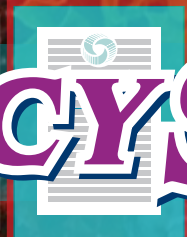




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## **Canada's Organic Nightmare**

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# Canada's Organic Nightmare

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**By Mischa Popoff and Patrick Moore**

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The Canadian Food Inspection Agency (CFIA) is supposed to protect Canadian consumers by ensuring food is safe and that it conforms to all labelling claims. Every year, the CFIA pulls food samples from all points in the food chain from the farm to the grocery shelf, and every year it brings the gavel down on violators who put consumers at risk by selling second- or third-rate product or downright fraudulent product. This goes on everywhere, every day of the year, behind the scenes, to protect you and your family ... everywhere, except in the organic sector.

## Executive Summary

A sustained assault is being levelled against agriculture across North America. It comes generally from environmentalists but more specifically from the organic industry, which survives, for the most part, by levelling unfounded attacks against any form of food that is not organic.

Through all the court cases against biotechnology and the public relations campaigns against pesticide and fertilizer use—to say nothing of the absurd allegations that most of the food we eat is unsafe, even toxic—the organic activist crowd harboured a dirty little secret: *Organic crops and livestock are not tested in Canada before they are certified*, thus making organic certification essentially meaningless.

An inspection of an organic farm or processing facility consists mainly of a review of the applicant's records, followed by a brief tour, during which an inspector might notice minor, technical infractions but is unlikely to find evidence of fraud or gross negligence. Since the inspected party knows well in advance when the inspector will be dropping by, there is no such thing as a surprise visit.

There is talk in the United States of introducing routine, across-the-board, unannounced testing of organic crops, livestock and stored product. The United States' federal organic standards allow for this, and so, in a healthy example of subsidiarity,<sup>1</sup> some states voluntarily carry out mandatory, scientific organic field testing at the local level in their application of U.S. federal organic standards.<sup>2</sup>

However, in Canada there is no such testing anywhere, just the exhaustive review of paperwork, because our federal organic standard does not even allow for the possibility of science-based organic field testing.<sup>3</sup> It was left out of our federal organic standard. This is ironic considering that the CFIA, a world-renowned, science-based regulatory agency, is currently undergoing a major overhaul in order to "to bring consistency to food inspection in Canada with mandatory preventive controls for all foods across the supply chain."<sup>4</sup> Again, it must be stressed, this evidently means all foods, except for organic. Defenders of the status quo routinely claim that testing organic farms would be expensive, but as we will show, all evidence points to the contrary: It will in fact cost less than a tenth of the cost of running the current organic certification system!<sup>5</sup>

It comes as no surprise that with more than \$2-billion per annum at stake, the Canadian organic lobby is dead set against organic field testing and will go to any lengths to discredit anyone who promotes the application of the scientific method to the organic industry. True rank-and-file organic farmers meanwhile have no affinity whatsoever for the class of self-appointed, urban political activists who claim to represent them. Canadian organic farmers, like their U.S. counterparts, support field

testing, as they know better than anyone that they have nothing to hide, and they know first-hand the many benefits that science and technology have to offer to the field of agriculture, even organic agriculture.

Considering that Canada's food system is fairly safe and is one of the most efficient in the world, and considering that only clean air and water are more important than food to the smooth functioning of an economy, it is probably a good idea for Canadians to take up the cause of defending our food system against assaults by a branch of the globalist environmental movement. Their attacks really do not hold up, not even to casual scrutiny.

In short, while there is nothing preventing the organic industry in Canada from some day *developing* an acceptable, science-based foundation, this paper argues that our organic standards are nowhere near acceptable in their current configuration given the lack of field testing, which would ensure that applicants are following the rules. Until scientific laboratory analysis is at least admitted into the Canadian organic industry, organic spokespersons would do well to cease and desist attacking the regular food industry.

## No guarantee

The United States and Canada recently arrived at a free trade agreement of sorts (called “equivalency”) for certified organic meat.<sup>6</sup> Each country now considers the other’s standards for organic ruminant stocking rates—which is the number of animals in a given area, in a feedlot for instance—as commensurate. While some consumers might worry about stocking rates, most people who spend twice as much or more on organic food than they would on non-organic food do so to avoid synthetic toxins in their diet and to eat more-nutritious food. Too bad this latest equivalency agreement does absolutely nothing to guarantee the veracity of either of these marketing claims, and too bad the absence of any guarantee is in keeping with all previous organic equivalency agreements signed by the world’s largest trading partners.<sup>7</sup>

The CFIA took over regulation of the organic sector in June of 2009 and did not conduct *any testing* of organic crops, livestock or processed certified organic food until late last year. The reason for this laxity, as explained, is the complete omission of even so much as a mention of testing in Canada’s organic standard.<sup>8</sup> In secret tests they conducted on 599 samples of CFIA-certified organic food products, Canada’s publicly funded food-safety officials found that a whopping 24 per cent of samples contained residue from prohibited herbicides and pesticides.<sup>9</sup> Interestingly, the Consumers Union in the United States found remarkably similar results in 1997, which prompted the USDA to implement the aforementioned organic field testing protocols for the U.S. organic standard. However, without any such protocols in the Canadian standard, the CFIA’s findings did not and will not result in any action. In fact, the CFIA cannot, even in theory, take action pursuant to these results. It makes one wonder why it did the testing in the first place.

No certified organic product will be removed from store shelves in Canada in response to the finding of the very substances in CFIA-certified “organic” foods that the organic industry purports to keep out. In addition, no farms, processors or broker/traders will be decertified, much less receive a nasty letter from the CFIA. In fact, a media-initiated Freedom of Information Request was necessary to drag the CFIA’s findings out of this tax-funded agency. With total certified organic sales exceeding \$2-billion per annum in Canada—and with the majority of product coming from *outside* of Canada—the organic industry will, sadly, continue to run as an honour-based system. This might prompt one to wonder why the CFIA even bothers to oversee the organic industry. Were they forced into doing so? Read on...



...Canada’s publicly funded food-safety officials found that a whopping 24 per cent of samples contained residue from prohibited herbicides and pesticides.

## A case in point

Jirah Milling & Sales Inc., a Canadian certified organic miller, was stripped of its CFIA-certified organic status in July 2011, and the CFIA never explained why,<sup>10</sup> which is a bit strange. Stranger still is the fact that Jirah may sell its existing inventory of milled grains (i.e., flour and meal). Could a restaurateur finish serving the customers in the dining room if a violation serious enough to shut down the restaurant was discovered in the kitchen? Of course not! But this is the Canadian organic industry we are talking about, so a different set of rules applies. How different exactly? Well, hold tight because this story is about to get worse. Much worse.

Letis S.A., a private, for-profit, CFIA-accredited certifier based in Argentina certified Jirah for years. Now, if an Argentinean miller were selling organic product *into* the Canadian market, it *might* make sense for an Argentinean certifying agency to obtain CFIA accreditation and then act as that miller's certifier, thereby providing it access to the Canadian market. However, Jirah Milling is based in Quebec, and as far as anyone knows, it did not buy from, or sell to, anyone in Argentina.

