

November 25 2015

After two years of work

## The 2015 Canadian Organic Standards has been published!

This revised standard will guide the production and preparation of organic food in Canada until 2020!

**Link to Organic Principles and Management Standards:** <http://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/programme-program/normes-standards/internet/bio-org/principes-principles-eng.html>

**Link to Permitted Substances lists -** <http://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/programme-program/normes-standards/internet/bio-org/permises-permitted-eng.html>

Certified operators have a full year to come into compliance with the revised standard, which includes some new requirements, particularly for livestock production.

New measures have been introduced to protect organic crops from GE contamination. For example, parallel production is still prohibited for annual crops.

Microgreens production has been added to the sprout production section; the use of organic seeds will be mandatory. A minimum quantity of soil to be used in greenhouse container production has been established: 70 liters per m<sup>2</sup>.

To further clarify acceptable practices in livestock production, specific clauses have been added to sections dealing with the production of organic ruminants, poultry, rabbits and pigs.

**Principle of Health** – Organic Agriculture should sustain and enhance the health of soil, plants, animals, humans and the planet as one and indivisible.



The contents of certain Tables of Permitted Substances Lists have also been reorganized. For example, rather than listing various substances such as Iron sulphates, Iron products, Ferric and ferrous compounds separately, revised table 4.2 provides a single listing for Iron, with the following annotation: *The following sources of iron are permitted, to correct documented iron deficiencies: ferric oxide, ferric sulphate, ferrous sulphate, iron citrate, iron sulphate or iron tartrate. See Table 4.2 Micronutrients.*

Some of the new or revised substances listed for crop production include Biochar, Meat meal, Anaerobic digestate and Formulants.



*Welcome to CAN/CGSB-32.310-2015 and CAN/CGSB-32.311-2015, more commonly known as the new Canadian Organic Standards. Over the past 2+ years over 100 people have spent thousands of hours to review and revise the Canadian Organic Standards! Our goal was to meet the needs of organic food producers in Canada and to be cognisant of organic standards in other countries. There are over 400 changes ranging from additional criteria, rewritten sections and many clarifications of previous paragraphs. There are changes on every page, so read the new requirements carefully to plan now on how to make the necessary changes to your operation.*

**Hugh Martin, Chair of the CGSB Technical Committee on Organic Agriculture**

Fully biodegradable mulches composed of polymers derived from GE or petroleum sources are definitely forbidden if left to decompose in the fields; a derogation allows the use of such non-compliant mulches until January 2017.

In livestock production, non-synthetic acids for water pH adjustment, physical teat seals, sodium hydroxide (for dehorning paste), and Formulants have been added.

Pest management substances permitted in and around facilities have are now located in Tables 8.1, 8.2 and 8.3. For all PSL sections (livestock, crops and processing): The use of inputs grown on GE substrates has been clarified: if there is no substrate residue in the final input to be used, the input grown on GE substrate will be allowed if this is the only source that is commercially available.

To make using the PSL easier, the number of each table is always indicated at the top of each page:

| 4.2 Soil amendements and crop nutrition                                   |                  |
|---|------------------|
| Substance Name (s)  | Origin and usage |
| <i>No more hesitation asking yourself which table you are consulting!</i> |                  |

A new Annex, Annex A, provides an alphabetical list of all substances allowed in organic production. The description above is a selection and not a full list of modifications. Operators are invited to consult the 2015 Canadian Organic Standards in order to get up to speed on the new requirements it includes.



*'The Preparation Working Group is pleased with the improvements made in the "Introduction", "Definitions" and the "Procedures to amend the PSL" segments of 32.310. We are especially proud of the work done separating out "Product composition" from "Maintaining organic integrity during cleaning, preparation and transportation". Separating these concepts will help all producers to understand the requirements around organic integrity on and off farm.'*

Rochelle Eisen, Convener of the Preparation WG

## SPECIAL NOTE

Training sessions by webinars or teleconferences are offered [by the OFC \(in French\)](#) and [COG \(in English\)](#).

You can also listen to the interviews with the Conveners on Youtube [CROP PRODUCTION](#) and [Specific Production Requirements](#)

[LIVESTOCK PRODUCTION](#) and [Apiculture](#)

[INTRODUCTION – DEFINITIONS](#) – MAINTAINING ORGANIC INTEGRITY- PRODUCT COMPOSITION  
PERMITTED SUBSTANCES LISTS IN PREPARATION – PERMANENT PSL PROJECT

## What is the impact of the COS Review on the Canadian Sector?

It may be a little early to assess the impact of the revised standards on the sector, but the managers involved in the application and control of the Canadian Organic Regime are already adapting their documentation and activities to the new requirements of the COS. We have interviewed some of them to know how the revised standards are impacting their work.

### Vincent Vilela

Accreditation Director  
CARTV

The CAEQ is the accreditation body of the CARTV responsible for the accreditation of the active CBs within Quebec. The CAEQ is also a Conformity Verification Body mandated by CFIA to accredit CBs under the Canadian Organic Regime.



