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Organic Agriculture as a driver for Sustainable Agricultural Development

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1. Executive Summary

Organic agriculture is an important sector of the economy that has the potential to make a tangible positive contribution to improving the health of citizens of the Republic of Kazakhstan, preserving biodiversity, reducing the amount of chemicals introduced into the environment, preserving and restoring soil fertility, reducing ground and surface water pollution, reducing the negative impact of agriculture on the climate, generating income and foreign currency while at the same time being a tool for adapting agricultural production to climate change.

Although having achieved some success in establishing export of organic products to the EU, the growth and development of organic agriculture in Kazakhstan both for export and domestically lies far behind its potential.

This policy brief provides information on the policy framework for organic agriculture development in Kazakhstan. It describes the history and current situation of organic agriculture in the country, introduces the relationship to overall government development strategies and gives an overview of organic laws, the current one and the new one that is under draft. Further information is delivered on organic agriculture trends in the EAEU and about the institutions related to organic agriculture in Kazakhstan.

In the analyses chapter, weaknesses and shortcomings are identified and discussed in the areas of institutional capacity; research, education and extension; export promotion; domestic market promotion and the legal framework focusing on laws to support and regulate the organic sector in the country.

The policy brief concludes with a summary of specific recommendations on what policy options could best address the current problems of organic agriculture and ensure the success of an organic agriculture development strategy in Kazakhstan.

2. Introduction

2.1. *The potential of organic agriculture in Kazakhstan*

Organic farming in Kazakhstan provides a tremendous amount of undiscovered development potential. Organic agriculture shows several benefits, as it reduces many of the environmental impacts of conventional agriculture, it can increase productivity in small farmers' fields, and it reduces reliance on costly external inputs, and guarantees price premiums for organic products in local and foreign markets.

The organic market has expanded internationally along with the concerns of individuals about environmental degradation, resource depletion, food quality, and safety. Ecologically produced organic production rules forbid the utilization of pesticides, synthetic fertilizers, and GMOs and protect biological systems and biodiversity.

Overall, organic agriculture thus provides promises for sustainable agricultural development, but its shortcomings need to also be considered.

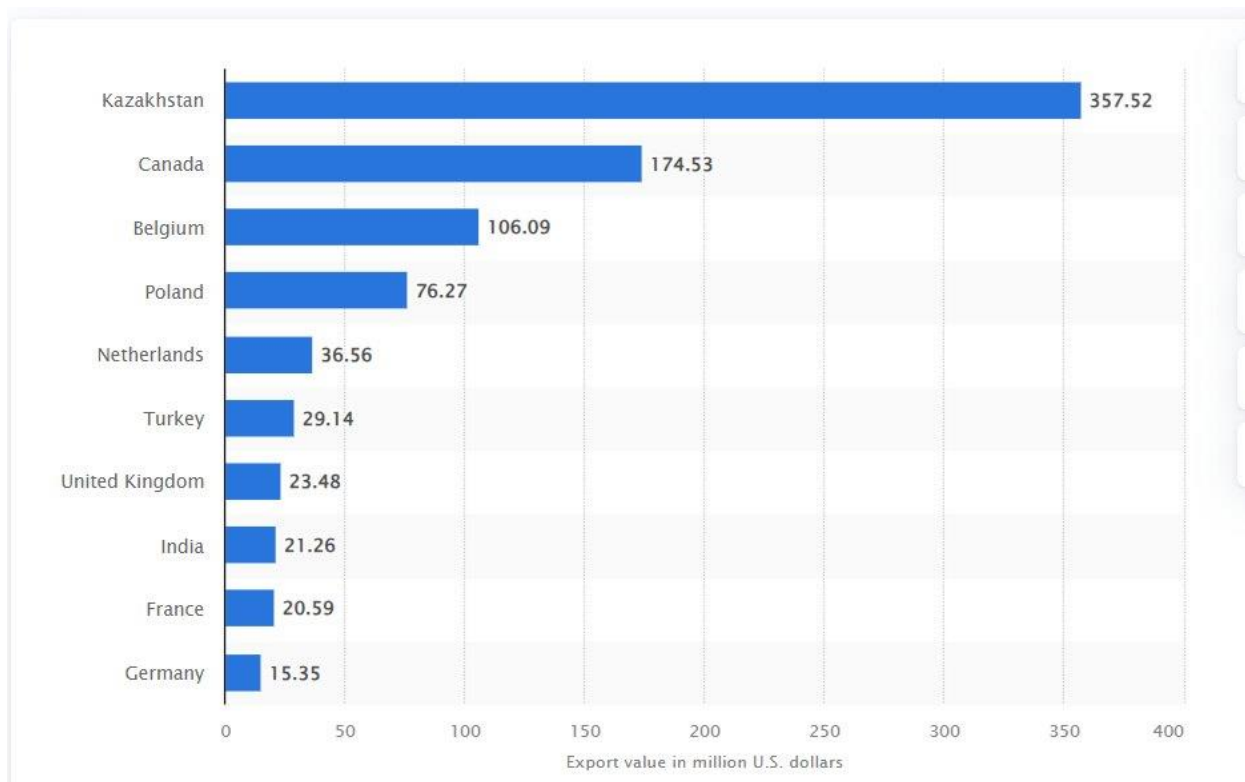
Organic agriculture has slowly begun to flourish in Kazakhstan. The growth of organic agriculture in Kazakhstan and an increase in its share of agricultural exports can be facilitated by the creation and adoption of more effective farming technologies, the promotion of investments in this sector, the training of agricultural workers, and other actions. [22]

The adoption of national legislation, the development of a certification system, the diversification of the cropping system, the educating of farmers and other project stakeholders in organic cultivation techniques, the establishment of marketing opportunities, and the development of organic standards are all urgently needed for the further development of organic agriculture in the whole country. In this respect, the APD project has assisted in the development of a new law on organic agriculture „On production and circulation of organic products“ in accordance with international norms.

For most farmers in Kazakhstan, organic products are still an unknown variable in the large realm of agriculture. Apart from the more obvious advantages of natural production, organic production is more complicated due to the extensive number of requirements for the growing process. Kazakhstan has a well-established export sector of conventional agricultural products. Over 15 types of farm produce are exported from Kazakhstan to Europe: peas, duck wheat, lentils, flax, soybeans, etc. Exports of linseed from Kazakhstan reached a total value of 357.52 million USD in 2022. [28] Globally known flax, which is actively purchased by Germany, Switzerland, and Italy, is also exported from Kazakhstan. The successful experience of export of conventional agricultural products from Kazakhstan shows that the country is in principle is well

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suited for export of agricultural products and that there is lot of potential to grow and expand also the export of organic products. Organic lentils, for example, are also very popular abroad and are purchased in large volumes by Italy and Turkey. This could be one potential crop for Kazakhstan to invest in more for export.



World linseed exports in 2022 (in mln, USD). [28]

2.2. The current state of organic agriculture in Kazakhstan

Organic agriculture in Kazakhstan is at the stage of active development and has gained significant recognition both at the national and international levels. Support from the government and international organizations such as BMEL, FAO, and UNDP helped to expand the sector and strengthen its market position.

According to the latest statistics from the 2024 edition of “the World of Organic Agriculture”, 103,447 hectares were certified as organic in Kazakhstan in 2022. Certification was given to a total of 24 producers and 2 processors and the share of organic among the total agricultural land organic was 0,05%. The main export positions of Kazakhstan are wheat, flax seeds, soybeans and oilseeds. Additionally peas, buckwheat, wheatgrass, flax, chickpeas, oats, millet, spring wheat, camelina, Sudan grass, lentils, sainfoin, and spring barley are also exported. Products are exported mainly to countries of the European Union. [30]

In the ranking of exporters of organic products to the EU, Kazakhstan’s position was 21st in terms of total volume in 2022. [30] The total export from Kazakhstan to the EU amounted for

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35,012 tons in 2021. Among these soybeans had the highest share with 14,500 tons, other oilseeds amounted for 13,600 tons. [32]

These figures indicate a significant decrease in certified organic production over a period of several years. The 10-year trend indicates a reduction of 187,756 hectares of certified organic land since 2012. In 2019, Kazakhstan had ranked 9th in the export of organic products, 4th among exporting countries of organic wheat, and 6th in the export of organic oilseeds flax. [33] A particular strong decrease took place between 2019 and 2020 when Kazakhstan's organic production land area decreased by 50%, from 229,463 ha in 2019 to 114,886 ha in 2020.

