

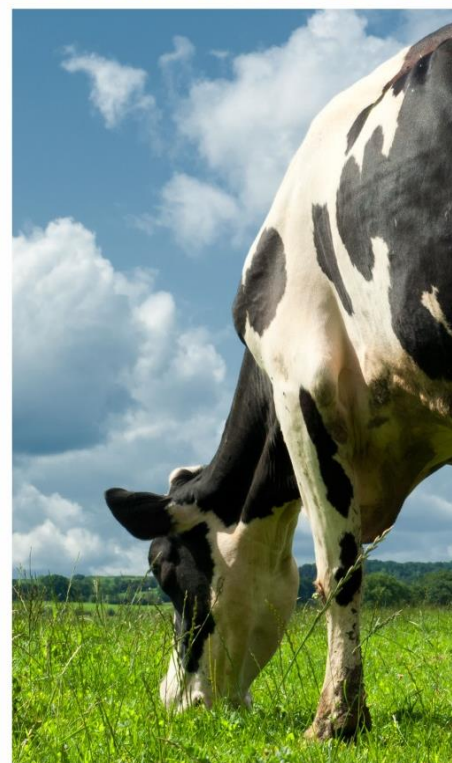
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Status-quo analysis of the institutional and legal framework of Organic Agriculture in Kazakhstan

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1. Introduction.

To date, Kazakhstan is making efforts to increase the export potential of agricultural products, which will be known under the common brand name "Made in Kazakhstan". This brand is expected to promote Kazakhstani products in world markets that are of high quality and environmentally friendly. In this respect, organic agriculture is supported by government through different government programs.

The legislative regulation of organic production in Kazakhstan started with the adoption of the relevant law in late 2015. Since then, the main legal acts on organic production and regulatory and technical documents have been developed and adopted. In particular, in 2018, three standards for organic products came into force, including a sign confirming the conformity of organic products. Also, the first body to confirm the conformity of organic products, represented by JSC "National Center of Expertise and Certification", appeared.

The purpose of this study is to study the institutional and legal framework of the organic agriculture in Kazakhstan. This study makes analysis of the current political and legal aspects. The methodology of the study includes literature review, interviews with stakeholders, experts and various participants in the value chain of organic production, based on which analysis was carried out and recommendations for the development of organic production in Kazakhstan were developed in cooperation with IFOAM.

1.1 Brief history and milestones of organic agriculture in Kazakhstan

Organic agriculture in Kazakhstan started at the beginning of 2000's, the sector was pushed by business owners who saw an opportunity in Kazakh agriculture. Later, international organizations and projects played an important role in the development of organic agriculture in the country.

For the first time in the history of Kazakhstan and Central Asia, 3rd International Conference on "Development of the organic sector in Central/Eastern Europe and Central Asian countries" was organized in Astana, Kazakhstan, from September 17-18, 2010

2012: Environmentally friendly production was included in the Strategy Kazakhstan 2050

2015: The Organic Law was adopted in November 2015.

2016: Rules for production and turnover of organic products and list of permitted substances for organic production were published

2016 Organic Agriculture was included in the State Program for Development of the Agro-industrial Complex of the Republic of Kazakhstan for 2017-2021

2017: National standards for organic production, labelling and conformity assessment were published

2019: Ministry of Agriculture published a Roadmap for Development of Organic Agriculture

2. Legal Framework for Organic Agriculture in Kazakhstan

2.1 Agricultural Policy Goals and Priorities

Government of Kazakhstan developed different national programmes aiming at supporting economic development of the country and as well as development of agriculture. In 1997 Government of Kazakhstan announced “Kazakhstan -2030 Strategy: Prosperity, Security and Improvement of Welfare of the Citizens of Kazakhstan. Kazakhstan-2030 is being implemented through a series of ten-year plans, the current one being the Strategic Plan for Development of the Republic of Kazakhstan until the Year 2020, approved in 2010.

The Plan identifies agriculture and the food processing industry as key areas for economic diversification and food security: Main focus areas are

- agricultural exports,
- increased labor productivity, and
- processing of meat, milk, fruits and vegetables.

In 2012 the government of Kazakhstan reviewed the Kazakhstan-2030 Strategy and adopted the Kazakhstan-2050 Strategy in order to preserve the high rate of economic growth and improve resilience. Strategy -2050 covered priority directions in social, economic, political areas of the country. With regard to agriculture, key issues of the new economic strategy are

- modernization of the agricultural sector,
- development of farming and small and medium-sized enterprises (SMEs) in agricultural processing and trade, and
- enhancement of water resources policy.



Strategy 2050

Modernizing the agricultural sector

- Increase the sowing area in the country.
- Ensure a significant rise in the crop yield, primarily by introducing new technologies.
- Creating a world class livestock forage base.

Development of farming and SME in agricultural processing and trade

- Change the culture of farming and revive tradition of animal breeding using the latest techniques in science, technology and agricultural management.
- Determine which products we are going to produce in large quantities to win over major export markets.
- Adopt a new development programme for the agricultural sector until 2020.
- Increase state support for agriculture by 4.5 times by 2020.
- Set out a system of legal and economic incentives for creating medium and large agricultural enterprises, focused on applying new agro-technologies.

Policy regarding water resources

- Examine international best practices in addressing water supply issues
- Introduce the most advanced extraction technology and be prudent in the use of our country's abundant underground water reserves.
- Move to modern water-saving agricultural technologies.

Ten-year plans are transformed into sequential five-year development programmes. In 2013, the Government of Kazakhstan approved the Agricultural Development Programme for 2013–2020 (also known as Agribusiness-2020) aimed at increasing the competitiveness of agricultural producers through increased financial assistance, improved marketing of agricultural products and enhanced governance.

As part of the Agribusiness 2020 programme, the Ministry of Agriculture has developed 15 master plans for each agricultural sector and is preparing a map of regional specialization. In 2017, the government adopted the new “Agro-industrial Development State Programme for 2017–2021”, which seeks to increase agricultural production and exports. It is a multi-sectoral policy document aimed at

ensuring the production of competitive products of the agro-industrial complex in demand on the markets through:

- (a) involvement of small and medium-sized farms in agricultural cooperation;
- (b) saturation of the domestic market and development of the export potential of domestic products;
- (c) effective use of financial measures of state support;
- (d) effective use of water resources;
- (e) creation of conditions for effective use of land resources;
- (f) increase of provision of agricultural producers with machinery and chemicals;
- (g) development of trade and logistics infrastructure;
- (h) scientific and technological, staff and information and marketing support of agro-industrial complex.

“Agro-industrial Development State Programme” also touched the status of organic agriculture and identified the following issues.

1. The country does not have its own production certification system of organic products.
2. Absence of specialized laboratories in the country for the definition of organic products and product qualities.
3. Low awareness of the benefits of the organic agriculture among the population and producers about production and consumption of organic products.
4. Insufficient level of minimization and reuse of waste in Kazakhstan's agricultural sector.

2.2 Supporting policies towards organic agriculture.

For the first time, the issue of development of environmentally friendly production was included in the President's message to the people of Kazakhstan in 2012 as part of the Strategy "Kazakhstan-2050": a new political course of the established state.

“I have touched upon the most fundamental issues which will determine Kazakhstan’s preparedness for the Third industrial revolution.

