

URGENT ACTION ITEM!!

Comments on Proposed Safe Food for Canadians Regulation (SFCR) to the CFIA

On January 21, 2017, the Canadian Government published proposed rule-making for the Safe Foods for Canadians Regulations (SCR) in Canada Gazette I. These proposed regulations will **combine** and modernize 14 separate existing regulations **including** the **Organic Products Regulations, 2009**. The proposed regulations are designed to implement the Safe Foods for Canadians Act of 2012.

These proposed regulations impact all organic operators in Canada and may also impact those operators exporting into Canada. Pro-Cert Organic Systems Ltd. has been monitoring the development of these regulations and is participating with industry organizations to review the proposed regulations and provide feedback to the Federal Government.

The Deadline for comments is:

April 21, 2017

The Address for Comment Submissions is:

Richard Arsenault, Executive Director
Domestic Food Safety Systems and Meat Hygiene Directorate
Canadian Food Inspection Agency
1400 Merivale Road, Tower 1
Ottawa, Ontario K1A 0Y9
Email: CFIA-Modernisation-ACIA@inspection.gc.ca

The SFCR can be found at:

<http://www.gazette.gc.ca/rp-pr/p1/2017/2017-01-21/html/reg1-eng.php#reg>

The SFCR Issues to Consider in your Comments Include:

- The proposed move of the Organic Products Regulation (OPR) from Agriculture and Agri-Food Canada (AAFC) to Health Canada;
- The loss of the Organic Products Regulation in exchange for Part 14 of the SFCR;
- Specific errors and omissions in the SCR which include but are not limited to:
 - The lack of an acceptable appeal mechanism for organic operators and certifiers,
 - The lack of cancellation periods for fraudulent operators,
 - The proposed “expiring” certificate issue,
 - The problematic 15 and 12 month pre-application/pre-inspection rules.

Please also consider the Key Issues and Recommendations prepared by the Canada Organic Trade Association found at:

<https://gallery.mailchimp.com/f64400aad0f09f97483d2c4d3/files/836ab5eb-ebee-4e7c-975f-67e0d0f29aab/SFCR.COTA.pdf>

Additional Issues to Consider in your Comments Include:

- The Loss of the Canada Organic Office (COO) and dedicated staff and titles **which has already occurred**,
- The need for CFIA to create and publish a “positive” list of certified operators in addition to the existing “negative” list of cancelled operators.

The attached White Paper Version I

There are many other opportunities to improve the Canadian Organic Regime (program) or COR at this time of change. An ad hoc group of senior organic industry stakeholders has, over the last 12 months compiled a **White Paper** on COR enhancement opportunities. **Version I** as attached was presented to the Minister of Agriculture on April 11th, 2017, and can be found at:

PDF File:

http://pro-cert.org/images/documents/2017/White_Paper_Version_040717.pdf

You may wish to include some of the other issues and proposed corrective actions in your comment letter. The proposal to create the **Canada Organic Products Act** under AAFC instead of the proposed move to Health Canada needs your consideration and comment. This proposal is outlined in Section 2.0 of the White Paper.

Your Opinion is Important!

The CFIA is required by law to review and consider all the comments received in the 90-day gazette period. Do not miss this opportunity to improve the regulatory system which supports your organic business plan.