Without full transparency in this case, whatever Jirah did wrong to get its certification revoked, it may have gotten away with it for years and it may continue getting away with it elsewhere or under a different set up. One wonders if the CFIA will make Jirah put quotation marks around the term "organic" as they clean out their remaining inventory and sell it as CFIA-certified organic product on the open market. In addition, the reasoning behind the CFIA allowing a foreign body to certify a Canadian processor that is doing business only in Canada and the United States remains unknown.

Could it be that the executives at Jirah went with a foreign certifier to avoid real scrutiny? They seem unaware that there is no scrutiny in the Canadian organic sector no matter where one carries out one's business and no matter where one's certifier is located. Just keep up on the paperwork and pay the fees. That is how it works here in the Great White North: no testing and no surprise inspections. If those running Jirah were, perchance, seeking less scrutiny, they could have readily found it right here within Canada's borders.



Without full transparency in this case, whatever Jirah did wrong to get its certification revoked, it may have gotten away with it for years and it may continue getting away with it elsewhere or under a different set up.

# The bigger picture

The sad fact of the matter is that wherever CFIA-accredited organic certifiers are located, they stay in business only as long as their clients stay in business. This is a perverse construct and the *opposite* of how enforcement works in every other sector of society. The police do not care if the meth lab they bust quits generating revenue, do they? Likewise, health inspectors do not care about the potential economic ramifications when they shut down a restaurant for health violations. But a CFIA-accredited organic certifier collects hefty application, inspection and certification fees from its clients, and all such fees will run dry immediately if the client loses the CFIA certification that its for-profit, CFIA-accredited certifier is providing. But there is one more point to make where the payment of fees is concerned ...

The greatest perversion lies in the fact that most CFIA-accredited organic certifiers also collect "royalties" of between 1 per cent and 3 per cent on their clients' *gross* revenue. This can easily amount to as much as 20 per cent of profits! These are tantamount to the franchise fees the owner of a McDonald's restaurant pays, the difference being that a McDonald's franchisee pays these fees in exchange for benefiting from McDonald's reputation. But the "royalties" paid to CFIA-accredited organic certifiers are paid in exchange for the use of the *CFIA's reputation*, not the certifier's. So, a certifier really has no incentive whatsoever to crack down on a client who might be breaking the rules. Indeed, by all accounts, Letis S.A. failed to do any cracking down. The entire arrangement presents the possibility, one could even say probability, of establishing and perpetuating conflict of interest "situations" throughout the multi-billion-dollar organic sector.

The CFIA is not only failing to disclose any details, it will not even share the annual inspection reports on Jirah Milling that Letis S.A. accumulated over the years. Many people involved in the certification and brokering sides of the Canadian organic industry would routinely see those reports. The reason we have inspection reports in the organic industry is precisely so everyone knows what is going on! It is called transparency. But alas, no inspection reports were released, which also means that we have no way of knowing who blew the whistle on Jirah Milling.

The absence of information will only feed speculation that in the end can become very damaging. Was it the inspector or Jirah's competition? It makes a big difference, right? Or is it possible that Letis S.A. had a crisis of conscience in spite of all the money it was making from Jirah? Clearly, the answers to these questions influence the credibility of this case. Otherwise, there is no way of knowing if the CFIA was actually doing its job of overseeing the Argentinean certifier it accredited. One wonders how many other clients like Jirah this Argentine-based Letis S.A. has, and how many other lax CFIA-accredited certifiers there are like Letis S.A.? Keep in mind that as a foreign agency, Letis S.A. is well and truly beyond the jurisdiction of the CFIA. Yet, the CFIA recognizes Letis S.A. the same way it recognizes domestic certifying bodies: based solely on the annual submission to the CFIA of the required paperwork and the payment of accreditation fees. Such a set up, we submit, draws into question the validity of CFIA certification.

Canadians are left to wonder if Jirah was perhaps singled out as some sort of sacrificial lamb or if it was merely guilty of clerical or bookkeeping errors. Canadians might also very well wonder whether the CFIA can be trusted in its many other areas of responsibility if it cannot disclose what is going on in a straightforward case like this. After all, Jirah has now been well and truly decertified by the CFIA. Case closed! Now let us hear why.



# A status quo defender speaks up!

Laura Telford, national director of Canadian Organic Growers (COG), dispassionately claims that the decertification of Jirah Milling is, in the words of one reporter, “evidence that Canada’s 2009 organic regulations are working.”<sup>11</sup> Never mind that she does not even know why they were decertified. This is how Kafkaesque the organic industry has become in this country. Consumers of organic food—along with every Canadian taxpayer who funds COG and the CFIA—deserve to know the facts. All of them! Instead, Telford says, “I’m not certain the world needs to know the exact reason why this company lost its certification.”

Of course, we need to know. That is the whole point of having objective, transparent, Canadian organic standards that *should* apply equally to everyone. Otherwise, how do we know the CFIA is doing its job or that it even cares to do its job?

Telford expects Canadians to have blind faith in the CFIA’s Canadian Organic Office (COO). Try to imagine any other Canadian regulator operating in total secrecy. COO should disclose *all* the details of this case *immediately!* Should we not expect them to take the opportunity to demonstrate why Jirah’s decertification was unavoidable?<sup>12</sup>

Failing that, doubt will hang over this case. People will have the impression that the CFIA officials had their fingers crossed when they bragged that they were standardizing “requirements and procedures across all food, based on science and risk.”<sup>13</sup>

Being organic is all about integrity and openness. We are talking about tens of billions of dollars per annum in certified-organic sales in North America, so how exactly are consumers to feel assured that everything is reliable in the Canadian organic sector when it is all just based on paperwork? Bernie Madoff kept up on his paperwork, and look how that turned out. Honour systems pretty much go out the window when large amounts of money are on the table. Should there not be at least a bit of scientific scrutiny in this premium-priced food market? In any other industry where fraud is likely to occur, it is commonplace to hear mention in a news story of a lab test being done to cinch the case or of a surprise raid. But in this case, all we know for certain is that Jirah Milling failed to keep up on its paperwork and that the CFIA did some testing on organic products but chose to keep the results secret even though 24 per cent of the samples came up positive. Try to imagine the Olympics being run this way or indeed any other sector of Canada’s food system.

As mentioned, the U.S. standard for organic food production does include field testing, so the big question for the Ministry of Agriculture and Agri-Food Canada is whether it plans to follow suit and aim for real equivalency with the United States by finally instituting the possibility for surprise inspections and routine field testing in Canada. Or will Canada once again lag behind the United States, thereby undermining Canada’s position in the North American market for certified organic foods? Let’s face it, no one is worried about inconsequential issues such as livestock stocking rates for certified organic animals. What consumers of organic food want to know first is whether organic food is produced without prohibited substances. They would also do well to ask whether it is pathogen-free; that is actually a far more important question, but most consumers do not even think about that one.<sup>14</sup> In any case, once regulators get a handle on these basic premises, they should then move on to ensuring that organic food is actually more nutritious, as claimed. Only then should they move on to completely technical issues such as stocking rates. Until unannounced inspections and field testing are implemented, discussions on stocking rates are tantamount to discussing the arrangement of deck chairs on the *SS Edmund Fitzgerald*.