“We need large scale modernization of the agricultural sector, especially as we face growing global demand for agricultural products. For us to become a leader in global agricultural market and build up our agricultural production we need to:

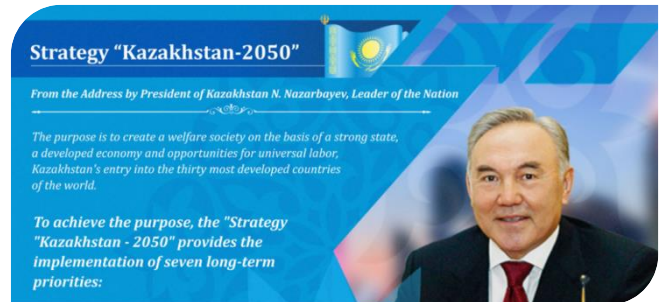
-Increase the sowing area in the country. Not all countries are able to do this, but we can.

- Ensure a significant rise in the crop yield, primarily by introducing new technologies.

- Creating world class livestock forage base.

- Create nationally competitive brand with an eco-friendly focus.

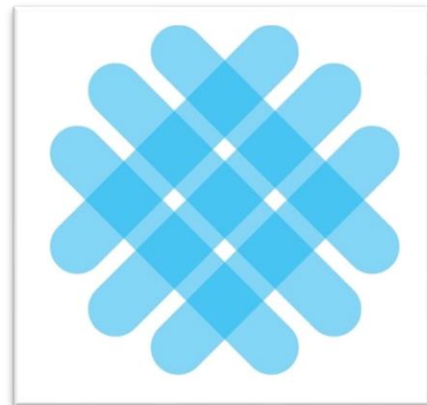
Our agricultural industry must become a global player in eco-friendly production”



Later the organic agriculture was included in **“State Program for Development of the Agro-industrial Complex of the Republic of Kazakhstan for 2017-2021”**

Production and turnover of organic products

“In order to improve the regulation of production and circulation of ecologically clean (organic) agricultural products, measures will be taken to improve national legislation in the area of production and circulation of organic products, in particular, the establishment and accreditation of national bodies to confirm the conformity and control of ecologically clean (organic) products according to national and international standards. The "Made in Kazakhstan" brand will become the benchmark for



environmentally friendly (organic) products. To implement it, brand award requirements and criteria for selecting manufacturers will be developed as part of a separate standard. In addition, rules (standards) of production, turnover and certification of environmentally friendly (organic) products will be harmonized with international norms and requirements, as well as legislation of countries - importers of environmentally friendly (organic) products of Kazakhstan, and normative and technical documents will be developed on production and use of biological plant protection products, soil improvers, growth stimulants and other bio products used in the production of environmentally friendly (organic) products. Statistical reporting on production, sale, export and import of environmentally clean

(organic) products will be introduced. In order to stimulate demand for Kazakhstan's organic products in domestic and foreign markets and to promote the products of organic production, outreach activities, representation and advocacy of Kazakhstan's organic sector at the international level, including at international exhibitions, trading platforms and forums on organic (organic) production, will also be organized."

Optimization of domestic and foreign trade policy with regard to agricultural products

The export policy will be based on targeted support to promote products in potential markets. For these purposes at the expense of own funds of JSC "NUH KazAgro" JSC "NC "ProdCorporation" will act as an export center of the agro-industrial complex in close cooperation with JSC "KazExportGarant" and JSC "National Agency for Export and Investment JSC" KAZNEX INVEST ", as well as diplomatic missions of the Republic of Kazakhstan abroad. The Centre will implement:

- 1) analysis of external markets and drawing up road maps for promotion of products for promising sales countries;
- 2) forward purchase of products from the Storage and Construction of large export lots;
- 3) creation of export sales channels for agricultural products demanded in the foreign market;
- 4) provision of insurance and guarantee of STP export contracts;
- 5) **promotion of umbrella brands, including "KZ ORGANIC FOOD";**
- 6) provision of consulting services on export of products, including contract support.

In his Message to the people of Kazakhstan "Constructive social dialogue is the basis of stability and prosperity of Kazakhstan" dated September 2, 2019 President of the Republic of Kazakhstan K. Tokayev said:

"We have a significant potential for the production of organic and environmentally friendly products that are in demand not only in the country but also abroad."



On July 30 2019 at a government meeting, Prime Minister instructed the Ministry of Agriculture to develop a road map for the production of "organic" products.

In September 2019 The Government of the Republic of Kazakhstan has approved the Roadmap for development of organic agriculture developed by the Ministry of Agriculture. The approved Road Map provides the basis for the implementation of a set of measures aimed at studying the needs and rules of access to the markets of priority countries, building an institutional structure in the field of "organic" industry, recognition of the national certification system in the international market, scientific and information support, etc. It includes a total of 55 activities related to 8 intervention areas:

ROADMAP FOR DEVELOPMENT OF ORGANIC FARMING IN KAZAKHSTAN



The roadmap includes a number of supportive measures to be implemented or at least considered for adoption including for example certification subsidies; partial compensation of expenses for organic producers, e.g. for advertising; certification training; support participation in international fairs. The activities indicate a clear prioritization of the authorities for export promotion with the majority of activities indicating a clear linking to export. Promotion of production for the domestic market is mentioned in a few activities, but seems to be of lower priority to the government.

State regulation of organic agriculture in Kazakhstan is provided within the framework of the Law of RK "On production of organic products" from November 27, 2015. The law defines the legal, economic, social and organizational basis for the production of organic products, aimed at ensuring the rational use of soil, promoting healthy nutrition and environmental protection.

The purpose of the legal regulation of organic production, along with the creation of favorable conditions for the development of organic production, the preservation of natural resources, the use of sustainable systems of natural resource management, is to improve the quality of food products and the creation of a national brand of organic products. Development of the domestic market of organic products, inspection and certification, increase of export of organic products and provision of state support measures to organic producers are defined as the tasks of legal regulation.

The law itself covers the topics of organic regulation, certification and the establishment of an national organic logo. It also mentions that operators that comply with law are eligible to receive state support and incentive measures. However, the law itself and the complementary documents published since then do not include any additional supportive policies or incentive measures. The 2019 Roadmap for the development of organic farming in Kazakhstan however indicates that the intention to introduce some additional support measures in the near future exists on the side of the government.

The development of organic production is attractive from the point of view of high export prices in the sales markets, stable supplies (guaranteed sales) and availability of growing demand in the world market.

At the same time, it is believed that organic farming in the first stages will require significant costs associated with the certification and sale of products, as well as reduced yields due to the abandonment of synthetic crop protection agents. Therefore, Kazakhstan's major agricultural producers were looking for state support in the form of subsidies, soft loans and other preferences for organic production.

At the same time, it is necessary to note a role of NGOs, which also act for development of organic agriculture in Kazakhstan. The main message of this sentiment is that Kazakhstan has great potential in this direction with all the resources and capabilities available.

Recommendations:

The Roadmap for the development of organic farming in Kazakhstan published in 2019 indicates great ambitions on the side of the Kazakh government to support the development of the national organic sector. Having such a supportive government that is willing to invest considerable resources in the promotion of organic agriculture provides an excellent basis for further development of the organic sector in Kazakhstan. The roadmap is very ambitious with an immense amount of activities to be completed within a very tight timeframe.

It is great to see such a comprehensive plan, but it is very likely that not all activities can be carried out due to constraints in resources and time. Also, we can identify some activities in the roadmap that may not be very effective in the promotion of the sector or not realistic to achieve within the given timeframe e.g. to gain recognition by the main markets importing Kazakh organic products. Also, we observe a focus of government interventions on regulatory measures so far. Regulatory measures only serve a small part of the organic sector in Kazakhstan – operators who produce for the domestic market. A large proportion of organic operators whose production is export-oriented obtain little benefit from these measures.

