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A Comparative Reading of the Groser Draft Text on Agriculture from a Development Perspective

Background Brief No. 3

April 2004

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ILEAPⁱ- initial analysis of Groser agriculture draft (16 July 2004)*

This note provides initial analysis of the Groser draft framework on agriculture (JOB(04)/96, Annex A) (the “Groser Draft”), from a development perspective.ⁱⁱ The attached table provides a comparison of the Groser draft with a number of existing proposals, including those by previous Chairmen and various negotiating groups representing developing and developed countries. In this table, we assess those provisions we find most substantial and controversial and highlight the important omissions from the text. We provide brief comments on the impact of these provisions on developing countries and suggest general directions for amendment, in order to assist developing country negotiators in ensuring that the Doha Development Agenda (“DDA”) goals are met. This examination cannot replace detailed analysis at the country- and product-specific level and is provided in the context of ongoing negotiations. The vagueness of the Groser Draft on many points precludes detailed analysis at this stage, and it is in this context that this note should be read. More detailed proposals for amendments and improvements to the Groser Draft may follow.

On the basis of our initial comparative analysis, and in the immediate context of the talks now being held in Geneva towards adjournment at the end of July, 2004, we contend that the Groser draft, although it may serve as a basis for discussion at the framework stage, is severely inadequate as it stands in addressing development needs in agriculture central to the DDA, as explained below:

Market Access draft provisions are dangerously flawed from a development perspective. The framework for the tariff reduction formula is ambiguous and potentially unbalanced. Contrary to what one might expect from a development focused text, the Groser draft addresses developed country sensitivities in detail, while leaving developing country sensitivities for the post-Framework stage. High levels of flexibility are generously granted to developed country ‘sensitive products’, at the cost of virtually abandoning the objective of increasing discipline.ⁱⁱⁱ The ‘sensitive product’ provisions risk seriously undermining the market access objectives of the DDA, by allowing as much as half of all OECD agriculture production to be subject to greatly weakened market access disciplines, essentially providing significant ‘reverse’ Special and Differential Treatment (“SDT”).^{iv} These flexibilities are ‘complemented’ by weak provisions on tariff caps (para 28), which will permit the continuation of tariff peaks on products of vital importance to development. Rather than being ‘operationally effective’, as envisaged in the DDA, SDT provisions are rendered virtually meaningless, at least at the framework stage: for example, in relation to Special Products (“SPs”), reference to tariff flexibility has been omitted (reflecting the US approach, rather than that taken by previous Chairmen, and developing country demands), undermining the ability for developing countries to protect the crucial non-trade interests of poverty alleviation, food security, rural development and livelihood security interests.

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Domestic Support draft provisions are similarly ambiguous, and generally weak from a development perspective. The Groser Draft Text provides for the capping of all boxes and product-specific commitments – both crucial aspects for a development-friendly outcome of the DDA. However as set out in greater detail in the table below, the provisions for support reductions are weak, in particular by limiting product specific reductions to “some” products (para 9). The explicit expansion of the "Blue Box" as proposed in the Groser Draft is most disconcerting from a development perspective, and might have the effect of 'rescuing' certain types of developing country (in particular US) subsidies who have a recognized trade-distorting effect and cause serious prejudice to developing economies (e.g., as confirmed in the recent US/Brazil Panel decision) by shifting them to the "Blue Box"..

In general, provisions on **Special and differential treatment** (SDT) are disappointing. Many of the positive elements of the Derbez text have been omitted and should be reinstated, including: Article 6.2 expansion, *de minimis* flexibilities, general duty-free access for developing countries to developed countries and market access for Least Developed Countries (“LDCs”). Concerns relating to NTBs and TRQ conversions are also not adequately addressed in the Groser draft.

Groser Draft on Agriculture:

Comparison table of proposals in relation to controversial issues (including omissions)

Issue	Groser Draft ^v	Comments on Groser draft	Derbez ^{vi} , Harbinson ^{vii}	EC-US joint paper ^{viii} / US non-paper ^{ix}	Other relevant proposals (G20 ^x , Kigali Consensus ^{xi} , Mauritius Declaration ^{xii})
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Domestic Support

