

COABC Small-Scale Certification

Research Project: Exploring Issues, Challenges and
Options for Small Scale Producers

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Executive Summary

The Certified Organic Associations of BC (COABC) has undertaken research to better understand the needs and issues of non-certified organic producers which deter them from participating in organic certification programs, and investigate possible solutions. While there are over 600 certified organic farmers and processors in BC, according to 2006 Statistics Canada figures, there were also 2,767 “uncertified organic” producers in the province. This high number implies that the current certification model may not be meeting the needs of all organic producers, particularly small-scale operators. Also, consumers are confused about which products are truly produced to organic standards.

This situation in BC has been compounded due to the fact that COABC and BC stakeholders have spent over 20 years, since the launch of the BC Certified Organic Program (BCCOP), educating consumers to seek out products labelled ‘certified organic’ as the 3rd party certification is the organic guarantee. With the implementation of the federal Organic Products Regulations in 2009, the term ‘certified’ has been deemed redundant and is now not necessary, nor allowed, to be used on labels of organic products sold in Canada that cross provincial or international borders.

Without a mandatory organic regulation in BC to align provincial and federal laws, additional complications arise. The COABC continues to seek a mandatory regulation that will require products marketed as ‘organic’ in BC to be produced in accordance with the Canada Organic Standards and certified by a certification body accredited by the BCCOP and/or one that is accredited by the Canadian Food Inspection Agency (CFIA) for the Canada Organic Regime.

With these issues in mind, the consulting team, hired by the COABC to undertake the research, solicited extensive feedback from stakeholders through an online survey, one-on-one interviews, farmer meetings, and outreach events on benefits and barriers to certification, as well as possible alternative models.

Some of the key benefits of certification identified through the consultations included: market access and product differentiation; enhanced consumer confidence and a recognition of quality; increased accountability and awareness amongst certified operators; demonstrated commitment to philosophical, political, and environmental beliefs; increased support for the organic community; and support and mentorship from the organic community.

Some of the key barriers to certification identified by sector stakeholders during the consultations included: cost of certification; paperwork associated with certification; and the time commitment needed for the paperwork; and the certification process itself. There were also concerns raised around a lack of standardization in paperwork and a lack of cohesive branding, particularly when producers do not have to be certified to sell their products as organic in BC. Some participants stated that they experienced difficulties complying with standards, while many felt there was a lack of education and support for producers, and a lack of consumer understanding and demand for local certified organic products.

Some possible solutions to overcome these barriers were also suggested through the consultations, such as: finding efficiencies to reduce the certification costs and paperwork; employing alternative certification models; more research and extension to overcome production challenges; and more outreach and community engagement. Stakeholders believed

that many technical issues could be resolved with effective outreach, education, and support particularly regarding the certification process and navigating the standards.

Alternative models for certification were also explored including:

- COABC's "*Low-Risk*" Program (currently offered by PACS and IOPA)
- Organic Pledges
- Participatory Guarantee Systems (PGS):
 - Certified Naturally Grown
 - Community Verified Organic
 - Kootenay Mountain Grown
 - Brazil's Organic Social Control
- Group Certification
- Certificate in Organic Farming

The consulting team developed a series of recommendations to overcome the noted barriers to certification. Their recommendations are based on information obtained through stakeholder consultations, further research, and assurance program assessments. The recommendations are separated into three categories as follows:

1. Recommendations requiring no change in the BCCOP framework

COABC and CBs to:

1. Offer outreach and orientation workshops.
2. Develop informative brochures to answer key questions.
3. Launch a web-based COS/organic systems plan (OSP) interface to improve accessibility and efficiencies for farmers.
4. Post all operator OSPs, de-certifications, suspensions, and other sanctions on website to increase transparency.
5. Create an accessible easy-to-use public complaint system.
6. Create a scorecard system so that farmers can enter their data and review their non-compliances before submitting their plans.
7. Create a transition program that provides funding during transition years and training/mentoring support.
8. Increase certification fees for larger gross earners to offset small producer certification fees.
9. Develop a fund from donations to offset certification fees.
10. Support the development of a Certificate in Organic Farming to serve as a bridging program to product certification.

2. Recommendations that would require change in the BCCOP framework

1. COABC to continue seeking a mandatory regulation that will require products labelled or marketed as 'organic' in BC to be produced in accordance with the Canada Organic Standards and certified by a certification body accredited by the British Columbia Certified Organic Program and/or one that is accredited by the Canadian Food Inspection Agency for the Canada Organic Regime. Due to the strength of the community response on this issue, it was necessary to maintain this initiative as a recommended priority for COABC to address the issues championed by the certified.

2. Develop a “Grower Group” category of certification based on the CFIA’s Canada Organic Office model.
3. Create a New Option that could be trialed by a few interested certification bodies for small-scale farm operators in BC who sell in short supply chains (see further discussion below).

The “New Option” combines the most desirable aspects of all of the alternative models studied and melds them into a cohesive option that addresses all assurance requirements while attempting to meet everyone’s needs. It is recommended that the COABC launch the New Option as a pilot project with a few CBs to field test it, and determine program costs and operator fees, before rolling it out as a full program. Under the “New Option”, each farmer would attend a training session (face-to-face or virtual) offered either by the CB or possibly by the COABC. Each farmer signs a pledge that includes a commitment to allow consumer site visits and compliance assessments. For biosecurity reasons, the farmer may choose to restrict windows of access by the public. The farmers also complete their Organic System Plans via an electronic interface, outlining their adherence to the Canada Organic Standards. Furthermore, an onsite peer-to-peer review is completed.

Using the completed OSP and the peer review report, the CB completes desk reviews on all members and random unannounced inspections are conducted on 10% of their members annually. The Verification Officers (VOs) complete site inspections targeting specific issues (not a full inspection) on the 10% randomly selected members unless there are concerns and a full site inspection becomes necessary. The VO uploads their findings onto the electronic interface and the CB makes their determination. The CB also employs marketplace surveillance.

This program could be delivered by existing CBs, if they feel so inclined, or by a new regional CB that deals exclusively with groups of operators. The fee for such a program would need to be assessed, but initial stakeholder feedback indicated that fees would need to be limited to \$150 - \$200 annually per farm to be tolerable. After the three year transition period, or a shorter timeframe depending on the land use history, the operator is allowed to use the BCCOP logo.

3. Recommendations the COABC could take to the Canada Organic Office (COO)

1. Request that the COO broaden the “Grower Group” certification category to allow any group of operators who are collectively committed to an effective internal management system to certify as one entity.
2. Recommend that the COO post all OSPs for the ISO system on their website and develop a publically accessible easy-to-use complaint system.
3. Request that the COO sanction a Risk Assessment system for ISO operators.

By implementing the recommendations that require no change to the BCCOP framework, many of the key barriers to certification would likely be addressed. The COABC is strongly urged to undertake those changes before piloting the New Option. No matter what the next steps taken by the COABC may be, the introduction of any program revisions will need to be accompanied by an effective education campaign in order to explain, teach, and promote the revised/enhanced program.

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Abbreviations

BCARA – BC Association for Regenerative Agriculture
BCCOP – BC Certified Organic Program
BDAS – Bio-Dynamic Agricultural Society of BC
BOPA - Boundary Organic Producers Association
CB – Certification Body
CFIA – Canadian Food Inspection Agency
COABC - Certified Organic Associations of BC
COO – Canadian Organic Office
COR – Canadian Organic Regime
CVB – Conformity Verification Body
CVO – Community Verified Organic
FVOPA – Fraser Valley Organic Producers Association
IOPA - Islands Organic Producers Association
ISEAL - International Social and Environmental Accreditation and Labelling Alliance
ISO – International Organization for Standardization
KLAS – Kootenay Local Agricultural Society
KMG – Kootenay Mountain Grown
KOGS - Kootenay Organic Growers’ Society
LEOGA - Living Earth Organic Growers’ Association
NOFA – Northeast Organic Farming Association
NOOA - North Okanagan Organic Association
OCIA – Organic Crop Improvement Association
OMRI – Organic Materials Review Institute
OPR – Organic Products Regulations
OSC – Organic Social Control
OSP – Organic System Plan
OTCO – Oregon Tilth Certified Organic
OVCRT – Organic Value Chain Round Table
PACS – Pacific Agricultural Certification Society
PSL – Permitted Substances List
QAI – Quality Assurance International
SOOPA - Similkameen Okanagan Organic Producers Association
SSCRP – Small-Scale Certification Research Project
STOPA - Shuswap Thompson Organic Producers Association
VO – Verification Officer

Introduction

The Certified Organic Associations of BC (COABC) conducted research to better understand the needs, issues and challenges of non-certified organic producers, which deter them from participating in organic certification programs. While there are currently over 600 certified organic farmers and processors in BC, according to the 2006 Census of Agriculture data¹, there are also 2,767 “uncertified organic” producers in BC. Most of the uncertified organic producers are small-scale operators. This high number indicates two potential problems:

1. The current certification model may not be appropriate for all organic producers, especially small-scale operators.
2. Without third party oversight, consumers may not be protected from fraud under the current system.

Therefore, there is a need for new and innovative approaches to certification. Due to the large volume of non-certified organic products sold in the BC marketplace, consumer confidence in the organic label is at risk, which affects the livelihood of all organic producers.

The objectives for this project were:

- To identify opportunities for certification of organic practices at all levels and types of production;
- To explore innovative solutions that will overcome historical barriers to certification;
- To include broad consultation (beyond the traditional certified organic sector, including non-certified operators claiming organic, past certified operators who have dropped certification, urban agriculturalists and currently certified operators) so that identified solutions suit the needs of all organic producers; and
- To explore new and innovative models for certification that could fit within the current BC framework. This could include but is not limited to some type of voluntary system.

The outcomes of this project impact the entire BC sector by creating a more unified and cohesive organic community and by providing better assurance for the word ‘organic’ for BC consumers. The organic marketplace was built on a strong understanding that organic products have an assurance code behind them. When products in the marketplace claim organic status, but have no certification, there is no guarantee, nor recourse, for the consumer if the product has been supplied from within the province. This presents an enormous risk to the BC Certified Organic Program, and there is currently no method of enforcing the Organic Products Regulations and Organic Regime within provincial boundaries without mandatory regulation.

Rather than taking an enforcement approach, this project aimed to discover the barriers to certification, and find innovative ways to minimize those barriers, thus bringing more ‘non-certified organic’ producers into a certification program. By bringing ‘uncertified’ producers claiming organic status under a certification program, the risk to the organic marketplace is reduced and the unity of the sector is increased.

This situation is faced by most of the provinces in Canada and in other jurisdictions. Organic operators and organic consumers around the province would benefit from clarity in the marketplace. Through consultation and meaningful discussion, this project provides the foundation for a more inclusive and unified organic sector.

¹ Statistics Canada. 2006. *Census of Agriculture, Farm Data and Farm Operator Data*. catalogue no.

Certified Organic Associations of BC Structure

The Certified Organic Associations of British Columbia (COABC) is an umbrella association of BC based organic certifying bodies. The central organization, COABC was incorporated under the Society's Act in March of 1993 and operates two accreditation streams, the regional BC Certified Organic Program (BCCOP), and a BC Certified Organic ISO 65 Compliant Program.

The regional program is a voluntary agri-food program sanctioned by the Government of British Columbia through the Organic Agricultural Products Certification Regulation under the Agri-Food Choice and Quality Act. The COABC is the program administrator and is responsible for auditing its member associations for compliance. The COABC also administers the use of the program's official mark, which includes the phrase "British Columbia Certified Organic" on its own or with the BCCOP checkmark graphic (see Figure 1), officially known as the BCCOP symbol. As of 2012, eight regional certifiers are accredited to the BCCOP (BDAS, BOPA, IOPA, KOGS, LEOGA, NOAA, SOOPA, STOPA).



Figure 1. BCCOP Symbol

Under the ISO program, COABC acts as a Conformity Verification Body (CVB) for the Canadian Food Inspection Agency (CFIA) under the Organic Products Regulations (enabled by the Canada Agricultural Products Act). The COABC has an agreement with the CFIA to assess and monitor ISO accredited certification bodies to certify operators to the Canadian Organic Regime (COR). Three COABC certified bodies BCARA, FVOPA and PACS are ISO accredited. Operators certified under the COR by any of these three certification bodies can use the Canada Organic logo on labels and advertising.

There are three key differences between the two accreditation streams. The first is that the regional program has less structural bureaucracy than is required by the ISO program. The second is that operators certified only by regional programs are limited to product sales within BC, while members of ISO accredited CBs may ship goods across provincial and international borders. The third difference is that regionally BCCOP certified goods can use the phrase 'certified organic' whereas ISO operators cannot use 'certified organic' as a COR product claim except as allowed in the certifier identifier clause.

This last difference is significant since up until June 2009, when the OPR was enacted, the COABC and BC stakeholders had invested substantive energy educating consumers to seek out product labelled as 'certified organic' versus 'organic' as the term 'certified' confirmed that the product had been verified by a recognized certification system.

It is important to understand that operators certified by COABC ISO accredited certification bodies have the option to secure both COR and BCCOP certification. This means that COABC ISO operators could use two labels if they so desired, one for their COR-certified ‘organic’ products traded across borders, and ‘certified organic’ labels for BCCOP certified products sold only in the province. Non-COABC accredited certifiers (ProCert, EcoCert, QAI, OCIA, OTCO etc.) have no such option and must adhere to COR requirements and cannot approve ‘certified organic’ statements on products except in the certifier identifier clause.

Label Confusion

Based on the situation indicated above, the following summarizes the various labels that can be found on products containing >95% organic ingredients in British Columbia since 2009:

- All imported certified products can only display the word ‘organic’ (not ‘certified organic’) and the COR logo.
- Any certified products bearing the COR logo can only display the word ‘organic’, but can indicate “certified by CB”.
- All ISO COABC CB certified products can only display the word ‘organic’ plus bear the COR logo and BCCOP symbol, unless they have opted to generate a secondary label under the regional program allowing ‘certified organic’ claims and the use of the BCCOP symbol or phrase.
- BCCOP certified product uses ‘certified organic’ and/or the ‘BCCOP symbol’ or ‘BCCOP phrase’.
- Products with no certification can be labelled ‘organic’, whether they meet any standards or not, without oversight, for goods sold within the province.

Until certification is mandatory in BC for human food and livestock feed organic products, increasing the percentage of British Columbian products able to use the phrase ‘certified organic’ is one strategic way to reduce consumer confusion.

Recent Branding and Logo Initiatives

Initiatives have been underway nationally and provincially to differentiate Canadian and locally produced certified organic products from non-certified organic products and imports, using branding strategies and logos. These initiatives are also intended to reduce label confusion and to educate consumers about certified organic production. A brief description of two such initiatives are provided in this section.

Comox Valley Certified Organic Logo

In 2012, the Comox Valley Organic Collective developed a logo to promote their local, certified organic products. The Collective was created by a group of certified and transitional organic farmers in the Comox Valley on Vancouver Island, to exchange information, create an opportunity for dialogue, and brainstorm possible solutions to deal with key issues. They developed the “Produced Organically in the Comox Valley” logo, in response to consumers’ concerns that they had to choose between organic or local. The Collective believed that consumers could have both, and launched the logo at the Comox Valley Farmers Market during Organic Week 2012 (Sept 22 – 28, 2012). It has been reported that the logo has been an effective way to differentiate local organic products for consumers and producers. COABC approved the use of the checkmark symbol on the Collective’s logo, and PACS and IOPA have both approved the use of the Collective’s logo by their members. An additional benefit realized from this collaborative effort has been the creation of a support and mentorship network for organic farmers in the Comox Valley – an unexpected but welcomed outcome for the Collective.

National Organic Sector Brand Strategy

The Organic Value Chain Roundtable (OVCRT) has created a national organic sector brand strategy to help differentiate Canadian organic products from imports and competing labels. The (OVCRT) is an industry-government partnership, comprised of industry representatives from along the value chain, as well as federal and provincial government officials. Members of the OVCRT work together to develop strategies and action plans that will secure an enduring competitive advantage for Canada.

The COABC along with sector associations in other provinces, and other key stakeholders, will have the opportunity to link to, and participate in, the national branding campaign that will be launched by the Canada Organic Trade Association (COTA) and Canada Organic Growers (COG) during Organic Week 2013. Key messaging of the brand concept revolves around the slogan and imagery of “Think Before You Eat”, plus the tagline “Think Canada Organic”, and provides compelling reasons to choose Canadian certified organic food.

Methodology

The COABC Small-Scale Certification Research Project (SSCRP) process began with the development of a communications strategy to engage producers who are certified organic, and those who may be making organic claims, to seek their opinions on the issues of certification.

Stakeholder Identification

The project kicked off with the identification of key stakeholders within and outside of COABC, including urban agriculturalists. The intent was to engage with stakeholders that have left certification; those that are not certified, but are claiming to be organic; and urban agriculturalists. The consultant team contacted the following organizations to help identify key informants:

- COABC accredited certifiers
- Farmers' markets (provincial and regional)
- Vancouver Urban Farmers Society & other urban farmer organizations
- Young Agrarians

Engaging with Stakeholders

There were two phases of public consultation. During Phase 1, the consultant team engaged with stakeholders at agriculture events, through online surveys, and via one-on-one interviews throughout the project. At select agriculture events the project was promoted. Facilitated workshops were hosted when possible, to gain feedback on the barriers to certification and potential solutions. Selected stakeholders were also contacted for one-on-one interviews in person and over the phone to obtain more in-depth input regarding stakeholder perceptions of certification. During Phase 2 of the project, additional stakeholders were contacted to provide feedback on potential options for more inclusive programs and to determine solutions for overcoming barriers presented in Phase 1.