Therefore, we recommend a review of the roadmap including a prioritization of activities with allocation of resources. In particular we recommend focus the public support on measures that effectively address the key constraints limiting the development of the organic sector. The measures should be chosen so that a maximum number of operators in the organic sector can benefit and the effects are not limited to only a few privileged actors.

Such measures are best selected after a deep analysis of the constraints of the organic sector. IFOAM – Organics International provides a set of tools as a resource for government to identify the most suitable measures and examples of policies that other countries have implemented. These tools are available on the following links:

- IFOAM Decision Aid for policy setting: https://pgs.ifoam.bio/policy_decision/questionnaire
- IFOAM Global Policy toolkit: <https://www.ifoam.bio/our-work/how/regulation-policy/global-policy-toolkit>

3.1 Organic Regulation, Standards and Certification

The Law on organic production was published on 27 November 2015 to define the legal, economic, social and organizational basis for production of organic products. Following the original law itself these complementary documents were published:

- Rules of production and turnover of organic products approved by Order of the Ministry of Agriculture of 23 May 2016 № 230;
- Rules for maintaining the register of producers of organic products approved by Order of the Ministry of Agriculture of December 18, 2015 № 1-3/1102;

- The list of permitted means used in production of organic products was approved by the Order of the Ministry of Agriculture of 23 May 2016 № 231.¹
- ST RK 3109-2017 Products are organic. National mark of conformity for organic products. Technical requirements and order of marking of organic products;
- ST RK 3110-2017 Conformity assessment. Requirements for bodies to confirm conformity of production of organic products and organic products;
- ST RK 3111-2017 Products are organic. Requirements for the production process.

This set of documents covers topics of organic regulation, certification and the establishment of a national organic logo. The organic law includes the following scope: crop production, wild collection, livestock production, beekeeping, production of aquatic animals and plants (aquaculture), processing and handling and labelling of organic products, as well as the production of organic feed, seed and plant propagation material. Not included in the scope of the law are hunting, fishing and the production of non-food products such as cosmetics, or textiles production. Social justice is also not covered. There are also no provisions for export and import or recognition of other organic certifications included in the law.

The law sets out the requirements that must be met when producing organic products. In particular, the use of synthetic substances, pesticides (pesticides), hormones, antibiotics and food additives, GMOs, ionizing radiation and chemical treatments for wild plants are prohibited. The aim is to preserve and reproduce soil fertility, minimize the use of non-renewable natural resources and preserve ecological systems.

The rules of production and turnover of organic products approved by Order of the Ministry of Agriculture in 23 May 2016 № 230. It provides two definitions:

"Organic Crop Production" is the production of crops, including wild harvesting, without the use of synthetic fertilizers, pesticides and plant growth regulators.

"Organic livestock" is the production of farm animals under conditions that provide full access to natural sources of feed using extensive and natural breeding methods.

Production requirements defined in the law:

¹ The list of permitted means used for production of organic products is available in the IPS of the NAP of the RK: <http://adilet.zan.kz/rus/docs/V1600013836>.

The law includes production requirements for organic production in three different documents. Article 12 of the original law clearly states that the rules of all the 3 documents are valid and subject of the conformity assessments done for compliance with the law. The production requirements are found here:

- Article 11 in the basic law itself lists 15 conditions that an organic operator must follow in order to comply with the law. In addition, rules about conversion (article 10), prevention of contamination and processing (both article 11) are defined.
- In 2016 rules on the production and turnover of organic products were published. This document included a total of 129 requirements covering all areas of the scope of the law. Most notable are the detailed rules for animal husbandry management.
- In 2017 the National Standard for the production of organic products was published. This document that was developed on the bases of the IFOAM Standard and includes requirements that cover all the areas of the scope of the law with the exception of wild collection.

There are overlaps, contradictions as well as complementary aspects between the production requirements included in the 3 laws. A preliminary analysis of the production requirements was carried out in order to a) identify any general inconsistencies and b) evaluate equivalency of the requirements in the law with the Common Objectives and Requirements of Organic Standards (COROS). The COROS is a tool that was developed jointly by FAO, IFOAM and UNCTAD and is used to evaluate Standards for inclusion in the IFOAM Family of Standards. The sections on aquaculture in Kazakh production requirements have been excluded from this preliminary assessment as it is outside the scope of the COROS and is also not included in the considerations of this report.

These are examples for inconsistencies between the documents:

- Conversion periods for crop production differ in length, e.g. conversion for crop production according to the 2016 Rules for production and turnover is at least 1 year before sowing while the 2017 national standard refers to at least 2 years before sowing.
- The conversion approach for livestock differs: The 2016 production rules include a transition period for animals that are kept for livestock production (e.g. for meat products 6 months) while the 2017 national standard requires all livestock products to be produced from animals that were managed organically from birth (exception only for egg-producing poultry).

- Accepted substances differ, e.g. 2016 Rules for production and turnover refer to different feed preservatives to be accepted as the national standard.

In most cases the 2017 standard includes the most strict and most detailed rules while the other 2 documents are more general or less strict. However there are several exceptions to this rule, most notably what concerns animal husbandry practices and wild collection where the 2016 rules for production and turnover are more detailed.

A preliminary evaluation of the set of three standards for equivalence with the COROS was done with the following preliminary findings:

- 57 requirements of the COROS are addressed as equivalent by the production requirements of the law.
- 25 requirements of the COROS are addressed with positive variations by the production requirements of the law – meaning the law includes additional requirements or is more detailed and/or stricter than the COROS.
- 18 requirements of the COROS are addressed with negative variations by the production requirements of the law – meaning that requirements are absent or not as detailed or strict as the COROS.

Positive variation was found including the following areas:

- Long conversion periods
- Detailed requirements for living conditions of livestock
- Prohibition of use of non-organic seeds and planting materials
- Prohibition of human excrements for fertilization
- Requirement for recycling of organic materials
- Extended withdrawal periods for use of veterinary drugs for livestock
- Limitations to intensive breeding methods
- Detailed animal feed requirements
- Prohibition to use non-organic ingredients in processing (only processing aids allowed)
- Limitation of techniques accepted in processing
- Limitation to packaging materials accepted

Particular many positive variations are found in the bee keeping section:

- Limitation to introduction of non-organic bee populations
- Restrictions to the destruction of male brood

- Promotion of local breeds
- Limitation of hive materials
- Temperature limitation in the treatment of honey

Negative variations were found in the following areas:

- Protection of high conservation value areas requirement not addressed
- Wild collection insufficiently addressed
- Social justice not addressed
- Regional sourcing of livestock feed not addressed
- Several issues with the list of accepted substances and related referencing in the law.

As indicated above the requirements for organic production in Kazakhstan include a range of rules that are stricter than most existing organic standards. Some of these strict rules are actually problematic and can pose significant barriers for operators to be able comply with the rules.

In particular the following points are especially limiting and are recommended to be adapted:

- Prohibition of use of non-organic seed and planting material.
- Requirement for manure to be sourced from organic farms.
- Prohibition of use of non-organic ingredients in processing.
- Absence of rules that define whether any other existing certifications (e.g. operators in Kazakhstan that are certified as organic operators for export to the EU) can be accepted either for usage of ingredients or to cut transition periods, or even whether such certification could be enough to market products as organic on the national territory.

These rules are extremely strict and exceed the requirements of any of the main organic markets. Even the EU, which has a long history of organic production and regulation, allows the use of non-organic seed and non-organic ingredients if organic ones are not commercially available. In the EU there is no restriction of manure to be sourced only from organic farms.

