- Organic Standards reviews must be conducted every 5 years. What are your suggestions for an improved cycle of standards review.
- La révision de la Norme doit être effectuée chaque cinq ans. Comment pouvons-nous améliorer le cycle de la révision des normes?

### **Comments / Commentaires**

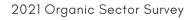
Note: The comments below were submitted to the survey by individuals, and do not reflect the views of the Organic Federation of Canada, Canadian Organic Trade Association, the Organic Agriculture Centre of Canada, or the Canadian Organic Growers.

Remarque : Les commentaires publiés ci-dessous ont été soumis par les participants au sondage et ne reflètent nécessairement pas le point de vue de la Fédération biologique du Canada, de l'Association canadienne du commerce biologique ou, le Centre d'agricultures biologique du Canada de Cultivons Biologique Canada.

- Permettre une amélioration en continu des normes et la mise en place des révisions annuellement
- Trends, risks, challenges are changing every year. So, shorter period for review sounds better.
- no suggestion
- Réduire le cycle à 2 ans ? Pour s'adapter plus rapidement aux changements ou au demande du public.
- "Demander des avis aux professionnels
- ex: je suis en train de mettre en place une filiere de semences de mais, soya , fourrageres pour les producteurs de grandes cultures . Je ne recoit aucun support des institutions de certification par exemple ou de vulgarisation."
- It is difficult to constantly be updating forms and protocols when revisions are made. While major changes are obviously warranted, and clarifications/corrections are important, it would be preferable to reduce the volume of changes made. Every revision is like a pebble in a lake, the impact is broader than could be predicted. Some changes in wording or to materials are suggestions by 1 or 2 individuals but affect an entire sector. I think the solution is better communication and more public process, and engaging more subject matter experts to ensure that the changes are relevant and correct
- En obtenant le financement adéquat de la part du gouvernement. En s'assurant que les représentants sur les comités soient équitablement représentés
- requires greater engagement with producers, who do not fully understand how they can be involved
- Break it up, do sections at different times? Swine this year, Poultry next year.... Strongly consider how to streamline the process -- the issues we saw in Poultry TC could come to roost in other sections over time.

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- Trop long et fastidieux!
- Reviewed more frequently to keep up with technological and industry changes
- Government funding to do review.
- Ideally, there should be a continuous review process, rather than a five year process. Federal government funding should assured and should cover the entire cost of the review.
- No input
- Start fundraising for the next review as soon as the prior one is over (until gov't provides more funding). Get clear on, and remind participants continually what the core purpose of the Organic Standards are -if our solitary goal was making it easier for you to make money, then we wouldn't be here. It's about finding a way to make money that also protects the planet, the people, the ecosystems.... until the Canadian Organic System is very clear on its purpose, this process will not get easier.
- Pérenniser le financement de la norme biologique au Canada.
- It would be good to see the TC members had a separate survey in this regard.
- The process is unlike any other in agriculture; there are other review processes that could be learned from.
- AAFC has no formal role their involvement could be helpful for the growth of the sector.
- Because it is driven by volunteers who work very hard, it is hard to make unbiased decisions without getting personal/emotional vs. science-based or outcomes-based.
- Not in a position to judge....
- Increased awareness and education of producers on the process.
- Full input from all stakeholders.
- Ongoing review. Life-cycle management.
- still learning
- I know there has been discussion on shortening this cycle, or making it more continuous. I think the 5yr review works. I think the process takes 3 years, and the 2 years of not working on it feels like a break to work on your day job. To make it continuous would not be my first choice.
- S'assurer que plus de producteurs puisse être entendu.
- Stop looking for things to change for change sakes just for something to do so you have some meaning in your life you are making the process increasingly difficult for the producer. Pressure treated fence posts REALLY?? give your head a shake.
- The PSL (32-311) can be updated every year . However, 32.310 should be fully reviewed every 5 years. This standard cannot be modified constantly.