In addition to large agricultural events and one-on-one interviews the consultant team also attended small farmer meetings, such as farmers institute meetings and grower events to share information about the project and conduct consultations/interviews. These outreach events provided an opportunity to reach farmers not currently involved in a certification program and reach new audiences.

One-On-One Interviews

During Phase 1, the consultant team conducted 30 one-on-one interviews, over the phone and in person, with key stakeholders. These individuals were identified through outreach events, directories, and word of mouth. The interviews were semi-structured and lasted approximately 45 – 60 minutes in length. The focus of the first phase of consultations/interviews was on determining the barriers to certification and, if applicable, the reasons why stakeholders left certification or abandoned the process. Interviewees were also asked what measures, if any,

would be necessary to encourage these individuals to rejoin a certification body or try it for the first time. A second round of interviews/consultations were also conducted during Phase 2 once solutions/options had been developed by the consultant team and approved by the project advisory committee. The intent of these interviews was to gain feedback on the proposed solutions to minimize barriers and identify possible options for more inclusive certification programs.

Online Survey

As part of Phase 1, an online survey was created to provide another vehicle to engage with the public. A total of eighty-one surveys were completed and provided important insights into certification challenges facing the organic sector.

COABC and Localorganic Listserves

Feedback was also gathered from exchanges on the COABC listserv and the special 'localorganic' listserv set up specifically to discuss alternative certification models. The 'localorganic' listserv submitted a manifest to the COABC board on Feb 21 presenting their position and desire for a solution. The manifest entitled "Direct Market Organic Approach: Trust and Transparency" can be found at

<http://woodgrainfarm.files.wordpress.com/2013/03/trusttransparency.pdf>.²

Outreach Events and Sector Consultations

BC Food Systems Network Gathering

The project's first facilitated workshop took place at the BC Food Systems Network Annual Gathering on Gambier Island on July 6, 2012. The 18 participants included non-certified organic producers, urban farmers and certified organic producers. Lively discussions ensued on the benefits of organic certification, barriers to certification, and innovative solutions. General consensus was that certification is important for consumers and producers alike, and the system would benefit greatly from outreach, education, and innovation.

Participants raised issues regarding lack of access to resources, the challenge of buffer zones and rotating sites for urban farmers, the cost of paperwork in time and money, the lack of mentorship/training opportunities, a need for a primer/roadmap to help navigate the standards, and the desirability of a streamlined program that would provide credibility and build community. Notes from the facilitated session were recorded and incorporated into the research results.

² Direct Market Approach: Trust and Transparency. A Community-Based Alternative for Small-Scale Producers in BC. February 20th, 2013.

<http://woodgrainfarm.files.wordpress.com/2013/03/trusttransparency.pdf>

BC Seeds Gathering

One of the consultants facilitated a workshop at the BC Seeds Gathering in Richmond on November 10th, 2012. Thirty participants attended the session including certified and non-certified farmers, future farmers, urban farmers, researchers, and students. There was a ‘Seeds’ focus to the discussion and many had concerns about GE contamination for all farmers – urban and rural. The need for isolation distances for seed producers compounded the issue of access to land and need for land use histories, especially for rented land. The challenges and barriers raised mirrored the discussion by the group at the BC Food Systems Gathering in July. The need for education, mentorship, and navigation aids for the standards was expressed. Suggestions for streamlining and reducing paperwork were offered.

One interesting suggestion to help support certified organic seed production in Canada is grower group certification. This option is discussed in further detail in the Alternative Models section of this report. A seed cooperative was being formed, comprised of certified and uncertified operators, many of whom produce organic vegetables and fruit for sale in addition to seeds. A grower group certification may or may not work for them but is definitely an option for some other operators. Community Verified Organic and peer review programs were also discussed as possible options. Notes of the issues raised and suggestions provided were incorporated into the research results.

Urban Farmer Symposium

A member of the consulting team attended the Urban Farmer Symposium hosted by the Vancouver Urban Farmer Society (VUFS) on November 17th, 2012. Approximately 40 urban farmers were present at the symposium from around Vancouver. The Vancouver Food Strategy plans were presented to the group by James O’Neill from the Vancouver Food Policy Council. Participants were asked to provide input on a variety of production-related challenges such as soil amendments, pest management, water usage and sources, land tenure arrangements, and more.

Some barriers to certification were raised during the symposium that specifically impacted urban farmers. Some of these included:

- Potential soil contamination
- Inability to provide land use history information
- Expense of verifying land use
- Difficulty accessing appropriate inputs
- Difficulty obtaining permitted composting feedstock

Some solutions were raised such as: the potential of certifying best practices or the farmer, as opposed to the land; affidavits from previous land owners; peer-based certification; and subsidized inspectors to reduce costs. A lively discussion on certification occurred during the roundtable portion at the end of the symposium. Notes from this discussion were captured and incorporated into the results of the research project.

Nanaimo-Cedar Farmers Institute Meeting

On November 8th, 2012, a member of the consulting team attended the monthly meeting of the Nanaimo-Cedar Farmers Institute. “The Nanaimo Cedar Farmers' Institute strives to improve the conditions of rural life in support of prosperous and permanent settlement. [They] promote the theory and practice of agriculture through lectures, essays, the circulation of information and other educational methods, and to stimulate interest by exhibitions, prizes, and other means”³ (NCFI, 2013). There were approximately 12 farmers in attendance. A short presentation was given to explain the COABC Small-Scale Certification Research Project and a hard copy of the optional online survey was distributed to members. A few members provided some interesting feedback on barriers to certification and potential solutions that were included in the project results.

Pacific Agriculture Show

Two members of the consultant team attended the Pacific Agriculture Show, held Jan 24-26 at Abbotsford's Tradex Centre to staff the COABC booth and engage in dialogue with certified and non-certified producers. The COABC booth was bursting at the seams with “organic-ness” for the entire show with many current and past members, along with lots of wannabe's dropping in for a chin wag or two.



Visitors to the COABC booth were engaged in discussions regarding certification barriers and opportunities, to further gain insight for COABC's Small Scale Certification Research Project.

Salt Spring Seedy Saturday

The consulting team was asked to present the project at the Salt Spring Seedy Saturday weekend. A member of the team travelled to Salt Spring Island on Sunday, February 10th, 2013 to discuss some of the preliminary findings of the research project and some of the alternative models and recommendations. The intent of the session was to determine a certification model that would work for the Salt Spring Island community. Approximately 20 people were in attendance with varying levels of familiarity with the standards. Some of the key points that were raised during the discussion included: the lack of education and motivation regarding the organic standards amongst farmers; the desire to prevent duplication of services and certification options already in existence; some support for the group certification model, particularly a mentoring component; some support for Participatory Guarantee Systems and peer reviewing; and ways to streamline the application process by developing a multiple choice electronic system. Comments raised during this session were summarized by the research team and included in the project results.

³ Nanaimo-Cedar Farmers Institute (NCFI). Accessed January 2013.
http://www.ncfarmersinst.org/index.php?area_id=1001&page_id=1001&article_id=2&LIMIT=

Organic Federation of Canada Board Retreat

On Feb 22, 2013, a member of the consultant team presented a brief outline of the research data and alternative models to members of the OFC board. There is much interest in COABC's SSCRP project across the country as BC is the only province exploring alternative options.

COABC Conference

The SSCRP team presented the project and project findings during a workshop on Feb 23, 2013. Many COABC directors and OFC board members were in attendance. Overall the audience was not only receptive to the research data presented, but they were intrigued by some of the alternative models. Many suggested that education and outreach activities by COABC and certifying bodies may greatly reduce perceived barriers to certification. However, by the end of the workshop, it was clear most thought the New Option and Certificate in Organic Farming should be explored further. Following the session many new and young farmers approached members of the project team to confirm their enthusiasm for alternative opportunities, particularly the Certificate in Organic Farming option.

BC Association of Farmers Market AGM

A member of the consultant team staffed the COABC booth at the BCAFM AGM. One-on-one discussions with market managers revolved primarily around market signage and organic claims policies. Most managers said their market either had already implemented a strict policy requiring certification evidence before an organic claim could be made, or were in the process of introducing such a policy for the 2013 season. Only one talked about continuing to have both certified and uncertified organic claims in their market for 2013.



Results of the Online Surveys and One-on-One Interviews

Respondents to the online survey and the one-on-one interviews came from a variety of backgrounds. Out of the 115 respondents (n=115), the majority of participants (76%) were rural farmers.

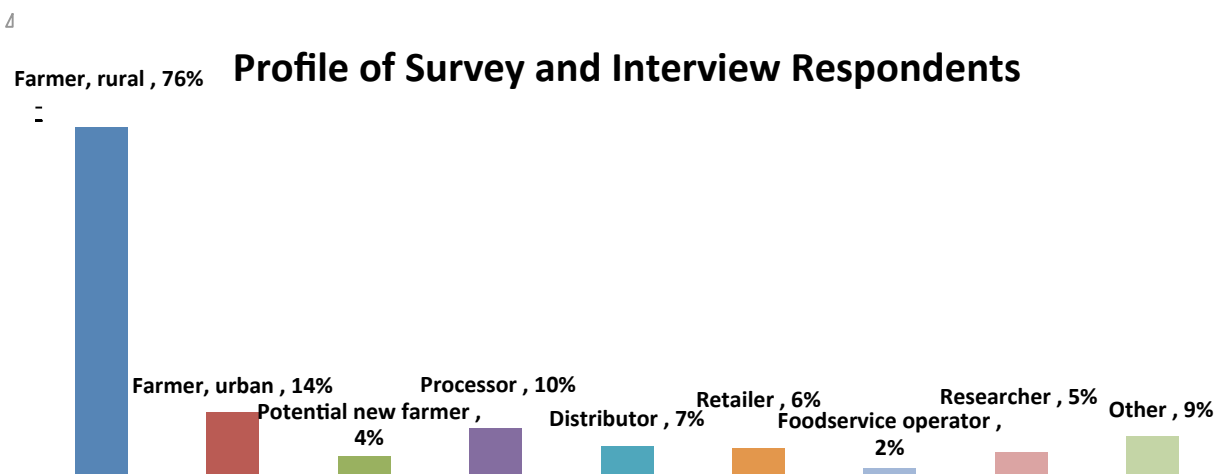


Figure 2. Profile of Respondents.

Respondents in the “other” column included hobby farmers, village farmers and those who kept horses for pleasure or rescue purposes.

Respondents (n=115) produced a wide variety of products with the most common products being vegetables (53%), fruit (35%), and livestock (30%). Products in the “other” category included plants, wild berries, herbs, seeds, wheatgrass, microgreens, preserves, flowers, nuts, wool, herbal products, and soap.

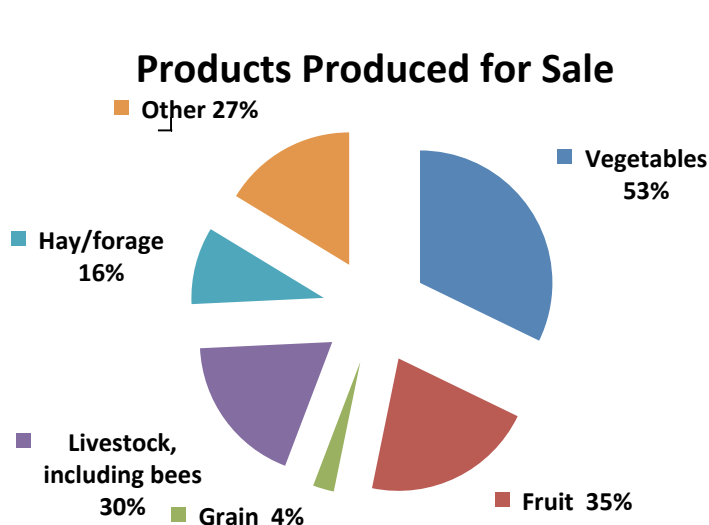


Figure 3. Products Produced for Sale by Respondents.

Participants were asked to indicate how many people worked on their farm or establishment. Below is the breakdown of workers in four different categories.

Table 1. Number of People Working at the Operation.

Number of Individuals Working on the Operation	Full-Time, Year-Round	Full-Time, Seasonal	Part-Time, Year-Round	Part-Time, Seasonal
1	29	12	16	14
1.5	1	0	0	0
2	25	6	4	12
2.5	1	0	0	0
3	6	5	2	9
4	3	3	0	4
5	0	3	0	1
>5		3	0	7
Total	65	32	22	47

Participants were also asked to indicate the number of acres they had in agricultural production. The following chart indicates the distribution of acreage amongst respondents. The largest land use was in pasture at 1096.3 acres, followed closely by hay/forage at 1058 acres.

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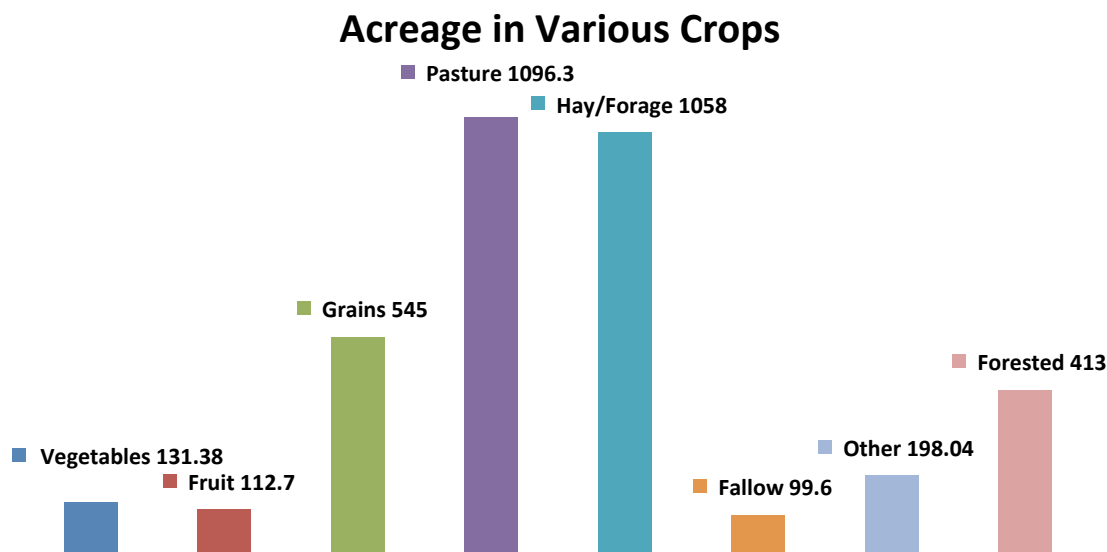


Figure 4. Acreage in Various Crops Reported by Respondents.

In order to gain an understanding of where participants sell their products, respondents were asked to indicate whether they are direct marketing or selling to a third-party. The majority of respondents sold their products through their farm gate (49%) and/or at a local farmers market (45%). Farmers who chose the “other” category were selling their products through

caterers, online and internet sales, a co-op packing house, rural delivery, other breeders, and wholesale. It is important to note that respondents could select as many categories as applied to them.

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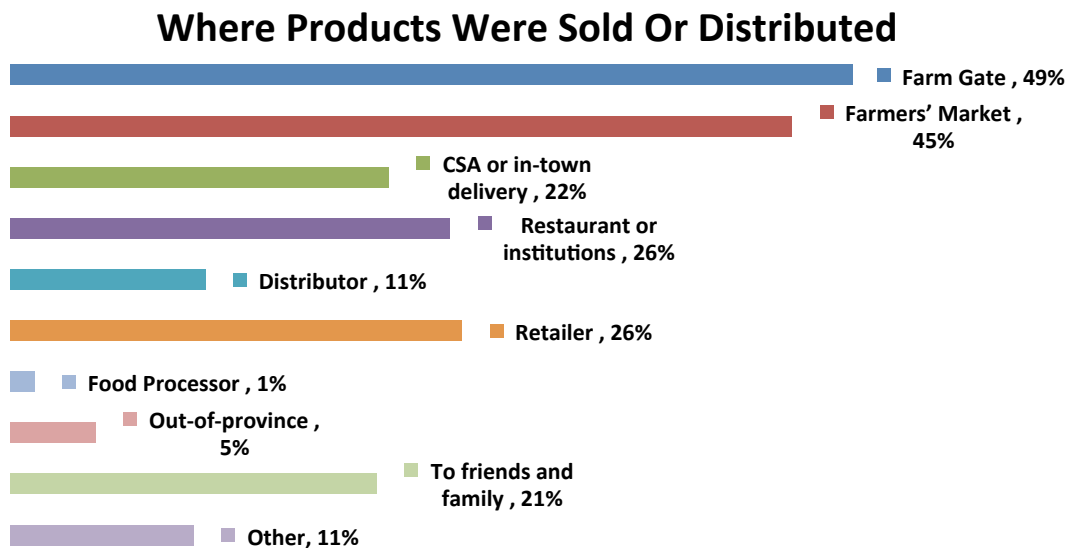


Figure 5. Where Products Were Sold Or Distributed by Respondents.

The majority of respondents indicated that their gross revenue from the sales of agriculture and food products was between \$0 and \$20,000 (45%). Another 24% of respondents indicated that their sales were between \$20,000 and \$40,000.