Recommendations:

We recommend adapting the above-mentioned strict requirements to fit the local situation. Considering that the organic production for the domestic market is in an early stage and no operators (status end 2019) have been certified yet according to the national legislation in Kazakhstan, the

requirements above make it at this stage almost impossible for any operator to comply to the law. The extensive conversion period of 2-3 years additionally decreases any incentives for operators to participate. This is especially true in a situation where the benefit of certification against the national regulation in Kazakhstan is still low, due to the current limited size of the domestic organic market and the absence of additional supportive measures for certified operators. It would be much more beneficial to adapt the requirements to meet the reality of the local conditions. These rules should be more open at early stages of implementation and can be made stricter once the organic sector becomes more developed.

For export of organic products, the regulations of the importing countries apply and the requirements of the national legislation are not relevant. Especially for export to the EU there is no perspective that this will change in the next years for countries that do not have existing trade agreements, due to the latest revision of the EU regulation.

IFOAM – Organics International is carrying out a assessment of the production requirements of the law on organic production and provides detailed recommendations to become equivalent with the COROS for inclusion in the IFOAM Family of Standards. We recommend to go through the process of revision of the production requirements with technical support by IFOAM – Organics International in order to make sure the production requirements included in the Kazakhstan legislation are consistent, implementable, and in line with international common objectives and requirements of organic standards. The inclusion of the Kazakhstan legislation in the IFOAM Family of Standards has some additional benefits including recognition of the Kazakhstan organic law by some export markets, in particular Saudi Arabia and Australia, but also private programs like the Global Organic Textiles Program. It is also a precondition for certification bodies to obtain IFOAM Accreditation for the scope of the Kazakhstan organic legislation.

Labelling and regulation of the term “organic”

Operators that were verified for compliance with the regulation are allowed to use the national mark of conformity. According to the standard for a national organic product labeling, there are three types of certified organic product labels (Figure 2). Types of labeling are related to the state of transition to organic production and its composition. The fact that a logo for products using organic ingredients exists indicates that the prohibition to use non-organic ingredients as defined in requirement 9.2.2.1 of the standard might not have been done intentionally.

Figure 2.



In conversion organic products

Organic products

Produced using organic ingredients

According to our preliminary assessment of the law texts based on unofficial translations of the Russian originals, the regulation of the term “organic” seems relatively clear. The labelling rules especially chapter 3 of the 2016 production rules in combination with article 13.1 of the original law seem to clearly limit the use of the term organic only to products that were assessed for compliance with Kazakhstan organic regulation:

2016 Production Rules chapter 3:

110. When labelling organic products and advertising them, one of the following designations may be used: "organic", "organic", "organic", "organic", "organik", derivatives or reduction forms, separately or in combination with the name of the product.

111. The terms mentioned in paragraph 110 of these Regulations are not used to mark, advertise products that do not meet the requirements established by these Regulations.

Article 13.3 Original law:

“The use of the designations, given in the rules for production and turnover of organic products, derived from them or diminutive forms, such as "bio" and "eco" alone or in combination in the labeling of organic products and its advertising, is permitted.

Any designations provided for in this paragraph shall not be permitted, including designations used by trademarks, as well as methods of labeling and advertising that may mislead the consumer about the fact that the product or ingredients used in its production comply with the legislation of the Republic of Kazakhstan in the field of production of organic products. “²

² Law text inserted in this chapter is unofficial translation.

However, some unclarity appears from the following statement in the basic law that says “**confirmation of conformity is voluntary**” which could indicate that organic operators can sell their products as organic even if not certified. It is still to be clarified what the intention of this clause is, but we came to the following interpretation of the law text as it is currently formulated:

Operators in Kazakhstan are free to choose whether to produce organically and according to the rules of the national organic legislation and whether to apply for certification. However they are not allowed to use the term “organic” to sell or advertise their products in Kazakhstan nor are they allowed to use the word “organic” to market their products or to otherwise indicate to the consumers that they produce organically unless they are certified according to the legislation.

There are no rules for export, import or acceptance of other certifications for organic products in the law. However, the formulations regarding the use of the term organic are so general that they apply for all products circulating in Kazakhstan. This means that according to the law the selling of imported organic products that mention any of the versions of word “organic” as indicated in the law, are in fact illegal including for example organic products imported from the EU, or products from Kazakhstan certified to the EU organic regulation.

Recommendation:

We recommend to clarify first the intention of the statement “confirmation of conformity is voluntary” and to subsequently adapt the law accordingly to make sure the law is clear in stating whether confirmation of conformity is voluntary or compulsory for operators who want to utilize the term organic for selling their products as organic in Kazakhstan.

We would like to highlight here that making compliance to the law voluntary and is also an option that could be adopted by the Kazakhstan government. In this case the law would be not a regulation but a voluntary certification program where operators that comply can use the national organic logo. Such a system is very suitable as a promotive measure in countries where the domestic market is not yet very developed. In case the competent authority in Kazakhstan is interested in this option, it should contact IFOAM – Organics International for support on how to adapt the law accordingly. The recommendations included here are based on the assumption that the intention of the Kazakhstan authorities to regulate the term organic and make compliance compulsory for organic operators that sell on the domestic market.

To ensure clarity regarding the application of the law for exports we recommend to include the following clause into the law:

„This regulation remains voluntary for products that are intended only for export, as those may choose to comply with the organic regulation of the importing country only.“

We recommend this approach as exported products anyways need to follow the regulations of the importing country (e.g. EU) and to make compliance to the Kazakhstan organic regulation compulsory also for export would only create additional barriers for operators and could even seriously disrupt outgoing trade.

To ensure clarity for imported products we recommend to include the following clause in the law:

“For imported products, the labeling and claims of a product may refer to organic production methods only where the product was produced and certified in compliance with one or more of the following:

- a) the legislation of the Republic of Kazakhstan in the field of production of organic products;*
- b) the Organic Regulation of the European Union;*
- c) the National Organic Program of the United States of America*
- d) add others if relevant*
- e) other recognitions of certifications as added to a public list maintained by the competent authority of the Republic of Kazakhstan in the field of production of organic products.*

For import the question can also be raised whether these products should be obliged or exempted from the obligation to apply the national organic mark of Kazakhstan. We recommend to oblige the use of the national organic mark only to products that were certified for compliance to the legislation of the Republic of Kazakhstan in the field of production of organic products. In that case, imported products that are certified for recognized regulations are just sold with their original logo (e.g. EU or NOP logo). This is the approach taken by other countries in the region, e.g. Ukraine and Russia.

Additionally, in the first years of implementation of the Kazakh organic legislation, we also recommend to allow a transition period of at least 5 years, during which existing EU and NOP certified organic producers from Kazakhstan should continue to be allowed to sell their certified organic products on the domestic market as well, without the need for a second certification (to the Kazakh organic standard). This is to ensure that there is no market disruption as this would be very detrimental to the growth of a market which is just in its infant stage. Indeed, as the Kazakh organic legislation and standard has not yet been effectively used to certify any operator, it is too big of a risk to make it suddenly mandatory for all wishing to sell organic products domestically. A more precautionary approach would be to launch the use of the national standard first on a voluntary basis (by those

operators who do not wish to be certified to foreign standards and who wish to access the Kazakh organic brand). After a few years of use on such voluntary basis, adjustments will likely be made once the system is tried and tested, and then it can be extended to all with less risk of negative market impact.

Conformity assessment rules

In 2017 the national standard for conformity assessment was published. The document describes the requirements for certification bodies in organic production and is based on the IFOAM Accreditation requirements with only few adaptations.

The document states the following:

Reference documents that are required to apply this standard: (...)

GOST ISO/IEC 17000-2012 Conformity assessment. Dictionary and general principles.

GOST ISO/IEC 17065-2013 Conformity assessment. Requirements for certification bodies for products, processes and services.