In the last decade, Kazakhstan has been actively promoting the idea of organic farming. On November 27, 2015 the “Law on organic production” was adopted. [16] This law will soon be replaced by the new law on “Production and Circulation of Organic Products” which will create a new legal basis for the formation of relationships in the system of production and circulation of organic agricultural products. The draft new law proposes the introduction of two schemes that facilitate participation of small farmers in organic certification: group certification and Participatory Guarantee Systems (PGS). Group certification and PGS have been promoted as viable certification methods by IFOAM – Organics International for many years and have been taken up in many regulations around the world. These new additions to the Kazakhstan organic law are therefore in line with the recommendations of IFOAM and, thus, comply with international quality and control standards for organic products. [21]

Along with the adoption of the main law regulating the organic food market in the Republic of Kazakhstan, the government has also introduced new standards and rules for organic farming. In parallel the Ministry of Agriculture has also started to prepare proposals for the "Roadmap for the Development of Organic Agriculture in the Republic of Kazakhstan for 2024-2025". The adoption of the new legislative framework allows Kazakhstan to participate in the world organic trade market and has positive implications for the development of organic farming in Kazakhstan.

The main authorized state body, which coordinates in the field of organic production, is defined as the Ministry of Agriculture of Kazakhstan. This institution actively cooperates with international partners, organizing trainings and seminars for farmers, exporters, and other representatives of the agri-commodity sector.

In addition to legal support, various projects and initiatives are being implemented in Kazakhstan aimed at promoting organic production. For example, Kazakh organic products are presented each year at international exhibitions, such as Biofach in Germany.

In general, the attention given to the development of organic agriculture in Kazakhstan provides for positive development conditions, and there are many reasons to believe that this sector will

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grow and develop actively in the coming years. Nevertheless, despite all the achievements and initiatives, organic agriculture in Kazakhstan faces a number of challenges, such as the need for standardization, certification, and the training of specialists.

3. Legal framework for organic agriculture in Kazakhstan

3.1. Government Strategy and Green Economy Concept

The promotion of organic agriculture in Kazakhstan is embedded in wider government strategies and programs for sustainable and eco-friendly development. The most notable ones are:

The "**Strategy Kazakhstan-2050**"—according to which Kazakhstan should become a global player in the market for environmentally friendly agricultural products. The government strategy highlights the “levers” that policymakers can use to support organic farming on its way to achieving its target. It is crucial for developing a sustainable and eco-friendly agricultural sector.

The "**Concept for "Green Economy"**: Concept "Green Economy" is one of the important tools to ensure sustainable development in the country. Kazakhstan has prerequisites for organic production. The concept for the transition of the Republic of Kazakhstan to a "green" economy has been developed. In addition, the National Project for the Development of Agro-Industrial Complexes for 2021–2025 was approved, which provides for the creation of conditions for the development, production, and circulation of organic agricultural products.

Tasks for the development of production and turnover of organic products are described in the following strategic and program documents:

- The message of the President of the Republic of Kazakhstan in September 2, 2019 "Constructive public dialogue - the basis of stability and prosperity of Kazakhstan" indicated that "We have a significant potential for the production of organic and environmentally friendly products in demand not only in the country, but also abroad";
- The message of the President of the Republic of Kazakhstan K.-J.Tokayev from September 1, 2020 "Kazakhstan in a new reality: time for action" indicated that "I instruct the Government to begin to implement practical measures to improve the environmental situation. Long-term plans for the conservation and rational use of biological diversity should be approved";
- National project "Quality and affordable health care for every citizen "Healthy Nation", approved by the Government of the Republic of Kazakhstan on October 12, 2021 № 725: measure 6. "Stimulation of domestic producers of organic agriculture in order to improve the health of the population, production of food products safe for human health" Task 1. "People's choice in favor of health";
- Concept of development of agro-industrial complex of the Republic of Kazakhstan for 2021-2030 years, approved by the Government of the Republic of Kazakhstan on December 30, 2021 № 960.: p.5. Basic principles and approaches of development;

- Roadmap for the development of organic agriculture of the Republic of Kazakhstan, approved by the First Deputy Prime Minister of the Republic of Kazakhstan dated May 25, 2022.

3.2. *The current and the new organic law*

In 2015 the Kazakhstan government published its first law to promote and regulate organic agriculture in the country: The law “On the production of organic products” (hereinafter called current law or law). This law is expected to soon be replaced by the law “On production and circulation of organic products” that is currently in draft (hereinafter called new law or draft new law).

The need to develop a new law is due to the fact that the regulations in force in this area do not meet the legitimate interests of domestic producers of organic products and do not comply with international and regional practices of organic production.

The current law on organic production

The current law of the Republic of Kazakhstan, “On the production of organic products” was adopted in 2015 and provides for mandatory certification of final organic products. Certification of organic production and organic products is carried out in accordance with the requirements of four documents simultaneously: the law itself, the rules of production and turnover of organic products, approved by the order of the Minister of Agriculture of the Republic of Kazakhstan from May 23, 2016 № 230, as well as the current two national standards (ST RK 3109 and ST RK 3111).

In order to implement the law the following implementing regulations and standards were developed and adopted: Rules “On the organic production”, approved by the Order of the Minister of Agriculture dated May 23, 2016 No. 230 (hereinafter referred to as the Rules on organic production). Rules “On maintaining the register of producers of organic products”, approved by the order of the Minister of Agriculture dated December 18, 2015 No. 13/1102.

The list of permitted inputs used in the production of organic products, approved by the order of the Minister of Agriculture dated May 23, 2016 No. 231 (hereinafter referred to as List of permitted inputs).

In 2017, three national standards were adopted, which came into force in 2018, to regulate organic production and labeling. The activities of the national certification bodies are regulated by the above laws, by-laws, and the following national standards:

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- National standard ST RK 3109-2017 “Organic products. National mark of conformity for organic products. Technical requirements and procedure for labeling of organic products” (hereinafter referred to as the Labeling Standard).
- National standard ST RK 3110-2017 “Conformity assessment. Requirements for bodies conducting the conformity of organic production and organic products” (hereinafter referred to as the Certification Standard).
- National standard ST RK 3111-2017 “Organic products. Requirements for the production process” (hereinafter referred to as the Organic Production Standard).

Criticism of the current law

The current law introduced strict regulation to the organic sector in Kazakhstan. Organic regulations have various benefits. Most notably they can create of trust and recognizability of the organic products in the market and therefor service producers and consumers of organic products alike. In developing organic sectors however, such regulations can slow down organic development because they provide extra burden to local producers. In some cases the regulation - inspired by more developed countries - may include rules that are too strict for local producers to comply and thus create very high barriers to participation. Indeed the current law in Kazakhstan was introduced at a moment when the domestic organic market was only very little developed and brought various challenges.

Drawbacks of the current law and its by-laws, including aspects that provide extra burden to local producers and are likely to have slowing effects on organic agriculture development due to the early stage of development of agriculture in the county:

- mandatory certification of organic products is provided for;
- the law contains certification requirements;
- organics is something that complies only with the Standard of the Republic of Kazakhstan;
- absence of the possibility of collective (group and PGS) certification;
- mandatory transitional (conversion) period even for virgin and fallow lands;
- there is a significant legal conflict on the duration of the transition (conversion) period;
- there is no legal norm on the creation of necessary infrastructural resources for the effective functioning of organic production and circulation of organic products;
- there is a lack of information, organizational, methodological and advisory support of organic farms at the legislative level.

The new law on production and circulation of organic products

At present, a new version of the Law "On production and circulation of organic products" is in draft. The vital impetus and urge for the advancement of the new, upgraded law has been the

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need to adjust the current law better to best global practices and to address the interests of local organic producers. The improvement of the law was foreseen in the public strategy «Concept of Developing the Agro-Industrial Sector of Kazakhstan for 2021–2030.» [16]

On June 27, 2023 at the plenary session of the Majilis [Parlament], deputies approved the first reading of the draft law and a package of related amendments.

The draft law covers not only the issues of organic production but also regulate its circulation. According to a member of the Majilis Committee on Agrarian Affairs, the draft law is aimed at ensuring the rational use of natural resources, providing assistance in the formation and development of the domestic market for organic products, and improving the competitiveness of organic products produced by domestic producers in foreign markets.

In November, 2023 Union of Organic Producers of Kazakhstan together with the profile Technical Committee for Standardization № 100 "Organic Products" in the framework of the National Standardization Plan for 2023 completely revised all standards in the field of production and turnover of organic products.

As a result, the following standards have been developed:

1. ST RK "Production of organic products. Terms and definitions";
2. ST RK "Conformity assessment. Requirements for bodies on confirmation of conformity of organic production";
3. ST RK "Organic Products. Requirements for the process of production, processing, labeling and sale";
4. ST RK "Organic Products. Production and turnover of organic products".

The standards were developed taking into account European norms and Kazakhstani practice and reality: completely revised conceptual apparatus; detailed activity of bodies to confirm the conformity of production of organic products; revised requirements for the production process, labeling; camels, red deer and rabbits added to the list of organic animals, etc.

During the development of standards received useful and detailed suggestions from KTRM MIT RK, SPE RK "Atameken", TOO "QAZAQ BIO CONTROL" and experts KazStandard, which were aimed at improving the quality of standards. All suggestions of stakeholders were taken into account, consensus was reached.

The approval and enactment of standards in the field of production and turnover of organic products will contribute to the solution of many systemic problems existing in the production of organic products and certification of production.