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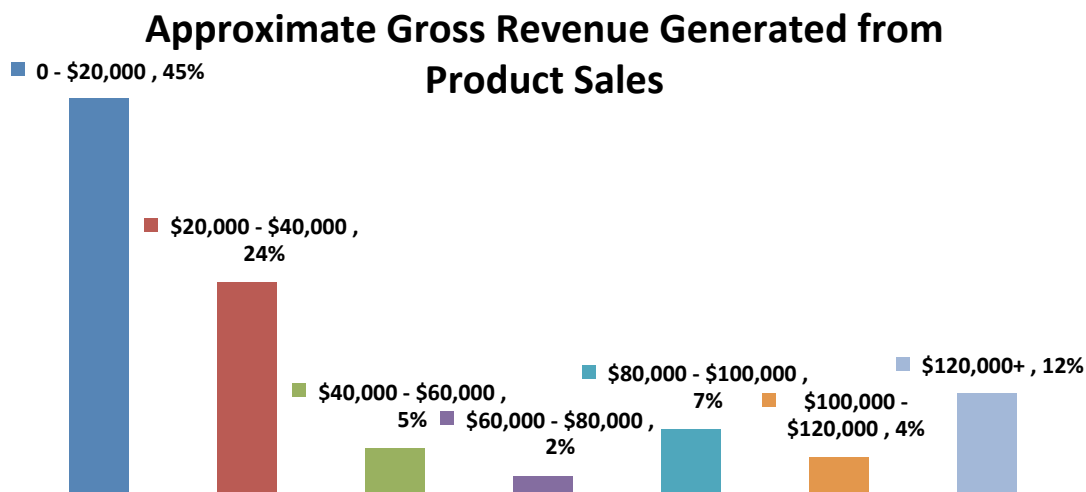


Figure 6. Approximate Gross Revenue Generated from Sales of Products Produced/Sold by Respondents.

Participants were asked to indicate if they use any particular claims or labels when selling their products. It is important to note that certified organic farmers may have responded to this question, which could have affected the results and increased the response in the “Organic” column. A total of 47% of respondents used the term “Local” when marketing and selling their products. Responses in the “other” category included: Certified Organic, Non-Certified Organic, Bee-Friendly, Organically Grown, Ocean-Wise, Sustainable, Permaculture Grown, Uncertified Local, Pasture-raised, Free Range, 100 Mile, and Biodynamic.

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Claims/labels Used for Products

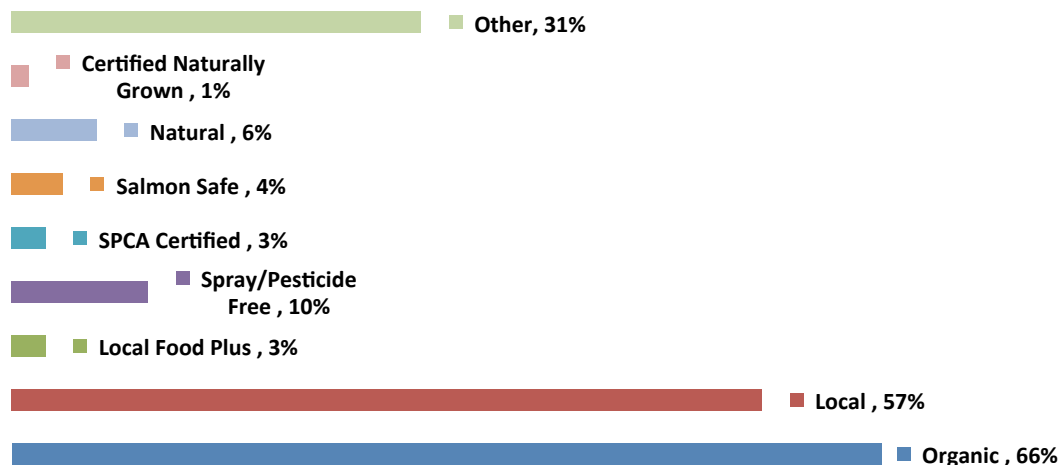


Figure 7. Claims/Labels Used by Respondents for Sale of Products.

Participants were asked two questions regarding organic certification to determine the profile of the respondents in the survey and in the interviews. A total of 59% of the respondents were not certified organic, which indicates a high response from the conventional sector. Those who were certified were members of IOPA and PACS.

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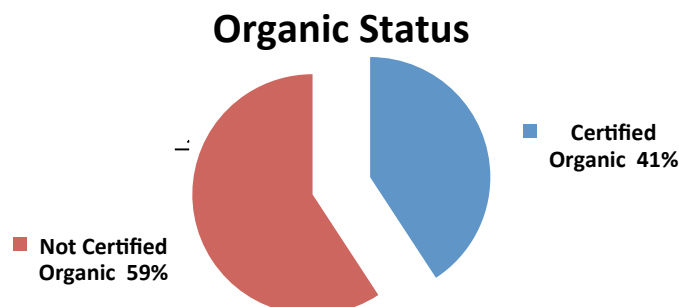


Figure 8. Organic Status of Respondents.

Analysis of Uncertified Farmers, Rural and Urban

An analysis of uncertified farmers, both rural and urban, was performed separately in order to obtain a good understanding of this key subset of survey respondents. Of the respondents who answered ‘No’ to the question “Are you currently certified organic?” (60 respondents), 27% (16 of the 60 respondents) indicated that they had been certified organic in the past, but left certification. There were a variety of reasons why they left and these were captured in the Barriers section. 50 respondents were uncertified *producers*; of these, 19 (38%) make organic claims. 10 respondents were not certified and were not producers (i.e. processors, retailers, distributors, etc.). Eighty percent of respondents making uncertified organic claims were small scale operators engaged in short supply chain relationships with gross organic earnings of less than \$40,000 per year.

Data Comparisons for Barriers

In order to refine the recommendations and determine the most appropriate alternative models for certification, a number of correlations and comparisons were conducted with the data from the online survey and the one-on-one interviews.

Cost as a Barrier

To determine whether cost was perceived as a barrier for all respondents, or just for those in low gross revenue categories, data were compared over revenue. There were no significant correlations; respondents in every revenue category reported cost as a barrier, but this problem was perceived most often by those grossing less than \$40,000.

Table 2. Number of Respondents who Indicated Cost Was a Barrier to Certification.

Gross Revenue	Number of Respondents	Those who Indicated Cost to be a Barrier	Percentage
\$0 - \$20,000	43	27	63%
\$20,000 - \$40,000	23	18	78%
\$40,000-120,000	18	8	44%
\$120,000+	11	4	36%
Did not say	16	9	56%
Total	111	66	59%

Paperwork as a Barrier

A similar correlation was investigated for those who reported paperwork as a barrier to certification. No significant correlation was determined, but it is important to note that paperwork was seen as a barrier by about half of all respondents, regardless of gross revenue.

Table 3. Number of Respondents who Indicated Paperwork was a Barrier to Certification

Gross Revenue	Number of Respondents	Those who Indicated Paperwork to be a Barrier	Percentage
\$0 - \$20,000	43	20	47%
\$20,000 - \$40,000	23	10	43%
\$40,000 - \$120,000	18	8	44%
\$120,000+	11	5	45%
Did not say	16	8	50%
Total	111	51	46%

Barriers to Certification for Urban Farmers

Barriers to certification were considered specifically for urban farmers. A total of 77% of the 13 reported urban farmers indicated that cost was a barrier to certification. Also, 46% of the urban farmers indicated paperwork as a barrier to certification, while 23% of the urban farmers indicated that a lack of education of the standards and difficulty complying were barriers.

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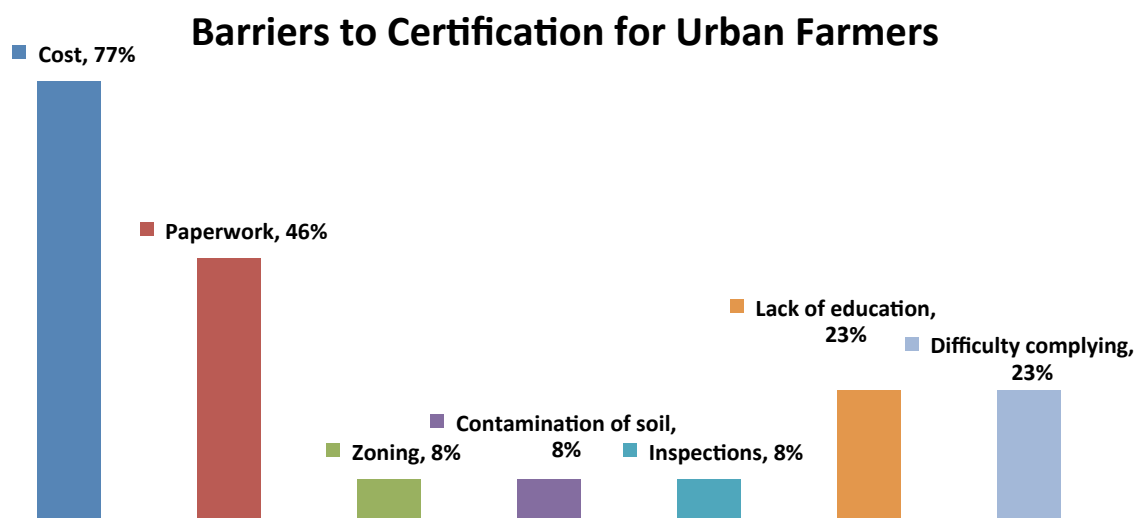


Figure 9. Barriers to Certification for Urban Farmers.

Certified Vs. Non-Certified Farms and Barriers

A total of 43 respondents to the online survey and the one-on-one interviews indicated that they had certified organic operations. Of these respondents, 58% mentioned that they considered cost would be a barrier to those looking to certify. 37% reported paperwork to be a likely barrier, while 23% indicated that a lack of cohesive organic branding was also a possible barrier.

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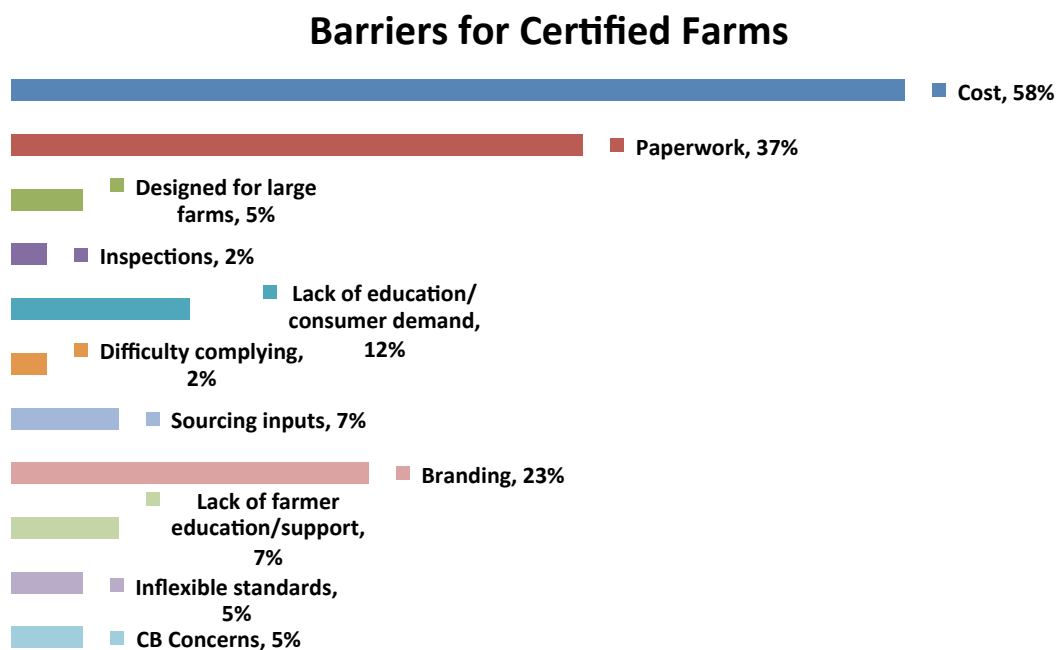


Figure 10. Barriers to Certification Identified by Certified Organic Farmers.

Of the 60 respondents who reported themselves as non-certified, 67% indicated cost to be a barrier to certification, while 53% indicated that paperwork was a barrier. Both of these figures are higher than for the certified respondents. Also, 25% of the non-certified respondents indicated that difficulty complying with the standards was a barrier to certification, while 17% thought the standards were inflexible. Only 10% considered a lack of a cohesive organic brand to be a barrier, compared to 23% of the certified respondents.

Barriers for Non-Certified Farms

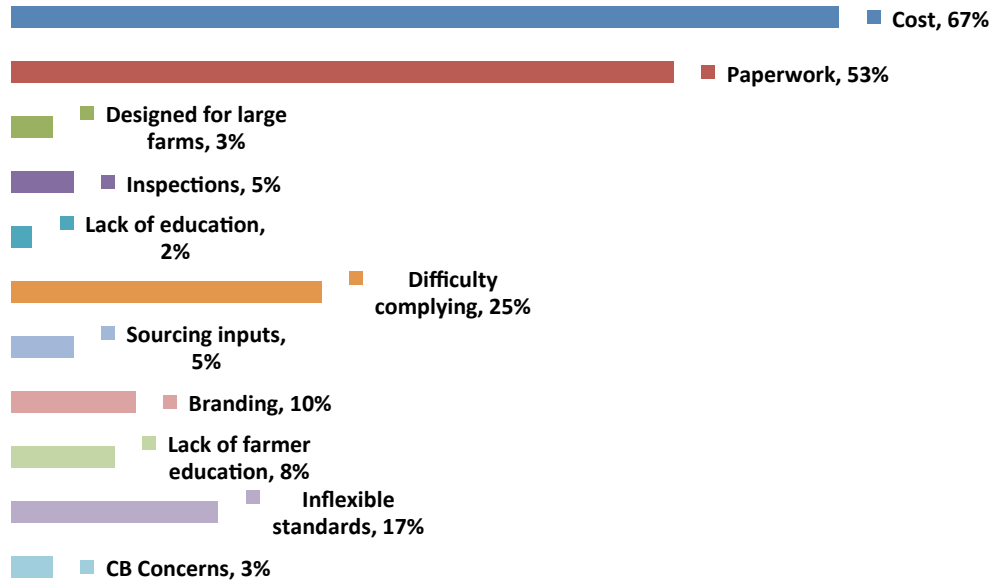


Figure 11. Barriers to Certification Identified by Non-Certified Farmers.

Direct Marketing Vs. Revenue and Certification Status

Reported gross revenue categories were cross-referenced with location for sale of farm products. A few notable figures stood out. For instance, 23% of the respondents who reported gross revenues of \$0 to \$20,000 indicated that they sell to restaurants; 91% of respondents in the \$20,000 to \$40,000 category reported that they sell at farmers markets; 55% of respondents that reported gross revenues of \$120,000+ indicated that they also sell at farmers markets.

Table 4. Comparison Between Gross Revenue and Method of Sale of Farm Products.

		Farm gate	Farmers Market	CSA (in-town delivery)	Restaurant
Gross Revenue	Respondents	%	%	%	%
\$0 - \$20,000	43	67%	47%	19%	23%
\$20,000 - \$40,000	23	70%	91%	39%	39%
\$40,000 - \$120,000	18	72%	50%	33%	50%
\$120,000+	11	73%	55%	27%	27%
Did not say	16	25%	38%	38%	31%
Total	111	63%	56%	29%	32%

Certification status was also considered relative to the location of the sale of farm products. The majority of respondents sold at their farm gate. It was interesting to note that a larger proportion of respondents indicated that they sold their products to restaurants than through community shared agriculture (CSA) programs. Those respondents in the “Did not say” category reported their location of the sale of their farm products, but not whether they were certified. It is also important to note that respondents could choose more than one answer.

Table 5. Comparison Between Certification Status and Method of Sale of Products.

		Farm Gate	Farmers Market	CSA (In-Town Delivery)	Restaurant
Certification Status	Respondents	Number, %	Number, %	Number, %	Number, %
Certified	43	30, 70%	29, 67%	10, 23%	15, 35%
Non-Certified	60	40, 67%	33, 55%	20, 33%	21, 35%
Did not say	8	0, 0%	0, 0%	2, 25%	0, 0%



Benefits to Organic Certification

Participants at the public events and respondents to the online survey were asked what they considered the benefits to organic certification. Responses were divided into seven categories:

1. Market Access and Differentiation
2. Consumer Confidence and Recognition of Quality
3. Accountability and Awareness
4. Philosophical, and Political
5. Health and Environmental
6. Support for the Organic Community
7. Support and Mentorship from the Organic Community

Qualitative answers were coded in order to obtain quantitative results. The majority of respondents indicated that market access and the differentiation of organic products was the main benefit to being certified organic. Secondly, the increased consumer confidence and the recognition of quality were also important. Accountability of farmers and awareness of the standards were also other strong benefits to being certified organic.

Table 6. Benefits of Organic Certification Reported by Respondents.

Benefit	Percentage
Market Access and Differentiation	27%
Consumer Confidence and Recognition of Quality	25%
Accountability and Awareness	13%
Philosophical and Political	9%
Health and Environmental	8%
Support for the Organic Community	8%
Support and Mentorship from the Organic Community	7%
No Benefit	3%
Total	100%

Each of these categories is discussed in the following sections:

Market Access and Differentiation

Respondents mentioned that organic certification offered many benefits in regard to market access and differentiation in the marketplace. Some respondents mentioned that organic certification improved and/or increased their sales and the value of their product, particularly those new to certification, while others suggested that they were able to access a larger market, in particular wholesale venues. Respondents also discussed their ability to access more distant markets, restaurants, and value chains.

Other respondents mentioned that organic certification provided a strong marketing tool and selling feature. Some respondents also stated that with certification they were able to charge more for their products and generate a higher return, particularly from larger retailers.