This formulation at least the English language seems to indicate that in addition to the National Standard for conformity assessment, also the full ISO 17065-2013 applies and need to be followed. It needs to be confirmed that is really the intention of the statement. The IFOAM Accreditation requirements that were used as a bases for the national standard already cover all requirements of ISO 17065-2013 that are applicable to accreditation of certification bodies in organic production and therefor it is redundant to additionally require ISO 17065 to apply. Most edits that were made in the national standard compared to the IFOAM Accreditation Requirements were minor. Adaptations were made to reflect the set-up of the organic legislation in Kazakhstan.

The only major change was the deletion of the chapter 9 of the IFOAM Accreditation Requirements on “Acceptance of other product certification”. Also the other law documents that regulate the production of organic products in Kazakhstan do not include any rules referring to any acceptance of other certifications. This technically means that only products certified against the Kazakhstan national regulation can be accepted, e.g. to use as ingredients for processing.

Recommendations:

The absence of any related rules in the current text to accept other organic certifications is a major bottleneck for organic production and marketing in Kazakhstan and the addition of rules in order to accept at least the main certification, e.g. EU or NOP is highly recommended.

One tool alternative to third party certification that is used in many countries for verification of organic products is not included in the current law: Participatory Guarantee Systems (PGS). PGS are locally focused quality assurance systems. They certify producers based on active participation of stakeholders and are built on a foundation of trust, social networks and knowledge exchange. This tool is recognized in several existing organic regulations either limited to the domestic market (e.g. India) or as equivalent to third party certification (e.g. Brazil). To date we are not aware of any existing PGS initiatives that are active in Kazakhstan and it has not been evaluation if the concept is suitable for the Kazakhstan context. We recommend to at least initiative a discussion with stakeholders about the suitability of PGS. If it is found that there is interest in PGS, we recommend to contact IFOAM – Organics International to discuss further how it can be supported.

Implementation status of the legislation:

The authorized body in this industry is the MoA, and the CCSBT and the KREMCP are the approving state bodies. At the same time, local executive bodies (Akimats) of the regions exercise state control over compliance with the requirements of legislation in the field of organic production. At the same time, the law does not define what exactly control and monitoring measures of organic products producers' activity are.

JSC National Center for Expertise and Certification (NECS) is so far the only certification body in Kazakhstan (confirmation of conformity) of organic products accredited by the National Accreditation Center KTRM MINT RK in July 2018. The National Economic Commission carries out certification of services and products in various fields, including certification in the field of organic production and organic products:

- production of organic products of plant origin;
- production of organic products of animal origin;
- processed organic products.

In 2018 JSC National Center for Expertise and Certification (National Economical Commission) was accredited as a body to confirm the conformity of organic products in Kazakhstan. The National Economic Commission carries out certification of services and products in various fields, including certification in the field of organic production and organic products.

However, at the end of 2019, no certification of organic products for compliance with national requirements had been carried out. According to the expert opinion, Kazakh enterprises are not yet willing to certify their products for compliance with national requirements. The main reason provided is that organic producers in Kazakhstan are export-focused and therefore choose to get certified to the

foreign regulations, which they need in order to access their target export market, while the Kazakh certification has no acceptance abroad. Adding to this, is the fact that as detailed above, the Kazakh national organic standard has a few requirements which are overly strict and therefore prohibitive for farmers to enter the Kazakh organic scheme.

Almost all local organic products are produced for export and are accordingly certified for compliance with foreign standards. As of today, more than 70 % of the Kazakhstani organic areas are certified by the Ukrainian organization on conformity acknowledgement, in particular LLC "Organic Standart" (Ukraine). Also, Ekoagros Company (Lithuania) is popular among Kazakhstani organic producers. The certificate of this company allows exporting to EU countries.

The main export countries are the European Union (UK, Italy, Germany, France, Belgium, Netherlands, Poland), USA, China, Russia and Ukraine.

According to EU statistics, Kazakhstan is among top 10 exporters of organic produces to EU.

Main products exported to the EU are wheat, oilcakes, oilseeds and soybeans.

Table 1. Volume of organic agri-food imports in the EU by country (tons)

Rank	Exporting Country	2018	2019	Change %
1	China	404 623	433 705	7.2
2	Ukraine	265 817	337 856	27.1
3	Dominican Republic	271 801	324 354	19.3
4	Ecuador	276 879	304 297	9.9
5	Peru	204 871	214 240	4.6
6	Turkey	262 722	210 760	-19.8
7	India	125 477	176 568	40.7
8	Colombia	63 114	87 341	38.4
9	Kazakhstan	50 250	85 675	70.5
10	Brazil	72 204	78 825	9.2

It is worth mentioning that Kazakhstan has increased the volume of exports of organic products to 70.5% from 2018 to 2019. While the export volume of organic oilcakes has dropped from 6.6 thousand tons in 2018 to 2 thousand tons in 2019.

Table 2. Volumes of organic oilcakes by exporting country (thousand t)

Exporting Country	2018	2019	Change %
China	300.2	318.0	6.0
India	17.3	45.4	162.9
Ukraine	2.6	8.8	244.8
Brazil	4.2	5.7	35.2
Kazakhstan	6.6	2.0	-68.9
Total	341.7	385.9	13.0

Table 3. Volumes of wheat by exporting country (thousand t)

Exporting Country	2018	2019	Change %
Ukraine	75.4	64.8	-14.1
Turkey	52.1	44.7	-14.2
UAE	43.6	0.0	-100
Kazakhstan	31.0	62.8	102.7
Canada	14.4	13.4	-6.8
Total	241.9	203.9	-15.7

Biggest increase in export of agri-food products took place in export of organic wheat from Kazakhstan. The export volume of organic wheat increased from 31 thousand tons in 2018 to 62.8 thousand tons in 2019, while export volume of other countries dropped significantly.

Table 4. Organic import volumes of oilseeds, other than soybeans, by exporting country, 2018 and 2019 (thousand t)

Exporting Country	2018	2019	Change %
Turkey	44.8	37.8	-15.4
Ukraine	28.8	29.1	1.2
China	20.8	21.3	2.5
Moldova	15.7	15.7	0.1
India	13.7	13.2	-3.9
Kazakhstan	7.7	12.5	60.7
Total	192.5	160.1	-16.8

Kazakhstan also recorded increase in export of organic oilseeds to EU market with 60.7 %. Same pattern is followed in export of organic soy beans where Kazakhstan increased the export volumes to EU market from 4 thousand tons to 7.4 thousand tons in 2019.

Table 5. Organic import volumes of soy beans by exporting country, 2018 and 2019 (thousand t)

Exporting Country	2018	2019	Change %
Togo	19.7	42.3	115.0
China	23.5	28.2	20.3
India	20.5	21.6	5.4
Ukraine	13.3	17.1	29.0
Kazakhstan	4.0	7.4	86.1
Uganda	9.8	2.3	-76.7
Total	105.9	132.1	24.8

Fraud and integrity issues affecting the organic sector in Kazakhstan

The big blow from the perspective of organic producers in the region came in 2015 when all CIS Countries were sanctioned after fraudulent produces entered EU. The reason was most of the produces that came from these regions entered European market with chemical residues of plant protection materials. European Commission required to go through laboratory analysis of produces entering EU from CIS countries. In addition, EU Commission also demanded to make 2 inspections annually. This requirement almost doubled the cost of certification. Although in 2016 most of the CIS countries were exempted from above mentioned requirements, Russia , Kazakhstan, Moldova and Ukraine remained in the list.