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Currently, all of the above standards have passed NTS NOS and STC of the authorized body in the field of standardization. All standards are to be put into effect from July 1, 2024.

Predicted improvements through the new law The new law "On the production and circulation of organic products" proposes norms according to which the certification of organic production will be carried out depending on the demands and preferences of the sales market, in compliance with the requirements of the selected (applicant-producer) standard of organic production.

At the same time, the new law "On production and circulation of organic products" provides for the possibility of forming Participatory Guarantee Systems (PGS) through which domestic small farms, peasant farms, and personal subsidiary farms can be officially considered producers of organic products for the local market.

The draft new law also provides for the provision of information, organizational, methodological, and advisory support to producers of organic products in accordance with the results of scientific, scientific, and technical projects and programs financed from the state budget and other sources.

The draft new law also regulates the issues of the transition (conversion) period from conventional to organic production. For example, it is established that virgin and fallow lands (more than 3 years) will be introduced into the turnover of organic crop production without a transition (conversion) period. At the same time, it is specified that the duration of the transition (conversion) period will be established in accordance with the rules of the selected standard of organic production.

3.3. Trends in the development of organic agriculture in the EAEU

Eurasian Economic Union

The relatively low volumes and growth rates of organic production in the EAEU member states are the result of the lack of legal regulation in this area. Armenia legislatively started regulating organic agriculture back in 2008. In Kazakhstan, the corresponding law was adopted only seven years later—in 2015, in Belarus and Kyrgyzstan—in 2019, and in Russia, it came into force on January 1, 2020.

The five Eurasian Economic Union (EAEU) members of Armenia, Belarus, Kazakhstan, the Kyrgyz Republic, and the Russian Federation have seen a rise in interest in developing organic agriculture in recent years. This kind of farming supports profitable farming production and the growth of high-margin agricultural output. This sector is seen as an addition to traditional agriculture, and it is being promoted in line with a global movement toward the production of nutritious, healthful food. Additionally, the growth of organic agriculture supports EAEU

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members' efforts to increase agricultural exports, foster the development of resilient and diversified agricultural systems, increase the profitability of small farms, and lessen farmers' reliance on high-cost inputs and resource-intensive practices.

The demand for organic products generated by EAEU members creates enormous opportunities for EAEU producers. Based on national study findings, the issues that EAEU members are confronting are similar:

- The local market for organic products is underdeveloped.
- The requirement to serve global markets.
- A lack of comprehensive official assistance to encourage organic agriculture and weak banking institutions
- The absence of official data that accounts for the export and manufacturing of organic goods
- The absence of land classification systems.
- The firm position adopted by large agribusinesses in Belarus, Kazakhstan, and Russia maintains its own interests, occasionally at the expense of organic agriculture development.
- Low understanding of labeling standards as well as the benefits of organic products for both customers and the environment.

The following characteristics of organic production may be found in EAEU member nations:

- Small farmers and their groups (cooperatives) are important producers in Armenia, Belarus, and the Kyrgyz Republic.
- Although small-scale businesses make up the majority of producers in Kazakhstan, large agricultural companies seem to be responsible for the majority of the country's production.
- Medium-sized enterprises and the organic divisions of large agro-firms dominate the organic production sector in Russia.

Kazakhstan has been involved in the harmonization of organic legislation within the Eurasian Economic Union (EAEU).

Recently, the Eurasian Economic Commission (operative body of EAEU) approved the roadmap for the development of a common market for organic agricultural products in the EAEU. One of the key objectives of this roadmap is the unification of organic legislation, including the requirements for the production and labeling of organic products, in order to provide mutual recognition of organic certificates of member states in the common market of the EAEU.

However, the ongoing geopolitical crisis in the region may affect the integration processes within the EAEU.

The organic production standards adopted at the national level by the members of the Eurasian Integration Association also take into account the main regulatory provisions of the international Codex Alimentarius standard. At the same time, for the purposes of international recognition, it is important to also obtain confirmation of the compliance of national standards with the general goals and requirements of organic standards (Common Objectives and Requirements of Organic Standards, COROS) and to become included in the family of standards of the International Federation of Organic Agriculture Movements (IFOAM). [17]

In general, these steps are aimed at improving the competitiveness of manufactured products, saturation of the common agricultural market, and the development of mutually beneficial cooperation between partners in the EAEU.

3.4. National agencies promoting the development of organic agriculture

In Kazakhstan, institutional and organizational support for the development of organic agriculture was formed by ministries, committees, and national agencies.

- Ministry of Agriculture (MoA)
- Ministry of Trade and Integration (MTI)
- Ministry of National Economy (MNE)
- Committee for Technical Regulation and Metrology (CTRM)
- Kazakhstan Institute of Standardization and Metrology
- National Center for Expertise and Certification (NCECC)
- Technical Committee 100 (TC 100)
- "QazTrade" - Trade Policy Development Center

All these institutions/institutions in Kazakhstan make a great contribution to the development of organic agriculture. Organic farming is not subject to a specific policy by the Ministry of Agriculture in Kazakhstan. However, the Ministry recognizes the potential of organic farming in generating foreign exchange and features it in its strategic plan.

Facilitating agencies such as the Ministry of Agriculture, the Center for Support of Organic Production, Project Office ORGANIC at "Atameken" the Union of Organic Producers of Kazakhstan, KazFOAM, "Qazaq Bio Control," and the public association "Association of Organic Farming" are the drivers of organic farming in Kazakhstan. They undertake to organize farmers into groups, link producers with buyers, provide policy support and training opportunities, and link producers to certifying agencies.

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Authorized bodies in the organic sector to strengthen the institutional framework are:

- MoA: an authorized agency in the sphere of organic production that coordinates the activities of other agencies;
- Committee for Technical Regulation and Metrology of the Ministry of Trade and Integration (CTRM)
- Sanitary and Epidemiological Control Committee of the Ministry of Health;
- Consumer Protection Committee of the Ministry of Trade and Integration;

National Center for Accreditation (NCA)

The National Center for Accreditation (NCA) is the only national accreditation body in the field of conformity assessment defined by the Government of the Republic of Kazakhstan.

Accreditation of bodies for confirmation of conformity to standards of organic production and organic products will initiate the development of the domestic organic market, and will allow a large number of farmers to start organic production, which will have a positive impact on the development of this area in the Republic of Kazakhstan.

To date, the National Centre for Accreditation" (NCA) is implementing activities to popularize certification in the field of organic production and organic products, which are designed to introduce in the activities of not only the principles of health, but also the preservation of the environment.

National Certification Body

The JSC NCB is an accredited conformity assessment body whose activities are directly aimed at certification of organic production and organic products

Technical Committee for Standardization № 100 "Organic Products"

The Technical Committee for Standardization № 100 "Organic Products" (TC 100) is, according to the conclusion of its Chairman B. Bulashev, essentially an information, organizational, methodological and advisory center in improving the legislative and regulatory framework for organic production and dissemination of knowledge. At the same time, TC 100 is an active participant in the formation and development of processes occurring in the field of production and turnover of organic products. TC 100, which is part of the infrastructural system of organic production, is involved in the work on the formation of effective infrastructural resources in this area.

Technical Committee 100 is:

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1. an elaborator of the Concept of the draft Law of the Republic of Kazakhstan "On production and turnover of organic products";
2. developer of the draft of the new version of the Law of the Republic of Kazakhstan "On production and turnover of organic products";
3. author of the Roadmap for the development of organic agriculture in the Republic of Kazakhstan for 2021-2023 years, approved by the Government of the Republic of Kazakhstan on May 25, 2022 № 17-13/2738;
4. initiator and developer of national standards in the field of production and turnover of organic products (2017-2024);
5. developer of educational author's course "Standardization and certification of production of organic products" for undergraduates studying on OP 6M073200 "Standardization and certification" Kazakh Agro-Technical University named after S. Seifullin;
6. the author of the advanced training course "Organic Agriculture", Part I-"Organic Farming" (2021);
7. author of the training program "Technologies for improving soil fertility in organic farming" (2020);
8. organizer of a series of webinars on the topic: "Technologies for improving soil fertility in organic farming" (2020);
9. organizer of a series of webinars on the topic: "Features of agrotechnics in organic farming" (2020);

Almost 50% of activities are implemented (or are in the stages of implementation) at the expense of international technical and financial support of the Project "German-Kazakh Agrarian Policy Dialogue" (APD) and FAO Office for Relations and Partnership in the Republic of Kazakhstan.

Along with the development of the Concept of the draft Law of the Republic of Kazakhstan "On Production and Circulation of Organic Products", TC 100 actively participated in finalizing the Concept of the model law "On Organic Agriculture", developed by the Standing Commission on Agrarian Policy, Natural Resources and Ecology of the Interparliamentary Assembly of the CIS member states. At present it participates in the expertise of the draft model law itself.

TC 100 also forms a position on the draft Agreement on the procedure for recognizing organic products within the EAEU, aimed at creating a common market for organic agricultural products within the EAEU¹.