Some respondents also suggested that organic certification provided a ‘built-in’ marketing tool and a short-cut to consumer confidence when combined with the organic logo. Some stated that organic is a trusted claim and provides a niche market that answers questions for consumers and improves recognition in the marketplace.

Consumer Confidence and Recognition of Quality

Another benefit stated by respondents was consumer confidence and the recognition of quality. Many mentioned that organic certification was a third party verification of organic principles and a transparent system that is traceable. Respondents also suggested that with organic certification customers can know, or be shown, exactly what they are purchasing and be confident that the product is free of pesticides and grown/raised using organic principles.

“People can rest assured that the herbs (and food) are grown with the highest standards for health, of humans, soil, ecosystem, planet...”

Some respondents also mentioned that organic certification provides an education opportunity to explain to consumers the benefits of choosing certified organic products. The term provides a level of integrity and authenticity, and instills trust in the consumer.

Health and Environmental

When responding to the online survey and one-on-one interviews, respondents indicated that the health and environmental benefits of organic certification were very important. One respondent mentioned that organic certification provides a “...statement that I care about my animals and my land.” Other respondents also suggested that organic certification provides a safe work site and healthy, sustainable way of life. It was also mentioned that families, products, farms, soil, and the environment are healthier under organic certification.

Accountability and Awareness

Some of the respondents indicated that organic certification provides a way to enhance accountability and makes people better farmers. The mandatory record keeping and annual visit from the inspector offers a process of ongoing improvement.

“Certification has helped us to become very effective managers because of the detailed records we need to maintain.”

Some respondents mentioned that the process of certification encourages them to be better farmers as they are more informed and more organized. There is an educational component to certification that ensures accountability and integrity in their practices. Some new producers also suggested that the act of certifying was a great learning experience and sets a good precedent, particularly for urban farmers that want to operate at a professional level.

Philosophical, Political, and Environmental

For some, organic certification was a point of pride and an ethical decision. They appreciated the quality of life and peace of mind that comes with certification and were invested in the organic movement. Some also mentioned that the reason for certifying was political, in that certification is a democratic system and an indication to government of the interest in this form of land stewardship. One respondent mentioned that they appreciated being part of a community that can be heard by government.

Support for and From the Organic Community

Some respondents mentioned that they certify because they support the organic community and benefit from the mutual support of other producers. Others mentioned that they are willing to invest in the movement and its principles.

“We need to strengthen the community of organic people - mentor more, share more openly, support one another - share the load.”

Support and Mentorship from the Organic Community

Other respondents to the online survey and interviews mentioned that another benefit to organic certification is the support and mentorship from the organic community. Many suggested that the reason that they certify is to be connected to the organic community and gain advice and support. Some also mentioned that they appreciated the visits from Verification Officers and the information they provide. Others suggested that the organic community functions as a support network and provides access to people who know what they are talking about. They have found the organic community to be collaborative and supportive.

Barriers to Certification

In the online survey and the one-on-one interviews, participants were asked to identify what they considered to be the barriers to organic certification. The results were divided into the following eleven categories:

1. Cost
2. Paperwork and Time
3. Bureaucracy and Standardization/Branding Issues
4. Difficulty Complying with Standards
5. Difficulty Accessing Inputs
6. Lack of Education/Support for Farmers
7. Lack of Consumer Demand/Education
8. Inflexible and Restrictive Standards
9. Standards Designed for Large Operations
10. Concerns with Certification Bodies
11. Concerns with Inspections

As in the previous section, the responses were coded to obtain quantitative results. The cost of certification and the burden of doing paperwork were identified as the strongest barriers (see Table 7). Also, bureaucracy and concerns with the lack of a strong organic brand were also very important barriers to certification.

Table 7. Barriers to Certification Reported by Respondents.

Barrier	Percentage
Cost	30%
Paperwork and Time	25%
Bureaucracy and Standardization/Branding Issues	13%
Difficulty Complying with Standards	8%
Difficulty Accessing Inputs	5%
Lack of Education/Support for Farmers	5%
Lack of Consumer Demand/Education	3%
Inflexible and Restrictive Standards	3%
Standards Designed for Large Operations	3%
Concerns with Certification Bodies	3%
None	2%
Concerns with Inspections	<1%
Total	100%

Each of these categories is discussed on the following pages:

Cost

A large number of respondents identified cost as a barrier to certification, particularly certification fees for small, rural producers. Approximately 45% of the respondents generate less than \$20,000 of annual gross revenue. Many of these individuals suggested that annual certification fees, especially during transitional status, were cost prohibitive.

“I am in favour of paying fees for certification, to demonstrate a level of commitment, but there needs to be a level suitable to intentionally-small or start-up operations. Also...remote, rural farms pay more for certification due to increased inspection costs than more urban ones, while having less earning potential due to more limited or depressed markets.”

One respondent also mentioned that these fees are collected at the beginning of the season when many producers do not have the available cash flow.

“We are on a shoe-string budget here and are working to move from a break-even or loss situation to perhaps generating a modest profit at some point. We supplement the farm running requirements with off-farm work. There is just no room in there for certification costs.”

Some respondents also mentioned that the input costs to certify their practices are too high. For instance, some identified feed, labour, and equipment costs as prohibitive. A couple of the respondents did mention that certification costs were not a barrier as long as these costs are passed on to customers.

Paperwork and Time

Another key barrier was the large amount of paperwork and record keeping required to certify and maintain certification. Many suggested that the time needed to adequately manage the paperwork was overwhelming and challenging to manage. For those that are considering certification, they found that the standards appeared too complex and off-putting, while others had a difficult time developing a paperwork trail and record keeping system that worked well for them.

Other respondents indicated that they think the certification process should be simplified and streamlined and that there should not be annual renewals. Some respondents are already dealing with a number of different record keeping systems for programs such as HACCP, SPCA-certified, Canada Gap, Environmental Farm Plans (EFPs), Crop Insurance and CRA business reporting, which are onerous, in and of themselves. Additionally, some were concerned that there have been more administrative difficulties with increased bureaucracy and issues of accreditation, such as ISO. There were concerns that this has trickled down to individual farms and increased paperwork, redundancy, and red tape. One mixed vegetable producer mentioned that they were expected to keep a full audit trail for each vegetable that they grew and felt that keeping the weeds down was more important than keeping track of numbers, which indicates that time pressures are a concern.

Bureaucracy and Standardization/Branding Issues

Much of the discussion in the online survey and during the one-on-one interviews focused on the lack of standardization and cohesive branding for the organic sector. Many were concerned that the lack of regulation around the use of the word “organic” leads to confusion for consumers. Some were also concerned that by adding new certification options, such as “farmer-certification” or Certified Naturally Grown, this would further confuse customers. Many respondents were concerned that nearby farms can use the term “organic” without being certified, which leads to more confusion and a lack of accountability for those farms that aren’t certified.

“I sometime wonder why we pay for certification while others are calling themselves “organic” while not being inspected or verified that you are farming up to the standard expected. It is a bit disheartening sometimes.”

“I feel that COABC is letting down the farmers who are certified by not coming up with a solution to the use of the word organic. There is no need for farms to certify as long as there are no enforceable regulations to stop the use of the word.”

A number of respondents suggested that the Provincial and Federal governments need to step in to help support the organic claim through policy and regulation, while other respondents felt that they should be able to use the word “organic” even if they are not certified.

“Certifying agencies didn’t create the word “Organic”, but no one should ever say that their product is certified if it is not. We use the organic claim with our customers to stimulate the discussion on why our products are not certified.”

Another major barrier to certification that arose during public consultation was the perceived loss of values and principles in the organic movement due to a dilution of the organic standards. Some respondents mentioned that they left certification due to the newly created organic aquaculture standards, while others were concerned about larger “factory” farms that are certified and only complying with minimum standards.

“Very worried about what is going on in the USA with agribusiness sniffing profits to be made from consumers concerned about healthy food... when the corporations start messing with the standards and allowing questionable substances to be added to the ‘approved’ lists, that is really worrying. What, then, is the real value of certification? It’s my understanding that hasn’t happened yet in Canada, but a concern nonetheless when the general public hears such stories from US media - how are they to know the difference?”

There were also concerns about the equivalency of the Canada Organic Regime and the BCCOP. Producers can certify, within the province, to a non ISO program which does not give them access to the Canada Organic Logo or the right to claim organic status if products cross provincial or national borders. Other concerns around cross-border distribution were also raised:

“One big problem for us, as distributors, is the two-tiered organic system that has resulted from the Canadian National Organic Regime. We sell some products from farmers that are BC Certified Organic. As soon as those [products] leave BC they are no longer considered organic and I think that is unfair. Many of our out-of-province customers do as well and it confuses

them, and ultimately hurts the organic label because they don't understand why something can be organic in one province but not another. I have to agree with them.”

It appears there is confusion amongst stakeholders regarding the benefits and limitations of the BCCOP certification program.

Difficulty Complying with Standards

In addition to accessing inputs, some respondents found it difficult to comply with the organic standards due to their location or current practices. Some suggested that the buffer zone standards were too limiting and impossible to comply with, particularly those farming in an urban setting on small lots, while others had a great source of inputs that are not permitted under the standards. Some of these barriers may be more perceived than real – nonetheless, they are deterring farmers from certifying.

“How do we ensure that inputs (e.g. manure) brought onto the farm are organic and how do we not waste inputs because they don’t meet organic standards (e.g. food waste, human waste).”

Some respondents also mentioned that their current practices, such as hydroponic systems and the use of humanure, are currently not allowed under the organic standards, which is a barrier. Another respondent suggested that the need to keep their grain lots separate from one another when their farm was certified was challenging and became a rodent concern. Other respondents suggested that they find it challenging to obtain affidavits from input providers, particularly those supplying manure.

For urban farmers, there were concerns that the potential soil contamination of their sites, or neighbouring sites would prevent them from complying with the standards. Other respondents were reluctant to certify because they appreciated that ease of using fertilizer and other inputs when needed.

“I respect the organic approach and approximate them as best I can, but I don't want to be bound by the rules.”

Difficulty Accessing Inputs

Some respondents, particularly those in remote communities and some of the urban farmers, identified accessing inputs as a barrier to certification. Many urban farmers are able to access sources of manure or grass clippings easily, but are unable to determine whether these have been treated or sprayed with non-permitted substances. Some farmers on Vancouver Island also mentioned that they found it difficult to obtain good quality sources of animal feed and organic grain. Also, some respondents suggested that it was difficult to find heritage organic seeds and that they needed to choose between organic (hybrid) seeds or heritage varieties. Finally, one respondent mentioned that they have difficulty obtaining organic alcohol to use to process tinctures.

Lack of Education/Support for Farmers

Many of the respondents indicated a lack of information, education, and support for farmers as a barrier to certification. Some respondents mentioned that there are not enough resources available to producers and a lack of understanding of what is required for record keeping. One respondent mentioned that there was an expectation that some extension would accompany the certification process. It was also suggested that the rules are not very clear until one enters certification and that there should be support/extension for research into compliant inputs.

“Consistent, clear, transparent, and well-communicated organic certification policies and equitable enforcement will not only improve farming, farm land, and our food, but will help to sell the public and private benefits of organic production.”

Lack of Consumer Demand/Education

A large number of respondents indicated that there was not enough consumer demand to encourage them to certify, or renew their certification. Many respondents direct market their products and felt that they were able to demonstrate their practices effectively to their consumers to generate consumer confidence and trust. Some were concerned that there was a lack of appreciation from consumers on what organic certification is about, or a general indifference and disinterest in paying more for organic, while others felt that they were already able to attract a price premium by selling direct.

“Ultimately certification means something - but what means even more is how farmers are using and respecting their land, and thus the produce they grow, the food they produce, and in the end, the people who eat that food. Greater emphasis must be placed upon 'education' and 'awareness' for consumers. People who really care about their food sources should make the time to investigate and visit local farms/farmers. People should care about from where their food comes, and by whom it is grown. There is no substitute for human relationships and firsthand knowledge. Consumers should not be passive about their food, and they should not rely upon certification programs to make their choices. People should empower themselves through education and awareness.”

Inflexible and Restrictive Standards

Many of the respondents suggested that the current standards were either too restrictive or inflexible. It was mentioned that the standards are too dogmatic and do not leave room for experimentation. Some suggested that the standards need to keep improving and changing with new times, pests, climate change, etc. and that they do not go far enough to take into account permaculture or other alternative practices.

Some respondents also felt that the broader organic movement was originally meant to address issues such as labour, community health, and environmental health, which has now been narrowed to strictly certification.

“Organic is interpreted as a substitution of materials, and certification has evolved as part of what has gone wrong with the organic movement, we’ve lost direction.”

Standards Designed for Large Operations

A few of the respondents suggested that the current organic standards are intended for larger operations that are selling to regional or international distribution chains. Some were concerned that they needed to compete with large firms with a lot of influence and finances, while others felt that the organic commodity producers are undermining the messages the organic industry is offering and are misleading the public.

Concerns with Certification Bodies

Some of the respondents had concerns that directly related to certification bodies. Some felt that the certification bodies were not personalized and it felt like it was an “us-against-them” system.

“Need a PR push to show certification is a partnership, not a hierarchy. Put a face on the certifier.”

A few of the respondents indicated that there is a general mistrust of institutions and standards and may philosophically object to any intermediary entity.

Other comments regarded the lack of support from the certification bodies. It was mentioned that response times are often slow and information can be confusing, particularly for permitted substances.

Concerns with Inspections

A few respondents had specific concerns about inspectors and Verification Officers. It was mentioned that the inspectors were not necessarily experienced enough in the operations they were inspecting or that they were not thorough enough. It was also suggested that inspectors should be providing more education for farmers on site during inspections where possible.

Solutions and Opportunities for Certification

Some solutions and opportunities were proposed by participants in the survey and interviews. These fell into the following categories:

1. Cost
2. Paperwork
3. Creating clarity for consumers
4. Certification options
5. Provide more extension (and research)
6. Thoughts related specially to COABC
7. Government relations
8. Other issues

The majority of respondents indicated that there were some potential certification options that could help overcome the barriers to certification.

Table 8. Solutions to Overcome Certification Barriers Reported by Respondents.

Solution	Percentage
Certification options	29%
Provide more extension/research	19%
Cost	14%
Government relations	10%
Creating clarity for consumers	9%
Paperwork	8%
Other issues	7%
Thoughts related specially to COABC	4%
Total	100%

Each option is discussed in the following sections:

Certification Options

Respondents provided a number of comments and suggestions for changes to certification. These fell into four basic categories:

1. Provide alternative certification systems for some operators;
2. Make the rules more flexible;
3. Add more rules/certifications; and finally
4. Don't change anything.

Of course, these options reflect rather different views on certification.

Alternative Certification Systems

A few respondents felt that commodity growers and agri-industry should continue to be certified using the current system, but that a different system be used by “real organic” farmers. This alternative certification system was suggested for smaller scale enterprises or those that market “face-to-face” and are viewed as “low risk”. A range of options was suggested: from reducing the frequency of inspections for members with a proven track record, infrequent unannounced inspections, and mini inspections; to peer review rather than inspections; or to self-declaration, possibly with an affidavit or a posted code of ethics. One respondent suggested crop testing rather than inspections. Another suggested that if inspections were needed, these could be done by COABC staff.

Advantages of a peer review system were thought to include peer support and mentoring, less bureaucracy, and lower cost. Some thought customers would be able to detect dishonesty, so direct marketers did not need to be inspected.

This peer certification would allow participants to be included among those who could legally use the word “organic”. Alternately, big companies could be certified using the current methods, and small producers would be uncertified.

Loosen the Rules

A small group of producers felt that standards should move to a more philosophical document, with greater flexibility with regard to inputs and parallel production. Producers should be encouraged to follow the “spirit of the law, not necessarily the rule”.

Additional Rules

Some respondents were interested in having other areas come within the organic umbrella. Specifically mentioned were hydroponics, Society of Organic Urban Land (SOUL) Care’s Certificate in Organic Farming, certifying Urban Farmers, and allowing people to close the nutrient cycle by allowing humanure, and animal manure with fewer sourcing constraints.

Don’t Change Anything

Several people suggested that the barriers were not true barriers, and that to remove them would reduce organic integrity. They urged farmers to “just do the work”.

Provide More Extension (and Research)

Provision of meaningful extension services was seen as a very helpful way to reduce perceived or real barriers. Several areas of extension were recommended:

- Information about the standard, the standard review process, organic principles, and the requirements for and costs of certification;
- The difference between the COR and the BCCOP program;
- What to do when alternative practices, such as permaculture, appear not to align;
- Record keeping, including setting up spreadsheets and using data to improve operations;
- Agronomics including input replacement, cost of production, grain vs. pasture production, urban farming;
- Organic philosophy; and
- Estate planning.

Producers were interested in handbooks or guides for specific sectors, workshops, models and mentoring (“handholding”), field days, and online help. They were also interested in undertaking communication and marketing in a collaborative fashion.

A research component was also identified. One respondent was interested in identifying and developing seeds for organic production. Another suggested that researchers have been hired to create best practices and appropriate certification for urban farmers.

Cost

If cost is seen as a barrier, the most obvious way to minimize this barrier is to reduce cost. Several respondents suggested this with no further detail.

A few specified that small scale and/or low risk producers would benefit from reduced fees; one suggested that costs should reflect a percentage of gross sales. One respondent expressed concern that the small guys have to pay for everything.

“I can't see why I would pay the same as a multi-million or corporate organic producer; I make less than \$10,000 [per year]!”