Organic products imported from the black sea region including Kazakhstan have been considered as increased risk of organic fraud for several years. Some scandals uncovering actual fraud have contributed to this situation. One of the most prominent incidents in recent years involved an exporter from Turkey who exported fraudulent grains to the United States including products that were claimed to be produced organically in Kazakhstan and certified by Control Union.

Reactions to these integrity issues from the importing countries include not only the sanctioning of the fraudulent companies, suspension and revocation of organic certificates but went as far as suspending the accreditation of Control Union, who is a major certification body for organic production for several countries in the region including Kazakhstan. In fact, in April 2019 Control Union lost EU approval for Kazakhstan, Moldova, Russia, Turkey and the United Arab Emirates (UAE). In May 2019

Control Union also got suspended (for 1 year, until 9 June 2020) by the USDA organic program for all organic certification activities in all countries managed by the Turkey office which includes Kazakhstan.

In November 2019 the additional requirements for Russia, Kazakhstan, Moldova and Ukraine has been prolonged until the end of the year 2020.

“The Commission carried out investigations on suspected irregularities in relation to several lots of products from Kazakhstan, Moldova, Russia, Turkey and the United Arab Emirates that had been certified as being organic by ‘Control Union Certifications’. ‘Control Union Certifications’ did not provide timely and conclusive answers to the various requests for information made by the Commission. In addition, ‘Control Union Certifications’ failed to demonstrate the traceability and organic status of those products. Moreover, ‘Control Union Certifications’ issued a certificate of inspection for products that had previously been downgraded to conventional by the competent authorities of a Member State due to pesticide residues. Therefore, the Commission has decided to withdraw the recognition of ‘Control Union Certifications’ pursuant to points (c), (d) and (f) of the first subparagraph of Article 12(2) of Regulation (EC) No 1235/2008 for all product categories in respect of Kazakhstan, Moldova, Russia, Turkey and the United Arab Emirates. As a consequence, the entries relating to those countries should be deleted from the list of recognized control bodies and control authorities in Annex IV to Regulation (EC) No 1235/2008 for ‘Control Union Certifications’.



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT
Directorate B. Quality, Research & Innovation, Outreach
B.4. Organics

**GUIDELINES ON ADDITIONAL OFFICIAL CONTROLS ON PRODUCTS
ORIGINATING FROM UKRAINE, KAZAKHSTAN, MOLDOVA AND RUSSIAN
FEDERATION**

Applicable from 01/01/2020 until 31/12/2020

The Competent Authorities¹ of all Member States undertake to ensure that the control measures described in these guidelines are carried out on all consignments of organic food and feed originating from Ukraine, Kazakhstan, Moldova and Russian Federation with the following CN-codes:

- a. Chapter 10 – Cereals
- b. Chapter 11 – Products of the milling industry; malt; starches; inulin; wheat gluten. The following CN codes are excluded: CN codes 1105, 1106, 1107, 1108, 1109
- c. Chapter 12 – Oil seeds and oleaginous fruits; miscellaneous grains, seeds and fruit; industrial or medicinal plants; straw and fodder, with the exception of processed products ready for human consumption derived from them. The following CN codes are excluded: CN codes 1211, 1212, 1213, 1214
- d. Chapter 23 – Residues and waste from the food industries, prepared animal fodder. The following CN codes are excluded: CN codes 2307

Consignments originating from one of these four countries arriving at the EU border from another third country shall also be concerned by these guidelines.

Recommendation:

Lack of trust and integrity related to Kazakh organic products is a problem that mostly affects the export of organic products from Kazakhstan because the domestic market only plays an insignificant role in the marketing of organic products at this moment. The national organic regulation of Kazakhstan serves primarily as a tool for the national market and only a very limited contributions can be expected from it in terms of fraud prevention and trust building for export.

This means that the authorities in Kazakhstan need to identify and apply other instruments if they want to support export of organic products by effectively addressing integrity issues. One of the most promising tools that is available to the Kazakh government that can help to tackle the problem is the software “Check Organic” that was developed by the company Organic Services. The software functions on the bases of mass-balance calculations and allows to track product flows down the supply chain. Through a project that was implemented by FAO Kazakhstan in cooperation with Organic Services Check Organic is already adapted and available in Russian for usage in Kazakhstan.

We recommend to promote the utilization of the software for organic operators in Kazakhstan. The competent authority can for example make it mandatory for certification bodies operating in Kazakhstan to enter data collected from their clients in Kazakhstan into the software to build a National Organic Integrity Database. This way clients importing products from Kazakhstan have full transparency whether their purchased quantities of organic produce can actually be linked to a surface area in Kazakhstan that has been inspected for organic certification.

Certification bodies working in the country.

N	NAME OF THE CERTIFICATION BODY	COUNTRY	CODE
1	A Cert European Organization for Certification S.A	Greece	KZ-BIO-17
2	Agreco RF Goderz GmbH	Germany	KZ-BIO-151
3	Bio Inspecta AG	Switzerland	KZ-BIO-161
4	CCBP Srl	Italy	KZ-BIO-102
5	Ceres GmbH	Germany	KZ-BIO-140
6	Ecocert SA	France	KZ-BIO-154
7	Ecoglobe	Armenia	KZ-BIO-112
8	Ecoagros	Lithuania	KZ-BIO-170
9	Istituto Certificazione Etica e Ambientale	Italy	KZ-BIO-115
10	Kiwa BCS Öko-Garantie GmbH	Germany	KZ-BIO-141
11	LACON GmbH	Germany	KZ-BIO-134
12	Organic Standard	Ukraine	KZ-BIO-108

As one can see from the list , most of the certification companies are located in Europe. The certification is also done according to EU Organic Regulation. It is worth noting that 2 certification bodies have been sanctioned by European Commission to Conduct inspections in Kazakhstan. 1st one is Turkish certification body ETKO , second one is “Control Union Certification” of Netherlands.

Certification provides transparency to the buyer and helps to optimize the functioning of the market. The cost of certification is mostly born by organic producers, which is a disadvantage compared to conventional producers who have no such cost. Governments can correct this imbalance and help promote a well-functioning market by supporting organic certification, e.g. by taking on some of the costs that are otherwise born by organic farmers.

Organic certification is a competitive business with large multinational certification bodies occupying an increasingly large market share. Certification bodies that offer certification for several export markets at once including the major ones like EU, US, Japan, China etc. have an advantage in the marketplace compared to smaller certification bodies with few accreditations. Foreign certification bodies are not necessarily more expensive than national certification bodies, as they can reduce for example travel cost by operating national or regional offices or by working with local inspectors. Accreditation fees for the various export markets are expensive and certification bodies need a relatively large number of clients before they can offer competitive prices to their clients while running the business profitably.

To build national certification bodies is a lengthy process and requires large investment in capacity building. It is difficult for small certification bodies to compete with large ones and establish a successful business. In order to support operators in obtaining organic certification, governments can take various measures including to support the set-up of private certification bodies, or to offer public certification. Certification subsidies that are paid directly to the operators who can freely choose their preferred certification bodies is one of the most effective measures that can be taken.

If actors in Kazakhstan take the decision to pursue the development of a national certification body, it is important to invest sufficiently in capacity building of certifiers and inspectors in order to make sure the certification body is capable of offering professional services. As a first step training of local inspectors who can act as freelance inspectors for European certification bodies would be the quickest and cost-effective solution, rather than aiming for accreditation straight away.

Accreditation of certification bodies

Organic accreditation is an oversight mechanism for the certification of organic products. It could be used to approve and surveil certification bodies (national or foreign) that certify operators who produce and/or sell their products domestically. A national accreditation system has nearly no relevance for exports as the main importing countries of organic products have their own import regulations and accreditation systems.