¹ Eurasian Economic Union (EAEU or EEU) is an economic union of five post-Soviet states located in Eurasia.

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Separately it should be noted that the members of TC 100 in the framework of the draft national standards (NSS) for 2023 will develop drafts of 7 national standards, including drafts of 4 national standards in the field of production and turnover of organic products:

10. ST RK2 "Production of organic products. Terms and definitions";
11. ST RK "Conformity Assessment. Requirements for bodies on confirmation of conformity of organic production";
12. ST RK "Organic Products. Requirements for the process of production, processing, labeling and sale";
13. ST RK "Organic Products. Production and turnover of organic products".

On the initiative of TC 100 on the basis of the National Chamber of Entrepreneurs of republic of Kazakhstan "Atameken" the Project Office "ORGANIC" was established to provide methodological and practical assistance to the development of Organic Agriculture in the Republic of Kazakhstan.

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TC 100 is also the developer of the Regulations on the Project Office "ORGANIC" and its Work Plan for 2023.

TC 100 actively implements the Scientific and Technical Assignment within the framework of implementation of the Program-targeted financing of the Ministry of Agriculture of the Republic of Kazakhstan in the scientific direction: "Organic Agriculture" (2021-2023):

- monitoring (analysis and assessment of scientific and technical, organizational and practical level) of standardization documents, operating in the field of organic production, according to the results of which 4 ST RK are being developed at the expense of the Republican Budget;
- developed the Concept of the procedure for assessing the suitability of land (soil) and the establishment of
- organic production zones;
- developed a Roadmap for the development of organic agriculture in the Republic of Kazakhstan for 2022-2023;
- developed the Concept of formation and functioning of the Register of organic seeds of agricultural crops in the Republic of Kazakhstan;
- developed the Concept of the system of traceability of organic products throughout the life cycle of products on the principles of "from field to table" and "from farm to fork";

² Standard Republic of Kazakhstan

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- developed the Concept of formation and functioning of the PGS-Qazaqstan program;
- developed a proposed professional standard "Organic Production";
- compiled and justified SWOT-analysis of the market of organic products.

Organic Project Office (OPO) in the National Chamber of Producers "Atameken".

In Kazakhstan on the initiative of public organizations, certified producers of organic products and scientific and educational community established Scientific, technological and practical center to support organic production - Project Office "ORGANIC", which operates on the basis of the National Chamber of Entrepreneurs of the Republic of Kazakhstan "Atameken".

The purpose of the Project Office "ORGANIC" is to create favorable legal, economic, technological, social conditions and information environment for the development of organic production in Kazakhstan and the implementation of entrepreneurial initiatives.

The mandate of the OPO is to submit proposals or recommendations to the government on the development of the organic sector in Kazakhstan.

Union of Organic Producers of Kazakhstan

The Union of Organic Producers of Kazakhstan, "Qazaq Organic Union," was established in 2018 to protect the rights and interests of its members and promote organic products in the market. Also, to promote understanding of the European certification system and to assist Kazakhstan companies in entering the international market.

Qazaq Bio Control

Qazaq Bio Control is one of the first certification bodies in Kazakhstan who has accreditation to control compliance with the quality and safety of organic products and issue certificates for the realization of products in the domestic market. In the field of organic agriculture, "Qazaq Bio Control" takes into account and follows the four principles of the International Federation of Organic Movements (IFOAM).

The company "Qazaq Bio Control" was opened to give confidence in the quality of organic products, their safety, and compliance with the labeling that guarantees compliance with the necessary requirements and standards of production.

“Qazaq Bio Control» Services:

- Organic Certification: Certification of organic production processes according to ST RK 3109-2017 and ST RK 3111-2017 standards

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- Surveillance services - inspection of cargoes during loading and unloading, weighing of cargoes, taking samples for laboratory tests, and sealing of cargoes.
- Sampling and Analysis: Sampling of soil, green mass, and food products and sending them to European laboratories for testing for pesticide residues and other indicators
- Consulting according to international standards: - Provide full consultation on organic production according to European Union standards (Regulation (EU) 848/2018, Regulation (EU) No. 834/2007, Commission Regulation (EU) 889/2008).
- Clarification on standards: Explain in comprehensible language the requirements of Kazakhstani standards (ST RK 3109 and ST RK 3111) and laws in the field of the organic production process. [24]

KAZFOAM

The Kazakhstan Federation of Organic Agriculture Movements is the first organization operating in the field of organic agriculture since 2010. The mission of KAZFOAM is to initiate, integrate, develop, and support the organic movement in Kazakhstan in all its dimensions.

- Objectives of the Federation: To establish a platform for the organic movement of Kazakhstan;
- Development, advocacy, promotion, and protection of international principles of organic agriculture;
- Advocacy and promotion of the transition to organic farming principles;
- Promoting the development of the organic market [25]

Republican public association "Association of Organic Farming" in Kostanay region

The founders of the association are scientists and agricultural producers in Kostanay and the North-Kazakhstan region. It is a member of the Central Asian Organic Movement, "Coalition for a Green Economy". It promotes the organic certification of 150 thousand hectares of sown areas, three oil refineries, and a flour and cereal complex.

BMEL project "German-Kazakh Agrarian Political Dialogue".

The project "German-Kazakh Agrarian Political Dialogue" (APD) has been implemented since 2009 with the support of the Federal Ministry of Food and Agriculture of Germany on the basis of the resolution of the German Bundestag. The aim of the APD project is to support the development of political and economic cooperation in the agricultural sectors of Germany and Kazakhstan. The thematic areas of the project are coordinated with Kazakh partners, and as a result of a joint decision, relevant issues for cooperation are identified. One of these thematic areas includes organic agriculture.

4. Shortcomings and proposed solutions and recommendations for organic policy in Kazakhstan

4.1. Why is the trend towards organic production so difficult to take root in Kazakhstan?

Kazakhstan has achieved notable success in the production of grains, legumes and oilseeds for export to the EU. At times Kazakhstan was among the top 10 exporters of organic products to the EU in terms of volume. However, as can be observed from the statistical figures presented in chapter 2.2, the stability of the success has been limited with fluctuations and significant setbacks. The overall potential for organic agriculture is far from being reached, on the contrary the share of certified organic land remains rather low and the actual number of certified producers is very small.

While notable success can be observed on the export side, things are not very rosy in the domestic market with food certification. Organic production for the domestic market is very small and the sector is struggling with one particular issue: pseudo-organic products and a related lack in trust in the integrity of organic products and certification. Experts of the National Accreditation Center of the Committee for Technical Regulation and Metrology of the RK note the active spread of the trend of greenwashing (greenwashing, similar to whitewash - "bleaching", sometimes "green camouflage") in Kazakhstan. Companies label product with Bio and Organic stickers, although the products have not been certified and it has not been proven that they are environmentally friendly.

This labeling using the terms "Bio", "Eco", etc. often found on store shelves is actually illegal. The use of these terms is strictly regulated by the standards on labeling of organic products (ST RK 3109) and on the requirements for the production of organic products (ST RK 3111) of the Republic of Kazakhstan and only allowed to operators who have obtained the relevant certificate.

Control over these offenses is however not yet strictly implemented. State authorities in the country actually do not check and control the compliance of eco-labeling. This became known during the discussion of the problems of organic production in the Republic of Kazakhstan at the meeting of the project office Organic at the site of NPP "Atameken".

This means also that obtaining an organic certification does not actually give advantages to the Kazakh producer for selling in the domestic market, because the consumers cannot determine whether a given certificate is valid and whether products labelled as "Bio" or "Organic" are actually organic.

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This failure of the organic sector in Kazakhstan to live up to its potential, both for exports and the domestic market, has its roots in the many weaknesses of the organic sector as a whole: Institutions lack the capacity to efficiently administer and support the organic sector. A lack of research, education and extension specialized in organic agriculture led to producers lacking the knowledge and technology they need to run successful organic farms. Export promotion has not succeeded to stabilize and continuously grow the production. The absence of trust in organic claims in the domestic market makes it difficult for any producers to promote their organic produce. The legal framework in general has not yet succeeded to put the core issues hindering organic development at the center of the policy interventions in order to provide an enabling framework for the sector to prosper.

In order to dig deeper in the identification of the issues, and to propose solutions, recommendations and action points each of these areas will be reviewed separately.

4.2. Institutional capacity

Kazakhstan has a number of agencies, both government and private bodies, that fulfill important functions to promote, enable and assist the production and circulation of organic produce. Many of these institutions however are rather weak in their capacity to support the organic sector.

The following institutional drawbacks were identified:

Ministry of Agriculture:

The Ministry of Agriculture of Kazakhstan does not have a specialized structural subdivision for the development of organic agriculture. Currently the Division of Certification of Agricultural Products of the Department of Agrifood Markets and Processing of Agricultural Products is engaged in regulatory support in the field of organic production and determines the international agenda of the Ministry in the production of organic products.

The lack of a specialized unit is a limiting factor in the implementation of public policy, as well as the implementation of inter-sectoral coordination in the field of production and turnover of organic products.