General reduction method	<p>(a) Tiered approach based on sum of trade distorting support (Final Bound Total AMS + <i>de minimis</i> + <i>partial</i> blue box);</p> <p>and -</p> <p>(b) In addition, separate and complementary formulae to be developed for each category.</p>	<p>Difficult to assess without more detailed reduction formulae;</p> <p>Cumulative overall reduction as “<i>minimum</i> overall commitment” (paragraph 8, point 1) combined with category reductions – depending on particular formulae this is positive for reduction of support;</p> <p>Only partial inclusion of Blue Box support in tier-setting total trade distorting support (paragraph 7) grants a relative advantage to Members with high usage of blue box.</p>	<p>Amber, Blue and <i>de minimis</i> should be reduced significantly.</p> <p>Reduce the final bound total AMS in the range of []% to []% (Derbez, para 1.1).</p>	Essentially same as Derbez.	Essentially same as Derbez.
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper /	Other relevant

				US non-paper	proposals (G20, Kigali Consensus, Mauritius Declaration)
Tiered Approach	<p>Developed Members will make “substantial and effective” reduction in overall support (para. 6, point 3);</p> <p>“reductions from allowed levels” for each element of support, except for Blue Box (“reduction to a level to be agreed”) (para 6, point 4);</p> <p>”higher levels of allowed support, in either absolute or relative terms, will be subject to deeper cuts” (para. 6, point 2).</p>	<p>Level of reduction of support is unspecified; incorporates DDA Article 13 language: “substantial reductions in trade-distorting domestic support” (Para. 6)..</p> <p>Again, unjustified preferred treatment for Blue Box.</p>	Amber, Blue and <i>de minimis</i> should be reduced significantly.	Reduce “the most trade distorting support”, which is presumably just the Amber Box.	
Final Bound Total AMS	Harmonizing, tiered approach, with Final Bound Total AMS to be “reduced substantially” (para. 9, first point); Members may make greater than formula reductions in order to meet overall reduction requirements	Difficult to assess without specific formula.			
	Product-specific AMS capping: At average levels during “historical basis to be agreed”, with a reduction of “some” product specific caps (para 9, point 4)s	Positive inclusion, but inadequate specification. Will allow some product-specific AMS to remain untouched. Language does not ensure reduction of product specific AMSs of interest to Developing Countries, including, <i>inter alia</i> , cotton”.	Product specific cap but no reductions (Derbez).		“reduce all trade distorting support ... on a product specific basis” (G20).
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus,

					Mauritius Declaration)
Blue Box	Expansion of blue box to include de-coupled support, i.e., direct payments unrelated to current production (Para 13, point 2).	This is highly problematic as it will encourage the continuation of trade-distorting domestic support ^{xiii} through box-shifting, and may allow payments which were recently ruled WTO-inconsistent in the Brazil/US Cotton dispute. ^{xiv}	No expansion envisaged.		Eliminate blue box (G20).
	Limit as per percentage of production, with 'flexibility' for Members who have placed an "exceptionally large percentage in Blue Box". (Para 14)	This flexibility will potentially allow the continuation of greater levels of trade-distorting support. Extremely abstract language. Important to push for no exceptions, especially as this was previously agreed by EC-US.	Limit was 2.5% in Castillo, 5% in Derbez, no exceptions.	Limit was 5%, no exceptions.	Change limit from 5% to 2.5% (G20)..
	"reductions to a level to be agreed" (para 6, point 4)	Unclear what the difference is between "reductions from allowed levels" (all boxes) and "reductions to a level to be agreed" (Blue Box). Does this imply that blue box reductions will be less rigorous than other boxes? It appears that a cap will be set on Blue Box reductions.	Blue box support to be linearly reduced by []% for.		"substantial reduction with a view to phasing out" (G20)
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)

Blue Box (Cont.)	Review of Blue Box reduction criteria taking into account “balance of WTO rights and obligations” and recognition of Blue Box as “essential tool of reform”.	Very problematic, open-ended language. On one hand, recourse to “balance of WTO rights and obligations” may allow account to be taken of results of US/Brazil cotton dispute, although these will formally be product-specific and <i>inter partes</i> only. On the other hand, recognition of reform-role of Blue Box as overriding consideration may prevent real reductions.			
Green Box	‘Green Box criteria will be reviewed with a view to ensuring that Green Box measures have no, or at most minimal, trade-distorting effects or effects on production’. (para. 16). Also, para. 6, point 3 on general AMS reduction applies to ‘each element of support’ therefore including Green Box .	This is positive as it implies that green box will be capped and reduced. Moreover, this is implied only, and may be made more explicit by adding language in this regard under “green box” para 16.			
De minimis	Reduction (para 11). No mention of SDT	Important to include SDT, push for Derbez language.	Reduce by []% developing country exemption from <i>de minimis</i> reductions, (Derbez, para 1.7).	Reduce by []%	Elimination (Kigali consensus) developing country exemption from <i>de minimis</i> reductions, (Kigali consensus).
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
SDT (Article 6.2 AoA)	“continued access” to A6.2 (para 6, point 1).	No expansion of SDT and policy flexibility; Derbez	“enhanced provisions” Derbez para 1.6.	Not mentioned.	“enhanced provisions” (Kigali