Accreditation is an expensive and bureaucratic procedure that requires a high level of specialized expertise on organic agriculture from the side of the accreditation agency. It only makes sense when the domestic market for organic products has reached a significant level, whereby multiple certification bodies are involved in certifying to the national standard and there needs to be an oversight mechanism to ensure a fair level playing field between them.

Once such level is reached, and in the process of building a new organic accreditation system, it is recommended to first rely on trusted organic accreditations of other countries and partner with international organizations specialized in organic accreditation. Only after having gained several years of experience, created a robust system and built the required expertise within the accreditation agency, the country should start operate on its own system.

For Kazakhstan we therefore recommend the following:

Start with a simple registration system for certification bodies first. Certification bodies that are already active in Kazakhstan certifying for export and accredited abroad should be able to apply to the Kazakhstan authorities to expand the scope of their services to also include certification for the Kazakhstan national organic standard. Approved certification bodies can be included in an official registry without requiring additional accreditation by the Kazakhstan authorities. The procedures should include criteria or a list of accepted accreditations, e.g. EU, NOP and possibly others. It is possible to include a set of conditions for certification bodies before they can be approved in the registry, but we do not recommend to enforce a full-fledged accreditation system right from the start. This approach would require a change to the regulation documents, for which IFOAM-Organics International can propose precise recommended text, on the basis of similar approaches taken in other countries in comparable situations in terms of their domestic markets.

In the longer term, when Kazakhstan will start to build its accreditation system, we recommend to initially partner with the IOAS, an agency who is specialized in organic accreditation and that can assist the Kazakhstan government to build expertise in the field of organic accreditation and set-up a functional system. In order to not disrupt trade and to not create additional barriers for operators exporting organic products from Kazakhstan we recommend, in this longer term vision, to exempt products that are exported from the obligations to be certified against the organic regulation of Kazakhstan and the respective certification bodies to be accredited in Kazakhstan. Instead the focus for set-up of an accreditation system in Kazakhstan should be put on a system that serves the national organic market. This vision could be mentioned in national strategic organic action plans or other such type of documents. There is no need to put it into the regulation texts at this stage, as the simple registration approach mentioned above should be prioritized.

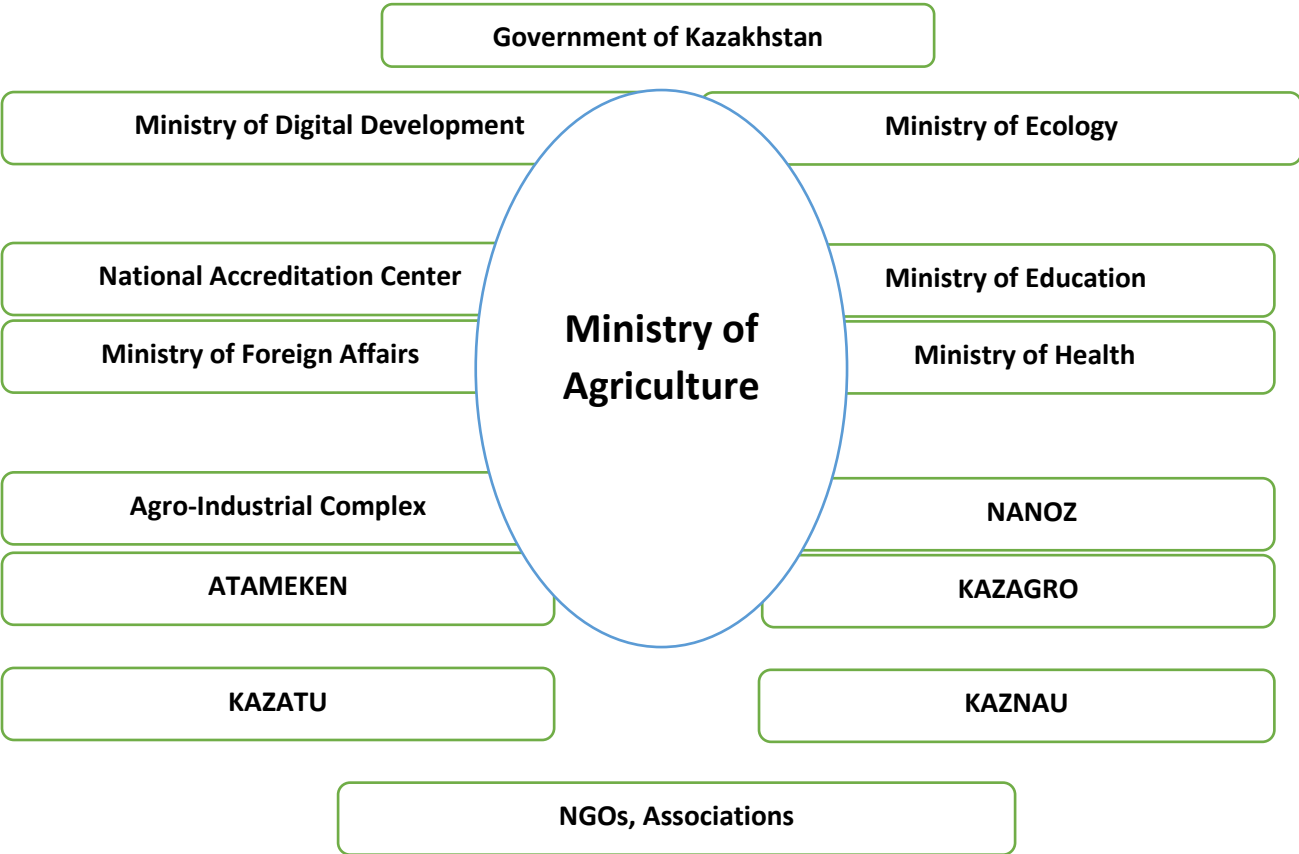
For import of organic products into Kazakhstan, clear rules need to be set-up which products are accepted to enter the country. We recommend to include provisions in the law to accept the main certifications e.g. EU and NOP for import into Kazakhstan. Without such an exemption it will be likely that organic imports to Kazakhstan will stop once the law is enforced as the national organic market in Kazakhstan is too small for any foreign operators and their certification bodies to justify the cost and bureaucracy to get certified and accredited according to the Kazakhstan organic regulation at this moment. Stopping the import of organic products into Kazakhstan would be extremely counter-productive to the goal of developing the national organic market.

3. Institutional Framework for Organic Agriculture in Kazakhstan

3.1 Main Stakeholders, roles and responsibilities. (Stakeholder mapping)

Today, the Ministry of Agriculture of Kazakhstan is the main governmental body responsible for the development of organic farming in Kazakhstan along with other governmental institutions.

The Road Map developed by the Ministry of Agriculture tasked every governmental institution with certain tasks. The implementation of the road map will be coordinated by the Ministry of Agriculture in close collaboration with other interested governmental and non-governmental organizations, as well as national and international experts in the organic sector.



Currently there is no information available on the current status of the Roadmap. A **National Working Group** is formed under the ministry of Agriculture and members include representatives from different governmental institutions, private sector and non-governmental organizations. The NWG also formed a group on WhatsApp and different topics related to agriculture is discussed.

3.2 International cooperation and support. (FAO, EBRD, USAID other projects)

FAO

PROJECT "SUPPORT TO ORGANIC AGRICULTURE DEVELOPMENT AND INSTITUTIONAL CAPACITY BUILDING IN KAZAKHSTAN".

