The review of the Canadian Organic Standards

A fast-tracked review

February 18, 2019

For the last several months, people across Canada have been talking about organic standards. Farmers, inspectors, and other foodies have spent hours on conference calls discussing proposed revisions to the Canadian Organic Standard and Permitted Substances List.

A report from Janet Wallace

"The review is going relatively well," says Hugh Martin, "We've had challenges and our biggest challenge is time." Hugh is the Chair of the CGSB Committee on Organic Agriculture, known as the "Technical Committee" (TC).

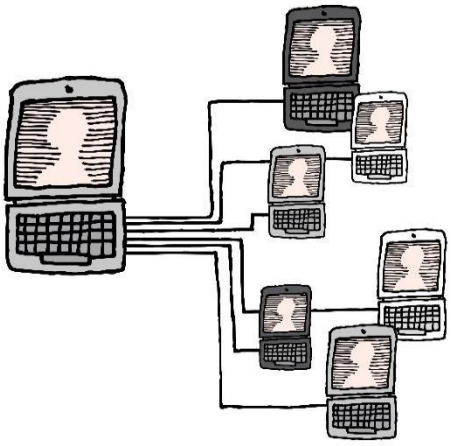
The Technical Committee has had three conference calls so far. On the first call, we covered procedures and four recommendations. The committee accepted or rejected 26 working groups' recommendations on the second call, but decisions were made on only 8 recommendations on the third call. Why so few? Several recommendations were returned to the working groups for further work, such as editing the text or conducting background research.

Even though the TC has made decisions on only 37 of 200+ recommendations, we've accomplished a great deal. For one thing, certain decisions addressed more than one petition. Also, the working groups have invested many hours into developing detailed responses to all the petitions; many are now ready for the whole Technical Committee. Still, it's hard to pinpoint where we stand in terms of progress. Some recommendations might be resolved in five minutes when the TC will meet, while others remain unresolved after hours of discussion.

Hugh Martin, Chair of the Committee on Organic Agriculture (TC)

How this review differs from past ones

Five years ago, the revision of the standards was accomplished during four three-day, face-to-face meetings of the TC, along with conference calls among the working groups. This time, the TC meetings are done primarily through conference calls with only one 3-day in-person meeting (coming up in March).



The COS review held
76 teleconferences
since September 2018

Also, more volunteers are involved in the working groups in this review, notes Hugh Martin. This is positive but also leads to longer discussions and debates. “It’s more difficult to reach consensus because there are many people with strong ideas and they’re not afraid to speak out.”

“Before,” he says, “most of the working groups were made up of organic sector insiders. Now we have some newcomers and more farmers involved.”

One reason for this, he speculates, “is that maybe last time people didn't think the review mattered. Now they see the importance of it.”

Changes to the standards can be minor or major. At times, just adding a comma might change the meaning. On the other hand, this review is considering a proposal to completely re-write “7.4: Sprouts, shoots and microgreens production.” While this may look like a huge change, much of the intent of the standard will remain the same. The proposed change will just clarify and better organize the content. (Note, however, there are a few notable changes also proposed to this section.)

A strength of the review process, says Hugh, is the dedication of the working group chairs. These individuals not only chair the conference calls, but also organize petitions and conduct background research. They present the recommendations to their working groups and later present the recommendations to the Technical Committee. The job can be challenging, particularly for contentious issues such as artificial lighting, parallel production or outdoor access for poultry.

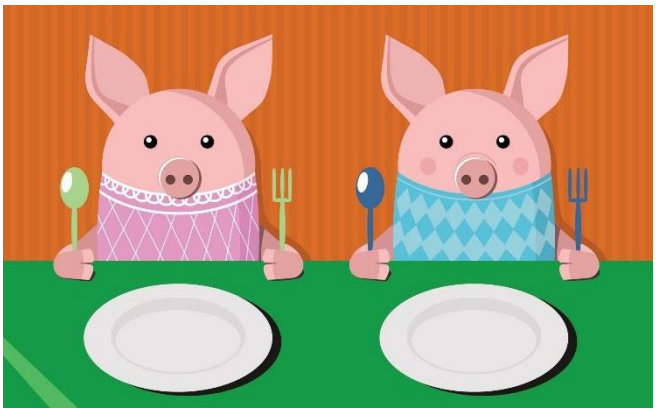
New technology

One reason for reviewing the standard every five years is to address technological changes. This can involve new products, such as the GnRF analogue, used to castrate male pigs. This vaccine-like substance stimulates a pig’s immune system to produce antibodies against the pig’s own GnRF (gonadotropin releasing factor) protein. This inhibits the function of the testes by chemical castration.

The Swine Taskforce (part of the Livestock Working Group) reviewed the issue. Allowing GnRF analogue would mean that young boars would not undergo physical castration. However, the substance required the pigs to receive needles twice including when the boars are fairly large. Restraining and needling pigs of this size is stressful for the animals and dangerous for farmers. The taskforce rejected the petition for these reasons, as well as the concern that consumers may think (mistakenly) that organic pork contains artificial hormones.

Also, new technologies such as CRISPr, a gene editing technique, and synthetic biology have been added to the definition of genetic engineering by the GE (genetic engineering) working group. The standards will continue to prohibit genetically engineered crops and cloned livestock

but there are nuances and complications regarding a complete ban on GE substances. For example, certain livestock vaccines are produced using GE technology. No one wants to cause unnecessary suffering to animals by withholding needed vaccines, so the working group recommends allowing vaccines derived from GR technology.



