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DATE

Canadian Food Inspection Agency  
Canada Organic Regime

Dear Sir/Madam:

Thank you for your efforts in strengthening the organic industry through the passage of the Safe Food for Canadians Regulations and for responding to some of the concerns expressed after last year's publication of the first draft in Gazette I.

The following are suggestions for improvement and clarity that could be addressed via CFIA directives, CFIA website content and/or incorporation into the Canada Organic Regime Operating Manual.

- Clarify requirements to maintain organic integrity for entities that are not required to obtain certification – such as traders, distributors and brand-holders.
- Section 346(1) - The requirement for annual renewal of organic product certificates to be prepared more than six months prior to the current certificate's expiration date will only add to the documentation burden of both operators and certification bodies, as planting plans can often change within that period. If it is unable to be changed within the current regulations please stipulate that for spring horticultural producers this requirement will be waived.
- Section 352 – the wording of this section is too broad (“any change” and “any complaint”) – please provide specific examples and define more clearly what reporting is needed under this section.
- Section 353(1) – the term “certified organic” needs to be allowed on the labels of Canadian-made organic products. This is too often seen on imported products and calls into question the authenticity of Canadian-made organic items.
- Last but absolutely not least – please ensure that the CFIA enforces any and all convictions regarding fraudulent organic claims with the full extent of the penalties available under the Safe Food for Canadians Act section 39.

We greatly appreciate your attention to these issues.

Best wishes,