The issues identified in relation with the absence of a special organic subdivision in the Ministry of Agriculture are:

- Absence of reliable information on organic production in Kazakhstan;
- Absence of extension officers trained in organic farming.
- Lack of information and analytical support on the development and promotion of exports of domestic organic products;

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- Absence of statistical reporting on production and turnover (certification, processing, storage, sales, domestic consumption, export and import) of organic products;
- Lack of systematic work on popularization of technologies, methods, means (substances) and practices of organic production and promotion of organic products;

National Organic Certification and Accreditation:

Despite the presence of two accredited certification bodies (JSC National Center of Accreditation and Qazaq Bio Control) the capacity to conduct organic certification for the national market is rather weak:

- There is no expert auditor for the confirmation of conformity of organic production - How was the JSC «National Center for Expertise and Certification" accredited without having an expert auditor?
- There are training centers on organic farming at "KazStandard" and the "National Accreditation Center", but they do not have a curriculum and program for training and advanced training of expert auditors on inspection and certification of organic production and advanced training of lecturers.

Technical Committee for Standardization № 100 "Organic Products":

The TC 100 fulfills important functions in the development of organic laws, however:

- There are no mechanisms for financing the activities of TC 100 on a systematic basis.
- The TC 100 is not involved in the development of the Program for training and advanced training of expert auditors to evaluate conformity of organic production and the curriculum for the course: "Advanced training of expert auditors to confirm conformity of organic production process".
- The TC 100 is not involved in the analysis and systematization of documents on standardization in the field of organic production.
- The TC 100 does not receive any operational and other information (draft standards, draft strategic and program documents, letters, appeal of business and other stakeholders on organic production, etc.) related to any aspects of organic production from the Ministry of Agriculture, the Committee of Technical Regulation and Metrology of the Ministry of Trade and Integration and the Republican State Enterprise "Kazakhstan Institute of Standardization and Metrology" (KazStandard). [29]

Organic Project Office (OPO) in the National Chamber of Producers "Atameken".

- Project Office "ORGANIC" is a center to support organic production, is managed only collegially and even though it is a targeted platform where all stakeholders can discuss

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and make recommendations and still there is no office and permanent staff, advisors as well.

- Even though one of the goals of the Project Office "ORGANIC" is to support the Scientific, technological and practical center to support organic production there is no scientific, technological and educational support of organic production.

Union of Organic Producers of Kazakhstan:

- Even though one of the goals of the "Qazaq Organic Union" is to promote organic production there is no European certification system and technological and educational support of organic production.

Qazaq BioControl:

"Qazaq Bio Control" LLP does not fulfill the condition to obtain accreditation in the EU:

- Weak research and technological and educational support of organic production
- Insufficient partnerships with EU accreditation bodies, etc.

To improve this situation, it is necessary to establish assistance from state bodies and state-owned enterprises to the national bodies for confirmation of conformity of organic production in passing accreditation and inclusion of national accreditation bodies in the List of recognized management and control bodies of the EU.

KAZFOAM:

- Weak research and technological and educational support of organic production;
- Lack of international cooperation
- Lack of cooperation with IFOAM International

Republican public association "Association of Organic Farming" in Kostanay region

- Weak research and technological and educational support of organic production;
- Lack of international cooperation
- Lack of cooperation with IFOAM International

Even though one of the goals of the "Association of Organic Farming" is to promote organic production there is no European certification system and technological and educational support of organic production.

4.3. Research and extension

Organic agriculture is knowledge-intensive and relies on adaptation of practices to the local conditions. It should be taken into account that organic agriculture cannot fully develop without research and technological support. All regulations in force in the field of organic production, and procedures existing in this area, are the results of research and development work by international and national research institutes. Research, extension and education specific on organic agricultural practices are therefore key in the development of a striving organic sector.

Kazakhstan still has a long way to go to develop these fields in order to be able to provide professional education and extension services for organic agriculture.

- Agricultural extension services and institutions are generally not adapted to the requirements of organic methods and marketing.
- Low levels of investment in ecological agricultural research, organic farming experimental research, and laboratories.

Weaknesses exist at the level of universities and agricultural support call centers. The government has made extension services a free service to encourage improved management by smallholders. Stakeholders expressed concerns about the capacity of extension centers to serve the needs of modern farms.

To fill that gap, a German-Kazakh Agrarian Policy Dialogue (APD) project is providing extension support for innovative organic farming methods. Training is targeted at giving farmers, researchers, and students the skills and knowledge to manage new technologies coming from abroad. Experts from Germany and EU countries are delivering training courses on organic crop production topics.

In order to develop organic agriculture, national research think tanks have to further strengthen research in the field of organic production:

- Carry out a comprehensive assessment of agricultural lands regarding their suitability for organic production at regional and local levels;
- Determine the number of farms in all soil-climatic zones and agricultural areas suitable for organic production;
- Development of fertilizer system for organic farming with the involvement of renewable sources of mineral nutrition of plants;
- Development of crop rotations and soil treatment systems, integrated systems of fertilizer application, bio-fertilizers, plant protection systems, technologies for growing organic products; [25]

Universities

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A very important factor in the development of organic agriculture is the training of specialists who could not only work as producers, but also bring innovative and economically sound techniques in organic agriculture and conduct scientific research in this area.

- To ensure positive results in this direction in the curricula of agrarian universities it is necessary to include training of specialists (agronomists, animal engineers and veterinarians) in the field of organic agriculture, which would provide knowledge acquisition not only in theoretical, but also practical, including internships in foreign organic farms, research institutes and universities.
- An integral part of the effective implementation of training programs on organic agriculture will be the creation and use in the educational process of experimental sites on the basis of following universities in Kazakhstan.

The most important university for agricultural education is the **Kazakh National Agrarian Research University" (KazNAIU)**. Organic agriculture only plays a minor role there:

- Lack of curriculum and programs for training and advanced training of auditors-experts on inspection and certification of organic production and advanced training of lecturers;
- Lack of international joint educational programs of higher and postgraduate education with relevant competencies (learning outcomes) in the field of organic production;
- Lack of professional standard "Production and circulation of organic products";

However there are several other universities that implement educational programs on organic farming. The first educational program "Organic farming" was developed by the faculty of **NAO Kazakh Agrotechnical Research University** named after Seifullin and **North Kazakhstan University** named after M. Kozybaev relevance of this educational program is that the market in the country requires environmentally safe products, so it requires an increasing number of specialists using environmental technologies in agriculture, which is one of the priority tasks to promote this direction in the world, including in Kazakhstan.

The peculiarity of the educational program "Organic farming" lies in the needs of the labor market in specialists of a new formation, capable of ensuring environmental conservation and sustainable production of safe crop production.

Research Institutes

The development of scientific research in the field of organic agriculture is a strategic factor in the development of organic agriculture.

- If the Government of the Republic of Kazakhstan and the Ministry of Agriculture of the Republic of Kazakhstan decided to recognize organic agriculture as a priority area, the

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Ministry could act as a state customer of the program of scientific research in the field of organic agriculture.

- Additionally, state programs that provide for measures to increase the production of organic products, may also contain an indication of funding for research in this area.
- Identify priority areas of research topics in the field of organic agriculture and include projects in the research programs of organizations.
- Ensure implementation of the results of scientific research;

Kazakh Research Institute of Agriculture and Crop Production.

The Institute is a major scientific center in the field of agriculture and crop production in the southeast of the country and they have a laboratory for Organic Agriculture. However weak research and technological support of organic production result to the following weaknesses:

- underdevelopment of technologies and lack of practical experience in the production and circulation of organic products;
- lack of tools in organic farming to protect against plant diseases and pests;
- lack of specialists who know how to work with biopreparations;
- lack of technical and technological specification of organic production taking into account soil-climatic, economic conditions and peculiarities of agro-ecological zones of Kazakhstan;
- there is no dissemination of knowledge, technologies, practices in the field of organic production and carrying out accurate and individual consultations for interested subjects of agro-industrial complex.

There is arguing that between science and small and medium agricultural producers. Large agricultural holdings can afford their own research. Small and medium producers, use the achievements of state researches. The issue of establishing interaction between state science & research and farmers, unfortunately, does not work very well. It is necessary to adapt the achievements of modern science & research for farmers. This will make it possible to produce organic products.

Research - Experimental Stations

Agricultural Experimental Stations along the country are involved in the promotion of organic farming. Taking into account the experience of the European Union, USA, Australia, it is possible to propose the following measures to stimulate and support producers of organic products in the Republic of Kazakhstan:

Building of a positive image of organic agriculture by conducting:

- Systematic and long-term awareness campaign addressed to producers, potential buyers of organic products, as well as representatives of government agencies of different levels;

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- Educational activities for different target groups;
- Scientific and scientific-practical international conferences;

Outreach visits to successful organic farms in regions and EU.