Since the Canadian organic standard has no testing clause, the CFIA’s COO is left to define organic food in the following desultory manner:

### What is an organic product?

An organic product is an agricultural product that has been certified as organic. A product can be certified if it is produced using the methods outlined by the National Standard for Organic Production Systems. Products that make an organic claim must be certified by a Certification Body that has been accredited, based upon the recommendation of a recognized Accreditation Body. The Certification Body must certify the product to the National Standard for Organic Production Systems [NSOPS].<sup>15</sup>

There is an unavoidable circular logic to this. There is no mention of safety, purity, nutrition or sustainability, criteria that are all readily and inexpensively verifiable through basic lab testing. Instead, “organic product” in Canada is legally defined as product “that has been certified as organic.” (Seems self-evident.) And if you are wondering what exactly that lofty sounding term “certified” means, well ... it is “outlined by the National Standard for Organic Production Systems” and is granted based on “the recommendation of a recognized Accreditation Body” that certifies the product in question *according* “to the National Standard for Organic Production Systems.” All clear now? We submit that any such government pronouncement must be based on actual verifiable and credible foundations, preferably science-based, especially if market premiums are being granted as a result!

However, thanks to the deliberate omission of field testing from Canada’s organic standards, being organic is now nothing more than a function of the office and the official, according to the bureaucratic letter of the law as contained in the NSOPS. Being organic in Canada is not dependent in any scientifically verifiable sense on the field nor upon anything the farmer may or may not do. It has all been rendered for your shopping convenience into a matter of administrative authority, not skill; record keeping, not real inspection; pre-announced visits, not surprise inspections. One hopes that people reading this will be astute enough to appreciate that things are not always fine just because the government says they are.



[In CFIA’s definition] There is no mention of safety, purity, nutrition or sustainability, criteria that are all readily and inexpensively verifiable through basic lab testing. Instead, “organic product” in Canada is legally defined as product “that has been certified as organic.”

# This is equivalency?

We can thank former president Bill Clinton and the Consumers Union for making sure a testing clause made its way into the U.S. organic standard. As there is no such clause in Canada, this means that the CFIA has no ability, *even in theory*, to carry out a simple residue analysis for the purposes of enforcement. And if it does carry out a test, according to the CFIA's own regulations, it is not able to take action against a violator unless test results show pesticide residue levels *in excess of the allowable limits for conventional food*. You heard right. Canada's scientific food watchdog can only pull certified organic food from the store shelf if it fails to qualify according to measures applied to any food, never mind organic food.

And do not think for a moment that you can simply rely on the media to set things straight. *The Gazette* and *The Western Producer* started covering the decertification of Jirah Milling late last year,<sup>16</sup> but for some reason, they could not get past the fact that the CFIA refuses to divulge information about what happened, and they simply stopped writing about it. Imagine if a lack of co-operation from the government could make every embarrassing story involving the government just disappear like that.

Pretending there is "the need to maintain confidentiality about further details"<sup>17</sup> in a case like this is nothing short of bizarre, especially if words to that effect come from the person charged with the duty of enforcing Canada's organic standards: the soon-to-retire National Manager for the CFIA Canada Organic Office Michel Saumur. Lucky for him though, it has not yet struck any Canadian reporters as odd that the CFIA is being tight-lipped about doing the job everyone expects it to do. But the reason is obvious, is it not? Whether the agency likes it or not, the CFIA is part of the story! Like traffic cops who forego the use of radar guns and stand idly by the side of the road as cars go careening by, the CFIA is powerless, by design ... largely its own design. The inescapable conclusion is that Canada will now act as an unguarded backdoor to the multibillion-dollar U.S. market for organic food, as well as to our own lucrative and ever-growing market of unwitting consumers of organic food.



...CFIA has no ability, *even in theory*, to carry out a simple residue analysis for the purposes of enforcement.

# Putting lipstick on an organic pig

Why did the leaders of the organic industry in Canada set up a lax system that forces federal bureaucrats such as Saumur and leading industry spokespersons such as Telford to be so tight-lipped? We all know how the police brag when they make a big bust. But this is the opposite of bragging. Why? Simple! To guarantee overnight success for a fledgling “green” industry in which they all have a stake.

Ironically, coming up with a truly lackadaisical certification system that could deliver overnight success under the rubric of the otherwise thorough and scientific CFIA meant a very long delay in developing Canada’s national organic standard. It took eight long years to catch up to the Americans and we still managed to avoid even alluding to an organic field testing clause. Throughout that time, the self-appointed leaders of Canada’s Organic Regime kept reassuring Canadians that a Canadian standard was right around the corner. Of course, the long delay did not hurt the sale of organic food in Canada or our organic exports to the United States, because organic certifications continued to be done under U.S. standards, on paper at least, but with no testing.

Here is how it went down...

In 2004 when Canada was still five years away from having its own standard, a well-meaning public servant by the name of Ken Bruce from the CFIA set out across this great land to speak with the stakeholders in the organic industry. There are no records of the meetings he held, which is quite telling in and of itself, except for an obscure entry in a little periodical called *British Columbia Organic Grower*. In the revealing words of Paddy Doherty, a self-styled organic lobbyist, we learn what happened when Bruce spoke to a group of organic broker/traders and processors in British Columbia.

Ken Bruce really put his foot in it.... [H]e made the mistake of using the word ‘testing,’ in conjunction with a description of the proposed Canadian Organic Regime. To the large (150) group of keen organic farmers, traders and processors, the mention of testing was like waving a red flag in front of a US politician. The reaction was immediate, negative, and suspicious. Poor Ken took the brunt of it.<sup>18</sup>

This account stands as a candid example of how the powers that be in the Canadian organic sector—the “stakeholders” as the CFIA refers to them—resisted and destroyed any notion on the government’s part that there would be field testing to ensure compliance in the industry that these very same people were lobbying the CFIA to regulate. The testing of organic crops and livestock in Canada was lobbied right out of existence, thereby opening the way for cheap and potentially fraudulent domestic and foreign “organic” imports and exports. Bruce was quickly transferred off the organic file. Science be damned. And, soon enough, Canadian organic farmers and consumers be damned as well.

Co-author Popoff spoke to a former president of the CFIA, Ronald Doering. Doering helped launch the organic file and said, “Who the hell cares if Canadian organic standards are useless? I always warned there would be problems like that when I was still at the CFIA, but the industry kept begging us to regulate them so we finally did!”<sup>19</sup> It seems apparent that the CFIA caved in to the organic industry, giving them all the credibility that a world-renowned regulator such as the CFIA could possibly provide but with none of the independent scientific scrutiny. And all you have to do to obtain your very own piece of that credibility if you are an organic farmer, a pretend organic farmer, a processor or broker/trader is pay 1 per cent to 3 per cent of your gross revenue to a private, CFIA-accredited organic certifier, and pay the upfront application fees.

One has to wonder how many CFIA-certified farmers and processors are committing fraud under such a simple and lax process? It is as if the people at the CFIA are policing the Canadian organic sector while wearing a blindfold that they put on themselves.