The situation gets more tricky when dealing with amino acids, such as L-lysine and DL-methionine, as there are no non-GE sources of these. Traditionally, pigs and chickens obtained amino acids through protein by consuming insects while foraging, or from feed supplemented with whey and other dairy waste or fish products. Without the addition of amino acid supplements to commercial hog and poultry feed, the rations must contain higher levels of protein.

Some say this can harm animals and have a significant environmental cost (e.g., more land needed for soybeans and higher nitrogen levels in excrement). However, adding isolated amino acids to feed is similar to using a concentrated nitrogen fertilizer--not natural and perhaps not in line with organic principles. Moreover, most amino acids are produced on GE substrates, and some by GE organisms. The Livestock WG is currently reviewing this issue.

At times the review is stalled simply because some petitions are very complicated. For example, the Preparation WG struggled with the question of "How to calculate the **amount of water in a processed product**." The calculation is important because it determines the percentage of organic ingredients.

Sound simple? It would be if you could just look at the list of ingredients, work out the mass of the water added as a proportion of the total mass. But once you delve into the calculation, the issue becomes quite murky.

For example, in a frozen chocolate soy dessert made with soymilk, do you consider the water used to make soymilk? In a canned bean soup, do you need to consider the water that was taken up by the beans while they were soaking and cooking? How does the calculation change if one mixed juice is made with pure apple juice and the other is made from dehydrated apple juice that is later reconstituted? As you can see, the calculation can become quite complicated, but the Preparation WG has a proposal for the TC.

The larger picture

While the working groups need to examine each issue closely, they also need to keep the big picture in mind.

"We don't want rules that are so difficult that it puts current organic farmers out of business," says Hugh Martin. He respects the views of the farmers who say they "don't want to be forced to do unnecessary paperwork."

"We need to make it feasible to grow on a scale that you can make a living at," he says. He wants a standard that will help farmers get into organics and enable farmers to "scale up." This will increase the supply of Canadian organic food and displace imports.

"Another big issue is **animal welfare**," says Hugh. "With the first Canadian standard, the animal welfare requirements were much more strict than those in the conventional industry. But as the conventional industry improves the way they handle animals, the differential between conventional and organic production methods has been reduced. The question is: are organic standards good enough or do we need to always be better than conventional?"

"We also have to consider the economics of the standards. We don't want to price ourselves right out of the market," he adds.

Next steps

In mid-February, CGSB will email TC members 108 recommendations. People will have ten days to review these and provide their comments by email. The comments will be tabulated. Presenting recommendations by email is a new process, which was introduced to simplify the review process and to meet the deadline described below (see Funding). However, TC members will need to take the time to read through the recommendations; this may require more focussed attention compared to meetings where WG chairs present and explain the recommendations.

We hope, says Hugh, that most of the recommendations will be approved by the members of the TC. If not or if critical issues are raised, the working group may need to revise the wording or the recommendation may need to go to back the committee.

In March, the TC will meet -- some people in Ottawa, others at home on their computers and phones -- to review 83 recommendations. There will be one more conference call in April to analyze recommendations that were sent back to the WGs at the Ottawa meeting. The outcome will be released in the summer for a 60-day public consultation period. The public feedback will be shared with the WG chairs, who will determine if the comments have already been addressed at earlier meetings or if they are significant. In the fall, a draft of the standards

will be sent to the members of the TC. They have a month to review the draft and vote on whether to accept or reject it.

"If people want to reject the standard, they must list which issues they have problems with," says Hugh. "If these views have already been addressed in working group or TC meetings, they will be non-persuasive. Hopefully since we've had such boisterous discussions, we've already dealt with these points. However, if someone brings an entirely different twist to the recommendation, the point will need to be reviewed."

The new standard will be accepted if, according to CGSB, "50% plus 1 of members who are eligible to vote cast affirmative votes; and Two-thirds of the votes cast are affirmative."

After that, the CGSB does a final edit -- crossing the 't's and dotting the 'i's in both languages. In November 2020, the new standards are published.

The funding issue

The review of the Canadian Organic Standards is a rigorous process overseen by the CGSB. The cost for CGSB services is covered by Agriculture and Agri-Food Canada (AAFC), as announced in January 2018.

In August 2018, AAFC Minister MacAulay made a second announcement: AAFC was contributing up to $300,000 to OFC under the Canadian Agricultural Adaptation Program (CAAP) for (i) a study on the funding mechanisms to ensure the sustainability of the organic associations and (ii) support for the industry's involvement in the review of the Canadian Organic Standards (COS). The part of the review led by the industry has to be completed by March 31st, 2019, when the CAAP funding ends. To meet this deadline, the working groups have been meeting frequently and TC members will be sent a bundle of recommendations by email as described above.

The AAFC contribution under the CAAP needs to be matched with funds from the industry. OFC is compiling in-kind contributions with the voluntary participation of stakeholders in the WGs, A fundraising campaign will be launched in March to generate the matching cash contribution.

Lawrence MacAulay,
in Mara, BC, August 2018

The target: $40,000

The OFC is preparing an interesting campaign that will offer organic learning opportunities.

Stay tuned!