



October 18, 2019

Mr. Parthiban Muthukumarasamy  
Director, Import Export Division  
Canadian Food Inspection Agency  
1400 Merivale Road Tower 2, Floor 6, Room 268  
Ottawa, ON K1A 0Y9

Mr. Frédéric Seppey  
Assistant Deputy Minister, Market and Industry Services Branch  
Agriculture and Agri-Food Canada  
1305 Baseline Road Tower 5, Floor 6, Room 322  
Ottawa, ON K1A 0C5

Re: Official position of the Canadian Organic sector on Hydroponics being considered in organic

Dear Mr. Muthukumarasamy and Mr. Seppey,

We are writing on behalf of the organic sector in regard to a question posed to our associations at a meeting with the Canadian Food Inspection Agency (CFIA) on June 4, 2019. We were asked to come back to the Federal Government with one voice on why organic prohibits hydroponics in our Canadian organic standards. This correspondence is to address this request by CFIA that was put forward to our national associations (Canada Organic Trade Association, Canadian Organic Growers and the Organic Federation of Canada).

We stand united and unequivocally reject the allowance of hydroponics by the Canada Organic Regime (COR) for sale in Canada and for export to other trading partners. The very notion of being asked to articulate why hydroponics is banned from COR is similar to being asked why we would ban synthetic pesticides, genetically engineered seeds and have built humane treatment of animals into the organic standards. The attached position statements (Appendix A, B, C, D) from each of our organizations spells these point out in detail.

In summary, the global definition of organic (despite the USA's National Organic Program recent ruling permitting hydroponics) prohibits hydroponics. In fact, there is a court hearing challenging the NOP's permittance of hydroponics currently in the US court system as the USDA's allowance of hydroponics is a fundamental shift away from the global norms of what is defined as organic. See below links for further details of the US court case. We fully support and stand behind the organic sector in the USA who is challenging the NOP/USDA for allowing this egregious act.



<https://www.foodsafetynews.com/2019/02/organic-industry-is-not-giving-hydroponic-growers-a-warm-embrace/>

[https://www.centerforfoodsafety.org/files/1\\_16\\_19\\_cfs-hydroponics-petition\\_final\\_11376.pdf](https://www.centerforfoodsafety.org/files/1_16_19_cfs-hydroponics-petition_final_11376.pdf)

The organic sector is a \$5.4 billion market in Canada, with over a billion in export sales worldwide. The USA's NOP hydroponic products are banned from all export sales due to not meeting international standards. We stand united in that we do not want any US hydroponically produced products entering Canada and lowering the public trust that we have worked to establish in Canada. We also do not accept or support the Canadian Horticulture Canada (CHC) and the Ontario Greenhouse Growers position that there is a trade harmonization concern.

Our Canadian organic standards and US-Canada Equivalency Arrangement is absolutely clear that operators must adhere to Canadian standards and respect the details of the equivalency arrangement. The system has been set up banning hydroponics since 2009, calling out critical variances in our US-Canada Equivalency arrangement. It is of utmost concern if the Government of Canada wishes to alter the established organic standards and trade arrangement details that the organic sector has been functioning under (and strongly support). Amending the Canadian organic standard (or other mechanisms available to government) to permit organics to be produced through hydroponic methods would not only damage the trust and reputation of the Canadian organic label, but also override the research and decision reached by the Organic Agriculture Technical Committee. Any changes to current practises made without the consensus of the Technical Committee would be a breach of the consensual principles embedded in the policies and procedures of the Canadian General Standard Board.

Our concern is that we risk retaining our respected global position in the organic marketplace and that significant trading partners, such as EU, Japan, Switzerland, would need to alter the equivalency arrangements we have with these markets should hydroponics in the organic system be permitted under any circumstances in Canada. With the court case ongoing in the USA, we certainly feel it would be detrimental to our sector to allow CHC's argument of not being able to access the US market opportunity as a worthwhile argument to alter the standards/trade arrangement or create any policies which would change the current practise of banning all hydroponics under the COR. We support the horticulture sector accessing the US market with their conventionally grown produce but we diametrically oppose their position of trying to drag the Canadian organic sectors reputation down to the US's "lowest common denominator" which is globally rejected and may be overturned through a court process. There is no other country in the world that permits hydroponics in their organic programs and it would be a fatal error to move in this direction for the sake of an opportunistic market opportunity.



Each association agrees with the contents of this letter and reject hydroponics as part of the organic program. Each of our associations have attached our unique position statements as appendices to this correspondence. We are prepared to oppose any moves made to change the current practise of banning hydroponics under COR or sell “organic hydroponics” to any of our equivalency arrangement partners.

Should you wish to meet with our delegation, we are available at your convenience. We wish to receive a formal response on your position on this topic to ensure you have heard our collective voices and understand our concerns.