Some CFIA-accredited agencies require a conventional soil test when a farm begins the transition to organic status, but they do not even look for prohibited substances or lethal pathogens such as E. coli that routinely result from improper composting. Apologists perpetuate the fallacy that this basic soil test—offered up for show and nothing more—is proof that they are at least doing *something* scientific to protect consumers when actually it is akin to testing the cholesterol level in Olympic athletes’ blood and concluding that they are free of performance-enhancing drugs. The CFIA should really reconsider letting stuff like this go on under its watch.

While honest Canadian organic farmers do everything they can to adhere to the taxing philosophy of organic production while at the same time juggling the bureaucratic, record-keeping requirements laid out by the CFIA, a swarm of foreign challengers has swooped into the market to take advantage of the complete lack of field testing requirements in Canada’s organic standard. And with every broker/trader who figures out how to keep up with the CFIA’s paperwork requirements outlined in Canada’s NSOPS, the honest, hard-working Canadian organic farmer is reduced to an ever-shrinking minority share of the Canadian market for organic food. Imports of “organic” product from countries with slack environmental standards such as China, Mexico, Brazil and Argentina are on the rise, and all that a Canadian organic farmer can attempt is to compete on price.<sup>20</sup> After all, a Canadian farmer’s certification is the same, word for word, as that held by these foreign competitors.

On that note, it was suggested that we, the authors of this report, should show greater respect for the advocates of organic farming. But clearly we do! Organic farmers are wonderful, intelligent and resourceful people. In this report, we are aiming at those who claim to be leading Canada’s organic farming community. They are the ones standing idly by while Canadian organic farmers watch their share of the Canadian market for organic food shrink and foreign imports rise. They are also the ones who support the status quo and who vehemently oppose organic field testing as a replacement for paperwork. We have very little respect for these individuals, and for that we make no apology. We fully support global trade, even in organic commodities that consumers have been led to believe are more domestic and local than non-organic commodities are. Nevertheless, the playing field must be level! And without field testing, the global organic playing field is definitely tilted against our very own farmers.



While honest Canadian organic farmers do everything they can to adhere to the taxing philosophy of organic production while at the same time juggling the bureaucratic, record-keeping requirements laid out by the CFIA, a swarm of foreign challengers has swooped into the market to take advantage of the complete lack of field testing requirements in Canada’s organic standard.

# Organic research?

In addition to the lack of field testing to ensure that farmers, brokers, traders, importers, exporters, wholesalers, millers, processors and certifiers—domestic and foreign—are all following the rules, there is a complete lack of organic agricultural research in Canada, which is in marked contrast to Canada’s leadership role in the conventional and biotech agricultural sectors. This is not to say that tax dollars are not pumped into “organic research” in this country<sup>21</sup> but that no research of any value results. Anyone with even basic farming experience knows this when he or she sees tax-funded research into elementary concepts our grandfathers understood, such as “more seeds help control weeds” and “oats will tolerate harrowing.”<sup>22</sup> This is not science; it is lazy researchers on the research-grant gravy train, repeating common knowledge just to appear useful. Indolence of this sort will eventually kill the Canadian organic industry but only after a select few “stakeholders” get rich in the process.<sup>23</sup>

In 1946, when the global organic movement was being conceived, *The Lancet*, the influential British journal of medicine, weighed in on what was evidently already becoming an “organic versus science” debate. They identified the strong,

...emotional reaction against modern agricultural methods, particularly against the use of artificial fertilizers, which are supposed to ruin the land and the crops grown on it... [B]ut it must be admitted that many of the statements made in preaching this new gospel are unacceptable both to the scientist and to the practical farmer.<sup>24</sup>

Rather than take up the challenge and prove their claims, the organic movement instead ignored the critics and just struggled along for the next few generations, barely surviving as an alternative food system. Then, in the late 1990s, the activist element decided to pursue a political agenda instead. Moreover, as long as a tiny bit of research provides a patina of objectivity, the new organic gospel is better received by the politicians who provide all the legitimacy the activists could ever hope for. Regulation henceforth became the industry’s salvation the world over. Science be damned! And thus, the CFIA’s good name was put up for rent in the organic sector.



This is not to say that tax dollars are not pumped into “organic research” in this country but that no research of any value results.

# Pay to play, Canadian style

What all this means is that a federally regulated, for-profit, CFIA-accredited organic certifying body is merely in the business of doling out the completely politicized privilege to organic farmers, brokers/traders and processors—whether honest or not, anywhere in the world—of being deemed “certified organic.” Organic certifiers, the gatekeepers of the organic canon, do not do anything for the farm, the land or the planet, nor do they ensure that their clients do anything. They are not required to, and they compete instead merely for brand recognition among organic farmers, brokers/traders and processors (whether honest or not) as they weakly enforce the exact same *administrative* rules that their competition does from the comfort of offices far removed from any farm. And they do not have to worry about promoting their brand with Canadian consumers, because that job is already done for them; all they need do is affix the CFIA’s brand to their clients’ products, and consumers on both sides of the world’s longest undefended border will immediately infer its supposed worth. It amounts to little more than an extortion racket, one that the greediest of Mafiosi would envy. All Canadians pay for this, whether they like it or not, and it is growing by leaps and bounds.<sup>25</sup>

This brings us to the heart of the matter from the certifying businesses’ perspective. Private, for-profit, CFIA-accredited organic certifiers do not want to be accused of being party or privy to a fraud occurring under their watch. The mountain of paperwork they keep on file will not prevent fraud or gross negligence nor even deter it, but it will shield them from being held culpable in a court of law if it should ever be proven that one of their clients is flouting the rules that an organic certifier is supposed to ensure are being upheld.

As long as all the paperwork is in order, the CFIA-accredited certifier never has to worry. As long as organic certification businesses such as Letis S.A. are purposely limited to reviewing *only* the paperwork that a farmer or a processor such as Jirah generates (an arrangement that these businesses lobbied Ottawa to accept as so clearly shown by Bruce’s experience discussed above), the certifiers cannot ever be held responsible in any way. No matter what kind of trouble surfaces, whether it is the failure of one of their clients to maintain the bureaucratic record-keeping requirements as laid out by the CFIA or a case of outright fraud, the certifier remains in either case the proverbial Teflon Don. Besides, relying completely on paperwork is also a handy way to collect revenue (royalties, a.k.a. franchise fees), and field testing through federally accredited labs would likely only diminish that revenue.<sup>26</sup>

This is not to say that government employees should replace private organic certifiers. The Canadian Organic Regime would become even more bureaucratic were that to happen. What is needed is that CFIA-accredited organic certifiers must perform routine field tests to ensure that their clients are not cheating. The federally accredited labs these certifiers would use are privately run, so there should be no problem with the certifiers remaining private. The difference is that when an ag lab is federally accredited, it is done according to strict, scientific protocols, not mere paperwork. Running the Canadian Organic Regime on paperwork, replete with exorbitant certification fees, turns organic certification into a privilege instead of the right the founders of the organic movement envisioned.<sup>27</sup> And, more so than in any other jurisdiction in the world, Canadian certifiers dispense that privilege up to and never exceeding the highly technical and completely bureaucratic standard according to federal law. Again, science be damned.

