 834/2007 they are called “control bodies” – but the bodies referred to are certification bodies.
Article 11(6) (case-to-case)

The second path lets a company in the EU intending to import organic products apply for a permit to import such products. The importer must show (to the competent authority) that the product is produced according to equivalent standards and certification procedures. Once a permit has been provided, the product can be marketed throughout the EU. This is is managed by national or regional authorities of member states in the area to which to the product is being imported. There is a database where all the issued import permits are recorded. If a certification body has been listed there once, it is easy to get new approvals certified by the same organisation. This is the process whereby exports from Rwanda have been approved.

Importantly, the importer is responsible for declaring that the products exported from third countries are produced and monitored according to EU 2092. Also, an original certificate from the competent body issued to the third country exporter must be produced for these exports. Most of these products are certified by an EU based certification organisation, but increasingly products certified by organisations based in the exporting country have been accepted.

Labelling

Regulation (EC) No 331/2000 regulates the use of a European Union wide logo for organic farming in the European Union. The EU logo itself has not been universally accepted by producers or certification agencies, and many certifiers still rely on their own logo, which equally demonstrate compliance with EU 2092 regulations.

Some logos are government owned while others are private. Some have additional requirements, for example:

- The governmental AB logo in France cannot be used on organic products imported from outside the EU, if they can be grown in the EU.
- Some logos, like Demeter, KRAV and Soil Association, are based on private standards that are stricter on some issues than the EU regulation.

As consumers are familiar with the logos of these organisations, operators in these countries feel obliged to use these logos on their consumer packages. This can result in re-certifications and extra costs.

Regulation 1997/2006 from 1 Jan 2007

This regulation clarifies that for the assessment of equivalence not only the EU regulation itself should be taken into account but also the international guideline Codex Alimentarius CAC/GL 32, Guidelines for the production, processing, labelling and marketing of organically produced foods. The system of a list of approved third countries will be maintained, but the provisions in article 11(6) are no longer in place. The regulation (in article 5) introduce a system for direct recognition of certification bodies operating in other countries (something that the US and Japanese systems already had in place). There is no explicit requirement for the certification body to be accredited, however they should be under some kind of system of supervision or accreditation.
The current authorisations to market products imported from outside the EU that were granted based on article 11(6) prior to 31 December 2006 to importers will expire on 31 December 2007. However the member states will still be allowed to issue import permits until the list of recognised certification bodies has been published and an additional 12 months after the first publication. The labelling rules remain the same.

**Regulation 834/2007 from 1 Jan 2009**

While the regulation 1997/2006 is an amendment to the regulation 2092/91, the regulation 834/2007 repeals 2092/91. The Council regulation 834/2007 still leaves quite a number of issues open as it mandated the EU Commission to draft more detailed implementing rules. However for the imports the picture is quite clear, except for the procedures to be followed. The regulation 834/2007 rules for imports are very similar to the ones in regulation 1997/2006. The regulation contains the following three options:

1. Products certified according to the EU regulation by certification bodies recognised by the EU Commission. The certification bodies shall be ISO 65 accredited (art 32). The exporter shall have a valid certificate.

2. Products certified to equivalent standards to the EU regulation or the Codex Alimentarius by certification bodies recognised by the EU Commission. The certification bodies shall follow equivalent rules to the ones in the EU regulation and needs to be under the supervision of an accreditation body or a competent authority. (Art. 33 par 2). The products must be followed by a certificate of inspection.

3. Products from countries put on a list of recognized third countries. Such countries need to have a system that ensures that the exported products are produced to equivalent rules and certification procedures as the EU regulation or the Codex Alimentarius (Art. 33, par 1 and 2). The products must be followed by a certificate of inspection. The last option is more or less the same as the current third country list, the only difference is the explicit reference to the Codex Alimentarius.

Another change of some relevance is that under the new regulation organic products from within the EU shall bear the EU organic logo. Imported products may carry the logo. If the EU logo is used the country of origin should also be indicated.

**What are the implications for Rwanda?**

The fist option gives simpler access to producers that are certified directly to the EU regulation, and means that products certified by EU based organic certification bodies can get direct and simple access, also when they are from outside the EU. However, also certification bodies that are ISO 65 accredited outside the EU, can be approved this way. Compared to the current situation (where Rwandan products are imported under article 11.6 provisions), the main benefits are that Rwanda based certification bodies can get a direct permanent approval and that exporters don’t have to supply the certificates of inspection for each shipment. The main disadvantage of this system is that the producer must follow the exact requirements of the EU regulation, some of which are less well adapted to the situation in Rwanda, e.g. the requirements for organic seed and the restrictions on what kind of manure that can be used. Group certification is also not possible under this option, according to representatives of the EU Commission at the European Organic Conference December 2007 (The Organic Standard 2007), which would mean that it will be without relevance for most developing countries.
Option 2 also gives the same opportunities but with more flexibility regarding standards and accreditation. The main advantage of options 2 (and 3) is that there is not a need to follow every detail of the EU regulation. Compared to the current situation, the official listing of certification bodies outside the EU as recognised by the EU give non-EU based certification bodies better opportunities and exporters certified by local bodies that are recognised will have market access. It is a bit unclear what kind of supervision or accreditation that will acceptable by the Commission, but it is quite obvious that ISO 65 accreditation will be accepted as it is accepted for option 1. Further one can expect that IFOAM accreditation and government approval will qualify. Exactly what kind of diversions from the EU standards for production which might be permissible is not possible to tell at this moment. Only time will tell how this is implemented in practise. A disadvantage with option 2 and 3 is that the individual shipments will have to be accompanied by a certificate of inspection, something that is also the case today and which cause extra costs and sometimes damaging delays for perishables.

Option 3 is more or less the same as today, with possibly a bit more flexibility. It is not possible to assess if it will be quicker or easier for Rwanda to be approved through this route than through the current article 11.1 route which has proven to be tedious (see above),

The immediate response to the changed regulation would be for local certification bodies to seek approval either for option 1 or for option 2, or for both – the same certification body could very well be recognized under both options. Option 1 seems to be a clearer and safer route, but option 2 have the potential to give producers better conditions.
The International Trade Centre (ITC) is the joint agency of the World Trade Organization and the United Nations.