

## **Peer Review and Standardization: the devolution of the organic certification model.**

*Rebecca Kneen, January 27, 2022*

One of the great strengths of organic agriculture from the earliest days has been that the standards that were developed were descriptive – they describe the methods and processes which work with natural systems and the philosophy that guides that approach. The standards carefully avoided prescriptive lists of permitted materials, instead focusing on the goal of integrating into natural ecosystems and supporting biodiversity, natural animal behaviour and soil health. Inspectors looked at soil, pasture plant mix, buffer zone diversity and riparian areas, as well as looking at the tools and methods used for weed and pest management. The key, for many farmers, has been that our own farms dictated our methods, tools and crop mixture, and that knowledge was shared within the bioregion to create regionally appropriate approaches.

This approach was strengthened by the peer-reviewed, supportive regional certification system. With the provincial network, farmers could share ideas and resources more widely to strengthen their technique and adopt new materials and methods. The peer-reviewed system gave farmers a chance to learn from each other and to tighten the whole community. There's nothing quite as motivating to do a good job than knowing that your respected peers and neighbours will be examining your farm in detail! There's nothing quite as embarrassing as having a field day and seeing one of the most skilled elder farmers walk straight to the weediest, worst spot on the farm and collect everyone around them. And there's nothing as inspiring as having those folks share their knowledge and suggest improvements, while acknowledging where you've done well. In 20 years of peer certification, I have not seen peer reviewers "go easy" on fellow farmers because they are friends. I have seen reviewers support farmers to do better, whether in paperwork or farm methods; adapt to known farm disasters from family deaths to flood/drought/fire; encourage more farmers to become organic because of the strength of the community.

The current system has devolved into a prescriptive, reductionist, list-making approach which makes no reference to the philosophy behind organic agriculture or to the support of natural systems, livestock welfare or human welfare. The descriptive, systems-based and soil-based approach has become a series of boxes to be ticked. VOs no longer walk around the farm, dig their hands into the soil, or look your livestock in the eye. Inspections are completely preoccupied with paperwork inspections, mass balances and traceback audits. I haven't had an inspector walk to the far end of my hopyard for over 8 years, much less actually walk through the tool area to check on all the "bottles of stuff" we use. The concern instead is whether we have used the logo correctly, a seed search for organic versions of every single vegetable in our home garden, and whether the truck we ship on has been examined for cleanliness, not to mention the aforementioned audits.

All that paperwork exists for a reason, of course. Because no-one directly knows our farms, they rely on our reporting of our actions to determine how well we are following the rules – and the rules themselves have proliferated. This is much more than the increasing numbers of available allowed "substances" (everything from mulch material to yeast, from pesticides and herbicides to cleaners, sanitizers and clarifiers). The rules now specify things like the size and number of popholes in chicken houses, the amount of lighting in greenhouses that is considered supplementary rather than a replacement for natural light, what carrying agents are allowed in chemical formulations of cleaners. The lists are longer and more detailed every year, prescribing with extreme accuracy what is and is not

allowed. They require a high degree of knowledge and training to navigate, not to mention write and review to manage new “substances” being developed all the time.

This has happened gradually, as more farmers seek certification and more resources are developed. It has also happened because the standards are now encased in regulation overseen by a federal body that only understands one methodology of standard creation. It has happened because there has been more and more pressure from big business to shift the standards to a more industrial model, allowing larger farms, more mechanization, more distance from soil and natural systems.

Because direct farm knowledge has been discouraged, there is no potential to understand the farmer’s commitment to the philosophy of organic agriculture and how their farm supports biodiversity and natural systems. This has been ruled out by the methodology of paper audits, prescriptive standards and arms-length review.

“Standards... emphasize abstract, remote, expert knowledge, the kind that the Canadian Food Inspection Agency is supposed to have – think about standards for food handling, including abattoirs. One of the consequences, perhaps unintended but certainly not opposed by the CFIA and other regulators under neo-liberal regimes, is the increasing control exercised by the major corporate players in the global system as they convince suppliers and buyers that they have to play their game, and that since there is no trust in the system, there has to be standards and certification.