This project was launched in 2015. The main objectives of the project are:

- Determination of the current state of OSH in Kazakhstan.
- Evaluation of the current legislation and development of proposals for its improvement
- Preparation of a national strategic plan for OSA development.
- Assistance in establishing an effective control and certification system for CAs.
- Collection and dissemination of information on OSA.
- Building national capacity, improving food quality and environmental safety for future generations.

The implementation period is 2 years. The project contributed to the improvement of the legal and regulatory framework, capacity building in the provision of implementation services to farmers to increase production, which will provide the basis for the production, certification and marketing of OPs, so that OAI can be steadily and gradually introduced in the country.

USAID

“REGIONAL ECONOMIC COOPERATION” PROJECT

The goal of the Regional Economic Cooperation Project is to facilitate improved trade between Central Asian countries, Afghanistan and other major trade partners of these countries. Through its company capacity-building initiatives and gender strategies aimed at economic cooperation, the

project promotes export capacity and facilitates business linkages in the region by developing and supporting export partnerships.

One of the priority export partnerships under the Project is the Export Partnership of the Organic Sector of Central Asia (EPOS CA). In this area, the Project supported workshops, training, seminars, participation in international exhibitions (Poland 2011) for organic producers of EPOS CA members. In 2012, support was provided for a study to assess the organic export potential of Central Asian countries.

The project annually provides a platform for exchanging information, experience, knowledge and establishing business relations in the framework of the Trade Forum, which is organized annually in Almaty. Traditionally, this Forum includes a session on organic production and an exhibition of organic products from Central Asian countries.

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Last time, the project organized a Organic Fruit and Vegetable session during Central Asia Trade Forum in Tashkent, where development of organic farming in Central Asia was discussed.

UNDP/GEF PROJECT

“CHANGING LAND USE PRACTICES IN STEPPE AND SEMI-ARID ZONES THROUGH SPATIAL PLANNING AND AGROECOLOGICAL INCENTIVES.”

The project will conduct an analysis of the technologies used, economic parameters and efficiency of land use practices before launching demonstration projects to compare economic and environmental results. There are plans to develop subsidy schemes and identify a number of policy options for authorities at the district and oblast levels. The prepared proposals on agro-ecological subsidies will be submitted to the Ministry of Agriculture.

In addition to testing the effectiveness of agro-ecological measures, the project will analyze existing agricultural subsidies in land and water management. The final document with recommendations on the integration of green subsidies into the existing agricultural subsidy system will be submitted to the Ministry of Agriculture for consideration and approval.

Funding under the project at the pilot sites will be used to implement crop rotation systems, use irrigation water in rice production, restore abandoned arable land, expand forage areas, improve arable pastures, increase livestock mobility. This will lead to direct economic benefits in the form of increased yields, which will certainly interest other local farmers and encourage them to share their experiences and share the benefits. In other words, conditions will be created to attract additional investments.

The project will demonstrate methods for rehabilitation and sustainable use of land resources by selecting 9 demonstration plots in six target areas covering 145,503 hectares.

The project envisages development of recommendations on improvement of legal and regulatory framework in the field of organic agriculture, as well as implementation of pilot projects in this area.

3.4 Associations for organic agriculture in Kazakhstan

Currently there are 3 associations working actively in promotion of organic agriculture of Kazakhstan.

"Association of Organic Farming"



Established in 2010 in Kostanay city. Lead by Vadim Lopuhin. The association has 14 members.

Scientists and agricultural producers of Kostanay and North-Kazakhstan regions became founders of the association. Is the participant of the Central - Asian organic movement, "Coalition for Green economy". In 2014 it promoted organic certification of 150 thousand hectares of sown areas, three oil plants, flour mill and cereal complex.

At the same time "Association of Organic Agriculture" conducted joint (with the Ministry of Agriculture of the RK, Parliament of the RK, FAO and other organizations) work on the development of the draft law on "Organic Agriculture". November 27, 2015 under № 423V-ZRK "Law on the production of organic products" was signed by President of the Republic of Kazakhstan Nursultan Nazarbayev.

08.02.2016 by the Order № 41 of the Ministry of Agriculture was established working group on the production and turnover of organic products. OYUL "Association of Organic Agriculture" takes an active part in the activities of this working group.

Two North-South training centers are expected to be established under the Association.

Kazakhstan Federation of Organic Agriculture Movements - KAZFOAM

2012 Almaty Chairman - Evgeny Vladimirovich Klimov

The organization was established as the next stage of development of the Organic - Center of Kazakhstan on the recommendations of IFOAM (www.ifoam.org). Federation is a member of the international board of IFOAM Euro-Asia <http://www.ifoam.org/es/regional-activities/ifoam-euro-asia>. It enjoys a high reputation in the international organic community. At present, it is the largest association of the organic sector in Kazakhstan.



3 Projects are planned by the organization for the future. Planned activity is Pre-certification audit for the preparation of certification by accredited certificates for export of organic products to the EU and Russia, taking into account the peculiarities of the subject of agro-industrial complex for the following organizations.

1. Tenrikut" AH is one of the largest horticultural farms in Uyghur district, which is headed by Uyghun Arziev. The KC has 40 hectares of gardens, of which 25 hectares are apricot trees. It is noteworthy that the farm is engaged in the cultivation of fruit seedlings: in the property of the farmer kennel area of 1 hectare.
2. Agricultural Production Cooperative "Shelek Farmleri" was established in 2017 and includes 26 farms. The members of the cooperative have been cooperating since 2014. The products of the cooperative are delivered to Almaty to METRO Cash&Carry, Arzan and Cin-Kaz LLP. The volume of deliveries increased from 124 tons in 2014 to 348 tons in 2018. Main produces are vegetables.
3. Cooperative SPK Med.kz is a voluntary association of beekeepers, established in 2016. The cooperative have 16 members and they are interested in converting to organic honey production. 3 members are actively working in this area and first analysis of the honey production was conducted for organic certification.

“Kazakh Organic Producers Union”

Chairman: Kerimbekov Arsen Dzhakashovich

Founded in 2008. Member of IFOAM -International Organics since 2019. Active promoter of organic agriculture in Kazakhstan in close cooperation with Ministry of Agriculture and ATAMEKEN.

The Union also promotes organic products of Kazakhstan in export markets. In 2019, the union has organized the participation of producers of organic products at BIOFACH 2019 in Nurnberg, Germany. Runs the most active Facebook page with topics related to organic agriculture all over the world.



The main goal is to unite all necessary services for exporters of organic produces. Services are consulting, training, certification, escort of shipment, analysis of world prices and niche markets, formation goods for sale, development of the domestic market, development of organic livestock breeding, logistics to the markets, international cooperation (CIS and EU, PRC) . All activities aimed to improve the efficiency of producers of organic produces. The Union does not collect membership fees until 2024 - this is the policy to prove that members need us. There are 12 members in total, with a total area of 30 thousand hectares. The plans for future are to help with accreditation of a Kazakhstan certification company for the domestic market, organization of the first local certification, creation of an online retail market for organic produces. Union is also planning to organize a conference on organic agriculture in Nursultan on September 2020.

Successful associations are providing benefits to their members. They offer services or fulfill relevant functions. In the field of organic agriculture, common functions that associations fulfill are provision of trainings and extension services, provision of networking opportunities, marketing support and consumer awareness raising. Organic associations are often involved in lobbying and advocacy activities and they may represent the interests of their members on various levels. In order to be successful, associations need to also identify ways to generate resources that can be used for implementation of activities and use them wisely.

It is important for associations to be in close contact with their members in order to be aware of their needs and challenges. This way associations can allocate their resources to activities that are relevant for their members. Furthermore, it is important for associations to identify the vision and mission of the organization and to make sure actions and activities are taken accordingly.

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