- Maybe to tackle a different part of the standards each year to spread it out more (eg. greenhouse, poutry, beef, crops, etc.). This past revision felt very rushed and I think a lot of decisions were made without incorporating all of the research and input from growers.
- We need to have more representation from the people who are actually growing the organic food on the technical committee!!!
- Pay/compensate people for their time because we're limited in it.
- as a processor it's very work intent part to have certified every recipe instead as control just massbalance
- Je ne sais pas
- 3-4 years instead of 5
- none
- Probably should be an ongoing process
- I am very familiar with the behavior expressed by chickens, hens, and roosters. I have visited organic chicken farms in the US (Perdue) and Barbados (a Demeter certified farm) and was surprised to see the unconventional behavior of those animals. They seemed lifeless to me. It came to my attention that the same breed is used for conventional and organic broilers, animals that "have been bred to grow very big very quickly (especially their breast muscles". More disgusting has been that researchers from the University of Guelph, in conjunction with the Global Animal Partnership, have wrapped up a two-year study of broiler chickens and concluded that most are in chronic pain as a result of their rapid growth. And that pain is not something that can be addressed by design changes to the barns they live in; it's a much bigger problem that challenges the whole industrialized chicken-raising model and the actual breeds we're choosing to raise and consume". To date, I have not found an organic Canadian poultry farmer, certified or not, offering broilers from breeds not manipulated, breeds that will have anatomical dimensions as nature (not humans) intended. This situation needs to change. I do not think consumers should eat meat from animals in constant pain and stress, especially if they are organic certified and are sold at a much higher price.
- I do not have any suggestions at this time
- Keep organic farmers informed of the issues at hand that need to be incorporated in standards review.
- 3 years
- The world is charges fast we must adapt.
- I feel 5 years is sufficient.
- farmers participation is crucial





- Consult with producers
- Government funding
- Nothing is perfect. What we have is working pretty well. Risks of increasing frequency of reviews or continuous streaming is that it may overwhelm and lose focus on the details/issues by stakeholders. Having it concentrated every 5 years forces focus and attention. Making it easier to change standards is a risk in most cases, not a safeguard. Increased pressure from financial stakeholders to water down standards in organic will have more opportunity in a streamlined process. Once every 5 years prevent persistent "water torture".
- Provide more funding for the committee
- Increased financial support for the process including a focus on increased support to the 'diversity, equity, and inclusion' aspect of who has a voice with how to shape the revised standards. Level the playing field of stakeholders who are at the table while the process is underway.
- 5 years is often enough for review
- Make sure the time frame for producer participation and feedback is in the winter months.
- TO have an ongoing process that focuses on one section of the standards at a time.
- Does industrial agriculture have to go through the same review process?
- It is paradoxical to me that if I farm sustainably using organic principals I have to be certified.
- If I am an industrial farmer, constantly ploughing the soil and spraying to kill insects and weeds I do not have to tellanyone!
- Make sure our input is sought during the winter, not the main growing season.
- Funding to Certification Bodies to educate and consult members
- Better communication with business that are certified organic.
- groupe de travail prévisionnel
- comité de recherche avant le début du cycle
- médiatisation des informations
- envoie d'informations dans les comités locals (upa, coopérative...) pour avoir un opinion en aval
- présentation des changements dans ces mêmes comités locals
- 5 years is OK
- I think every 5 years is often enough. If they change too often then it is hard to make sure all farmers are up to date with the changes. This also allows enough time for those actively involved in the review to carefully study and understand the problems that need to be addressed and come up with proposed solutions and have adequate consultation before the changes come into effect.





#### No comment

- Keep same, look at removing all the fees to be certified
- Our organic certifying body conducts reviews of our farm every year. I am happy that policy for Canadian Organic Growers is reviewed every 5 years.
- Move from voting to consensus-based, to encourage compromises. Increased time and funding to allow topics that were not covered in this update to be addressed in the next update (e.g. rabbit, fish production).
- Make it easier to understand the process and the changes
- I would like to see an continuous improvement approach, rather than trying to review the whole standard in a compresed time frame. For example, in the last review process, the IFOAM principle of 'Fairness' was noted in the annex C, to be included in the discussion for the 2025 review process. This is a big topic, so the sooner a working group is formed to discuss, the better. I suspect there are other issues/ topics that would benefit form more time to review.
- Do it more frequently
- 5 years seems right
- I'm unable to provide anything meaningful here.
- Divide the norm in 5 sections and work on one per year. It is way too big and changing way too fast to do this all at once.
- Ongoing review is also required as rapidly evolving organic market exposes areas of the Standard that were not anticipated and/or covered.
- Sufficient government funding to do the pre-work in order to make the review process streamlined
- benchmark to the standards of the iap2 https://www.iap2.org/page/about
- International Association of Public Participation
- See OFC statements and errata.
- engage professional, educated, technical people to review and write and review standards
- ongoing evaluation and improvement based on the SIC model with updates published yearly, just as organic system plans are updated yearly for the operators.
- Les membres des comités non élus ne représentent pas nécessairement l'opinion de la majorité des producteurs et des consommateurs. La vision consommateur est peu présente, c'est une débat entre érudits du bio entre eux.
- It should not depend on donations. This is a government owned standard and regulated label. Review should be funded with stable govt money.