Several people thought government funding should be available for transition, for small scale or new farmers, for inspections, or just in general. One argued that organic production had significant public benefit and thus should be funded as a public good. Two people felt that certification expenses could be reduced at the level of the certifying bodies, by using volunteers for administration or by reducing staff.

Government Relations

Two different comments were raised about government involvement in organics:

“The provincial government should endorse the regulation intra-provincially, as has been done in Quebec”.

“The federal government should support the organic sector financially.”

Additional comments on government included that labeling should be streamlined and requirements frozen and that “certified organic” should be used. One person reported that the Harper government is limiting people’s ability to lobby.

Creating Clarity for Consumers

Respondents were concerned that the “organic message” was not clear to consumers. They suggested greater consumer education around certification, for consumers and also for the entire value chain. Some suggested the clarification of other labels that consumers might confuse with the values of organic, such as local, free range, non-GMO, etc.

There were mixed feelings about the consumer demand for organics. Some felt that people were listening, and will continue to listen if the messages are positive. Others felt that they would wait until they felt a market pull before they would certify. Some felt that much more joint work needs to be done provincially, promoting certification bodies to the public, using modern marketing methods and making organics “cool”.

Some suggested the importance of limiting the use of the word “organic” to those who were certified; that this rule should be enforceable, and have legislation behind it.

Paperwork

Again people provided the obvious answer that reducing paperwork was the way to minimize the barrier of too much paperwork. Several respondents recognized that some record keeping was a necessary part of farm business management, but most felt that the paperwork needed for certification could be streamlined.

Some respondents suggested the use of templates, a “baseline production log management system”, or farm business management reporting systems (such as those used by ProCert), or “whole farm management tool”. There was hope that this might allow data to be collected, and then used for a multitude of farmer-friendly applications, including certification among other uses.

There was concern that paperwork was redundant, and that information collected by certifiers was also collected in other sorts of forms. Some information was irrelevant, applying to specific sectors that would not include all operators. Some respondents thought information should be shared, and that certifiers could share forms, and work together updating them, reducing the work for any one CB.

One respondent suggested that we needed to create the story that inspired people to do this as the easy, sensible and desirable thing to do. Two people suggested they would like more help with record keeping.

Additional Issues

A number of additional issues were mentioned:

- One respondent suggested that financial compensation was needed if producers were to import feed
- Food safety rules differ regionally, making it difficult if you live and sell in different jurisdictions
- An aging farm population is a concern
- Access to land and equipment is difficult for beginning farmers
- OMRI/PSL should be “fixed”
- Federal leaders should be less moved by corporate lobby pressure against the organic sector
- Organic integrity needs to be maintained beyond the farm

Two producers suggested that they wanted recognition for the good work that they were doing, including perhaps thank you letters from the local municipality for them being organic.

Thoughts Related Specially to COABC

Some respondents suggested that there should be changes in COABC. One person suggested that all the smaller Certifying Bodies (CBs) should amalgamate, or that COABC become the CB, thus eliminating a layer of administration. A more common thought was that COABC stop dealing with the certification process, and work more on community and messaging by regrouping and returning to core values. It should act as a source of connections and of resource people, including increased staff at COABC. Other people mentioned grass roots, democracy, and collaboration and inviting more farmers in.

One individual felt that people would eventually join COABC if the messages continued to be positive.

Alternative Models for Certification

A number of agriculture product assurance programs were reviewed by the consultants and compared to existing organic certification systems in terms of affordability, accessibility and credibility.

In order of complexity (least to most):

1. Organic Pledges (Self-declared pledges, Farmer's Pledge™)
2. Peer to Peer Review (COABC's draft of Community Verified Organic, DemeterLocal);
3. Participatory Guarantee Systems (Certified Naturally Grown, Kootenay Mountain Grown, Brazil's Organic Social Control);
4. COABC's 'Low-Risk' Program;
5. Group Certification.

A Certificate in Organic Farming was also explored. For further details on the more intricate programs such as the Farmer's Pledge™, Community Verified Organic, DemeterLocal, Certified Naturally Grown, Low Risk, and Group Certification refer to Appendices F through M.

Alternative Models Overviews

Pledges

Self-declared pledge - Some farmers interviewed for this project mentioned using a self-declared pledge as a means of communicating their commitment to their customers. Most edited a version they found online, signed it and displayed it where it their customers could see it (hard copy and on-line)

NOFA's Farmer's Pledge™ has a bit more structure and requires annual renewal. All participants sign the boilerplate pledge and submit the signed copy to the association. Operators commit to allowing their customers to inspect their farms in the pledge. Annually, NOFA publishes an Organic Farming Guide that lists all pledged members. If the pledged member is certified that certification information is also provided. There is no desk review nor third party oversight and no associated organic logo.

Community / Peer Review

COABC's draft of Community Verified Organic (CVO) - was proposed to provide a certification program that: increases accessibility to small-scale farmers (producers earning less than \$30,000 from local sales); fosters local connection of organic food producers with shoppers to build trust and accountability; and increases capacity for long-term food security. Certifying Bodies would decide whether to offer the CVO Program, and whether CVO applicants are full members or a new class of members. It was intended to be an open and transparent process. Farmers would fill out an online application on COABC's website stating their planned crops, methods, off-farm inputs, etc. and sign a disclosure agreement. The Certifying Body, determined by the applicant, would review the application and arrange a site visit. [The growers' claims of their practices could thus be directly accessed by the public. University agriculture programs could educate students about organic production methods and marketing, and provide students to act as one level of verification].

DemeterLocal – a peer-to-peer Biodynamic education and certification program managed by Demeter International in the USA. DemeterLocal fosters the growth of Biodynamic education and farming within pre-defined geographic areas through the development of regional groups composed of farmers, educators, students, and anyone interested in Biodynamic agriculture. The goals of this program are the growth of Biodynamic farming and certification amongst family farms and the development of regional Biodynamic foodsheds.

Participatory Guarantee Systems

According to the International Federation of Organic Agriculture Movements (IFOAM) Participatory Guarantee Systems (PGS) are defined as locally focused quality assurance systems. They certify producers based on active participation of stakeholders and are built on a foundation of trust, social networks and knowledge exchange. PGS represent an alternative to third party certification, and are especially adapted to local markets and short supply chains.

Certified Naturally Grown (CNG) offers certification tailored for small-scale, direct-market farmers and beekeepers using natural methods. Certified Naturally Grown is a Grassroots Alternative to the USDA's National Organic Program meant primarily for small farmers distributing through local channels - farmer's markets, roadside stands, local restaurants, community supported agriculture (CSA) programs and small local grocery stores. The program is accessible to Canadian producers and involves desk reviews, peer inspections and random residue testing. Transparency is the keystone in this program as all documentation per operation is readily available online.

Kootenay Mountain Grown (KMG) program is managed by the Kootenay Local Agricultural Society (KLAS), who is the sole certifier for the program. KMG is a PGS registered program. As the owner and certifier of the KMG label, KLAS is responsible for ensuring that only farmers and processors that meet the KMG standards for organic agriculture can market their product as KMG.

Brazil's Organic Social Control (OSC) is similar to the two other PGS programs described. It is limited to small operators involved in direct sales who are members of locally formed OSC organizations that are registered with the government. The registration is a declaration of adherence to the Brazilian organic standard. Once an OSC is registered, OSC members can market their products as “organic” direct to end users, but cannot use the official organic logo. An OSC can be any scale (e.g. a cooperative or a farmer's group). It is thought that OSCs provide an opportunity for farmers to gain experience with organic standards and some of the certification processes. The OSC was chosen for review in this project due to the fact that the program requires compliance with the national organic standards and there is no cost to operators.

COABC's BCCOP Low Risk Program

COABC's BCCOP Low Risk Program is an assessment program that has been available to BC operators since 2006. The program is currently limited to operations that trade exclusively within the province and which have been certified for at least three years with no major non-compliances before entering the Low Risk program. Eligible operations are inspected only once every three years, but operators must submit complete Organic System Plans and pay registration fees annually. Only two COABC accredited CBs offer the Low Risk Program: IOPA and PACS. Each CB must conduct random inspections of 10% of its members annually, in addition to inspecting each client once every three years.

Group Certification

Group Certification entails sharing certification amongst a defined group of operators such as: growers growing similar products; producers selling into the same market; or all operators in the same value chain. For assurance purposes, this group functions as a single client adhering to an internal management system (documented structure).

Such a group management structure transfers partial responsibility from the external assurance system to the internal system. The external assurance system then only needs to sample the internal system to test for compliance, eliminating the need to inspect each operation individually. Additional synergies can be realized by members of the group such as information sharing, mentoring, etc. The management system plays a vital role in supporting a learning organization whose members seek to improve their practices over time.

Certificate in Organic Farming

The Certificate in Organic Farming program is a bridging program towards organic product certification, which offers an opportunity for operators to learn about organic farming principles, standards, and practices. This type of program is of particular benefit to operators who cannot meet all aspects of organic standards, but are committed to organic principles.

Affordability

Alternative model fees were reviewed for affordability.

\$0.00 – A self-declared pledge only costs the time it takes to generate the pledge, the time to print and to post. Self-declaration content varies as can be seen in Appendices F and G.

\$65.00 USD annually - Three chapters (Connecticut, New York, Virginia) of the Northeast Organic Farming Association offer the "**Farmer's Pledge™**" program. It has been in effect for 10 years and is available to both certified organic and non-certified organic operators. The process involves farmers submitting a newly signed pledge to one of these associations annually. By signing the pledge a farmer guarantees consumers the right to inspect and assess the veracity of the individual farmer's commitment.

In return, the chapter publishes the farmer's listing in their producer directories. Non-certified pledged farmers are distinguished from certified operators by some means of coding in each of these directories. There is no further oversight or guarantee of compliance. The Canada Organic Growers has been in discussion with NOFA on adapting the pledge for Canada, but nothing concrete has come to fruition.

\$100 CAD every 3 years when renewing membership (estimated) - Certificate in Organic Farming. There is a \$200 application fee to write the professional exam. This is a program under development. See further details under the "Other Observations" heading.

\$60 - \$150 CAD annually - Kootenay Mountain Grown (KMG). KMG's fee is comprised of the Kootenay Local Agricultural Society (KLAS) membership fee of \$ 40.00 plus an acreage fee ranging from \$20 for production on less than 1 acre to \$110 for 20+ acres of production. Processors pay \$40 KLAS membership fee plus \$10 for 1 product or up to \$55 for 10 products and \$5 per product thereafter.

\$110 - \$200 USD - Certified Naturally Grown (CNG). CNG 'recommends' an annual 'contribution' ranging from \$125 - \$200 USD per year, but the minimum contribution for livestock or produce certification is \$110 USD. The apiary certification program is newer, so while CNG recommends \$75 - \$200 USD per year, it doesn't specify a minimum.

\$150 CAD annually – Community Verified Organic (CVO). This was the proposed fee for the CVO program that was drafted by BCARA, but never came to fruition. In the preliminary draft of the program the fee amount appears to be based on what would be attractive to potential members as opposed to true cost recovery.

\$234 + annually - COABC's 'Low-Risk' program. As of 2013, IOPA Low Risk operations pay \$234 for the program, saving \$100 in annual fees relative to operations in IOPA's regular certification program. PACS Low Risk members save more partly due to the fact that PACS has many operators in remote communities, which increases travel costs for inspectors. All Low Risk certified operators save time and money by not having to host an inspection every year.

\$350+ Annually plus a Licensing fee assessed at .05% of gross sales over \$100,000 per year DemeterLocal. This is the current fee structure used by Demeter International for this new program, which limits operator sales to within 200 mile radius of the farm.

Exact figure unknown but possible substantive savings – Group Certification. The external agent tests the group's internal system annually by sampling components of the system to confirm overall compliance of the group. While cost savings can be substantial, the group is affected by the actions of each individual. Individual actions can be detrimental to the group if the internal management system doesn't appropriately address those actions or concerns.

Accessibility

According to the International Social and Environmental Accreditation and Labelling Alliance (ISEAL), accessibility is about the right to participate. All sizes of operations should be able to afford and handle a program's requirements. In other words costs and excessive paperwork should not hamper participation. Based on these two criteria, in general, pledge systems are the most accessible, then Peer Review, then PGS programs, followed by Low-Risk and Group Certification.

Credibility

Credibility in the global organic trade certification network typically includes verification and a very formal accreditation system. Accreditation is a means of oversight which may not always be necessary to assure consumer confidence.

According to ISEAL, credibility can be achieved through consistency (in standards interpretation, decisions, and sanctions), rigour, competency (particularly of evaluators), impartiality, transparency, accessibility and independent physical oversight by another body. The overseeing body does not necessarily have to be ISO accredited, as there are competent non-ISO systems that can more than guarantee consumer confidence. They can also facilitate a level of knowledge sharing that cannot be practiced under formal ISO accreditation systems.

For this project we assessed accessibility separately from credibility as there were sufficient differences to warrant this segregation. Thus credibility in this report identifies where some of these alternative models are not on par particularly in the areas of consistency, rigour, competency, impartiality, oversight or transparency.

Pledges are self-declaration systems and are only as good as the operator making the pledge. In some cases, this may be good enough, but there is no guarantee of consistency, rigour, impartiality or competency. Even if consumers have access to farms to see for themselves what practices a farmer is using, most consumers would not know what to look for. It is too easy for operators not to do what they say they are doing in their pledges. More importantly in organic production, it is not the “do not do’s” that are commonly overlooked, it is the “must do’s” such as effective soil building, generating the bulk of their soil fertility on-farm, and restricting their compost feedstock to acceptable, agro-ecological supplies.

Certified Naturally Grown is a very transparent system with peer reviews and desk reviews done by CNG staff to assess key requirements and compliance followed up by email/phone communications. There are no third party inspections or oversight from an independent agency. However, interested parties, including consumers are able to visit any member's operation at any time. Visitors can view member applications, inspection reports and farmer declarations from the CNG website or ask for it directly from the farmer. The situation is identical for **Kootenay Mountain Grown**, except that member documents are not accessible on the KMG website, but are available upon request. CNG differs from KMG in that CNG does conduct unannounced pesticide residue testing at point of sale on 2 – 5% of its members, a program that has been in place for the past 6 years.

CNG has also completed a rigorous self-assessment and submitted an application for IFOAM's level 2 Participatory Guarantee System recognition. Currently CNG is one of four PGS agencies in the world able to use IFOAM's official PGS logo in their marketing materials. The

level 2 PGS does not equate to oversight as it is a self-assessment process but does help in the credibility department. IFOAM created this level 2 PGS recognition program to encourage a high-level of commitment to the principles and core features of PGS to help strengthen the positive benefits of PGS.

One underlying problem with the PGS model is the inability to maintain sufficient impartiality with peer inspections especially in locations where there are few members since farmers are not to inspect each other. In other words, farmer A inspects Farmer B, B inspects C, and C inspects A; Farmer B would not inspect Farmer A if A inspects B. Impartiality is also compromised when the same farmers inspect the same farm year in and year out.

Similar problems could arise in COABC's regional CBs at the Certification Review Committee level if member numbers dwindle, and large numbers of members need to recuse themselves from decision making due to Conflicts of Interests. The regional CB is also not able to second non-members to their Certification Review Committees.

Based on the information presented above, a standalone **Community Verified Organic** program could be developed with sufficient criteria to guarantee credibility. Peer inspections would not be required. Components necessary to assure consumer confidence would include: the signing of pledges committing the operator to compliance to the Canada Organic Standard; desk reviews of all files (plans); random inspection of 10% of operators on an annual basis conducted by 3rd party inspectors; oversight from a professional body; and a high level of information transparency. It may also be beneficial to use marketplace surveillance as a means to assess compliance and make whistle blowing easy to do and a cornerstone of the certification process (hence the name community verified).

DemeterLocal has many layers of checks and balances including the requirement that two Farm Evaluators complete the annual assessment. At least one of the two evaluators must be enrolled in the program. There is also a Local Group made up of farmers, community members, and students that oversees the farm evaluation process and makes recommendations to Demeter on which farms qualify for certification and on appropriate Farm Evaluators. Demeter determines final status of certification and who is designated as Farm Evaluators. Demeter also reserves the right to send out an inspector at Demeter's cost, should it be deemed necessary.

COABC's 'Low-Risk' Program requires random unannounced inspections to be completed on 10% of low risk members annually. A desk review is conducted on all Low-Risk renewal documentation to assure continued compliance. Any concerns are followed up on and may include loss of Low-Risk status and a return to annual inspections. The Low Risk program is BCCOP accredited and could be duplicated by the COO.

Group Certification in Canada doesn't really exist yet, but it could easily be created by simply modifying the COO's existing Grower Group category to cover more diverse groups of operators connected through an internal management system. The BCCOP could adopt the Group Certification model.

Equivalency

According to the information presented above, only the Low-Risk Program and Group Certification are equivalent to current regional organic assurance programs as they both function within the same structure. All current COABC CB certification services could benefit from improved paperwork accessibility and increased transparency.

DemeterLocal is very innovative in its approach, has sufficient transparency in all areas, but it is not assessing to the Canada Organic Standard. All other existing programs reviewed seem sufficiently transparent with opportunities for improvement particularly in complaint handling and informing the public on the outcome of investigations. However, they all lacked sufficient oversight to be considered equivalent to organic certification.

Certified Naturally Grown also has issues of equivalency, in that their produce and livestock standards are based on the USDA NOP standard (not the COR). They set their own standards as needed, for instance, for apiaries. US based operators certified under the CNG program cannot use the word “organic” as the program is not accredited by the USDA. Canadian producers certified by the CNG may use “organic” in BC, but the claim is not based on the same standard.

