

# Dear Rochelle

by Rochelle Eisen

Dear Rochelle

I am confused about which standard we are supposed to be using in 2009. Hasn't the 2006 version been amended?

~ Slightly exasperated in Rutland

Dear Exasperated

I hear your frustration, all will work out. Let me take advantage of your question to tell you the story of The Four Amendments...

Once upon a time there was a voluntary Canada Organic standard that wanted to become mandatory. To make it happen, many people from across the land had to spend many long, arduous hours editing and discussing the legalities of our complicated organic ways and how to amend the 2006 version of the Organic Production Systems – General Principles and Management Standards <sup>1</sup> (simply known as the Principles) and the Permitted Substance List <sup>2</sup> (PSL), the two parts that make up the standard.

In the early stages of these discussions, we were taught that official standards must be legally defensible and to assure a fair playing field for all users each standard had to be precise on what was required for compliance. This meant eliminating all references to a certification agency's discretionary power (in other words, allowed exceptions to the rule are now clearly outlined in the standard). We also learnt that we had to be very precise as when to use "shall," "must," "may," and "should". We were also directed to remove all the organic labelling claim references in the standard as these could only exist in the Regulation. Repetitive redundancies were eliminated.



Beyond these ad nauseum bureaucratic changes, a few minor edits were completed during the first amendment process, but none that would actually impact on operators.

Amendment two dealt mainly with clarifying various definitions and standards so that they met more of the technical requirements for a mandatory system. Some notable changes were made; see the "Amendments with Impact" articles [pages 8 & 14] for more detail.

It was during the third round of amendments that more substantive changes were made which may have an impact on assorted operations. Again, see the "Amendments with Impact" articles [pages 8 & 14] for more detail.

By the time you are reading this article the revised version reflecting all the first three sets of amendments should have been published and posted online on the Canadian General Standards Board (CGSB) Organic Agriculture website:  
[www.tpsgc-pwgsc.gc.ca/cgsb/on\\_the\\_net/organic/index-e.html](http://www.tpsgc-pwgsc.gc.ca/cgsb/on_the_net/organic/index-e.html) .

The COABC is planning to supply hardcopies of this version to all the Certification Bodies (CBs) for distribution to their membership, with each CB having to decide how to distribute these to each member. This amended version is the version COABC will be operating with for 2009, but there will be some latitude given to allow for adaptation from the 2006 version to the 2009 version. The COABC Accreditation Committee has generated a Clarification and Guidance tool to assist CBs and licensees [see below].

There is still more work to do to clear the Future Work Lists (the collection system for petitions <sup>3</sup> for change and other comments) and a fourth round is in the planning stage. Many of the issues <sup>4</sup> raised by BC operators during Paddy Doherty's 2007 consultation process have not yet made it to their respective Working Groups (Crops, Livestock, Processing, PLS, Greenhouse etc.) for consideration, as every issue had to be dealt with in order it was received by the CGSB.

Working Group suggestions are then voted and worked on by the Technical Committee. If passed by the Technical Committee, the amendment is approved for inclusion in the standard. Once amendment four is published operators will have a year to align to the new requirements.

~ Rochelle

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<sup>1</sup> The Principles can also be referred to as CAN/CGSB-32.310. CAN = Canada and CGSB = Canadian General Standards Board and 32.310 the reference number for this section.

<sup>2</sup> The PSL is CAN/CGSB-32.311

<sup>3</sup> If you are interested in submitting a petition, contact your CB as they will have access to the necessary paperwork and procedure for you to follow.

<sup>4</sup> It maybe a good idea for BC operators to look over those 2007 submissions to see if any are no longer pertinent and could be withdrawn.