Trained as a chemist and in audit techniques, Vincent Vilela is the Accreditation Director at CARTV. Along with conducting various audits, he manages CAEQ in order to assess and monitor accredited certification bodies.

***Is it the first time that your agency is dealing with a major review of the standards under its supervision?*** No. The CAEQ was involved in the implementation of the Canadian Organic Standards in 2009; we also completely revised the Québec Organic Designation Specification

Manual in 2011, when CARTV decided to adopt the CAN/CGSB-32.310 and 32.311 standards in order to facilitate the work of organic operations active on interprovincial and international markets. Lately, we had to replace Guide ISO 65 with ISO/CEI 17065; our team has worked hard to complete make that transition..

***What is the impact of the review on your work (for internal documentation, for audits)?***

An accreditor controls the work of certification bodies to insure that they respect ISO/CEI 17065 standard and the accreditation criteria in applying their procedures. We will have to verify that the CB will have modified the checklist used by their inspectors so as to integrate the changes to the Canadian Organic Standards. Documentation will need to be verified , as well as field work with regard to observing inspectors performing an audit.

**Will the review facilitate your middle-term work?**

No. The review will neither facilitate nor complicate our accreditor's work. We will continue to ensure that businesses and consumers can trust the work of their CB, whatever the standard's version. But it is sure that the standards have to be clearly written in order to prevent misinterpretation; otherwise the CB and CVB work can become very complicated.

## **Donna Hildebrand**

### **Senior Certification Committee Member**

Pacific Agricultural Certification Society (PACS)



Holding a Diploma in Business Administration, and experienced in computer programming and technical support, Donna has worked for PACS since 2008.

She is a senior Certification Committee Member, that certifies almost 400 operators; she is also reviewing labels, is responsible for document management, training, and manual updates. And she gardens applying organic practices for her personal use.

**With the revised standard, what are the changes that you have to make to your documentation?**

All application forms and related documents will be updated to reflect the changes. New livestock application forms will be developed to align with the new specifications that were added. Manuals will be updated as required. Website will be updated to make the new application forms and manuals available to our clients. Newsletters will be distributed to clients explaining changes.

**Will you have to train your inspectors?**

Our VO guidance documents will be updated and distributed to our VOs. The agenda of a subsequent VO teleconference will include discussion of the changes and any specific methodologies that we would like the VOs to use in follow-up.

**The COO asks CBs to inform operators when there are changes to the standard (in Operating Manual, clause C.5.1). How do you plan to abide by that directive?**

We use a variety of tactics, some of which have already been mentioned (newsletters, updated website). When the newsletters are distributed, each type of client will be provided with copies of those parts of the Standards that apply to their operations. Additionally, at the time that their Certification Decision, PACS will advise clients individually of changes that they must implement.

### **Did you have a chance to look at the revised standard and do you think that the standard is clearer?**

The changes to the Processing section of the Standard improve its clarity a lot. Additions to the Livestock production section certainly enhance clarity. I haven't studied the changes to the PSL sufficiently to comment yet. It was a good move to cross-reference food processing for operations that performs on-farm processing and handling.



### **Stuart McMillan**

#### **Organic inspector**

Stuart has been an organic inspector since 2006. He has performed audits of field crop, wild rice, small scale vegetable and fruit farms. He has experience in auditing nearly all types of animal husbandry operations. In addition he has audited processing operations ranging from small on-farm operations and simple seed cleaners to huge multi-ingredient operations handling massive volumes.

### **As an experienced inspector, do you welcome the revised standard?**

I think both experienced and new inspectors will welcome the new revised standards. We understand the organic standards to be living and dynamic. They need to adapt to changing practices, and also address the gaps that can only be found after working with the previous standard for a few years. I try to point out to organic operators who have concerns with particular areas of the standards that they have the ability to provide constructive criticism, or suggestions to the regulation. It is a standard that belongs to all of us within the organic industry, not one that is forced upon us externally. I am excited to see the hard work of all the committee members come to fruition.

One of the other welcome parts of the revised standards is that it ensures that organic producers are following evolution in the rest of agriculture with implementation of best practices. This is particularly evident in the livestock sector with direct reference Codes of Practice. There was a risk that the conventional sector may have implemented some practices that had better environmental or animal welfare outcomes than the organic sector if we had not acted.

### **How does it modify your work?**

It don't think the revisions will modify the work of inspectors very much at all. Our role is the same, the approach we take will be the same. But there will be impacts on the amount of time an inspection will take in some cases, even though our role is not changed.

**'For a standard crop farm I don't see the new standard having any significant impact on how we perform our inspections. For other operations, especially those with livestock, there will be a number of new additional requirements we will need to verify.'**

This will be especially true in the beginning with more measurable details instead of general goals. For example I imagine I will always have to travel with an ammonia testing device and measuring tape (that is possible to fully sanitize) for all of my livestock inspections, rather than the ones where there is not a baseline measurement of the barn or corral dimensions. I still welcome the new measurements. As an experienced inspector I have seen tremendous variation in what individual farms felt meant the previous standard and how different certification bodies interpreted them. Some sectors and some individual farms will have significant changes coming with the standard. Poultry would be one that I see a number of existing organic



operations having to make some hard decisions about either making big capital improvements or leave the organic sector.