The situation is basically the same for **Kootenay Mountain Grown** where there are peer reviews, no oversight, and they use their own standard, which differs from the Canada Organic Regime. There is also an issue of restricted regional access and possibly too small a membership base to assure continued impartiality, especially when members are expected to inspect farms that produce similar products to their own – e.g. poultry producers inspect other poultry producers since they not only recognize issues of non-compliance, but can also share knowledge and help solve production issues.

The **Certificate in Organic Farming** is also not equivalent, as it is not a product certification program. It should be seen as a stepping stone to organic product certification and of particular benefit to operators who cannot meet all aspects of organic standards, but are committed to organic principles. Many Oregon Tilth Certified Organic (OTCO) and Northeast Organic Farming Association (NOFA) members carry both types of certification.

Table 9. Summary of Alternative Models.

	AFFORDABILITY	ACCESSIBILITY	CREDIBILITY	CAVEAT	EQUIVALENT TO COR AND BCCOP
Self-declared pledge	+++cheapest	Easy	Self-declared	Self-proclaimed	no
Farmer's Pledge™	+++cheaper	Easy Signing pledge & fees.	Self-declared	Not offered in CAN	no
Brazil's Organic Social Control (OSC) [PGS]	+++cheaper	Medium. Need to form an OSC or join one.	Self-declared+	Individual OSCs register with govt. Must commit to national organic standards. Can use the word “organic”	no

				but no logos.	
Certified Naturally Grown [PGS]	+++cheaper	Medium. Requires Systems Plan & fees.	Peer-review	USDA NOP based. Does not permit the use of the word “organic” in the US.	no
Certificate in Organic Farming SOUL (Society of Organic Urban Land Care) and possibly other CBs	+++cheaper	Medium. Passing an exam, signing an affidavit & fees.	Exam	Program in development · Not a product certification program.	no
Kootenay Mountain Grown [PGS] KLAS (Kootenay Local Agricultural Society)	++cheaper	Medium. Requires Systems Plan & fees.	Peer-review	Uses own standard. Limited to the Kootenay bioregion.	no
Community Verified Organic BCARA? Others?	++cheaper	?	?	Preliminary draft only.	could be if designed so
Low-Risk Program [BCCOP] IOPA, PACS	+cheaper	Harder. Requires more in-depth Plan & Fees.	Unannounced inspections + accreditation	Other COABC CBs could offer program	yes
Group Certification [COO]	+cheaper	Hardest. Requires an Internal Management System & fees.	Unannounced inspections for set percentage + accreditation	Would need to be developed by both the COO and the BCCOP	yes
Demeter Local	Not necessarily cheaper than some COABC regional CBs	Medium to Hard. Needs a local group for oversight. Requires systems plan & fees	Unannounced inspections as deemed necessary.	Using Demeter Farm Standard. Sales limited to radius of 200 km to farm. Many layers.	no

Other Observations

- Having a ‘Low Risk’ program serves as a real show of trust from a CB to its members. It is an opportunity for operators to be rewarded for good performance and also creates an opportunity for dialogue.
- According to OTCO and NOFA, Certificate in Organic Farming is a stepping stone towards organic product certification, not a shortcut to product certification. It is an opportunity for operators to learn about organic farming principles, standards, and practices. Many farmers who are certified with OTCO and NOFA started off with farmer certification and, as they gained experience and knowledge and worked through transition, they applied for product certification. Many renew both types of certification

annually. SOUL is interested in developing this program in BC in partnership with other certifiers.

- Group Certification in Canada doesn't really exist yet but could easily be created by simply modifying the COO's existing Grower Group category to cover more diverse groups
- Knowledge Sharing – all models need to use knowledge sharing and teachable moments to the utmost. Credibility is not compromised if knowledge is shared equally amongst members. Non-compliances only occur when information is preferentially awarded.

Conclusions on Alternative Models

All the alternative models reviewed offer cost savings in comparison to existing certification systems. Only two offer more accessibility in terms of reduced paperwork and ease of sharing information (CNG and KMG). Even though CNG and KMG are transparent programs, both lack credibility and oversight. OSC is equally transparent, has a little more credibility, but lacks oversight. DemeterLocal is very innovative in its approach, has sufficient transparency and credibility, but it is more expensive for operators than the fees charged by most of the regional CBs. It is also not assessing to the Canada Organic Standard. Only two models, the Low-Risk and Group Certification (a.k.a. Grower Groups), guarantee the same level of assurance and can be deemed completely equivalent to existing organic certification systems. The most innovative alternative is the Certificate in Organic Farming, but it is more an educational bridging program than a product certification system.

In the meantime, the COABC membership should recognize the uniqueness of the BCCOP risk based program. The entire BCCOP program deserves recognition since it limits bureaucratic and paperwork burdens present in ISO systems. Record keeping and tracking are critical components of any assurance programs and should never be abandoned, but some ISO requirements, and the way in which they are interpreted, can be burdensome for small-scale, uncomplicated agricultural operations. Discussions are taking place in the USDA NOP on how to reduce the ISO burden. We, in Canada, can only gain from their experience.

Recommendations

The following discussion is divided into three sections:

1. Recommendations requiring no change in the BCCOP framework;
2. Recommendations that would require change in the BCCOP framework; and
3. Recommendations that the COABC could make to the COO.

1. Recommendations Requiring No Change in the BCCOP Framework

1. Individual CBs or collaborating CBs should be encouraged to offer outreach and orientation workshops to answer questions of interest to growers, as knowledge gaps are evident from the responses received in the project survey. COABC and CBs could also consider partnering with other agricultural organizations or networks such as Young Agrarians, BC Farmers Market Associations, etc. to reach out to new or potential farmers.
2. Individual CBs, or CBs in partnerships, could develop informative brochures to answer questions of interest to growers.
3. The COABC, in partnership with all member CBs, could launch a web based COS/Organic Systems Plan interface to improve accessibility and reduce farmer burnout from excessive paperwork. Filling out the electronic plan for the first time may be a little onerous for some operations, but should become easier in subsequent years since it would allow the operator to easily confirm the existing plan or update it. Verification Officer findings and CB decisions could be posted on-line.

It is anticipated that such an interface would cost approximately \$35-\$50,000 to develop. Ideally, a Content Management System (CMS) could be created to eliminate the requirement for extensive external technical support to manipulate and update. A first step would be to create a basic farm plan template. A good example of a simple system can be viewed on the Certified Naturally Grown website. The COABC interface could be even more interactive, allowing for multi-year updating versus having to complete the entire organic system plan from scratch annually.

Further research identified Intact's Ecert as the most popular international ready4use electronic organic certification system available. Ecert can handle the organic certification process from application through the assessment process to issuance of certificates. It also meets ISO auditing requirements. CCOF, OTCO, Naturland, and Biosuisse are examples of organic certification bodies using Ecert. Outside of the Austria, Intact's homebase, Ecert is serviced by Organic Consulting Group (www.organic-services.com).

4. The BCCOP could post online all operator Organic System Plans, de-certifications, suspensions, and other sanctions. This would increase program transparency, resulting in greater credibility.
5. The BCCOP could create an accessible easy-to-use public complaint system.

6. A score card system (integrated into the COS/OSP interface outlined above) could be created so farmers can enter their data and review their non-compliances are before submitting their plans to certification bodies. This could reduce overall certification expense and trim volunteer and staff workload.
7. COABC could create a transition program that provides funding (government subsidy) during the transition years and training/mentoring support.
8. Certification fees for larger gross earners could be increased within each CB to offset small producer certification fees.
9. A fund could be developed from donations, to offset certification fees for small producers.
10. COABC and CBs could support the development of Certificate in Organic Farming that could serve as a bridging program to product certification. The Society of Organic Urban Land Care (SOUL) is well positioned to do this work based on its current Professional Land Care Provider certification.

2. Recommendations that Would Require Change in the BCCOP

Framework

1. COABC should continue seeking a mandatory regulation that will require products labelled or marketed as 'organic', or 'organically grown' etc. in BC to be produced in accordance with the Canada Organic Standards and certified by a certification body accredited by the British Columbia Certified Organic Program and/or one that is accredited by the Canadian Food Inspection Agency for the Canada Organic Regime. Many participants at the COABC workshop were adamant that COABC follow through on this high priority initiative which will benefit and serve the entire organic community, including consumers.

It is recommended that COABC consider including an exemption for operations generating less than \$5,000 in gross sales of organic products. Refer to Appendix C for an example of Declaration of Exemption used in North Carolina for the \$5,000 per year exemption under the NOP.

COABC should undertake effective outreach and educational activities to help minimize barriers/resistance to certification while pursuing mandatory regulation. This initiative should not stop the COABC pursuing the recommendations in section one.

2. The BCCOP program could develop a "Grower Group" category of certification based on the CFIA's Canada Organic Office model. Workshops should be held to launch this certification category option.
3. NEW OPTION: Create a new risk-based assessment process within the BCCOP program (Inspection Frequency Based on Risk Assessment - section 2.7.3 Book 1 Annex 1) focused on farmers across the province who sell in short supply chains (direct and to restaurants) within the province. Initially the plan was to limit the New Option program to operations earning less than \$40,000 annually, but through discussions with the Project Advisory

Committee there appeared to be no rational reason to impose any such restriction. Under the New Option, each farmer would attend a training session (face-to-face or virtual) offered either by the CB or possibly by the COABC. Each farmer signs a pledge that includes a commitment to allow consumer site visits and compliance assessments. For biosecurity reasons, the farmer may choose to restrict windows of access by the public (e.g. Seed producers who strive to prevent unwanted cross-pollination through isolation distances and restricted access or livestock producers who wish to prevent the transfer of disease, etc.). The farmer completes an Organic System Plan outlining their commitment to the Canada Organic Standard. Ideally, the operator completes and submits their OSP via an electronic COS/OSP interface. An onsite peer to peer review is completed (Farmer A inspects Farmer B, Farmer B inspects C, C can inspect A, but B cannot inspect A, nor can C inspect B). The CB completes desk reviews based on the OSP and the peer review report on all members and random unannounced inspections are conducted on 10% of their members annually. VOs complete site inspections targeting specific issues (not a full inspection), identified during the desk and peer review stage, on the 10% randomly selected members unless there are concerns and a full site inspection becomes necessary. The VO uploads their findings onto the electronic interface and the CB makes their determination. The CB also employs marketplace surveillance as a means to assess compliance.

After the three year transition period (or shorter depending on the land use history) and the appropriate checks and balances determined by the COABC, the operator would be allowed to use the BCCO logo. The checks and balances may include an on-site inspection with a one-time fee in addition to the on-site peer review in the third year of transition.

This program could either be run by existing CBs, if they feel so inclined, or by a new regional CB that deals exclusively with groups of operators. The cost of such a program would need to be assessed during the pilot phase, but initial stakeholder feedback indicated that fees would need to be limited to \$150-\$200 annually per farm to be tolerable.

Please see Appendices A and B for pictorial representations of the existing systems and the New Option.

This New Option has been suggested for use exclusively for farm operations, but could be adapted for use in processing operations in the future if the farm pilot project is successful and there is desire for continuation and expansion. The type of processors who might be attracted to such an offering are niche retailers such as local millers and bakers, preserve processors, chocolatiers and juicers.

3. Recommendations the COABC Could Take to the CANADA

ORGANIC OFFICE (COO)

1. The COABC could request that the COO broaden the “Grower Group” certification category to allow any group of operators, such as those producing similar products, or members of the same value chain, and who are collectively committed to an effective internal management system, to certify as one entity. The category could be renamed to “Group Certification” to reflect the broader range of operators who qualify. CBs would

need to conduct sufficient testing of the group to assure integrity. Workshops could be held to launch this certification category option.

2. The COABC could recommend that the COO post all OSPs for the ISO system on their website and develop a publicly accessible easy-to-use complaint system.
3. The COABC could request that the COO sanction a Risk Assessment system for ISO operators. Once sanctioned, CBs who offer the program could advertise the program benefits in their promotional materials and conduct training workshops in collaboration with COABC.



Other Thoughts

- ✓ It might behoove the COABC to survey operators who left organic certification to truly establish their reasons. Particularly of interest would be the operators who abandoned organics due to technical barriers. It is possible such operators may return to organics once the technical barrier is removed. This requires that there is sufficient research addressing these production challenges and sufficient dissemination of the solutions once established. With the release of such practical information it is also possible that non-organic farmers might be more inclined to consider organic certification.
- ✓ The New Option is an amalgamation of the best features of each of the programs reviewed that attempt to meet many of the needs of farmers and have sufficient rigor to meet assurance criteria. Farmers appreciate the learning and sharing aspects of peer review. Creating a transparent mechanism of certification that is based on risk is a natural progression of this process.
- ✓ It is recommended that the COABC launch the New Option as a pilot project with a few CBs to field test it and determine costs, before considering rolling it out as a full program. Many of the recommendations offered in the first category that do not require a change in the BCCOP framework may help to overcome enough barriers to certification that a New Option may not be warranted. This pilot project could include a cost analysis to determine how much it would cost to deliver the New Option. All CBs would provide their input to ensure the numbers accurately reflect BC's CB realities, including fee components comprised of CB and COABC fees. Many operators on the "localorganic" listserv felt that an annual flat fee between \$150-200 for an operator was within reason. However, some operators speculated that \$50/operation/yr for 1,000 operations (1/3 of all uncertified organic operators) would be more in line with their mindset, and would attract a higher rate of buy-in.
- ✓ There was resounding enthusiasm for the Certificate in Organic Farming following the workshop at the COABC conference. Many workshop participants stated that the creation of the Certificate in Organic Farming and implementing key suggestions provided by the consultants (see Recommendation section above) would offer sufficient opportunities for uncertified organic operators to join the community and would not necessitate the creation of a New Option. In addition, none of these enhancements would require a legislative change in the current BCCO Program.
- ✓ Further discussions on the New Option revolved around risk; particularly what higher risk activities, if any, should disqualify an operation. It was felt that operating as a whole farm (versus a split operation) should be a necessary requirement, in addition to restricting entry to those trading within the province in short supply chains

Conclusion

The overwhelming consensus is that COABC should continue to work toward a mandatory regulation in BC. COABC is seeking a regulation that will require products marketed using the terms "organic", "organically grown", etc. in BC to be produced in accordance with the Canada Organic Standard and assessed under a documented certification program or other assurance scheme by a certification body recognised under the BCCOP, or the COR. Consideration should be given to including an exemption for operations with less than \$5,000 in organic gross sales.

The recommendations presented in this document may appear to some as only interim measures until such a regulation is in place. However, by undertaking some of the key recommendations, some of the immediacy of the concerns could be tempered.

No matter what the next steps are taken by the COABC, an effective education campaign and launch will need to accompany the steps in order to explain, teach, and promote the changes.



Appendix A

Current options for assessing the validity of organic claims in BC

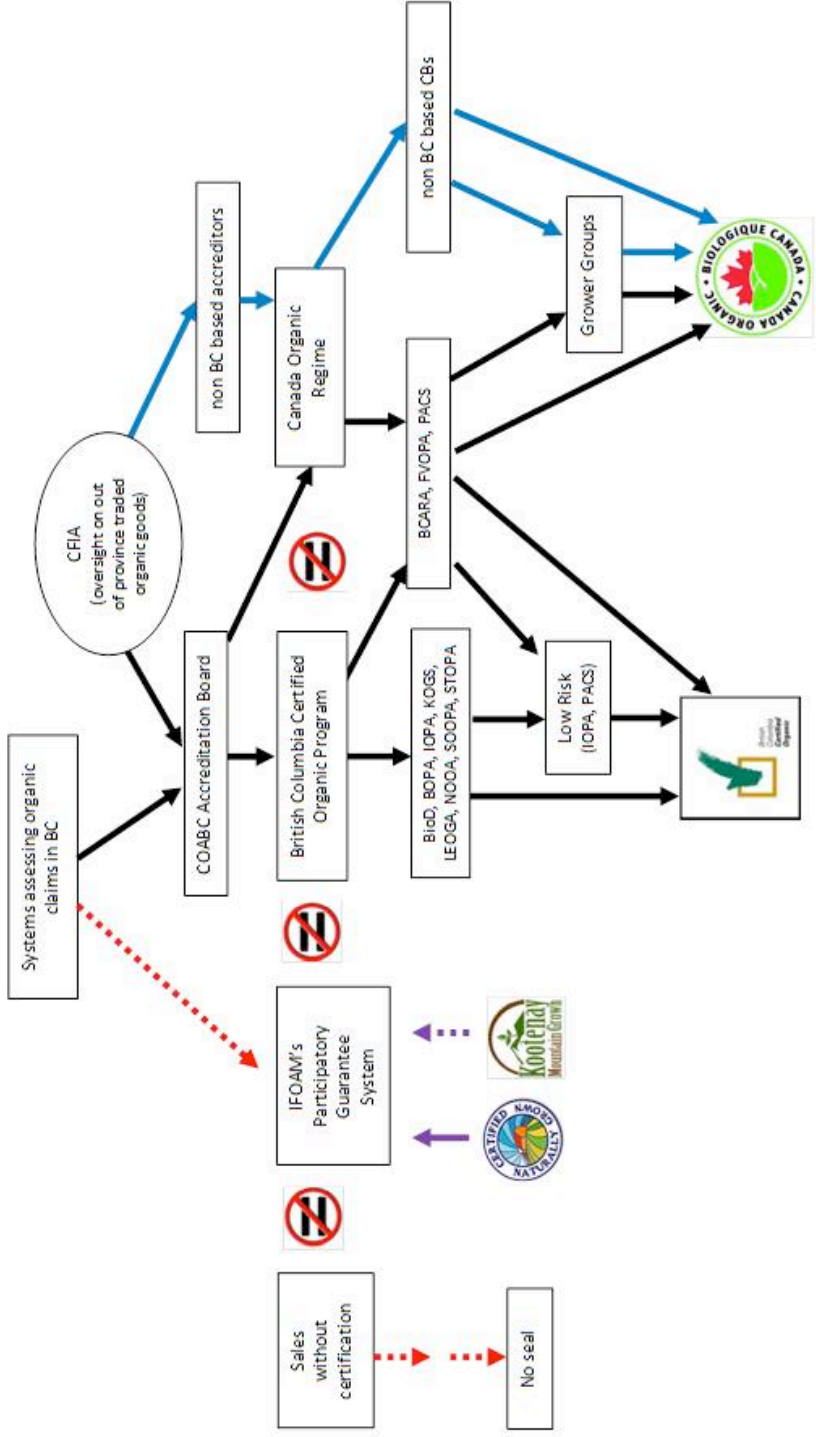


Figure 12. Current Options for Assessing the Validity of Organic Claims in BC.

