



September 2017

Special edition – Standards Interpretation Committee

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New public comment period

Below is a list of questions raised by organic stakeholders, regarding the National Standards for Organic Agriculture.

- ❖ Is there a temperature difference between the inside of a poultry barn and the outside environment (for example, a 2 degree C difference) that will allow operators to keep poultry confined indoors?
- ❖ May livestock be fed organic food waste containing 95% or more organic ingredients?
- ❖ Can waxed cardboard pellets be used as fuel in maple syrup evaporators?
- ❖ Can biodegradable mulches contain substances listed in PSL 4.2 or 4.3?
.... many other questions.

The proposed responses are posted [on OFC website](#), and are subject to a 30-day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Report on the last comment period – July 2017

The SIC has analyzed the comments received during the last public consultation held in July 2017.
[Click here](#) to read the report.

Standards Interpretation Committee Call for nominations

Are you interested in joining the Standards Interpretation Committee? Or, do you know a stakeholder who understands the standard and has the capacity to answer questions addressed by operators?

Do you like organic production and want to join the team that interprets the Canadian Organic Standards (COS) in order to help operators comply with the COS?

The OFC welcomes all good candidates!

The Standards Interpretation Committee (SIC) is an advisory body that has been created to assist the Canadian Food Inspection Agency (CFIA) in the interpretation of the Canadian Organic Standard (CAN/CGSB 32.310 and CAN/CGSB 32.311), in order to achieve the uniform application of the rules to all operators through various certifying bodies.

As per the SIC Terms of Reference that outlines the function of the committee as well as the selection process of its members, the terms of two committee members, Jean Duval and Janine Gibson, are ending in November 2017.

You are invited to submit nominations for these two positions.

Each nomination must be accompanied by an outline of the candidate's credentials; nominees must have:

- a) stature within the organic community; respected and trusted by their colleagues to uphold organic principles;
- b) broad knowledge of and experience in organic production and/or standards development, with particular expertise in one or more of the areas. For example, the person might be a
 - i) member from the Canadian General Standards Board (CGSB) Committee on Organic Agriculture, **or**
 - ii) stakeholder with experience in the organic standards development process as well as technical expertise in at least one aspect of organic production, **or**
 - iii) stakeholder with experience with any other kind of standards' development and/or interpretation.
- c) proven ability in consensus building and group decision making.

The two people ending their terms may not run for re-election because they have both completed three consecutive terms and must wait one year before being nominated again.

Appointments to the SIC are three-year terms. Other current members of the Standards Interpretation Committee are Rochelle Eisen, Kelly Monaghan, Amy Kremen, François Labelle and Rob Wallbridge.

We will accept nominations until November 3rd 2017.

SIC nominations should be sent to the OFC at info@organicfederation.ca Please contact the OFC if you have any questions or require further information - info@organicfederation.ca 514-488-6192

A special thank you to Jean Duval and Janine Gibson!

The appointments of Jean and Janine on the SIC will end in December 2017.



They both participated to the SIC meetings and discussions with dedication since 2009.

They efficiently helped clarify the COS and helped operators apply it rigorously!

The Canadian organic sector and the SIC would like to express a warm thank you to Jean and Janine!

An interview with Rochelle Eisen, the Chair of the SIC

Rochelle Eisen lives in British Columbia but her reputation extends beyond provincial borders as she has been involved for more than 25 years in the Canadian organic sector.

She is the current President of Canadian Organic Growers and she has chaired the SIC with rigor and passion over the two years; in the following interview, she talks about the challenges of her role as chair.

Rochelle, you have been the chair of the Standards Interpretation Committee for two years. Can you remind us of the specific responsibilities related to that position?

I am responsible for chairing our meetings, drafting responses to questions, ensuring impartiality and consistency in answering questions and encouraging our hard-working team!

The number of submitted questions to SIC currently reaches 360.

Are you surprised with that number of questions?

360 since 2009 - that works out to 33 questions per year.



Sure doesn't seem like a lot if you look at it that way. The questions though are getting harder, as the low-hanging fruit is done. Some are so technical they can make your head spin. Some of the latest questions are asking about new technologies that are not addressed in the standard – these ideas were not even on the horizon when the standard was written. In these situations, the SIC cannot interpret the standards to approve these new technologies but we can direct the questioners to prepare a detailed petition and submit it to be addressed during the next standards review.

How does the SIC cope with the questions that are very technical?

There is a great deal of expertise on the SIC and institutional memory within the group. As needed, we also consult with industry experts, researchers and scientists, and we do background research to better understand the issue before drafting our interpretation. Sometimes we go back to the questioners, as they are experts in their respective fields, and we can break the issue down to the level needed to assess compliance.

It takes time before submitted questions are interpreted and finalized. How can the SIC accelerate the interpretation process?

We are now meeting twice a month to help us keep on top of the workload and we have shortened the turnaround time for the public comment period from 60 days to 30. These two changes have expedited our ability to finalize interpretations that benefit the sector as a whole. We are also getting better at identifying which questions are not open to interpretation. For example, questions about the regulation are redirected back to CFIA to address, and as noted earlier, there are some questions that the current standard does not even consider. For those, we advise the questioners to submit a petition to the standards review process. We are fortunate to have 360 precedents to help us address new questions.

What are your relations with the Technical Committee (TC) on Organic Agriculture of the Canadian General Standards Board?

Up to now, all members of the SIC have been members of the TC. That has proven to be very beneficial because TC members often recall why the standard was written the way it was and are familiar with the intention of the working group members who worded things in a certain way. In addition, when questions coming into the SIC point out unintended contradictions or a lack of clarity in the standards, the SIC generates feedback for the next standards review on where improvements can be made in the text, or where gaps need to be filled to improve comprehension and clarity. It is my hope that this will expedite the Technical Committee's future revisions on those sections.

The revised Canadian Organic Standards were published in November 2015. How did you perform the important task of updating the interpretations that were affected by the COS review?

It was challenging as each question had to be checked numerous times. First, we had to see if any of the revisions made the question and answer redundant. For those remaining, we had to check if the interpretation was still accurate or had to be revised. Lastly, we had to make sure that the references were accurate for the revised text.

I would also like to mention that once in a while we will review a group of final answers to make sure no new response contradicts an existing Q&A. For example, during the first half of 2016 we pulled all of the apiculture questions back in for review to make sure all the questions were using the same terminology consistently (e.g. bee yard vs apiary) and to make sure all of the answers aligned in their logic. It was a lot of work.

What message would the SIC Chair like to share with the industry?

We can appreciate that some users of the standard may disagree with our interpretations on a given topic. To err is human; and the SIC is made up of simple humans.

The activities of the Standards Interpretation Committee are posted on OFC Website:

- Terms of Reference - <http://organicfederation.ca/sic-terms-reference>
- Addressing a question to the SIC -
<http://organicfederation.ca/addressing-question-sic>
- Final Q&As - <http://organicfederation.ca/final-qas-canadian-organic-standards>
- Q&As under Comment Period - <http://organicfederation.ca/qas-under-comment-period>

The Organic Week is the harvest week!



Martin LeMoine, President of [Fruit d'Or](#),
world leader in the production and processing of organic cranberries,
celebrates the abundance of the organic cranberry crops!

<https://organicweek.ca/>