A very effective way of convincing representatives of agricultural enterprises, farmers, governmental bodies that make decisions is to invite them to organic farms, including foreign ones, to get their personal experience about the benefits of organic agriculture "healthy to food". This approach, when those who influence the process and (or) decision makers can experience the benefits of organic agriculture is very effective in combination with scientific research in favor of organic agriculture.

Political support for research and extension

To date political support focusses on the support to conventional agriculture:

- little interest in organic by government,
- political domination by non-organic farming

4.4. Promotion of export of organic products from Kazakhstan

In order to successfully export organic products it is necessary to understand the target market and to be aware of the conditions and requirements. As recommended by international consultants, the process of export promotion of organic production should begin with studying the provisions, norms and requirements of organic standards. Producers of organic products in Kazakhstan are focused on the EU market, so it is logical to study and comply with the European legislation in the field of production, certification and import into their territory: the Organic Regulation (EU) 2018/848, which is applicable since 1 January 2022. This regulation replaces the previous EU regulation from 2007 and introduces many changes for operators within the EU as well as operators wishing to export to the EU.

Kazakhstani exporters of organic products to the EU market face the following problem: the degree of recognition of Kazakhstani regulations by importers, mainly by official EU bodies. This is the case if Kazakhstani organic production was certified by a Kazakhstani certification body, unrecognized by the official EU bodies. The fact that national standards are developed on the basis of European regulations and directives does not play a role here; these documents (ST RK) are not equivalent to European legislation. The new regulation will set even stricter requirements for imports.

The new EU regulation and related changes affecting exporters to the EU

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The new EU regulation is bringing many changes that affect both operators within the EU and outside: Changes include scope of products, e.g. sea salt, essential oils and silkworm cocoons are now included in the regulation. Major revisions were done in the scheme for group certification. One of the biggest changes is however the shift in the overall approach of the EU to regulate trade, control and certification in relation to third countries.

Previously the EU had followed the “equivalence approach”. This means other certification programs (e.g. from certification body from outside of the EU) or regulations from other countries could go through an evaluation and be recognized as equivalent to the EU. Such a recognition, even if very difficult to obtain, could significantly relieve the heavy burden from operators and reduce the required bureaucracy of certification.

Now the EU has shifted towards the “compliance approach”. This means all products imported to the EU will have to comply with the same requirements as operators in the EU. Recognition of equivalence is no longer possible.

Some countries will have the chance to enter into trade agreements with the EU through which both countries can recognize each other’s products, thus also existing certifications and regulations. It is expected that these agreements will be very limited in number and that the EU’s interest into trade agreements will focus on countries that have major domestic organic markets themselves and are thus attractive export destinations for EU organic products.

This major shift in regulation means that the development of a national organic regulation and a national organic certification scheme will have even less directly linkable export benefits countries that focus on export primarily to the EU.

National certification bodies to promote exports?

Currently the local situation in Kazakhstan with the certification of organic products is that it takes at least 3 years to get certified in the EU. A total of 19 companies have been accredited by the EU to grant certification to producers of organic items in Kazakhstan. The nearest laboratories that meet international standards are located in Chisinau and Kiev, with 90% of organic exports from Kazakhstan certified by the Ukrainian partners. Therefore, establishing own certification authority is considered a key issue for the development of organic agriculture in Kazakhstan.

Currently 19 certification bodies are accredited under EU regulations to work in Kazakhstan. But 8 of them are actually working. All operating certification bodies certified 50 operators across Kazakhstan.

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However the investment required for a local certification body should not be underestimated. It takes many resources to build the expertise needed to run such an operation, to train professional staff and to keep up to date with current developments. Attractive certification bodies can offer multiple certifications to their clients, e.g. for the EU, USA, China, Japan. These accreditations are very expensive. In reality many local certification agencies around the world struggle to keep up their business. Many are heavily subsidized by their governments in order to be able to offer competitive prices and to compete with the larger international certification bodies.

Still local certification bodies can have some advantages, these include:

- operational costs may be lower due to lower salaries and reduced travel costs.
- good understanding of the local conditions and ability to speak local languages.
- building of local expertise to be able to independently carry out certification, e.g. to serve the local market at a later stage.

Many of the bigger internationally operating certificate bodies run local offices in countries where it is economically beneficial for them (sufficient number of clients are present). These offices are often staffed with local employees. Such a local offices provide similar benefits as a local certification body while saving on the bureaucracy and cost of obtaining multiple accreditations. The opening of such office are private business decisions by the CBs, although countries can encourage them by for example offer good office conditions, they have little influence.

Considering this situation, the set-up of a local certification body should not be underestimated and it should be well evaluated. Alternative options should be considered too. If the high certification costs are the main issue, subsidies to certification directly benefitting the certified operators could also be considered and might be a more efficient option to support the sector.

A national organic regulation to foster exports to the EU?

Local producers in Kazakhstan have been marketing their goods overseas, mostly to countries in the EU, since the early 2000s. Products originated in accordance with EU regulations and are under supervision by external certification bodies recognized by the EU.

Here a question can be raised: Are national laws and regulations necessary if Kazakh producers are able to effectively produce and export organic goods in accordance with EU requirements? Would it not be simpler to accept international standards as the national standard?

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Adoption of the law may support and promote the development of institutions and a legal framework for organic production that are compliant with international standards and where competent authorities have the authority to exert control over production.

Foreign clients may use the national legislation as an extra assurance that products are sourced from a controlled market rather than an "uncontrolled" market. Adoption of national law therefore can indirectly assist in the growth of exports.

Under certain conditions however national laws can also hinder the growth of exports. If producers that have already successfully obtained certification to export to the EU are asked to additionally also comply to the national legislative, this can lead to additional burden and bureaucracy and increase the cost for the producers. In order to not negatively affect exports it is therefore important to include exceptions in the national legislation to relieve producers that are already certified to export to major markets from the requirement to double-certification for the national market.

4.5. Promotion of organic production for the domestic market in Kazakhstan

Currently, organic production in Kazakhstan is export-oriented. The concept of organic production is quite new to consumers in Kazakhstan, and the domestic market is not well developed. Trust in products labelled as organic, eco or bio is very low due to wrongful labelling being very common.

In order to promote the development of a domestic organic market a wide array of measures is possible. Measures may focus at increasing demand, e.g. by raising consumer awareness or by setting-up of new marketing opportunities. By introducing organic ingredients into meals of public facilities government agencies can become clients and directly influence demand also. When demand is raising it is important that production is catching up too. Therefore support to production is equally important to develop prospering domestic sectors. This can be done through various measures.

In Kazakhstan public awareness of the benefits of environmentally friendly products should be increased. When assessing the capacity of the organic foods market, the authors have revealed that primary consumers are upper income families with children. Hence, the awareness-raising policy must emphasize the benefits of consuming organic products on a daily basis.

In fact, the "Qazaq Organic Food" State Program is gathering pace, so the communications and outreach policy to promote organic products must be arranged in such a way as to allow the local public to become familiar with domestic producers and trust them just as they would trust foreign producers.

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Consumers should be able to distinguish between pseudo-labels and special marks (approved at the legislative level). When trust in organic products is low and mislabeling common, political measures can be key in building trust and to enable the sector to grow and develop. Governments can build trust through two main means: by establishing voluntary national organic labels or by establishing organic regulations. In order to create trust government have to invest in good oversight over the sector to make sure mislabeling and wrongful claims are sanctioned and they have to actively communicate about the trustworthiness of organic labels to consumers.

Currently there is no register of organic producers in Kazakhstan. In the future information about certified producers should be easily available also to consumers, so they can check-up the validity of organic claims.

Availability of organic certification for the domestic market in Kazakhstan

In organic agriculture there are two main ways to ensure that the conditions and methods of production of these products comply with the standards established by regulations or private organizations. In third party certification professional certification bodies carry out the certification. This is the most common certification method. In regulations accredited certification bodies can issue certificates proving the quality and naturalness of the product. Another method that has experienced increasing popularity over the last decades are Participatory Guarantee Systems (PGS). They are mainly used for local markets and short supply chains. In PGS local stakeholders (producers, consumers, retailers, etc.) come together and establish rules of production and verification together. In the context of regulations governments can recognize PGS as an alternative way of certification complementary to third party certification. In this case the PGS stakeholder would verify compliance with the national organic law and standards set by the government.

In Kazakhstan the National Center for Accreditation (NCA) in the Committee for Technical Regulation and Metrology of the Ministry of Trade and Integration of the Republic of Kazakhstan (KTRM MIT RK) has successfully implemented an accreditation scheme for certification bodies for organic products. The staff of NCA to date has qualified personnel to carry out work on accreditation of potential applicants for the implementation of works on certification of organic products. With the NACECS and QazaqBioControl there are now at least two organic certification bodies in Kazakhstan that are accredited to carry out certification for the requirements of the national standards for organic products. However some questions remain regarding the quality of their services. It is possible that the fight against greenwashing in Kazakhstan is complicated by the lack of its own competent national certification system for organic producers.