Appendix B



Figure 13. New Option: Another Possible Option for Assessing the Validity of Organic Claims in BC.

Appendix C

NAME OF FARMERS' MARKET

Small-Scale Organic Grower's Declaration of Exemption from Certification

I, _____, declare that I am an organic grower in NAME OF County, complying with all production and handling standards of the National Organic Program (NOP) standards **7 CFR Part 205**. These standards include using only OMRI-approved fertilizers and sprays, implementing a farm plan that builds soil fertility and conserves resources, and keeping sufficient records to document my organic practices. I further state that I am exempt from the NOP certification requirements due to the fact that my gross agricultural sales of organic products total less than \$5,000 per year. Therefore, the products I sell, while organically grown, will not be marketed or sold as "Certified Organic," but can be marketed and sold as "local," and "organic," plus any other truthful descriptive terms.

If at any time, my annual gross sales of organic products climbs above \$5,000, I understand that I will need to obtain organic certification from a USDA-accredited certification program, in order to be able to continue using the word "organic" in any of my marketing and sales.

I further understand that the National Organic Program includes criminal penalties for any operator who makes a false statement or knowingly sells or labels a product as organic that is not in accordance with the Organic Foods Production Act of 1990 or the NOP Rules. Violators may be subject to criminal prosecution and fined up to \$10,000 per violation. I accept all responsibility in following these rules. In no circumstance will the NAME OF MARKET Farmers' Market or any associated agencies or personnel be liable for any violations on my part, whether due to negligence, ignorance, deceit, or any other cause.

Signed,

Name

Date

Appendix D



2012 FARMER'S PLEDGE™

taken from <http://www.ctnofa.org/documents/2012%20farmers%20pledge.pdf>

Knowing your farmer is the best assurance that the food you buy is responsibly grown; grown with methods that recognize the inherent implications of the web of life in all our individual actions. CT NOFA (The Connecticut Northeast Organic Farming Association) believes that farmers should work in harmony with natural forces and leave the little piece of the world over which they have stewardship in better condition than when they found it.

To further enable consumers to identify the farms they want to support with their food dollars, CT NOFA is using the Farmer's Pledge, separate and distinct from USDA Certified Organic. Farmers and market gardeners who adhere to the following pledge have signed a copy which they display for customers and neighbors to view. This pledge is based on the integrity of the farmer/gardener. Those who sign this pledge agree that consumers may inspect, by appointment, their farm/garden to judge the truthfulness of this statement. CT NOFA does not investigate or make any guarantee that the individual farmer is complying with the Farmer's Pledge.

WE PLEDGE THAT IN OUR FARMING, PROCESSING AND MARKETING WE WILL:

- Reject the use of synthetic insecticides, herbicides, fungicides & fertilizers
- Reject the use of GMO's, chemically treated seeds, synthetic toxic materials, irradiation & sewage sludge
- Treat livestock humanely by providing pasture for ruminants, access to outdoors & fresh air for all livestock, banning cruel alterations, & using no hormones or antibiotics in feed
- Support agricultural markets & infrastructures that enable small farms to thrive
- Maintain & build healthy soils by farming practices that include rotating crops annually, using compost, cover crops, green manures & reducing tillage
- Conserve natural resources by reducing erosion & pollution of air, soil & water through responsible farming practices
- Maximize the nutritional value of food & feed by practicing careful post harvest handling
- Practice minimal processing for all food products to preserve the natural nutritional value of food: NO use of irradiation, ultra-pasteurization, excessive heat, synthetic preservatives, or GMO processing agents or additives
- Reduce the ecological footprint of farms & homes by limiting energy use & converting to renewable sources of energy
- Reduce food miles by selling produce locally & regionally
- Create beneficial habitat for wildlife & encourage biodiversity
- Help preserve farmland & farming know-how
- Ensure food safety by using potable water for washing crops
- Handle raw manure & soil amendments with care
- Use ethical business practices
- Pay a living wage to all farm workers & acknowledge their freedom of association & their right to collective bargaining
- Treat family members & farm workers with respect & ensure their safety on the farm
- Work in cooperation with other farmers & with neighboring community to create a more sustainable way of life
- Sustain the land in healthy condition for future generations

Name of Farm/Organization (*please print*)

Name (*please print*) Signature Date

Received by CT NOFA Date

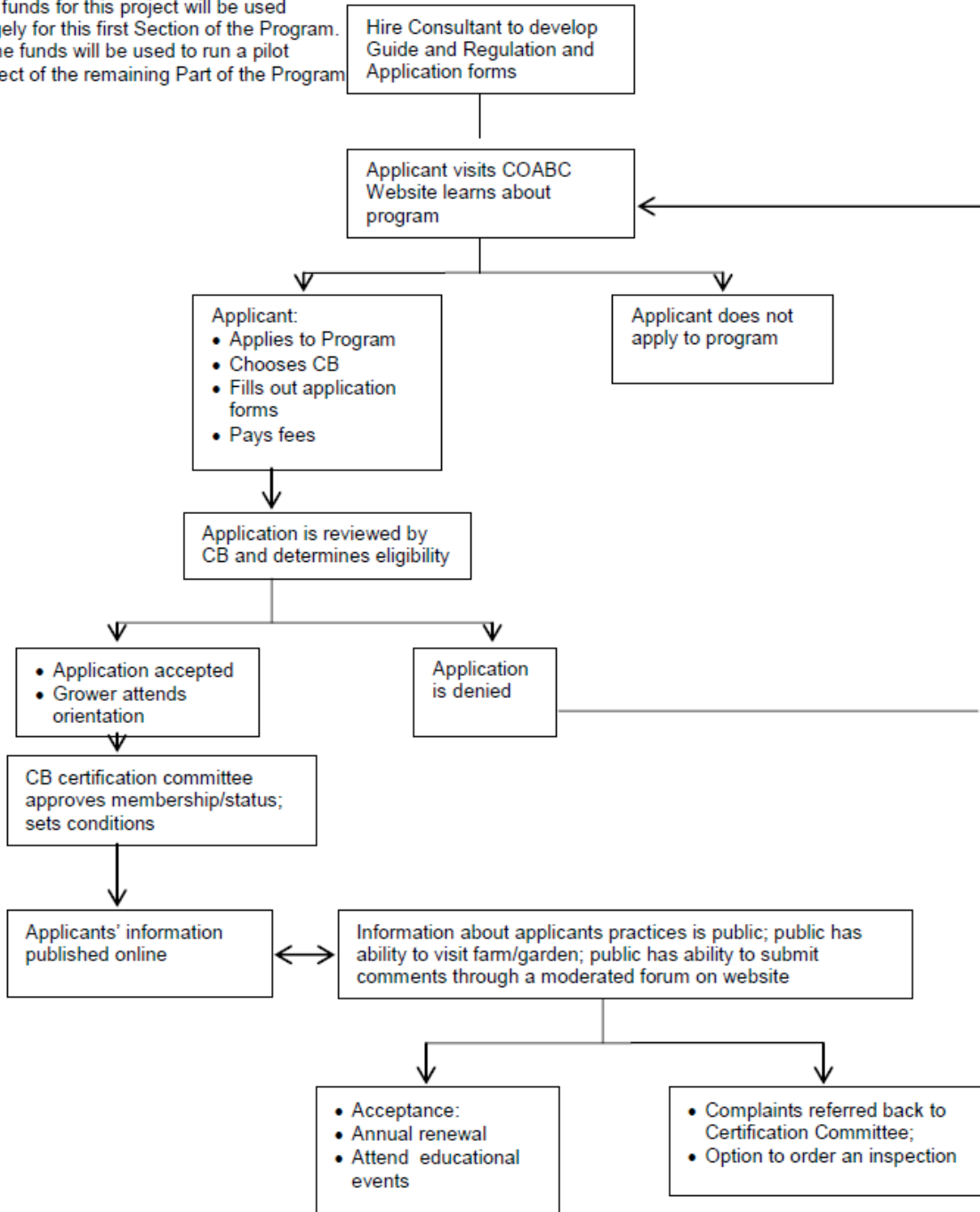
CT NOFA ~ PO Box 164 ~ Stevenson, CT 06491

ctnofa.org 203-888-5146

Appendix E

Flow Chart for Community Verification Organic Program

The funds for this project will be used
Largely for this first Section of the Program.
Some funds will be used to run a pilot
Project of the remaining Part of the Program



Appendix F

PROGRAM	FARMERS PLEDGE (as administered by various organic advocacy/educational associations)
Description of program	<p>From the Connecticut Chapter of the Northeast Organic Farming Association (CT NOFA) website. NOFA-New York has a mirror program.</p> <p>“The Farmer’s Pledge is a commitment to farming, marketing and farm management in accordance with sound ecological and economic principles. It is separate and distinct from “Certified Organic.” There is no inspection process for the Farmer’s Pledge, but the farmers have signed the Pledge to show their commitment to its principles. CT NOFA administers the Farmer’s Pledge program in Connecticut. However, we do not investigate or make any guarantee that the individual farmer is complying with the Farmer’s Pledge. Every spring, all our Farmer’s Pledge farms are featured in our annual <i>Farm & Food Guide</i>. Last year 15,000 copies of the Guide were printed and distributed all over the state at farmers markets, agricultural and environmental events, and wherever people were looking for healthy and sustainably grown food. In addition the Guide is posted on our website, so your farm’s listing is available to everyone who visits www.ctnofa.org. It’s a great way to spread the word about your farm.</p> <p>All you have to do to be included in the program is to sign a copy of the Pledge and return it to CT NOFA. We’ll initial, date, laminate and return it to you. You are encouraged to display your copy of the Pledge at your farm, farm stand, farmers’ markets and anywhere else where folks care about good food. CT NOFA keeps a copy of the Pledge for our records. To participate you or your farm must be a CT NOFA member. The Farmer’s Pledge must be renewed each year, and CT NOFA will contact you each winter to get your Pledge updated.</p> <p>See Appendix D for complete CT NOFA’s pledge.</p> <p>-----</p> <p>NOFA/MASS (Massachusetts) has a slightly different program.</p> <p><u>Certified vs. Sustainable</u></p> <p>Farms that are listed in the OFG are either certified organic by a statewide or national agency, or practice organic methods but have chosen for a variety of reasons not to be formally certified.</p> <p>If a farm is certified organic, that is indicated on the listing page beneath that farm's contact information. The certifying organization is also listed.</p> <p>If a farm listed in the Organic Food Guide is not certified organic, the word "sustainable" will appear on the listing page beneath that farm's contact information. All of the farmers in charge of these operations have affirmed the following NOFA/Mass Sustainability Pledge:</p> <p>“I have raised my food without genetically modified (GM) seed or sewage sludge on land free from synthetic pesticides, herbicides, and fertilizers for at least three years. My livestock have access to pasture out-of-doors, are raised without antibiotics, artificial hormones, or synthetic parasiticides and receive either 100% organic feed or feed that has been raised sustainably, as defined by the first sentence of this pledge.”</p>

	<p>Just as a whole farm, part of a farm, or only a single crop may be certified organic, in some cases only part of a farm meets the NOFA/Mass sustainability standards. In both scenarios, we have tried as much as possible to highlight only the parts of a farm that are either certified organic or sustainable.</p> <p>At NOFA/Mass, we tend to think that ultimately the best way to understand what practices a grower uses is to talk to the farmer. When you shop at farmers' markets, visit a farm stand or pick up your CSA shares, ask questions about the grower's operation. And get to know your farmer!</p>
What does it do; what does it certify	As described above, but not a certification program.
Who oversees it	Three of seven NOFA chapters (CT, NY, VA) offer such as program. There is no inspection or investigation by any party to assure that the individual farmer complies with the Farmer's Pledge.
Who accredits it	No one
Fees/Costs	NOFA charges \$65.00 per pledge. Might be sufficient to cover the associated expenses (administration, printing database, printing advertising guides).
Can/how does it fit in a regulatory program	<p>Does not meet either ISO or Regional certification program requirements, but does identify those with organic leanings. In the case of NOFA CT and New York certified organic, operators can also sign on to the pledge, but this does not appear to be the case for NOFA VA.</p> <p>COG has been in discussions with NOFA on adapting the pledge for Canada, but nothing concrete has come to fruition.</p>
Identify examples in BC	Nothing similar, except we have heard of individual farmers committing to such pledge and using them (online, and as signage etc.) as a means to communicate with their customers.
Pros	<ul style="list-style-type: none"> - More operators that are not enrolled in organic certification can express their commitment to organic principles. - Raises awareness of organics.
Cons	<ul style="list-style-type: none"> - Those currently certified may opt out of certification if they think pledging would be sufficient for their customer base. - If follow the NOFA models where the organic pledge is not a revenue stream, generating and maintaining the database, web presence, handling enquiries and including these operations in any farm directory would be additional costs for an organization to bear.

Appendix G

PROGRAM	DemeterLocal
Description of program	DemeterLocal – a peer-to-peer Biodynamic education and certification program launched in the USA. The program fosters the growth of Biodynamic education and farming within pre-defined geographic areas through the development of regional groups composed of farmers, educators, students, and anyone interested in Biodynamic agriculture.
What does it do; what does it certify	Education and peer-to-peer certification. In order to qualify, the farm's Biodynamic production must be sold within a 200-mile radius of the farm. Exceptions may be made for non-profits whose goals further the Biodynamic movement on a regional or national level. Two Farm Evaluators (at least one must be enrolled in the program) complete annual site assessments.
Who oversees it	Demeter International along with the LOCAL Group. The LOCAL Group defines the geographical boundary, liaises with Demeter, oversees the Farm Evaluators, offers educational opportunities and forwards Biodynamic certification recommendations and paperwork to Demeter. Demeter retains oversight on all aspects of the program. There is an appeal process outlined.
Who accredits it	No 3 rd party accreditation
Fees/Costs	Fee: \$350 per annual application Licensing Fee: Assessed at .05% of gross sales over \$100,000 per year.
Can/how does it fit in a regulatory program	Currently it does not certify to the Canada Organic Standard, only to the Demeter Farm Standard.
Identify examples in BC	None
Pros	Definitely a community building exercise Sufficient Demeter oversight and transparency
Cons	Requires extensive energy to set up and maintain LOCAL Groups and geographical boundaries. Does not certify to COR program Fees are higher than what most BCCOP certifiers currently charge for organic certification

Appendix H

PROGRAM	Community Verified Organic (CVO)
Description of program	<p>CVO was proposed to provide a certification program that is more accessible to small-scale farmers (those earning less than \$30,000 from local sales); Foster local connection of organic food producers with shoppers to build trust and accountability; Increase capacity for long-term food security.</p> <p>Certifying Bodies decide whether to offer the CVO Program, and whether CVO applicants are full members or a new class of members.</p> <p>Community Verified Organic is an open and transparent process. Farmers fill out an application on COABC's website stating their planned crops, methods, off-farm inputs, etc. and sign a disclosure agreement [The growers' practices can thus be directly accessed by the public]. The Certifying Body, determined by the applicant, reviews the application and arranges a site visit. University agriculture programs could also educate students about organic production methods and marketing, as well as provide students to act as one level of verification. For further program details see Appendix E – Flow Chart for Community Verified Organic Program.</p>
What does it do; what does it certify	<p>Certifies any products and processes that can be certified under the BC Certified Organic Program. Operators cannot use the BCCOP logo but can use a new CVO trademark.</p> <p>To be eligible, a farmer must:</p> <p>Sell to a market that is within 160km (100 miles) from their farm.</p> <p>Sell direct to the public, or sell to a business that sells to the public (i.e., no more than two steps from the buyer).</p> <p>Familiarize themselves with the Canadian Organic Standards</p> <p>Pay a certification fee</p>
Who oversees it	Any certifier accredited by COABC
Who accredits it	COABC Accreditation Board
Fees/Costs	\$150 annually. The fees of for CVO must ensure that the program is self-sustaining and contributes to COABC and the CB, while making certification affordable for direct-market farmers using organic methods. Half of the fee of \$150 is allocated to the CB to administer the CVO program, and half goes to pay COABC fees (to promote organics, to develop and maintain the website).
Can/how does it fit in a regulatory program	Fits under BC Certified Organic Program and is administered by an accredited CB
Identify BC examples	None
Pros	<p>Intended to entice non-certified operators to come under COABC umbrella</p> <p>Intended to be streamlined, lower cost</p>
Cons	<p>A new logo may be problematic; create confusion</p> <p>Did not become a reality so is difficult to assess</p>

