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THE ORGANIC FEDERATION OF CANADA NEWSLETTER

What are the best ecological practices in Canadian organic agriculture?

The public review of the proposed modifications to the Organic Standards has been launched!



Since 2009, all foods produced and sold in Canada that carry the Canada logo have been certified to the Canadian Organic Standards.

From oats to onions, and maple syrup to milk, the Canadian Organic Standards (COS) cover a great range of food products, including processed foods, vegetables, dairy products, eggs, sprouts, meats and fruit. For all these types of production, the COS promote and describe agricultural practices that minimize the impact of agriculture on our environment. The COS promote management practices that enrich soil fertility and promote animal welfare.

Referenced by the Safe Food for Canadians Regulations, the COS must be updated and validated every years.

**The public review has now started!
Farmers, processors, consumers and others are invited to comment
on the proposed amendments to the Standard.**

The Canadian General Standards Board is looking for your feedback!

The standards with the proposed amendments are presented in two versions:

- with tracked changes (suggested deletions are crossed out and additions are underlined)

- [CAN/CGSB-32.310 Organic principles and management standards](#)
- [CAN/CGSB-32.211 Permitted substances lists](#)

- clean version (as if the proposed changes have been accepted)

- [CAN/CGSB-32.310 Organic principles and management standards](#)
- [CAN/CGSB-32.211 Permitted substances lists](#)

All comments have to be submitted on the [form provided by CGSB](#) and sent at Mark.Schuessler@tpsgc-pwgsc.gc.ca

Changes inserted in the standards themselves will not be accepted.

Please be clear and concise and submit your comment by September 30, 2019.

An overview of the proposed changes

When you read the draft with the tracked changes, you may be surprised at the large number of proposed changes. However, many of them are simply editorial in nature, that is, they alter the text to clarify its wording. For example, **the terms "non-synthetic" and "synthetic"** have often been replaced by terms that more accurately describe the substance.

The proposed changes also reflect the evolution of technology. For example, "**treated seeds**" used to mean fungicide-coated seeds. Now, seeds can be coated with clay and other acceptable substances. The Technical Committee therefore clarified the use of terms related to treatment, priming and coating of seeds.



The definition of **genetic engineering** must also be rewritten as genetic engineering has evolved. The standards must clearly state that that genetic modifications and certain other new technologies, such as gene editing, are not allowed.

The Greenhouse Task Force has proposed significant changes. The text has been reorganized to make it easier to understand and the Greenhouse Crop Production section has been renamed "**Protected Crop Structures and Containers**".

The section applies only to a particular type of production. For example, if you have a greenhouse with crops grown in the ground without supplemental heating or lighting, this section does not apply. All you have to do is follow the general guidelines on crop production. The issue of **artificial lighting** in greenhouses has been the subject of much debate; the proposed text only allows it for crops harvested within 60 days.



The Working Group on Livestock has had many heated debates **on poultry farming conditions**. The revised standard proposes to provide **shade on outdoor runs**, clarifies requirements for access to the outside and perches, and introduces the concept of "**winter gardens**".

With hogs, more details were added to the requirement of outdoor access. Clarifications have made to the restrictions on vaccines, amino acids and parasiticides. The needs for indoor (barn) space for goats, sheep and cattle were examined.

The clause is clarified and, in many cases, the animals now require more space.

Another controversial issue that the Crop Working Group confronted was **parallel production**, i.e. the "simultaneous production or preparation of organic and non-organic crops that are visually indistinguishable when crops, livestock

or products are placed side by side". The proposed compromise is to allow parallel production for "annual crops harvested during the last 24 months of the transitional period, when fields are added to existing farms".

The working group also introduced a new requirement: farmers must take action "**to promote and protect ecosystem health**".

The Preparation Working Groups and the Permitted Substances Lists for Crop Production have made a number of changes to address new products and to make it easier to identify what products are permitted. The merge of Tables 4.2 and 4.3 marks a turning point in the presentation of permitted substances in crop production. Finally, the principle of **social equity** has been added to the text of the standard.