		language to be preferred.			consensus).
Bottom Line on Domestic Support	<p>The general scheme of reduction of Domestic Support is perhaps acceptable from a developing country perspective but is extremely vague on the details. In this context it is conspicuous that the draft gives disproportionate attention to Blue Box concerns of certain developed countries, while neglecting SDT specification. Subject to additional specification and incorporation of elements from, e.g., the Derbez draft, the Groser Draft may, however, serve as a working basis for agreement on a framework for modalities that takes development concerns into account.</p>				

Market Access

Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
Tariff reduction formula	“Tiered” formula (paras 26-28).	Similar to Harbinson “banded” formula but also to EU/US formula. Abstract, inoperative guidelines in comparison to previous drafts, leaving all details for future negotiations. Very difficult to assess.	”Banded” formula (Harbinson), “Blended” formula (Derbez).	Same as Derbez.	Most recent texts give principles only, no formula.
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
Tariff reduction formula (continued)	“substantial improvements in market access” (para 25, following DDA para. 13);	Groser draft adopts “substantial improvement” as overriding test, seemingly applied to developed and			

	<p>“substantial improvement in market access ... for all products” (para 27, point 4);</p> <p>“to ensure that [the] formula will lead to substantial overall trade expansion” (para. 27);</p> <p>“Achievement of substantial and effective overall tariff reductions will be a benchmark in evaluating the final result from negotiations” (para 27, point 1).</p>	<p>developing countries alike, and relegating crucial non-trade development concerns such as food security to secondary status, if at all.</p> <p>“All products” language suggests that developing countries will still have to provide substantial improvement in market access for Special Products (SP), undermining the SP concept of tariff flexibilities; this should be amended.</p>			
Maximum tariff	“tariff cap ... with distinct treatment for sensitive products requires further evaluation” (para 28)	Exception in Groser text much wider than other texts, and has potential to be more detrimental. Without effective tariff cap, there is no guarantee that tariff peaks will be addressed (central DDA goal).	Tariff cap with possible exceptions for a “very limited number of products” (bracketed). Derbez, para 2.2	Tariff cap with possible exception for a “very limited number of products” (para 3)	Tariff cap with possible exceptions for a “very limited number of products” (G20 para 2(c))
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
Maximum Tariff (continued)	No SDT specified for DCs regarding tariff cap.	Contradicts need for adequate tariff level in sensitive products.	Flexibility for DCs in relation to tariff cap under negotiation (para 2.8).		
TRQs	“reduction or elimination” of in-		In-quota tariffs will be		elimination (G20,

	quota tariff rates (para 36).		reduced (Derbez, para 2.4).		para 3(c))
	MFN-based tariff quota expansion falls within paras on “sensitive products” (para 35).	This might imply that TRQ expansion is only required for sensitive products, which is much more limited.	TRQ expansion remains under negotiation (Derbez, para 2.4).		TRQ expansion on MFN basis for all products (G20, para 3(a))
SSG	“Remains under negotiation” (para 38)	This is weak language compared to G20; reduces predictability regarding elimination of SSG in a manner that may affect balance of concessions.	Under negotiation (Derbez, para 2.5)	Under negotiation	“eliminate immediately” (G20, para 4)
Duty-free for LDCs	Duty-free and quota-free access for LDCs “remains under consideration” (para 48)	Much less attractive than previous drafts; may amount to a serious setback for LDC export-led development.	developed countries “[should] [shall] provide” this access (Derbez, para 4).		developed countries “shall provide” this access (G20, para 6(B)).
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
Duty-free for DCs	No mention.	This is a serious omission that needs to be rectified.	“All developed countries will seek to provide duty-free access for at least [...] % of imports from developing countries through a combination of MFN		“Developed Members shall provide duty-free and quota-free access and bind it on an MFN basis at least for a percentage to be agreed of imports from developing