Appendix I

PROGRAM	IFOAM * Participatory Guaranteed System
Description of program	<p>According to the International Federation of Organic Agriculture Movements (IFOAM) Participatory Guarantee Systems (PGS) are defined as locally focused quality assurance systems. They certify producers based on active participation of stakeholders and are built on a foundation of trust, social networks and knowledge exchange. PGS represent an alternative to third party certification, especially adapted to local markets and short supply chains.</p> <p>Definition of PGS (established by the IFOAM PGS Task Force in Modena, Italy, June 2008) http://www.ifoam.org/about_ifoam/standards/pgs.html</p> <p>The following excerpts are from IFOAM's policy brief on PGS titled: “How Governments Can Support Participatory Guarantee Systems (PGS)” http://www.ifoam.org/about_ifoam/standards/pgs/pdfs/PolicyBrief-HowGovernmentsCanSupportPGS.pdf</p> <p>PGS represent an alternative to third party certification, especially adapted to local markets and short supply chains. They enable the direct participation of producers, consumers and other stakeholders in:</p> <ul style="list-style-type: none"> • the choice and definition of the standards, • the development and implementation of verification procedures, • the review and decision process to recognize farmers as organic. <p>Participatory Guarantee Systems are also sometimes referred to as “participatory certification”</p> <p>Participatory Guarantee Systems share a common objective with third-party certification systems in providing a credible guarantee for consumers seeking organic products. The difference is in the path to accomplish this. Third party certification is based on reviews of applications, which include operator internal procedures such as organic system plans and an annual inspection visit by a trained independent inspector. Participatory Guarantee Systems have a much more intensive interaction between the farmer and the guarantee organization and uses different tools to maintain integrity. PGS integrate capacity building and allow farmers and reviewers to help solve practical problems which will enable producers to follow the standards. The direct relationship to the process, and the fact that it is owned by the farmers and related stakeholders, encourages more responsibility and active involvement in the design of production and certification processes.</p> <p>Internationally: There are 28 PGS programs that are currently registered with IFOAM and are listed on IFOAM's Global PGS database. The listed PGS programs represent over 24,500 producers world-wide, ranging from 7 producers in the <u>Namibian Organic Association's PGS</u> which started in 2009 to 10,500 producers in the Philippines' <u>MASIPAG Farmers Guarantee System</u>, founded in 2005. Brazil has registered 7 PGS programs with IFOAM (groups established between 1991 – 2004) with a total of 3,700 producer members.</p>

	<p>The IFOAM PGS GLOBAL database presents 3 different categories of PGS initiatives:</p> <ol style="list-style-type: none"> 1) PGS Initiatives Officially Approved by IFOAM - These are the initiatives that have applied for evaluation and have obtained approval. 2) Self-declared PGS initiatives – These are the initiatives that have submitted their Self-Evaluation form (SEF), but that have not been approved yet or that have not applied for IFOAM official approval and the IFOAM PGS Logo. Therefore, they have not been evaluated/assessed by the IFOAM PGS Committee. They are expected to update their listing on the IFOAM Global Database every 2 years. 3) PGS Networks – These are not PGS Groups but networks including many groups that might have different procedures even when using the same standards. See additional comments below re: IFOAM's PGS Global Database
What does it do; what does it certify	PGS's verify compliance. PGS certify farmers producing any products for which they have developed standards
Who oversees it	Any agency set up as PGS
Who accredits it	In some countries with regulations, the regulatory body accredits the PGS
Fees/Costs	Each PGS determines the costs
Can/how does it fit in a regulatory program	Yes – in some countries such as Brazil, PGS fits into the regulatory program. IFOAM is currently undertaking a review of PGS programs throughout the world. Will obtain report when available
Identify examples in BC	Kootenay Mountain Grown, Certified Naturally Grown – see separate assessments
Pros	<ul style="list-style-type: none"> • Improved access to organic markets through a guarantee system for small scale producers: in PGS, costs are mostly in the form of voluntary time involvement rather than financial cash expenses. Moreover, paperwork is reduced, making it more accessible to small operators. • Increased education and awareness among consumers: by involving organic consumers in the review process, PGS help build a base of engaged and knowledgeable consumers who understand the benefits and challenges of organic production. • Promote short supply chains and local market development: because they are based on direct personal relationships and because they often carry “endogenous development” values, PGS help consumers and producers to establish and favor direct or short-distance market relationships. • Empowerment: PGS are grassroots, non-profit, bottom-up organizations. Empowerment comes from the democratic structures of PGS and the fact that in PGS, the communities (producers and consumers) have the ownership of the conformity assessment system. It reinforces social capital and builds collective responsibility and capacity.
Cons	Impartiality, credibility, rigour is compromised without 3 rd party inspections and rigorous oversight

Additional Comments:

This **PGS database** is provided by IFOAM to help PGS stakeholders and other PGS-interested persons to connect and provide compiled information to those doing research or wanting to support PGS. IFOAM regularly updates and monitors the information provided on this platform. However IFOAM does not guarantee the accuracy of the information content.

The platform aims to offer a comprehensive list of PGS programs worldwide and offers to these programs the possibility to “register” to be included in the list and display some information on their PGS. However, this list is by no means an official endorsement of listed PGS programs by IFOAM. Registration on the list is voluntary, and IFOAM does not guarantee the compliance of the listed PGS with the key PGS characteristics elaborated by IFOAM, nor their integrity vis-à-vis the organic principles.

***What is IFOAM? http://www.ifoam.org/about_ifoam/index.html**

IFOAM is the worldwide umbrella organization for the organic movement, uniting more than 750 member organizations in 116 countries.

International Relationships

IFOAM actively participates in international agricultural and environmental negotiations with the United Nations and multilateral institutions to further the interests of the organic agricultural movement worldwide. IFOAM is uniquely recognized for taking on this important role. The introduction of the Principles of Organic Agriculture and the recognition of IFOAM by international institutions is of enormous importance for the further development of Organic Agriculture.

The Organic Guarantee System

IFOAM provides a market guarantee for integrity of organic claims. The Organic Guarantee System (OGS) unites the organic world through a common system of standards, verification and market identity. It fosters equivalence among participating IFOAM accredited certifiers, paving the way for more orderly and reliable trade whilst acknowledging consumer trust in the organic ‘brand’.

Facilitating Networks and Market Development

Through IFOAM programs, conferences and events, IFOAM is laying the groundwork for the further development of Organic Agriculture and its markets worldwide. Through IFOAM World Congresses, International Trade conferences, commodity specific (coffee, seeds, wild products, etc.) and other events, IFOAM brings together the key players from all over the planet to facilitate trade in organic products.

Appendix J

PROGRAM	Certified Naturally Grown (PGS)
Description of program	<p>Certified Naturally Grown (CNG) is a non-profit organization offering certification tailored for small-scale, direct-market farmers and beekeepers using natural methods. Certified Naturally Grown is a Grassroots Alternative to the USDA's National Organic Program meant primarily for small farmers distributing through local channels - farmer's markets, roadside stands, local restaurants, community supported agriculture (CSA) programs and small local grocery stores</p> <p>The CNG Standards and growing requirements are based on the USDA National Organic Program rules. They are no less strict- in fact CNG farmers are constantly improving their soil and striving to increase the sustainability of their farming operations. The primary difference between Certified Naturally Grown and the USDA Organic program is cost to farmers and paperwork requirements.</p> <p>The crux of the Certified Naturally Grown program is the farmer-to-farmer inspection approach. Farmer-inspectors are most familiar with the pest and disease challenges likely to be faced by other farmers using natural methods in their area, so they are uniquely qualified to observe and note whether their neighbors are sticking to the standards. They're also in a good position to make suggestions on how to deal with these challenges, thereby strengthening the local, natural farming community. Farmer-inspectors fill out a check-sheet inspection form and mail it back to CNG. It is scanned in and posted on the Internet for anytime public access.</p> <p>All farmers applying to use the label must agree to do at least one inspection http://www.naturallygrown.org</p> <p>Approximately 800 members in North America</p> <p>Canada: 16 farms participating in CNG: BC-10, AB-1, ON-3, NS-2</p>
What does it do; what does it certify	<p>Certified Naturally Grown certifies fresh fruits and vegetables, herbs, flowers, bedding plants and limited livestock operations. Honey is a new program. There are no CNG processors and no plans to include processors at this time although many farms sell their own jams, soap, cheese, etc made from their own produce.</p> <p>Farmers submit an application, inspection report and self-declaration on-line. Inspections must be conducted annually. All farms must arrange their own on-site inspection, which should take place within two growing season months of being accepted into the program, and then annually, at least once every 16 months. Inspections are done by volunteers for free, ideally by other CNG farmers. Inspection forms and guidelines are available online.</p> <p>CNG completes desk reviews to assess key requirement compliance followed by email/phone communications to deal with questions/issues, as needed. As the signed Declarations and inspection reports are submitted, they are each reviewed to ensure completeness, validity, and consistency with the information provided on the application.</p> <p>CNG requires that all participating farmers and beekeepers agree to <i>conduct</i> at least one inspection of another CNG farm or apiary annually. This requirement is waived if there is not another CNG farm or apiary within a 1 hour drive. To maintain the program's integrity, farmers may not "trade" inspections with other farmers.</p> <p>CNG encourages farm visits by consumers and other farmers, etc., but there are no unannounced inspections. CNG does unannounced pesticide residue tests at point of sale on 2 – 5% of its membership annually.</p>

Who oversees it	None but CNG is registered and officially recognized as a PGS by IFOAM. CNG submitted a rigorous self-assessment and passed IFOAM's evaluation http://www.ifoam.org/about_ifoam/standards/pgs_projects/pgs_projects/142http://www.ifoam.org/about_ifoam/standards/pgs/PGS_LOGO.html51.php
Who accredits it	None but IFOAM officially recognizes it as a PGS; as such CNG is permitted to use the IFOAM PGS recognition logo.
Fees/Costs	CNG recommends a contribution of \$125 - \$200 USD per year, but the minimum contribution for livestock or produce certification is \$110 USD. The apiary certification program is newer, so while CNG recommends \$75 - \$200 USD per year, it doesn't specify a minimum.
Can/how does it fit in a regulatory program	It does not fit in the USDA NOP due to the peer-to-peer inspections and reduced paperwork.
Identify examples in BC	10 farms in BC ranging from fruit/vegetable production to livestock to nursery stock.
Pros	Reduced cost and paperwork Peer to peer support Community Building Online application process is streamlined Documents are posted on-line so is transparent
Cons	CNG is not well recognized in Canada, especially since it's an American program The term "natural" or 'naturally grown' is over-used and confusing Little oversight Challenging for farmers in remote communities to arrange for inspections and to have qualified pool of inspectors If don't have critical mass, then is difficult to have peer inspectors who are knowledgeable about specific production and don't inspect same farms year after year.

Appendix K

PROGRAM	Kootenay Mountain Grown
Description of program	<p>Kootenay Local Agricultural Society is a non-profit Kootenay based local agricultural organization dedicated to the production and promotion of local agriculture and products. They are committed to supporting and strengthening sustainable agriculture and related businesses in the region.</p> <p>As the owner and certifier of the Kootenay Mountain Grown label, the Society is responsible for ensuring that only farmers and processors that meet the Kootenay Mountain Grown standards for organic agriculture can market their product as Kootenay Mountain Grown. As the leading advocate for sustainable agriculture in the Kootenays, the Society provides support and information to its members through regular newsletters, farm field days, mentoring programs, research trials, and marketing materials.</p> <p>All the Society's programs and certification are supported by member fees and fundraising.</p> <p>More information on http://www.klasociety.org and http://www.klasociety.org/KMG.html</p> <p>All standards, application forms, inspection form and record keeping forms used by the PGS are available for download</p> <p>http://www.ifoam.org/about_ifoam/standards/pgs_projects/pgs_projects/16204.php</p>
What does it do; what does it certify	The Kootenay Mountain Grown label is granted to KLAS members who register, sign a pledge, agree to Kootenay Mountain Grown certification procedures and sign an affidavit to follow these three guiding principles:
Who oversees it	Kootenay Local Agriculture Society (KLAS)
Who accredits it	No organization but KMG is listed on IFOAM's PGS Global Database but IFOAM does not officially recognize it as a PGS as it does CNG.
Fees/Costs	\$60 - \$150 annually. KMG fee is comprised of Kootenay Local Agricultural Society membership \$ 40.00 + plus acreage fee ranging from \$20 for production on less than 1 acre to \$110 for 20+ acres of production. Processors pay \$40 KLAS membership fee plus \$10 for 1 product up to \$55 for 10 products & \$5 per product thereafter.
Can/how does it fit in a regulatory program	No. While it has transparency, it cannot fit into a regulatory program since it does not have 3 rd party inspections nor does its standards comply with the COS/BCCOP.
Identify BC examples	16 farms – primary production & processing
Pros	<p>Reduced cost and paperwork</p> <p>Peer to peer support</p> <p>Community Building</p> <p>On-line application process is streamlined</p> <p>Documents are available upon request so is relatively transparent</p>
Cons	<p>Challenging for farmers in remote communities to arrange for inspections and to have qualified pool of inspectors</p> <p>If don't have critical mass, then is difficult to have peer inspectors who are knowledgeable about specific production and don't inspect same farms each year</p>

Appendix L

PROGRAM	COABC's Low Risk Program
Description of program	A risk based assessment system for operators holding organic certification in BC. Once a CB determines that an operation qualifies, inspection frequency is reduced to 1 in 3 years. 10% of these are randomly inspected annually.
What does it do; what does it certify	Reduces the cost of BCCOP certification for operators that qualify. To qualify operators must have a 3 year history with the CB, must submit membership fees and annual renewal plan, have no outstanding conditions, and have exemplary compliance
Who oversees it	Any BCCOP accredited CB who desires to deliver this program.
Who accredits it	COABC Accreditation Board
Fees/Costs	\$234 annually for IOPA. Variable for PACS but members do not incur the cost of inspection while enrolled in the program
Can/how does it fit in a regulatory program	Perfectly
Identify examples in BC	Currently IOPA and PACS offer the program.
Pros	There are cost savings compared to regular certification Functions within the current BCCOP frameworks There is third party oversight (desk reviews and unannounced inspections) Can use BCCOP logo and phrase
Cons	Must be certified for 3 years before entering program Need to submit annual plan Cannot have any outstanding conditions Limited to products traded within the province Cost saving is not significant Can be removed from program if there are significant changes made on farm from what was on file; therefore increasing inspection costs.

Appendix M

PROGRAM	Group Certification (previously known as GGC – grower group certification)
Description of program	<p>Internationally: Shared certification amongst a defined group. Could be a grower group growing the same commodity, or possibly a supply chain (chain of custody). Defining the group is the first criteria.</p> <p>Canada: The current Canada Organic Office's Operating Manual (ver 14) restricts GCs to growers. <i>"Certification of an organized group of producers with a central office, similar farming and production system, working according to a common internal quality management system, which is established and subject to continued surveillance by the central office. Group certification applies to the group as a whole. Certificate is issued to the central office of the group and shall not be used by a single group member."</i></p>
What does it do; what does it certify	<p>"Group certification evolved as a response to the constraints on small-holder producers to be able to access certification. Group certification is a practice of organizing individual producers into structured groups and shifting responsibility in part from an external audit to internal inspections. In order to bring about this shift, the group must have an internal management system in place that instills confidence that the individual group members are meeting the requirements of the standard. At the same time, the management system plays a vital role in supporting a learning organization whose members seek to improve their practices over time."</p> <p><i>From "Common Requirements for the Certification of Producer Groups" 2008</i> http://sanstandards.org/pdfs/ISEAL_common_req_group_cert.pdf</p> <p>Group assurance began for groups of small coffee farmers but has expanded to include chain-of-custody, food safety, forestry, and other applications. Generally, a group consists of an organization of individuals or businesses that acts as a single client for assurance purposes. The group can be formal or informal but must have a documented structure – the Internal Management System. Groups can be organized by NGOs, by commodity brokers, input suppliers, or by group members themselves. <i>Taken from Paddy Doherty's Sept 2012 draft of an ISEAL Group Assurance report.</i></p>
Who oversees it	Any certifier
Who accredits it	Any accreditor
Fees/Costs	Should be cheaper than individual producers certifying separately as part of the assessment work is performed by the group itself, reducing the need for certification bodies to verify the conformity of each member of the group.
Can/how does it fit in a regulatory program	Fits within the Canada Organic Regime (confirmed by the presence of a section outlining Group Certification in the COO Operating Manual). Not currently outlined in the BCCO program handbooks, but easily remedied.
Identify examples in BC	None. *In Canada maybe the wild rice producers*
Pros	Should reduce certification costs especially if risk management tools are used to improve group performance as risk assessments would identify areas and activities of high risk.

	<ul style="list-style-type: none"> - should create educational platform where information can be shared / knowledge gained. - should facilitate continual improvement in production / productivity / quality / record keeping / farm management etc.
Cons	<ul style="list-style-type: none"> - requires group management - requires an internal management system called the Internal Control System (ICS) by the COO and defined by the COO as <i>“a documented internal quality system within a grower group that allows an external CB to delegate the annual inspection of any group members to an identified body or unit within the grower group.”</i>

Additional Thoughts

Within the constraints imposed by the COO Operating Manual restricting group certification to growers.

Two groups could be identified as benefiting from this certification model – seed growers and cooperatives.

Tree fruit producers selling into one packinghouse could also take advantage of this methodology if they felt so inclined. This is how the food safety for Cawston Cold Storage is delivered. Each operator has to maintain a food safety system, and it has been developed under the guidance of the food safety expert engaged by CCS.