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What concerns PGS, this certification method is foreseen to be newly recognized in the new law on the production and circulation of organic products. Article 14 states that operators have the right to participate in PGS initiatives, that participants in PGS have to comply with the law on the production and circulation of organic products and the related standards and that they can use the claim “PGS participant”.

However in the law text remains somewhat unclear is some essential details. Namely the following:

- due to a lack of definition, it is not very clear if the term “conformity assessment body” referenced in the law in multiple places (especially articles 10 and 12) does include PGS or is refers to third party certification only.
- per consequence it is also somewhat unclear if operators certified through PGS initiatives are only limited to using the term “PGS participant” or if they are free to call their produce also organic, eco or bio and have access to national organic labels.
- it is unclear if and how the government exercises oversight over PGS initiatives.
- Assuming that the law intends to authorize PGS as valid certification method for the local and that the goal is to have some oversight over PGS in order to tackle issues with greenwashing and to establish trust in organic products, the following adaptations are recommended: Include a definition of the bodies that are authorized to carry out certification in the new law. This definition should include both third party certification and PGS.
- Develop a list of the minimum requirements that PGS initiatives have to follow in order to be officially recognized. These requirements should include provisions that are necessary for any PGS to implement in order be functional and deliver reliable guarantees. For example include the requirement that all certified operators are inspected at regular intervals and that the inspectors have to be qualified. A template for the development of such a list can be found in the IFOAM regulation toolkit, page 53. [30]
- Develop a process how to recognize PGS initiatives. This process should enable the authorities to oversee the PGS initiatives and evaluate whether they are implementing the requirements. However attention should be given to ensure the process is as light and unbureaucratic as possible in order not overburden initiatives, some of which might be small groups operating very locally. A template for developing such a process can be found in the IFOAM regulation toolkit, page 54ff. [30]

Ensure that the law is clear which provisions address certification bodies, which ones PGS and which are relevant for both systems. PGS is still a new concept in the Kazakhstan and it may take some time until local stakeholders have built the capacity to run such a system and to be official recognized. Again support and promotion of skills and knowledge may be more efficient

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means of promotion than investment primarily in the regulation and oversight. For organic agriculture to be successful, awareness and demand for organic products need to increase and various marketing channels have to develop first. Once they thrive, a need for a reliable guarantee will come up and stakeholders may move naturally to set-up their organic guarantee system. Organize trainings how to set-up PGS, help operators to participate by providing easily-understandable versions of the requirements and promote awareness about PGS being a reliable certification that is suited well for local markets and grassroots initiatives.

Take care to not overregulate the organic sector

A regulation controlling organic cultivation is a tool for creating trust in organic products in the local market and meeting consumer needs in the region. International experience demonstrates that national regulations for organic production should be well adapted to the local conditions in order to accommodate a country's particular geographical and climatic conditions as well as organizational constraints. 96 different countries now have laws regulating organic farming, according to statistics from FiBL and IFOAM from 2021.

In early stages of an organic sector, regulations can slow the development process. They create additional hurdles and bureaucracy. Instead promotional measures should be prioritized as means to support the sector. When regulating, it is important to include some exceptions at the beginning of the development of organic agriculture in order to promote and stimulate production and the growth of the local market. Prior to becoming more challenging and restricting any exceptions, standards in nations with grown-up organic production systems allowed for such exclusions.

Laws should not excessively limit local producers because Kazakhstan continues to promote organic production, which could occur if international standards are implemented directly. Local farmers won't be motivated to switch to organic farming methods if the Kazakhstan national law doesn't include specific exceptions. [16]

Furthermore, national standards allow more specific regulation of the production of certain agricultural crops or products specific to or of particular importance for the country's organic sector, which may not be addressed in foreign rules.

4.6. Creation of a conducive legal framework for organic agriculture in Kazakhstan

Governments have the ability to create a favorable framework for organic agriculture and to influence the prospering of the sector both for export and domestically. Measures should be well chosen based on needs and constraints and reflecting the resources that are actually available. Measures should be well balanced to develop of both supply and demand simultaneously. And

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they should be in line with the country's general goals and priorities (e.g. generate export revenue, provide healthy food for citizens, protect biodiversity and soil fertility on the long-term).

It can be clearly stated that there are the following systemic problems in the production and circulation of organic products in Kazakhstan: [23]

1. Inconsistent institutional structure of production and circulation of organic products, as a consequence of interdepartmental disagreements between the Ministry of Agriculture and the State Standard on key provisions of industry development;
2. Lack of appropriate analysis of the work done within the "first wave" of organic production development;
3. Lack of a comprehensive plan for the development of organic production, ensuring the transition from a situational approach to a systemic approach;
4. Weak information and image support for organic production;
 - 4.1. Lack of a single Internet portal for organic production in Kazakhstan;
 - 4.2. Lack of organizational and administrative measures to prevent pseudo-eco-labeled products from entering the food market;
5. Weak research and technological and educational support for the production of organic products;
 - 5.1. Lack of scientific, technological, and educational bases to support production and turnover (transportation, storage, processing, packaging, certification, sales, and export) of organic products;
 - 5.2. Lack of technical and technological specification of organic production, containing systematized and structured information and related materials necessary for organic production;
 - 5.3. Lack of a unified register of organic technologies and agro-techniques taking into account agro-ecological zones;
 - 5.4. Lack of a procedure for assessing the suitability of land (soils) and establishing zones of production of organic products and raw materials;
6. Lack of financial tools to support the production and circulation of organic products;
7. Lack of qualification requirements for candidates for inspectors and experts-auditors of certification of organic production and organic products, formed by the Ministry of Agriculture.

Other issues are:

- Biological control substances that are authorized abroad are not registered in Kazakhstan and are therefore prohibited for use. And domestic remedies that can potentially be applied are not authorized by inspectors of foreign certification bodies. It is necessary to go through the approval procedure with independent organizations

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authorized to allow biological control agents for use in organic agriculture according to EU standards.

- The use of chemical inputs is still supported in the form of initiatives to encourage increased use and in some cases subsidization.

To create a favorable legislation conducive for the growth of organic agriculture various adaptations are necessary. First of all, support measures should be adopted and prioritized.

Among the most important and promising measures are:

- Support for research and dissemination of organic products
- Support for the development and utilization of organic inputs
- Support for certification
- Support for organic vocational training and academic programs
- Payments for conversion and maintenance of areas for organic production
- Support for agro-ecological practices compatible with organic production
- Tax incentives for operators of organic production
- Support for investment in organic farms
- Support for companies processing, developing and marketing organic products
- Prohibition of the use of agrochemicals in vulnerable areas
- To provide information support for the development of organic agriculture, including an information campaign in the media aimed at popularization of organic methods of agricultural production and safe and healthy organic products, as well as dissemination of experience of Kazakhstani organic farms.
- The domestic market for organic production requires additional support from the government.
- Economic support: Develop normative and legal acts, including provisions on the rules of certification of technological production and organic products, on mechanisms of economic and financial support of farms engaged in the production of organic products.

Subsidies: Any farmer producing organic products as a subject of agro-industrial complex has the right to receive subsidies to reimburse part of the costs of investment investments (purchase of machinery, equipment and other fixed assets).

- For the development of the high-standard Road Map it is necessary to involve all interested parties. These are:
 - Producers and exporters of organic products;
 - Experts of authorized bodies in the field of production and turnover of organic products;
 - Inspectors (national, foreign) certification bodies;

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- Scientists of research institutes and universities of agrarian profile;
- Authorized representatives-members of technical committees on standardization of organic production and organic products;
- Specialists of trade unions and associations in the agro-industrial complex;
- Specialists of consumer protection organizations;
- Specialists in environmental protection organizations;

The government should also analyze the possibility of revising the planned indicators of growth of the share of organic land in the total area of agricultural land. Since even if the forecast indicators of the National Strategy of Sustainable Socio-Economic Development of Kazakhstan for the period up to 2030 are achieved.

5. Conclusions and summary of policy recommendations

Organic agriculture can provide important contributions to sustainable agricultural development. Kazakhstan has achieved success in the development of organic agriculture for export of some crops to the EU, but still faces many challenges and is far from reaching its potential for organic agriculture. On the export side growth has stagnated for several years, indeed the 10-year statistics of exports to the EU indicate significant decreases of export volumes. The domestic market is little developed. Kazakhstan has started to regulate the domestic market with the organic law on production of organic products from 2015, but faces many challenges in the implementation. The currently in draft new law on the production and circulation of organic products tries to correct mistakes and to lead Kazakhstan in a new phase of growth aiming both at export as well as the domestic market.

There are many best practices and lessons on organic agriculture development in both developing and developed countries from which Kazakhstan can learn and get inspiration from. However, each country has its own peculiarities in terms of climatic conditions, geographical location, natural resources, as well as culture, traditions, democratic values and so on. All these influence the development of organic agriculture and form a certain mechanism applicable only in a particular country.