			and preferential access, ...” (Derbez para 2.10).		Members and/or an agreed percentage increase over an agreed base period, whichever is higher.” (G20, para 5(e)).
General SDT	“SDT will be an integral part of all elements”; “proportionality will be achieved by ...lesser tariff reduction commitments” from DCs in each band (para 39-40).	No mention of longer implementation periods.	“lower tariff reductions and longer implementation periods” (Derbez, para 2.6).		“lower tariff reductions over longer timeframe” (g20, para 5(A)).
Sensitive products	Tariff lines with out-of-quota rates roughly equates to maximum permissible ‘sensitive’ tariff lines (para 32).	Developed countries will have a large allowance for flexibility (estimated to cover 20% of tariff lines and 55% of OECD production ^{xv}) which may undermine crucial market access. ^{xvi} Considerably expands undefined ‘sensitive product’ category while leaving Special Products untended in framework stage.			
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
Sensitive Products (continued)	Developed countries permitted flexibilities for ‘sensitive products’, through a combination of tariff cuts and TRQ expansion (based on ‘substantial improvement’) (paras 32-35).	Groser draft echoes the US non-paper. Relation of ‘sensitive products’ to “Special Products” unclear. Will developing countries benefit from both concepts? If not, the Groser draft appears to inappropriately equate very different developed and	In the Derbez text, ‘sensitive’ products would likely have been placed in the ‘Uruguay Round’ (average-cut) group, which would have been ineffective in lowering tariff averages. ^{xvii}	Flexibilities for ‘sensitive products’, through a combination of tariff cuts and TRQ expansion (greater TRQ expansion for greater deviations) (options 1 & 3), noting possibility for	Formula shall guarantee flexibility for sensitive products, flexibility through a combination of tariff reductions and TRQ expansion. For developing countries, shall be subject to

		developing country concerns.		'objective criteria' to limit selection of sensitive products.	their rural development, food security and/or livelihood security needs. (G20, para 1(B)). Differentiation between products shall be based on 'objective criteria' (G20, para 2(A)).
Sensitive products (continued)	Developing country sensitivities left to the post-framework stage (para 30)/	This is couched in terms of developing country interests (paras. 29-30: fair contribution from developing countries depends on forthcoming contribution from developed countries). Moreover, this places development concerns on the backburner, fundamentally undermines the DDA and its focus on development and operationally effective SDT. It is also difficult to see why developing countries should adopt a framework for tariff reduction formulae without knowing concurrently what exemptions and flexibility they will have with regard to its application to specific products of concern.			
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius

					Declaration)
Special Products	No express mention of tariff flexibility for SPs (para. 42), only exemption TRQ expansion.	Echoes US Non-Paper; reduces predictability of benefits. Should explicitly state that SPs will be subject to tariff flexibility, with reduced tariff reduction rates at least. ^{xviii} Without this, it may be understood that SPs will only enjoy TRQ flexibility which is irrelevant for most African and Caribbean countries. ^{xix} Inconsistent with generous treatment of 'sensitive products' of concern to developed countries, amounting to 'reverse SDT'.	Lower tariff reductions for SPs (Harbinson, para 14), lower reductions with exemptions for very low bindings (Derbez, para 2.7(i)).	No mention of tariff flexibility for SPs.	
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
	Designation of "a certain number of tariff lines" (para 42).	Unduly restrictive. Inconsistent with generous "TRQ-base" for selection of 'sensitive products' (see above). Formulation based on % of tariff lines is more likely to have equitable effects across DCs.			certain percentage (G-20, para 5(c))/
	Uncertain re self-selection/objective criteria for SPs,	This issue may best be left to modalities phase.			Differentiation shall be based on objective criteria (G20, 2(a)) Self-selection (Kigali consensus)

Bottom Line on Market Access	The Groser Draft remains deliberately vague as far as general tariff reduction formulae concerned, although compatible with the ‘banded’ Harbinson approach which is acceptable, in principle and subject to SDT, to development interests. In this respect, subject to the following significant reservations, the Groser Draft may be adopted as a basis for discussion towards agreement at the framework stage. Moreover, the Groser Draft draws a misguided equivalence between ‘sensitive products’ of concern to developed country trade interests, and Special Product/Special Safeguard Measure mechanisms of importance to developing country non-trade concerns such as poverty alleviation, food security, livelihood security and rural development; it would set the same “substantial improvement” test for market access negotiations for developing and developed countries alike; while expanding developed country exceptions to market access, it defers elaboration of measures required for developing country concerns to the post-framework stage; it does not promote tariff-policy flexibility for developing countries; and is overall weak with regard to SDT, although sensitive to developed country concerns, tantamount to ‘reverse SDT’..
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Other