Such dispensation of privilege does not just affect the honest Canadian organic farmer, it affects consumers on both sides of the border, because they assume that a CFIA-accredited certifier is impeding the bad apples, encouraging the good apples, and that the good apples are being rewarded for efforts that might actually go *above and beyond* the federal standard in the cause of producing purer, more natural, nutritious food. If only this were the case. Certifying agencies in Canada only encourage the good paper generators, and the consumer pays for the privilege while getting near zero protection in return. U.S. certifiers meanwhile are beginning to make use of the testing clause found in their standard<sup>28</sup>—at least at the state level—but with no such clause present anywhere in the Canadian standard, it would seem that an unscrupulous broker might find Canadian certification more conducive to his profit margin. After all, thanks to those “equivalency agreements”<sup>29</sup> mentioned earlier, the unscrupulous broker can now gain backdoor access to the much more lucrative U.S. market for organic food.

Overall, Canadian organic farmers are, like most farmers, as honest and committed as they are ingenious and adaptable to changing weather conditions, fluctuating markets and broken-down machinery. They never sought the “privilege” of farming without chemicals. They sought only someone who was willing to attest to their efforts. Indeed, it is as much the farmer’s right to produce organic food as it is the consumer’s right to buy it. All that is required from the certifying agents and the regulatory body is that, based on a scientific and objective process, they act as the independent, third-party validator and make every effort to keep pretenders out and nothing more.



Certifying agencies in Canada only encourage the good paper generators, and the consumer pays for the privilege while getting near zero protection in return.



# Would organic testing be expensive?

Many of the owners of Canada's for-profit certifiers are quick to assert that organic field testing is just too expensive, claiming it will cost "\$700 per sample ... with many samples being required."<sup>30</sup> This is nothing short of laughable. A single sample will more than suffice as long as the person whose wares are sampled has no idea what is being tested for. Without a volume discount, \$100 buys a single broad-spectrum analysis of over 150 common herbicides and pesticides.<sup>31</sup> And even before any franchise fees (royalties) are paid to a CFIA-accredited certifier, a farmer or processor can expect to pay in excess of \$2,000 just to cover the upfront administrative costs of becoming certified. Not a bad take from the certifier's perspective considering that the contract inspector will likely earn only 10 per cent of that revenue for doing all the paperwork during a three-hour, mind-numbing inspection. After that, it is just more bookkeeping and filing. Then, after the harvest, comes the payment of 1 per cent to 3 per cent of the client's *gross* revenue.<sup>32</sup> Yet, a \$100 or \$200 test is out of the question.<sup>33</sup> It would be interesting to see what agriculture officials say when confronted with this.<sup>34</sup>

As the organic industry matures in Canada (we would say \$2 billion per annum is plenty "mature" by any estimation), one would think this industry would at least try to provide a superior product in terms of purity and nutrition. Otherwise, to paraphrase philosopher Gregory Bateson, we are left with a difference that makes no difference, which, when you get right down to it, is no difference at all.<sup>35</sup> And as anyone with a calculator can see, a test-based system of organic certification will not only prove or disprove the many differences being claimed in the organic industry but will also cost less than one-tenth of what the current paper-based system costs. But, instead, here is a bewildering example of how things really work, straight from the mouth of the VP of Marketing for the Victoria, B.C.-based Planet Organic, Diane Shaskin: "You might have the most dedicated organic producer, but if they're not prepared to do this bureaucratic due diligence, we won't sell their product. It will make the growers understand the global perspective on organic growing."<sup>36</sup>

It is nothing short of astonishing, we submit, to hear such a flagrantly unscientific view held by people at the top. Shaskin is in essence saying that "bureaucratic due diligence" is more important than being "the most dedicated organic producer." Surely Shaskin can appreciate that such bureaucratic exercise for the sake of the exercise might just end up providing the whole explanation of why the CFIA decertified Jirah Milling. Could it be that the company failed to maintain its "bureaucratic due diligence" and nothing more and what we are dealing with here is nothing more than a mere series of clerical errors while tens of millions of dollars worth of untested CFIA-certified organic product continues flowing both ways over our border on a monthly basis? Or was this indeed a case of outright fraud? Surely, some scientific analysis is in order.

One logical assumption might be that Jirah failed one of the CFIA's recent tests mentioned above. But, speaking as a former organic farmer and inspector, Popoff can attest that there is little likelihood that there was *any field testing* or even a *surprise inspection* in the CFIA's "investigation" of Jirah. Telford meanwhile is on the record as *opposing* routine, unannounced organic field testing and claims end-product testing on a case-by-case basis will be sufficient instead.<sup>37</sup> If she was correct, we have to ask, "Was there even any end-product testing in this case?"

Saumur, the manager of Canada's Organic Office, claims to support the need for organic field testing, but in all his years at the helm of COO, he only carried out the 599 tests mentioned above, the results of which his agency chose not to disclose. It will be deeply troubling to any fair-minded Canadian to learn that this case probably unfolded without any scientific scrutiny whatsoever, which no doubt explains Telford's and Saumur's conspicuous desire to keep things veiled in secrecy.

Such secrecy becomes all the more disturbing when one considers that in addition to accrediting the Argentine-based Letis S.A., the CFIA accredits other foreign certifiers, alongside Canadian ones, under the exact same standards. These foreign certifiers are then free to dole out CFIA organic certifications—in exchange for hefty fees—to farmers, broker/traders, processors and exporters in their home countries for product that is destined for the Canadian market, sometimes before that product even leaves the field. This saves a lot of fuss at the Canadian border, and Canadian consumers have every reason to believe said product is actually a product of Canada! This means Canada’s sloppy organic standards not only provide backdoor access to the lucrative U.S. market for organic food, they also provide backdoor access to our own market!

To add insult to injury, in the words of one respected Canadian ag-journalist, here is what Telford, who I remind you is the national director of the *publicly funded* Canadian Organic Growers, says: “Observation is the first pillar of inspection, followed by good record keeping.” Then in her own words Telford concludes that “Testing on a random basis is not going to be of great utility.”<sup>38</sup> That is not a reassuring statement for any consumer who is looking for objectivity based on science. Similarly, Wendy Tilford (not to be confused with Telford), president of The Quality Management Institute, one of the world’s largest private USDA- and CFIA-accredited organic certifiers, said, “Organic certification is not granted through the testing of a product... It is, by definition, the adherence of specific practices in the production of a food.”<sup>39</sup> There is nothing wrong with requiring farmers and processors to adhere to “specific practices,” but to require basic verification that people are following the established rules should not be a concept too difficult to grasp. With every other sector of the food industry in Canada subject to scientific scrutiny, one can but wonder why the CFIA would allow its good name to be abused this way in the organic sector.<sup>40</sup>



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# Take off the lipstick

If for any reason, consumers thought a product did something it did not actually do, would it not be incumbent upon the makers of the product as well as the government body that regulates it to clear away any misconception and explain exactly what the product actually does? Apparently not in the organic industry, where facts are unimportant and consumers are left to believe whatever they have been told to believe over and over again by vested interests, “stakeholders” as the CFIA likes to refer to them. And keep in mind, as alluded to above, these stakeholders receive a great deal of public funding for their marketing campaigns that are designed to tell consumers what they are allegedly getting when they pay more for organic food.<sup>41</sup>

We advise consumers not to hold their breath while waiting for politicians and government officials to sort this out. Consumers have become an integral part of the whole scheme by underwriting it on the bottom end through their taxes and by paying for it on the top end whenever they buy CFIA-certified organic groceries.