This policy brief concludes that, for effective implementation and subsequent sustainable development of organic agriculture in the long term, the Kazakhstan government and Ministry of Agriculture of Kazakhstan should adopt a variety of measures:

1. Institutional development:

- Establish a specialized unit in the Ministry of Agriculture responsible for organic agriculture and staffed with professional personnel. This unit can then take up important functions to assist the organic sector, including the compilation and provision of information on organic agriculture in Kazakhstan and the organization of extension services.
- Establish targeted training and capacity building to overcome the key weaknesses and areas of lack of knowledge and capacity of the various organizations in the country both public and private. This support may include topics such as: export requirements to the EU, certification processes & auditing, or best practices for organic policy around the world.

2. Research, education and extension:

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- Support research on organic agriculture in country and provide state funding for research and development work in the country. It is necessary to create and maintain a unified register of organic technologies and agricultural practices. This approach will facilitate the work of farmers who decided to switch to organic production.
- Contribute to capacity building of organic farmers, Organic producers' Associations and students and teaching staff in universities. Organic agriculture should be included in the curricular of regular agriculture education and specialization should be available too.
- Establish cooperations and learning opportunities with other countries in the areas of research and knowledge transfer.
- Improve the expertise of extension offices in organic agriculture. Train some extension officers to have a specialization in organic agriculture.

3. Promotion of export

- Study the market and export requirements of relevant countries and provide this information to operators. Educate experts and organizations in the export requirements so they can organize trainings and assist producers.
- Invest in research, education related to the main existing and potential export crops. Through value chain development projects it can be ensured that all steps necessary to export are put into place for certain chosen crops.
- Fund or subsidize organic companies to exhibit in, or attend, international organic trade fairs such as BioFach in Nuremberg or organize trade missions with the aim to establish business contacts in target countries. Invite foreign business delegations to visit your country.
- Ensure that national legislation does not create burden additionally to what is already required by the importers. Existing accreditations and certifications from countries with well-established schemes (e.g. the EU or the US) should be accepted without requiring additional accreditation or certification for the national regulation.
- Keep in mind that establishment of national regulations, local certifications bodies and local laboratories is not a requisite for prospering export. In fact they require a lot of resources to set-up and run, but have only limited influence and enable export. In some cases national regulation even hinders export by establishing extra burden for producers.
- If certification costs are considered too high, subsidies to certification could be considered.

4. Promotion of the domestic market

- Encourage demand and market creation for organic products by informing consumers about the benefits of organic products, encourage new market channels (e.g. organic farmers markets) or by including organic ingredients in government facilities.

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- Support also the production of organic for the domestic market by adoption various measures that benefit organic producers that produce for the local market (e.g. some type of economic support).
- Enable consumers and producers to regain trust in organic labels and certification by putting into place a government oversight system that is based on standards that are feasible for producers to follow, prosecution of wrongful claims and active communication and awareness raising to consumers. Make sure consumers can easily find information on certified producers online.
- When implementing organic regulation make sure to keep processes and procedures as light as possible and to well-adapt the standards to fit the condition of local farmers.
- Make sure to accept existing accreditations and certification so that producers already exporting can easily sell their organic products also on the local market.
- When officially recognizing PGS make sure to clearly define the requirements and process of recognition while keep it as light and unbureaucratic as possible. PGS stakeholders should keep the possibility to design their own system and practices that manageable for them and adapted to their specific condition.

5. Create an overall conducive environment for organic farming

- Prioritize support measures over regulatory ones
- Concentrate policies on regions where organic agriculture has the most potential and on the main constraints slowing the development of the sector.
- Ensure a balanced development of both production and demand simultaneously.
- Learn from the experiences from other countries and build on existing knowledge, while keeping in mind the specific conditions present in Kazakhstan.
- Provide regulatory and legal support of the process of implementation of organic agricultural development at all levels of management: Law, Roadmap, Concept of industry development, national standards. Ensure participation of all relevant stakeholders.
- Encourage partnerships and exchange with other countries, may it be in the fields of research, education or business.
- Ensure alignment of development strategy of organic agriculture with overall government plans and strategies and ensure that indicators are consistent.

6. Bibliography

1. State Program for the Development of the Agro-Industrial Complex of the Republic of Kazakhstan for 2017-2021. <http://extwprlegs1.fao.org>.
2. Law on Organic Products and Amendments to Certain Legislative Acts of the Russian Federation. Adopted by State Duma (2018) <https://rosorganic.ru>
3. Law of the Republic of Kazakhstan No. 423-V dated NOV27 (2015) "On Production of Organic Goods", <http://adilet.zan.kz>.
4. Draft Concept of Development of Measures to Support Domestic Producers and Processors of Agricultural Goods based on Domestic Food Aid Arrangements within WTO Green Box, <http://www.mcx.ru>.
5. On Organic Products and Amendments to Certain Legislative Acts of the Russian Federation. Federal Law (2018) No. 280-FZ.
6. Order of the Ministry of Health of Russia dated January 15, (2020) N. 8 approved the Strategy for Promotion of Public Healthy Lifestyle, Prevention and Control of NonCommunicable Diseases until 2025. 7. Sanitary Regulations and Standards 2.3.2.2354-08 "Additions and amendments No. 8 to Sanitary and Epidemiological Rules of SRG 2.3.2.1078-01 "Hygienic Requirements for Food Safety and Nutritional Value of Foods" (registered with Russia's MoJ on March 22, (2002), reference No. 3326) 8. Ye. Varavin, M. Kozlova. Economy of the Region, 14(4), 1282 (2018)
9. V. Grigoruk, Y. Klimov, Development of Organic Farming in the World and Kazakhstan, 153 (2016) <http://www.fao.org>
10. B. Grigoruk. E. Klimov. Institutional and economic stimulation of organic agriculture. World experience of the possibility of its adaptation to the conditions of Kazakhstan.
11. Dilara S. Samenbetova¹, and Oleg Yu. Patlasov. Model of state support for organic farming of Kazakhstan in the context of creation of international regulatory framework for the industry .
12. Raushan Zhazykbayeva Counsel AEQUITAS Law Firm Regulation of Production, Labeling and Certification of Organic Products in Legislation of the Republic of Kazakhstan.
13. FIBL IFOAM – Organic International, World of Organic Agriculture, Statistics, and Emerging Trends, 2022 (p. 22) на https://www.fibl.org/fileadmin/documents/shop/1344-organic-world-2022_lr.pdf 2 14. 14. Available at <https://www.fao.org/fao-who-codexalimentarius/codex-texts/guidelines/en/>
15. See IFOAM norms at https://www.ifoam.bio/sites/default/files/202004/ifoam_norms_version_july_2014.pdf
16. Established by the Treaty in 2014 by the Russian Federation, Belarus and Kazakhstan and joined by Armenia and Kyrgyzstan in 2015
16. R. Zhazykbayeva. Z. Sharipov. Organic Production in Kazakhstan: Comments on the Draft Law on Production and Circulation of Organic Products.
17. <https://soz.bio/kurs-na-organiku-evraziyskiy-soyuz-ru>

POLICY PAPER

18. <https://soz.bio/organik-union-tendencii-razvitiya-organich/>
19. <https://kapital.kz/economic/116933/trebovaniya-k-proizvodstvu-organicheskoy-produktsii-izmenyat-v-kazahstane.html>
20. Источник: <https://parlam.kz/ru/mazhilis/news-details/id50288/1/15>. Мажилис Парламента Республики Казахстан.
21. https://read.oecd-ilibrary.org/agriculture-and-food/agricultural-policy-monitoring-and-evaluation2020_d3c7bdcf-en#page1
22. <https://www.undp.org/kazakhstan/stories/organic-farming-not-just-trend-its-future-agriculture#:>
23. B. Bulashev. Systemic problems hindering the development of organic production in Kazakhstan. <https://kazakh-zerno.net/139482-sistemnye-problemy-prepyatstvuyushchie-razvitiyu-organicheskogo-proizvodstva-v-kazahstane/>
24. <https://biocontrol.kz/uslugi>
25. V. Grigoruk, E. Klimov. Development of organic agriculture in the world and Kazakhstan.
26. <https://eldala.kz/specproekty/13662-pochemu-vse-organicheskoe-prodovolstvie-kazahstana-uhodit-na-eksport>
27. <http://www.nca.kz/info/articles/media/grinvoshing/>
28. <https://www.statista.com/statistics/916788/major-exporters-linseed-export-value/?fbclid=IwAR1MnXbqHZQJmdqOyuOGeeWc1N2igLcWdYbOjLVvEysKX3IVAlSwT-ilnc>
29. Технический комитет по стандартизации №100 «Органическая продукция».
30. https://www.ifoam.bio/sites/default/files/2020-04/regulation_template_countries_with_an_emerging_sector.docx
31. FIBL IFOAM – Organic International, World of Organic Agriculture, Statistics, and Emerging Trends, 2024. <https://orgprints.org/id/eprint/52272/>
32. https://agriculture.ec.europa.eu/system/files/2022-09/agri-market-brief-19-organic-imports_en.pdf
33. “EU imports of organic agri-food products. Key developments in 2019” EU Agricultural Market Briefs, No 17/June 2020

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