Export competition	Ad hoc temporary financing in exceptional circumstances (para 24)	Unclear what this will include? Perhaps emergency payments as per US commodity payments?			
Issue	Groser Draft	Comments on Groser draft	Derbez, Harbinson	EC-US joint paper / US non-paper	Other relevant proposals (G20, Kigali Consensus, Mauritius Declaration)
Cotton	Para 4, nothing operative.	This is meaningless unless these are backed up by operative provisions. For example, cotton must be explicitly mention in para 9.4, as one of the products for which caps will be reduced.			‘fast-track approach’ (para 11, Mauritius Declaration), or “support fund” (Kigali Consensus).
NTBs	No mention.				NTBs including SPS and TBT should be fully addressed in parallel with tariff reductions (Kigali Consensus).
Tariff conversion to <i>ad valorem</i> form	No mention.	It is important to include language to ensure that a transparent approach is	“non- <i>ad valorem</i> tariff... equivalents to be calculated in a		

		followed in this conversion, in order to “avoid another round of ‘dirty tariffication’”. ^{xx}	transparent manner ... full details of the method and data used ... shall be [published and] shall be subject to multilateral review”. (Harbinson, para 9).	
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ⁱ International Lawyers and Economists Against Poverty, www.ileapinitiative.com

ⁱⁱ This analysis is aimed at representing the poorer Developing Countries, in particular in African and the Caribbean, in line with ILEAP’s current mandate.

ⁱⁱⁱ World Bank (2004) *Market Access in Agriculture : Beyond the Blender*, Trade Note #16

^{iv} World Bank (2004), summarizing De Gorter’s estimation that of those countries using TRQs, quotas apply to 20% of tariff lines, and cover 55% of OECD agricultural production and 46% of trade. See De Gorter, H. and Hranaiova, J. (2004), ‘Quota administration methods: economics and effects with trade liberalization’, in Ingco, M., and Nash, J. (eds.) *Agriculture and the WTO: Creating a Trading System for Development*, World Bank and Oxford University Press, Washington DC.

^v JOB(04)/96, Annex A. July 16, 2004.

^{vi} JOB(03)/150/Rev.2, 13 September 2003

^{vii} TN/AG/W/1/Rev.1, 18 March 2003

^{viii} EC-US joint paper, 13 August 2003: JOB(03)/157

^{ix} US market access non-paper 23 June 2004

^x G20 Proposal on a Framework for Establishing Modalities in Agriculture: Market Access, 28 May 2004, and previous G20 draft: JOB(03)/162, and Rev.1

^{xi} Africa Group, Kigali Consensus, AU/TD/MIN/Decl.1(II)Annex

^{xii} G90 Mauritius Declaration

^{xiii} IATP argues that these payments are “universally acknowledged to distort world markets by contributing to export dumping”. See letter from IATP and other NGOs, 24 June 2004

^{xiv} This is likely to be the case, although the Panel Report is yet to be published, so detailed analysis is not yet possible; Panel Report is also subject to appeal.

^{xv} World Bank (2004) *Market Access in Agriculture : Beyond the Blender*, Trade Note #16, summarizing De Gorter’s (2004) estimation that of those countries using TRQs, quotas apply to 20% of tariff lines, and cover 55% of OECD agricultural production and 46% of trade. De Gorter, H. and Hranaiova, J. (2004), ‘Quota administration methods: economics and effects with trade liberalization’, in Ingco, M., and Nash, J. (eds.) *Agriculture and the WTO: Creating a Trading System for Development*, World Bank and Oxford University Press, Washington DC.

^{xvi} “The goal of increasing market access would be seriously compromised” under this formulation, with “potentially serious hazards for achieving the goals of the negotiations”. World Bank (2004).

^{xvii} Previous ILEAP briefs have highlighted the ineffectiveness of ‘average-cut’ disciplines, and advocates line-by-line tariff cuts to secure real market access opportunities for Developing Countries. See ILEAP, *The Framework for Market Access Negotiations Provided by the Derbez Draft* (Drafted by Dr. Will Martin), April 19, 2004

^{xviii} See ILEAP, *The Special Products Modality: An Evaluation*, forthcoming

^{xix} African and Caribbean countries with TRQs in their schedule: Morocco, South Africa, Tunisia, Barbados, Panama

^{xx} This is a crucial issue, as over 40% of developed country tariffs involve specific tariffs that will need to be converted to *ad valorem* form. See World Bank (2004) *Market Access in Agriculture : Beyond the Blender*, Trade Note #16

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