

Ongoing, full funding of the Canadian Organic Standards technical review

The request:

- We are reissuing our request for the federal government to provide **ongoing, full funding of the technical review of the Canadian Organic Standards (COS)**.
- The standards must be kept relevant and current, and their technical review ensures we are able to continue trading with our equivalency arrangement partners. **Each of our equivalency arrangement partners provides permanent core funding for their respective organic standards.**
- The estimated cost to the federal government for the recurring 5-year review and maintenance of the Canadian organic agriculture and aquaculture standards is **approximately \$700,000.**

The context:

The Canadian Organic Standards outline the principles of health, ecology, fairness and care that guide organic agriculture and aquaculture, and specify the methods required to grow and process certified organic products. Comprised of a set of principles and management standards, as well as a permitted substances list, these standards apply to any organic product sales involved in provincial or national import and export, and those using the Canada Organic logo. The Canada Organic logo is owned by the federal government, and the Canadian Food Inspection Agency (CFIA) is legally responsible (as the Certification Scheme owner) for the Canada Organic Regime. As such, there is an expectation that the government maintain the integrity behind this scheme and the Canada Organic brand, and protect the equivalency arrangements established for international sales.

All three organic standards (CAN/CGSB 32.310, CAN/CBSB 32.311 and CAN/CGSB 32.312) must undergo a technical committee review every five years according to compliance criteria of ISO/IEC 17065 and the compliance criteria of the Standards Council of Canada. The Canadian General Standards Board (CGSB) is tasked with the technical review process in conjunction with organic stakeholders to ensure that the standards are kept current. All international organic standards must comply with ISO/IEC 17011 and 17065 in order to be able to trade internationally. Failure to do so would make the standards unenforceable. If the standards were to be withdrawn by the



CGSB, Canada would be unable to maintain the equivalency arrangements negotiated with our major trading partners, which was the primary reason why industry sought government regulation in the first place. Canada would lose all export sales, estimated at \$1 billion in sales in 2017.

Canada's organic industry is at a competitive disadvantage compared to our key trading partners. Our equivalency arrangement partners – the US, the EU, Switzerland, Japan and Costa Rica – accept full financial responsibility for the maintenance of their respective organic standards, with no industry contributions required.

COTA greatly appreciates the partial financial support from the federal government toward the 2020 technical review of the organic agriculture standards, and support for the 2017 review of the organic aquaculture standards. With an initial estimate of \$550,000-600,000 for the agriculture review, the final costs are still being tallied as the standards review process commences. The government agreed to cover 75% of the costs toward the required industry consultations, leaving the sector with the responsibility of paying the remainder, estimated to be \$100,000 in contributions. As both the National Food Policy report and Climate Adaptation report recommendations from the Standing Committee on Agriculture and Agri-food have endorsed the full funding of the organic standards review through a permanent commitment, we urge the government to act upon the recommendations of the Standing Committee.

It is important to recognize that industry stakeholders are actively involved in the review of the standards, contributing over \$250,000 of in-kind expertise, time, and travel expenses to participate in the standards' working groups. As a trade association, COTA actively engages stakeholders throughout the year on the standards and contributes countless additional hours on member engagement on how the standards process works and what are some of the key issues up for discussion to inform opinions. While these in-kind contributions are a major expense, the sector is pleased to provide them on an ongoing basis. As the organic sector has committed to providing in-kind expertise on an ongoing basis, we are asking the federal government to reciprocate by owning up to their responsibility for the Canada Organic Regime and committing to core funding of the standards technical review.

In the absence of core government funding for the technical review, our relatively young and quickly-growing industry is left in a permanent state of uncertainty. The amount of resources required to secure government support for the funding of the standards every five years is substantial. It is a significant burden for the sector, which is required to invest heavily in advocating for this government support on an ongoing basis. These resources ought to be directed towards market development and innovation to support the continued growth of the sector.

The Canada Organic logo and the Canada Organic Regime are the legal responsibility of the federal government. As such, there is a responsibility to maintain the integrity behind this brand. We kindly request that all voices in Parliament unite behind the continued growth and integrity of the organic sector by supporting ongoing and full government funding of the Canadian Organic Standards. This comes at a modest cost of approximately \$700,000 every five years.