And we are not so naïve as to hold our breath either. Not only would it appear that the government is complicit, but academics also show themselves unwilling to catch up with this ruse. In a rather expensive study that amounted to nothing more than a puff piece for the Canadian organic sector, academics from the University of Saskatchewan interviewed stakeholders in the organic industry, and then they actually tried to argue that everything was just fine.<sup>42</sup> They would have us believe that there is no fraud or gross negligence to worry about in the Canadian organic industry, because those who are cashing in on it said there is not. But the most disturbing part of this tax-funded “study” is the fact that the authors actually admit that they spoke only to stakeholders, as if that were what passes for academic these days.<sup>43</sup> It is like asking Barry Bonds’ manager, coach, team doctor, agent and wife whether he injected anabolic steroids. Yet another example of tax dollars wasted on organic “research.”

It bears mention that just before the publication of his book on the organic industry (*Is it Organic?* Polyphase Communication, 2010), co-author Popoff received word back from Canada’s Minister of Agriculture, Gerry Ritz, about how many organic farms the CFIA had tested under their organic program. The reply took over four months, and instead of providing a satisfying answer, the CFIA sent a list of every single farm it had tested since the day Canada’s organic standards went into effect in June 2009. The list is 406 pages long (single spaced, double sided) and, sadly, not a single organic farm or processor is mentioned.<sup>44</sup> They were all conventional farms with no claim to being organic.

Then we received word that the CFIA finally tested some organic product late last year, and that brings us full circle to where this story began, with the CFIA’s suppression of its scientific test results. A whopping 24 per cent of samples contained residue from prohibited herbicides and pesticides that the CFIA is supposed to guarantee are, at the very least, kept to a bare minimum. Rather than revamp what it actually means whenever the CFIA’s good name appears on an organic label, this branch of the federal government’s regulatory apparatus chose self-censorship instead. Were any fecal coliforms found in any of the CFIA’s tests? Sadly, the issue of dangerous pathogens making their way into the organic food chain due to improper composting of manure is not even on the CFIA’s radar right now. This is what happens when science goes out the window.

# The conclusion no one wanted to hear

As long as consumers *think* organic food is worth more, then no one making money in and from the Canadian organic sector will ever be persuaded that it is necessary to bother *proving* it is worth more. They are not willingly going to act against their own economic benefit.

And yet, leaders and activists alike in the Canadian organic sector take every chance they get to go on the attack against conventional and genetically modified food, claiming it is dangerous and just so much empty nutrition. Even the mention of “natural” food provokes self-righteous indignation from the collective speech-centres of Canada’s organic industry, causing them to go on the attack. Dag Falck, the organic program manager with Nature’s Path Foods Inc., charges, “[T]here is no intent or guarantee or effort gone into preventing pesticides from being in natural products.”<sup>45</sup> Meanwhile, the hallowed organic industry fails to guarantee such things.

In fact, from a recent study out of Stanford University, there is very little if any difference between organic and non-organic food in terms of purity and nutrition.<sup>46</sup> While the study found some differences, they were hardly commensurate with what consumers have been led to expect when they pay double, triple, or more for certified organic groceries. And while levels of toxic pesticides were indeed found to be lower in children raised on predominantly organic diets, the differences were, again, nominal. One cannot help but speculate as to what the results of this study, which surveyed over 200 studies of organic food over the last 43 years, might have looked like if the organic industry in North America had instituted mandatory, across-the-board field testing as the Consumers Union suggested back in 1997.

We say that it is time to decentralize the Canadian Organic Regime, and let it be handled at a more local level by the provinces. It would be hard to do any worse. Canadian organic farmers and consumers are trapped in an organic nightmare, one from which they may never escape unless the CFIA admits it has exceeded its abilities. Some things were simply never meant to go national, especially farming and food production, which still is, after all, a provincial jurisdiction. What could be better than a little friendly competition in an effort to prove, scientifically, that Canadian organic food is indeed genuinely organic, as defined by the Canadian Organic Standards and Regulations? With the necessary additions—field testing and unannounced inspections—the standards the feds established could, in theory, remain in effect but be implemented through provincial enforcement. The feds could also maintain oversight of the import market in organic food, while still devolving ultimate enforcing authority to the province to which the foreign organic food is destined. No one province is going to want to be more lax than the rest when it comes to requiring field testing of all organic imports before they are shipped, lest it becomes the dumping ground for fake organic imports from around the globe.

By allowing competition between the regions, the provinces and even between individual farms within an improved version of Canada’s organic standards—based on the objective measuring tools that modern science provides—a great proliferation of success could be achieved in Canada. Otherwise, the nightmare will continue.