Yours very truly,  
Per:

Tia Loftsgard  
Executive Director  
Canada Organic Trade Association (COTA)

Nicole Boudreau  
Coordinator  
Organic Federation of Canada (OFC)

Wayne Adams  
Executive Director  
Canadian Organic Growers (COG)

Marie-Eve Levert  
Co-Chair, Organic Value Chain Roundtable  
Founder, Levert Organic Strategy

CC: Minister Bibeau, Minister of Agriculture  
CC: Fred Gorrell, Assistant Deputy Minister, International Affairs (AAFC/CFIA)  
CC: Tom Rosser, Assistant Deputy Minister, Strategic Policy Branch, AAFC  
CC: Glenda Taylor, Director, Industry Engagement Division, AAFC  
CC: Marco Valicenti, Director General, Sector Development and Analysis Directorate, AAFC  
CC: David Cox, Deputy Director, AAFC  
CC: Valeriya Staykova, Lead Auditor, CFIA  
CC: Jay Holmes, National Manager, Food Labelling, CFIA  
CC: Heather Holland, National Manager, CFIA



## **Appendix A**

### **Canada Organic Trade Association's Hydroponics Position statement Adopted as a Board Resolution on October 15, 2019**

Organic agricultural systems are defined fundamentally as a positive system of generating health by caring for the soil. Organic agriculture aspires to mimic natural ecological systems as a way to achieve the highest possible health-promoting qualities in organic products. The study of agricultural growing systems reveals that the optimum health of plants is achieved when they live in and absorb nutrients provided by the natural biological communities in soil (bacteria and fungi).

These biological communities are engaged in a continuous and virtuous process of transforming decaying plant and animal matter (plant residue, manure and minerals present in soil) into optimal nutrients for plant roots. This is how nature designed the system to create the best nutrition for plants. It cannot be replicated in the absence of soil. Just like substitutions to mothers' milk can never be considered superior food for infants.

According to the United Nation's Food and Agriculture Organization (FAO), soil holds a quarter of our planet's biodiversity. Organic systems cannot be described by what they avoid. Such agri-chemical inputs are avoided to protect the biological life, which is the essence of a healthy soil foundation, for the foods grown. This in turn protects humans from exposure to chemical residues that survive in the plants eaten by people and animals or that may end-up in the water table. Simply removing the elements of agri-chemical inputs does not replicate the intense stewardship and contributions of the soil required for organic systems.

Hydroponic growing is by definition a system that avoids the reliance on the soil and its lifeforms, and instead replaces it with nutrients in a water solution fed to the roots of plants through a drip irrigation system. Hydroponics does not contribute to the planet's biodiversity, help to combat and adapt to climate change or store and filter water in the earth.

The core contribution of organic agriculture, that of utilizing nature's soil micro-organisms capacity to cycle nutrients and provide optimal nutrition to plant roots, is entirely absent from a hydroponic growing system. As such, Canada Organic Trade Association's long-standing position is that hydroponic growing is not compatible with organic systems and it should not be able to be included in the organic standards.



## Appendix B

### Resolution about rejection of hydroponics in Canadian organic production systems

**Extract from the Minutes of a meeting of the Board of Directors of the Organic Federation of Canada duly called and held on July 9, 2019**

Whereas there have been some inquiries to the Canadian organic sector/movement/community asking why hydroponic production doesn't fit with organic and therefore we have found ourselves in a position of needing to clarify our core values.

And whereas Organic, at its core, is based on the idea that soil health = plant health = animal health (including humans). Within organic agriculture, soil is not simply an inert substrate that holds water and nutrients and plants upright. Rather soil is a complex ecosystem, and human knowledge has barely scratched the surface of understanding the community of members and interactions held within the vast universe of the soil.

And whereas the organic sector has always followed the scientific Precautionary Principle. As a species (human) that does not come close to fully understanding what goes on in the soil, and that is always learning of new nutrients important to the human body that come from the soil and microorganisms living within, we do not think there is even close to sufficient human knowledge to replace that store of complexity within the soil ecosystem with human-selected inputs.

And whereas the organic community applauds those hydroponic (and aquaponic) producers who wish to grow food without synthetic inputs (and respond to the marketplace demand for such products), but without soil in their systems, and without the responsibility of working to build soil health within their model, such food cannot be claimed to be Organic. We do genuinely hope that they come up with their own label that sufficiently describes their production model. And whereas the international / global organic community does not support hydroponics in Organics including the majority of the organic sector in the US.

Be it resolved that as an organic community/movement/sector, the Organic Federation of Canada clearly communicates its position to the wider agricultural community, to our various levels of government, and to the general marketplace on why the presence of soil and the work towards building soil health is the most critical aspect of organic production and any products marketed as such, which is why we are opposed to the label of organic being applied to any products grown hydroponically.

Jim Robbins  
President

Jérôme-Antoine Brunelle  
Treasurer



## Appendix C

### Canadian Organic Growers Hydroponics Position statement

#### Resolution about rejection of hydroponics in Canadian organic production systems

To be adopted November 21, 2019

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