The Organic Federation of Canada (OFC) would like to thank Marie-Claude Bibeau, Minister of Agriculture and Agri-Food Canada (AAFC) for [announcing the launch](#) of the public review and for AAFC's financial contribution to the review work.

The OFC also thanks all members of the Technical Committee and working groups who worked hard to analyze change requests and recommend best ecological practices in Canadian organic production.



Finally, the OFC would like to thank Janet Wallace, who worked very carefully to present the versions of the proposed revised standards with follow-up changes. A task that requires a lot of patience and passion.

Janet also has a series of articles on the revision work that you can read [by clicking here](#).

The revision of the Canadian Organic Standards A step-by-step process

Many consumers look for and trust the Canada Organic logo.

In 2017, 5,000 farms, processors or other companies produced \$5.4 billion worth of certified organic products.

The impact of the changes to the Canadian Organic Standard affects all Canadians, not just organic farmers and consumers. Our standard influences the impact of organic agriculture on our environment and economy, particularly on exports, as the COS are recognized in international markets.



Certified organic operations are directly affected by our standard, which clearly stipulates the practices required for a product to be certified organic - in terms of soil amendments, pest control, animal welfare, processing methods and much more.

The revision of the standard improves the standard. Sometimes the wording has to be changed just to clarify a point. For other issues, the content may be modified to improve and strengthen our standard.

The review is a step-by-step process.

1- Collection of petitions for changes

The revision work began in the summer of 2018 when the public was invited to propose changes to the standard. More than 220 requests were received.

2- Analysis of petitions by the working groups

These petitions were reviewed by working groups and task forces composed of volunteers with skills and interests in the various production types (e. g. processing, greenhouse production, poultry).



Some petitions were quickly accepted or unanimously rejected, while others were the subject of lengthy debates. Hugh Martin, Chair of the Technical Committee, commented that the diverse expertise and backgrounds of the working group members allowed for a broader view of each issue.

For example, a farmer could suggest a change to the standards and explain how this issue would affect his own farm. In the ensuing discussion, other farmers in the working group provided their views. Participating inspectors could describe the impact of the proposed change during inspections.

Activists in the working group could highlight the impact on issues such as animal welfare, biodiversity and global climate change.

This thoughtful and multidimensional approach is time-consuming and sometimes frustrating, but it leads to more sound solutions. The decision to amend the standard is not taken lightly.

For each working group, the goal was to reach consensus.

3- Presentations of the working groups' recommendations to voting members of the Canadian Organic Agriculture Technical Committee

The voting members of the Organic Agriculture Technical Committee (known as the Technical Committee), chaired by Hugh Martin, are representatives from organizations active in the Canadian organic industry, such as the Canadian Horticultural Council, the Organic Federation of Canada, Canadian Organic Growers, Dairy Farmers of Canada, Egg Farmers of Canada, as well as provincial and regional organic producer groups and federal and provincial government representatives. All members' names are listed on page 4 of the COS - CAN/CGSB-32.310.



When voting members of the Technical Committee evaluated working group proposals, an 80% consensus was sought, but a proposed amendment was accepted if two thirds of them agreed.

Overall, about 80% of the applications submitted convinced the Technical Committee to propose changes to the organic standard.

4- The public comment

Now we want to hear from you!

Farmers, consumers, environmentalists, food specialists, scientists and all those interested in organic products are invited to review the proposed amendments to the standard within the next 90 days.

After the public review....

Comments received are submitted directly to the CGSB. Each comment will be read and processed. If the request and its rationale merely repeat what has already been discussed during the revision, no action will be taken. However, if a new and convincing point is raised, it will be referred back to the relevant working group.

The Technical Committee will vote on the revised draft by the end of 2019 after all comments from the review have been resolved. If adopted by vote, the standard will be ratified by the Standards Council of Canada as a National Standard of Canada and published by November 2020.