## Endnotes

1. In libertarian circles, subsidiarity is also referred to as distributism or devolution. It means, essentially, decentralization. ←
2. The United States Department of Agriculture (USDA) National Organic Program requires that certified organic goods must not have residue from any prohibited materials. This is based on levels set by the United States Environmental Protection Agency (EPA) and the U.S. Food and Drug Administration (FDA). Residue in organic products must not exceed 5 per cent of the EPA limit allowed for conventionally produced goods or the actual limit set by FDA for conventional goods. (See USDA NOP §§ [205.670-205.671](#).) This stands in stark contrast to Canada's organic standard. See next footnote. ←
3. In contrast to the U.S. standard, Canada's organic standard makes no mention of testing or even what would constitute a failed test if one were carried out. See CAN/CGSB-32.310-2006, "Organic Production Systems General Principles and Management Standards," [ICS 67.040](#), National Standard of Canada, published September 2006 by the Canadian General Standards Board, Gatineau, Canada. ←
4. Sarah Schmidt, "[Safety Agency to Get Facelift: Report Calls for Single Inspection Approach for all Food Products](#)," *Postmedia News*, June 2, 2012. ←
5. See "Would Organic Testing be Expensive?" below. ←
6. See Caroline Scott-Thomas, "[US and Canada Compromise on Organic Equivalency for Certain Meats, Dairy](#)," Food Navigator-USA.com, February 2, 2012; and Michael T. Jarvis, "[Organic Trade: U.S. and Canada Take Step Toward Full Equivalency](#)," AMS No. 035-12, January 27, 2012. ←
7. See Sean Pratt, "[Canada, U.S. Sign Organic Agreement](#)," *The Western Producer*, June 25, 2009; and "[New Trade Group Will Work to Lessen Non-science Barriers](#)," *The Western Producer*, August 13, 2010. Meanwhile, the United States and Canada have both signed similar, separate organic agreements with the European Union (EU). See Lacy Gray, "[U.S. & EU Organic Trade Partnership](#)," AgInfo.net, February 16, 2012; and Sean Pratt, "[EU, Canada Shake Hands on Organic Standards, Laws](#)," *The Western Producer*, July 28, 2011. The United States just inked a more general trade agreement with China that includes "sustainable" (organic) agriculture. See "[Xi Pledges to Deepen China-U.S. Agricultural Co-operation](#)," CRIEnglish.com, February 17, 2012. In all cases, documentation will rule the day with no recourse to laboratory analysis. ←
8. See [CAN/CGSB-32.310-2006](#), ICS 67.040, National Standard of Canada, as cited above. ←
9. See <http://www.cbc.ca/news/pdf/cfiaresults.pdf> and <http://www.cbc.ca/news/pdf/cfiaresults2.pdf> and especially <http://www.cbc.ca/news/pdf/ncrmpresults.pdf>, which is the summary of the CFIA's organic tests. The CBC eventually ran a story about this but failed to mention the CFIA's unwillingness to divulge its results. See "[Pesticides Found in Canadian Organic Produce](#)," *CBC News*, December 8, 2011. ←
10. One reviewer of this report suggested the CFIA would disclose all information pertaining to this case if only we would ask. Quite the contrary. In the article "[Organic Exporter Rebuked](#)," Steve Brown quoted the head of the CFIA's organic office, Michel Saumur, as saying that he "couldn't comment further," *Capital Press*, August 11, 2011. In the Cornucopia Institute's coverage, Saumur expressed "the need to maintain confidentiality about further details." See "[International Organic Scandal: Major Canadian Grain Exporter's Certification Suspended](#)" on The Cornucopia Institute website, August 8, 2011. Clearly, when it comes to organic foods, the CFIA sees no need to communicate the potential for risk to Canadians. ←
11. The article was scrubbed from *The Gazette's* website, but fortunately, enough people in the blogosphere have quoted from the story to provide verification of Telford's comments. See [here](#). For the full story, quoted in its entirety, see "[Secrecy Surrounds Exporter's Lost Organic Certification](#)" on VegasOrganic.com. We made repeated attempts to contact the reporter of the original Gazette story, Lynn Moore, and her editor, Catherine Wallace. At first, they appeared willing to communicate and ran a letter to the editor by Popoff. However, they finally quit returning our emails and responding to our voice messages. ←
12. Michel Saumur is the National Manager of the CFIA's COO. ←
13. Sarah Schmidt, "[Safety Agency to Get Facelift](#)," *The Vancouver Sun*. ←
14. Consumers should be thinking about pathogens when they buy certified organic food. See for instance Popoff's articles on the E. coli outbreak in Europe that resulted in 44 deaths and more than 3,700 illnesses: "[Blame Organic Industry For E. coli Outbreak](#)" on RealClearScience.com, June 29, 2011, and "[Organic Food Deaths in Europe Could Have Been Prevented](#)" on AmericanThinker.com, July 1, 2011. ←
15. Canada Organic Office, the Canadian Food Inspection Agency, "Canada Organic Regime: A Certified Choice: Information for Organic Stakeholders, P0607E-08, April 12, 2008. ←
16. All stories that ran in *The Gazette* and *The Western Producer* have been scrubbed from the Internet. What is left is scant coverage such as Steve Brown's "[Organic Exporter Rebuked](#)" in *Capital Press*, (August 11, 2011), which fails to even mention that Jirah's CFIA-accredited certifier was based in Argentina. The Cornucopia Institute provides the most detailed coverage of Jirah's decertification, but perhaps because of this watchdog group's complete opposition to any need for organic testing, it fails to explain that the decertification was based on a review of the record. See "[International Organic Scandal: Major Canadian Grain Exporter's Certification Suspended](#)" on The Cornucopia Institute website, August 8, 2011. ←
17. See "[International Organic Scandal](#)" by The Cornucopia Institute. The words "the need to maintain confidentiality about

- further details” are those of the reporter, not Saumur himself. The reporter is interpreting Saumur’s words to that effect. ←
18. *British Columbia Organic Grower*, Volume 7, Number 1, Spring 2004, p. 4. In exchange for his good work in suppressing testing, Paddy Doherty received the 2009 Organic Leadership Award for Achievement in Growing the Organic Industry from The Organic Trade Association. For all his troubles in daring to promote organic testing, Bruce, by contrast, was replaced by Michel Saumur to head up the CFIA’s organic program. Saumur only pays lip service to organic field testing and so is deemed acceptable by key people such as Doherty. ←
  19. Popoff sent Doering a copy of his book that includes this quote (pp. 151-152) and did not hear any negative feedback from Doering. This is a clear indication that he does not deny saying these words to Popoff during their phone conversation. Popoff also sent a copy of his book to Michel Saumur, National Manager for the CFIA Canada Organic Office, and has likewise heard no negative feedback. Evidently, he is aware of how things played out when Bruce tried to institute organic field testing in Canada’s organic standards. ←
  20. See Brenda Frick, [“Is Now the Right Time to Move to Organic Production?”](#) *The Western Producer*, December 15, 2011, where she states, “By 2006, many organic flax buyers were buying product from China.” As an organic farmer, Popoff can attest to this, because his family used to produce certified organic flax in Saskatchewan and received upwards of \$50 per bu. in 2005. In 2006 when Frick wrote this article, the price was hovering around just \$20 per bu., a 60 per cent drop! See also Simon Weseen, an organic trade and market analyst at the University of Saskatchewan, who according to a respected ag-reporter said, “[L]ow-cost grain producers such as China, Eastern Europe, Argentina and Brazil may be filling demand that used to be supplied by Canadian product.” (Sean Pratt, [“Market Remarks Don’t Hold True: Organic Farmers,”](#) *The Western Producer*, November 9, 2006.) Finally, there are the disturbing sentiments of nutritionist Rosie Schwartz who, according to another respected ag-reporter, warns that “The safety of food imported from China is a consumer concern along with E. coli contamination of vegetables, such as spinach.” (Quoted by Michael Raine, [“Food Confusion Vexes Industry,”](#) *The Western Producer*, October 18, 2007.) ←
  21. See [“Welcome to Canada’s Organic Science Cluster”](#), a Part of the Canadian Agri-Science Clusters Initiative of Agriculture and Agri-Food Canada’s Growing Forward Policy Framework on the Organic Agriculture Centre of Canada website. ←
  22. See Noel Busse, [“More Seeds Help Control Weeds,”](#) *The Western Producer*, February 28, 2008, p. 14. Steve Shirliff, assistant professor, Department of Plant Sciences, University of Saskatchewan, recommends increased seeding rates. Eric Johnson, weed biologist, Agriculture and Agri-Food Canada, and Scott, Saskatchewan Research Station say oats will tolerate harrowing, more so than wheat. Diane Knight, University of Saskatchewan and Sukhdev Malhi, Agriculture and Agri-Food Canada, support Shirliff and Johnson, and they all plan to work on this, furthering our understanding of this already well-understood information, at taxpayer expense, for the next three years. ←
  23. For greater insight into how your tax dollars are spent in Canada’s organic “science” cluster, see also A. Ghaffari, M. Bunch, R. MacRae and J. Zhao, “Tools for Geospatial and Agent Based Modeling to Evaluate Climate Change in an Agricultural Watershed in Transition to Organic Agriculture,” Faculty of Environmental Studies, York University, 2012. Sadly, as co-author Popoff has shown in numerous articles, organic farming emits more greenhouse gas than does conventional agriculture. Then there is the revealing language used in section A.1 Executive Summary, (See “Welcome to Canada’s Organic Science Cluster;”) which states, “The Organic Science Cluster ... is designed to increase profitability and competitiveness by addressing production barriers, developing leading production technologies, and characterizing Canadian organic production for the national and international organic markets.” (Emphasis added.) As co-author Popoff has indicated in numerous interviews on the topic, “characterizing” Canadian organic production means marketing, which means your tax dollars are being used to market organic food to you. We cannot stress enough the fact that this hardly begins to qualify as scientific research. ←
  24. *The Lancet*, June 1946. ←
  25. See Lori Stahlbrand, [“OACC Launches the Organic Policy Tool Shed”](#) on The Organic Agriculture Centre of Canada website, specifically where she claims, “Retail sales have maintained 15-20% growth a year over the last ten years, making the organic sector the fastest growing retail sector on the continent.” ←
  26. There is talk of switching the organic industry from franchise fees to a checkoff system such as is used in other agricultural sectors in order to raise funds for political representation. See Coral Beach, [“Organic Assessment Possibility Draws Fire”](#) on ThePacker.com, May 24, 2012. Either way, the organic industry clearly appreciates the need for a robust revenue stream in order to maintain its image amongst politicians and consumers. ←
  27. The founders of the organic movement, Rudolph Steiner, Rolf Gardiner, Sir Albert Howard, Jerome Irving Rodale and Lady Eve Balfour, recognized the right of organic farmers to produce food in a more natural way, and each in his or her own way rejected bureaucracy as anathema to the true goals of the organic movement. ←
  28. USDA NOP §§ [205.670](#) - [205.671](#). ←
  29. See Endnotes 4 and 5. ←
  30. J. Wallace Hamm, owner and president of OCCP/Pro-Cert (Canada’s single largest CFIA-accredited organic certifier) in [The Inspectors’ Report](#), published by the IOIA, Vol. 12, No. 1, Winter 2003, p. 12. ←
  31. The single most-expensive test Popoff has ever seen from an accredited lab was for Roundup, which is in a chemical class unto itself. It will run you just \$200. ←
  32. Instead of a royalty levied on a sale, some Canadian certifiers just charge an exorbitant upfront fee, much higher than