**Did you have to be trained in order to understand the new or modified clauses?**

I have been following the various revisions and balloted changes so I feel personally that I am fairly up to speed with the changes. I still plan to participate in trainings both from certification bodies and other organizations. Personally I will need to review and better understand the references to Livestock Best Practices. I understand the organic standard, but references to external documents, some of which I have never seen, will require additional study and training. While certification bodies have an essential role to play in communicating these changes to their clients, undoubtedly inspectors will be spending additional time next year going over the revised changes with organic operations.

**Do you think that it will clarify the organic practices?**

Without a shadow of a doubt. This is one of the best parts of the new standard in my mind. Some of the revisions provide answers where there were none before, for example space requirements for pullets or inclusion of micro-greens. In other areas, it addresses the problem where some sectors suffered from wide variations in interpretation. What constitutes natural light for poultry, what is the definition of soil in greenhouse environments, how long should milk be provided to ruminants, how do you define clean water. There were all sorts of negative impacts from this ambiguity. Even in situations where I do not feel there was a negative impact the added clarity with these revisions is fantastic. I would say this is particularly true in the Preparation and Handling of Organic Products section of the standards.

## **Ted Zettel**

### **Chair of the Standards Interpretation Committee**



Ted Zettel is a pioneer in the organic farming field, one of the first Canadian farmers to make the transition, achieving certification in 1986. Ted retired from organic dairy farming after 29 years, but still manages their 400 acres as an organic cattle and cash crop operation together with his family. He has been active in many Ontario organic associations, still being the Organic Council of Ontario's delegate to the Organic Federation of Canada. He has been President of OFC from 2008 to 2014 and currently is the Chair of the Standards Interpretation Committee.

**Many interpretations issued by the Standards Interpretation Committee should be modified following the review of the COS; how will the Committee integrate the revised standard, what is your plan?**

Well, these are being looked at systematically; every revision to the standard is weighed against the interpretations that are already part of the Final Q&As to see whether there are interpretations which need to be modified. There certainly will be some that will be modified but we have to really go through all the questions and answers, to make sure that their interpretation is still correct.

I think that in general, I could say that the task of the Standards Interpretation Committee is becoming easier, it is becoming less stressful and there is less confusion in general, as we work through our work of interpreting the standard.

People are becoming more competent in interpreting the standard on their own; I would say that there are probably less contradictions between the various CBs, but there still needs to be a process for resolving things when there is an interpretation issue and that is what the Standards Interpretation Committee does and will continue to do with the new 2015 published version.

## Anicet Desrochers

Organic Beekeeper – Upper Laurentians region



Anicet, 35 years old, was born in a beehive. He got my university training in apiculture in Alberta, then in California, to become one of the few queen bee breeders in the country today. The science of apidology is a labour of love for him but he also does it with the concern of finding ways of reversing the bees' mortality rate, observed throughout the world. That is why he selects the most rustic and resistant specimens, the ones best adapted to their environment. His beekeeping and beebreeding expertise is renowned worldwide and everyday he works in the apiary, hands on, to make sure that his colonies are healthy.



### **What do you think of the revised clause 7.1.10 that defines buffer zones in organic honey production?**

The new clause that concerns the location of hives introduces grey zones; it is assumed that bees will not travel long distances for feeding if there is plenty of food around the hives. But certain crops, such as canola, are very attractive to bees because of their high nectar content. Bees might then travel from 3 to 7 kilometres to feed if closer food sources are not in flower or are insufficient. So, operators will be obliged to identify on a geographical map all surrounding crops and the flowering period of any 'prohibited' crops in order to foresee bees' behavior and insure organic honey integrity. The monocrop industrial crop production model has to be taken into account; bees that forage in diversified areas are more resistant; their immune system is stimulated by various wild crop varieties. It's possible, even, to taste the difference of honey derived from diversified forage areas, which has a richer, aromatic taste.

'In order to promote biodiversity and create complementary systems of production that enrich one another, our overall agricultural model needs to be redesigned'.

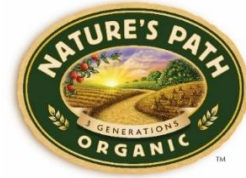
The OFC warmly thanks Agriculture and Agri-Food Canada (AAFC),  
the Canadian General Standards Board (CGSB)  
and all the sponsors who generously supported the review  
of the Canadian Organic Standards.

The OFC also thanks the members and the Chair of the Technical Committee on Organic Agriculture,  
all Working Group Conveners and all stakeholders  
who participated in the meetings of the working groups.

The COS review is the result of a collective effort of all of the participants and funding partners. We  
hope that the 2015 COS will support the work of Canadian operators and will encourage new  
operators to adopt organic practices.



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of Canada



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OF CANADA  
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