

16 November 2006

Bashir Manji  
Canadian Food Inspection Agency  
59 Camelot Drive,  
Ottawa, Ontario K1A 0Y9

Dear Bashir Manji,

This letter is in response to the Canada Gazette I publication of the proposed Organic Products Regulations on September 2, 2006. These comments are submitted on behalf of the CropLife Canada. CropLife Canada is a trade association representing the developers and manufacturers of Plant Science Innovations on Crop Protection and Biotechnology. As an industry we support agriculture in Canada through all production methods, conventional, biotechnology and organic. We also support the principle of adding value to agricultural products through the means of production standards driven by science based data, clear communication and consumer expectations.

We believe that the Canadian government should support all agricultural production systems and that these systems be supported by recognised practices, including certification and recognition provided that the communications based on these production practices do not make claims indefensible by science. We strongly urge the Government to ensure that these marketing-oriented standards must explicitly exclude any health or environmental claims that are not fully supported by science based research.

We applaud the development of a uniform standard for organic production in Canada. A clear definition of the terms and the establishment of a brand identity will help to clear up many of the misconceptions surrounding organic production. Several of our member company's products are included in this standard, and we support this government initiative.

Our objective in our comments is to ensure that any claims made by the users of our products are supported by sound scientific research. Allowing ill-defined scientific claims must not weaken the safety and value requirements for all crop protection products whether they are synthetic or organic pesticides. The reputation of agricultural production, and the consequent confidence in the food system by the Canadian public, requires the highest scientific standards for evaluating and formulating any proposed regulation.

CropLife Canada has serious concerns with the Regulatory Impact Analysis Statement (RIAS) for the Organic Products Regulation. Our concern lies with a statement in the introduction and the sections titled, Strategic Environmental Assessment and Society/Consumer Benefits.

In the RAIS Introduction, the second paragraph states, “Organic agricultural production is a management system designed to produce crops and livestock in an ecologically stable way.” We do not dispute this statement, however as indicated above, clear science based communication on various agricultural production systems is critical for consumer confidence in our food and feed supply. The statement included in the RAIS may be misinterpreted to indicate that other agricultural production systems are not ecologically stable.

The paragraph titled, Strategic Environmental Assessment makes claims related to positive environmental impacts, improved soil management practices and environmental benefits. Although the word, “may” is used as a qualifier, it is important to recognise these claims as speculation and not scientific research driven or supported. An example being the dependence of organic production practices on tillage for weed control when the Canadian government research indicates that this practice leads to erosion and poor soil management. Reduced tillage practices, with the help of herbicides, reduce the soil erosion and compaction. The paragraph also states that, “Increased organic acreage may result in reduction of the use of synthetic agricultural chemicals.” This statement is factually true, but again the inference being made is that this is a positive benefit. There are many organic standard pesticides that have and will cause negative environmental impacts; in fact some are very toxic. The final sentence indicates that, “No negative environmental impacts are foreseen.” This statement is incorrect, as stated above, there are many organic standard pesticides that have and will cause negative environmental impacts.

The stakeholder impact statements section on Society/Consumers raised similar concerns for CropLife Canada. The section indicates that increased consumption of organic products and domestic organic farming would bring additional environmental benefits to Canadian society. It is also the implication of these statements are that the majority of agricultural producers are following practices that are damaging the environment. These statements are conjecture and not supported scientifically.

We appreciate the opportunity to comment on the proposed Organic Products Regulations and look forward to your clarifications and revisions regarding the Regulatory Impact Analysis Statement.

Regards,



Peter MacLeod  
Executive Director Crop Protection Chemistry  
CropLife Canada