\$2,000. In such cases, the upfront fee is still based on a farm's potential for production, either on sheer acreage or on past sales. Then there is also the idea mentioned in a previous footnote of moving to a checkoff system, which will still be based on a farmer's or processor's potential for production. ←

33. We must point out that the more samples one runs through a federally accredited lab, the cheaper the cost per test. Popoff performed organic field tests 10 or 20 at a time, and as such was paying top dollar. ←
34. Indeed, this was precisely the situation that allowed Bernie Madoff to pull off the largest Ponzi scheme ever right under the noses of the Security and Exchange Commission (SEC). Whistleblower Harry Markopolos tried six times to tip off the SEC about Madoff's criminal activities, but as he explained to *60 Minutes* correspondent Steve Kroft, the regulators are only versed in "how to look at pieces of paper that the securities laws require. They can check every piece of paper perfectly and find misdemeanors, and they'll miss all the financial felonies that are occurring because they never look there. Even when pointed to fraud, they are incapable of finding fraud." (*60 Minutes*, June 14, 2009.) Why would anyone in the federal government stand by and allow the undermining of the CFIA's reputation in this. ←
35. Gregory Bateson, *Steps to an Ecology of Mind*, University of Chicago Press, 2000, pp. 457-459. ←
36. Laura Severs, "Organic Food Sector Gets Stamp of Approval," in *Business Edge*, August 10, 2007, Vol. 7, No. 16. ←
37. You can hear Laura Telford [responding to the release of Popoff's book \*Is It Organic?\*](#), which she admits she has never bothered to read, interviewed by Shaun Haney on RealAgriculture.com, November 17, 2010. ←
38. Sean Pratt, "[Residue Tests not Priority](#)," *The Western Producer*, May 13, 2010, p. 54. ←
39. Wendy Tilford, president, Quality Management Institute (QMI - SAI Global), Keynote Address at the *Canadian Summit on Food Safety-Raising Food Standards in Canada, Protecting the Customer and your Company*, April 24, 2007. (Emphasis added.) ←
40. One reviewer of this report suggested, "With regard to the testing of organic foods, it would be helpful if the authors could distinguish between tests to prove the authenticity of organic produce and tests to confirm the quality and safety of organic foods. I am certain the public is interested in both. Only the latter would appear to be within the mandate of the CFIA." If the CFIA indeed has no mandate "to prove the authenticity of organic produce," then why pray tell do they have a fully staffed Canadian Organic Office, and why are they bothering to oversee and regulate the organic industry in the first place? This strikes us as one of the strongest arguments possible for the organic industry to devolve to the regions and provinces. Perhaps the CFIA could retain a role in the import/export market for Canadian organic food, with the proviso that it would stop providing paper-based accreditations and certifications to foreign entities such as farms, processors, broker/traders and certifiers. The CFIA does not "rent" its name out in any other sector of Canada's food economy, so it should stop doing so in the organic sector. ←
41. We again refer to "[Welcome to Canada's Organic Science Cluster](#)" on the Organic Agriculture Centre of Canada Web site, especially "[Organic Science Cluster Proposal Summary](#)" A.1 Executive Summary: "The Organic Science Cluster (OSC) will mobilize organic science ... to increase profitability ... by addressing production barriers ... and *characterizing* Canadian organic production for the national and international organic markets." (Emphasis added.) ←
42. See Andrew Baker and Stuart J. Smyth, "[Managing Opportunism in Value-added Supply Chains: Lessons From Organics](#)," *Journal of International Food & Agribusiness Marketing*, February 10, 2012, pp. 22-46. ←
43. See for instance *Ibid.* p. 31 (second paragraph) where the authors admit that it is difficult to assess the "amount and incidence of cheating" in the organic sector, and so decide that since "statistics are not readily available," they will consult with the "relevant stakeholders." Their conclusion that "[o]verall, most stakeholders feel that the organics sector has done a good job of combating fraud by ensuring two-way information flows that address emerging issues across the supply chain" is nothing short of laughable and, in fact, does not even qualify as academic. ←
44. See CFIA Canadian National Chemical Residue Monitoring Program, Report on Pesticides, Agricultural Chemicals, Environmental Pollutants and Other Impurities in Agri-Food Commodities, Fiscal Year 2008/2009, Vol. 2. The cover letter from Minister Ritz is dated June 29, 2010, Quote 146973. ←
45. Sean Pratt, "[Organic Industry Calls Natural Food Movement Dangerous](#)" *The Western Producer*, November 25, 2010. ←
46. See Crystal Smith-Spangler et al., "[Are Organic Foods Safer or Healthier Than Conventional Alternatives?: A Systematic Review](#)," *Annals of Internal Medicine*, September 4, 2012; 157(5): pp. 348-366. ←

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