#### • I wouldn't know.

- Alot of time and energy is put into Organic Standards, however, people can claim "natural" or other tag
  names without regulation/red tape/increased cost/increased paperwork/no accountability etc...
  Consumers don't value what they don't know in terms of 100% certified organic" or "it's just like organic".
  Farmers are paying the higher price of certification, developing their markets, and having to sell into a
  "natural" market because there isn't a Certified Organic market waiting for their product when it is ready
  to sell. I don't know how you regulate the unregulated sector! Our standards have been established and
  require less tweaking...focus elsewhere.
- 3 years
- sorry I am farmer not policy maker
- Si ce n'est pas déja le cas ce serait de faire un sondage auprès des organismes de certifications, des entreprises pour s'assurer d'avoir le plus de feed-back possibles avant de passer a la révision. Ces feed-back sont souvent des interprétations personnelles mais ils sont importants pour la rédaction d'une norme plus facile a lire pour tous les utilisateurs finaux
- They should be reviewed every 3 years.
- Utilize serious growers who work to produce quality and quantity with modern methods.
- The Updating of the Standards is in the best interest of the Canadian Public and should be funded by the Govt of Canada. The Organic Industry provided the expertise to sit on the review committee and contributes that information well but should not have to fund that review or trust that those who are less informed should be the instruments to make changes. People in the trenches are best informed but shouldn't have to have the industry pay for it as well as provide expertise.
- increase public awareness about joining the review process. Otherwise I think the 5 year cycle is good.
- 5 years is good. Do not make it more often.
- develop organic co-packers, processors, methodologies to develop added value products.
- leave the same
- Less forms, more automated systems. Easier to follow the supply chain without having to fill out the same forms over and over
- increase the adversitsement related to organic products
- The review process is over-complicated by the industry bystanders that have been allowed to be involved in the process. This leads to very high costs for the review process but adds little to the value of the review.
- Je ne sais pas





- Il y en aurait long à dire. Le processus devrait être à 100% financé par le gouvernement. La composition de chaque groupe de travail devrait être balisée par des paramètres clairs et l'identité et l'affiliation de chaque partie prenante aux comités de révision devrait être clairement indiquée (et la même d'un groupe de travail à l'autre).
- subventionnée par le gouvernement
- The process should be structured and laid out more clearly on a website that collects comments and inputs and monitors progress. The petition process needs a better structure and help for petitioners.
- Peut-être faire un point a mi-révision (2.5 ans) pour voir si les changements apportés ont eu des impacts positifs ou non. Sous une forme de collection de données, ou de sondage.
- not sure
- Common sense approach
- le support du gouvernement fédéral au niveau financier
- More time to discuss and debate. More "expert" advice from people who are not necessarily part of organic agriculture (like researchers who are focused on pollinator health or waterways). Ideally, there should be people who are speaking on behalf of the soil, the air, the water, etc who have no financial incentive.
- Keep it simple.
- n/a
- I think five years is a great timeline!
- I think reviews of the Standards should be dependent on what is happening in the market. For instance if there is a need to do a review because of pressure or impending action from the non-organic sector, then the organic sector needs to adapt to block legislation and also change or revise the standards to protect organic farmers.
- I don't have a problem with the way it is currently done, except for the ongoing concerns about how to fund the process each time.
- c'est correct
- le CARTV dit que le comité d'interprétation des normes est inutile et non légal? dit que tout ce que le comité donne comme réponse pourrait être refusé devant un tribunal. donc je suis décue de cet état de fait, je croyais que on pouvait se fier aux interprétations.
- feedback from various stakeholders
- We are a UK producer so I can't comment here.
- it works well.







- More producer involvement
- Try less to include all interest groups involvement in the TC, and instead strive to find persons with expertise and specific competency with the complex, intricate issues that come up for debate.
- Instead of trying so hard to involve all sectors and interest groups in the TC, try harder to attract reviewers who have specialties and competencies for the high level of expertise needed to competently make decisions on the many intricate issues/decisions that come up.
- Que la révision de la Norme soit financé par le gouvernement fédéral comme dans plusieurs autres pays.
- Needs to be more cost efficient. CGSB needs to lower their cost. Need to be able to get minor changes through quicker than 5 yrs



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