*“The logical companion to a complete faith in a quasi-industrial model of high-modernist agriculture was an often explicit contempt for the practices of actual cultivators and what might be learned from them” (James C Scott, **Seeing Like a State**, Yale 1998)*

Standards, by their very nature, also have to reduce or eliminate diversity. Otherwise they are meaningless. They have to eliminate diversity because it is simply not possible for a central agency or authority to know about and recognize the incredible variety of local practices, and the knowledge accompanying them. Standards can only allow for a very limited amount of deviation or exception, and can certainly not take into consideration local weather conditions from place to place and year to year. Local knowledge, on the other hand, has no limits and can take in an immense diversity of social and ecological life.” (*The Ram’s Horn* # 274, June-July 2010)

In this ongoing adaptation, the system has become professionalized and distanced, with the baseline stated assumption that only paid, arms-length review processes are valid.

Our VOs come from other regions, may not be farmers themselves, and expect to be paid as other professionals – like our dentists and doctors and chiropractors. Their depth of knowledge is assumed to be more thorough and more valid than farmers themselves, because they undergo regular training (as though farmers don’t get additional training every day on the farm!) from an external source. VOs have always been a critical part of the certification system, and their knowledge and skills are extremely valuable, but it’s worth remembering that all parts of the system have their own skills and knowledge and useful perspective.

Our Certification Committees are now meant to be paid professionals who have no direct knowledge of the farms whose work they review (by the way, we call them “files” not work or farms). Any direct

knowledge is considered to be a detriment to our ability to strictly review a file. Certification committee members are to be paid, to encourage more time and expertise building. The system we use to review files is now a series of check-boxes, with little scope for descriptions of actual on-farm activities or circumstances. We cannot recommend changes to our member farms either, even if there are solutions readily to hand, because that is somehow wrong or biased. Absurdly, we cannot even tell a member “if you enlarge the logo by 10% and change the background to white we can approve your label.” Why not? What on earth is wrong with that? Why can’t we tell a farmer that there is an organic source for a crop seed they were unable to find? How on earth does that endanger organic integrity?

That same rigidity separates BC’s regional farmers from federally certified farmers, distributors and processors. In the current paradigm, regionally certified farms cannot sell to federally certified processors, creating a completely unnecessary division even in local food systems, where processors are often required to have federal certification because of their own markets. For example, a jam-maker, selling to a grocery store with outlets in both BC and Alberta, can only buy from federally certified farms, even if there are plenty of local regional suppliers in their immediate neighbourhood. This discourages local sourcing and enforces greater distancing in the food system.

The rigidity of the system also makes adaptation to actual real-world events extremely difficult. Farmers are expected to anticipate problems and have a prior approved plan on file – but what happens when you’re overtaken by a wildfire or flood? What if your hay barn burns down, and it’s January and there is no organic feed available in western Canada? What if your livestock have been evacuated and housed in emergency housing, fed whatever can be donated and come in contact with non-organic animals? What if your wife, who’s done all the paperwork for the last twenty years, dies? What if you are trying to ensure your access to organic feed and get new hay fields into transition, but you don’t have the capacity to sell that hay and buy organic hay until they are through transition? These are all real-world scenarios, all of which we have seen in BC in the last year alone. None of them were “reasonably foreseeable” and the farmers did not have plans on file – for which they are punished rather than supported.

With this change, the peer-reviewed system has been vilified and sidelined. We are told that we are biased, unprofessional (even if we have more years of experience and a broader knowledge base than many VOs), and simply obsolete.

I would say that the contrary is true. We need peer-reviewed certification based in local communities to keep us honest, both personally on our farms and in our entire systems approach. We need to re-examine our process and our outcomes, and, just possibly, switch horses mid-race. There is a real need to ensure that organic agriculture does not become that which it was meant to replace. Our goal has never been to simply replace industrial toxic agriculture with a less toxic alternative. Our goal was to change agriculture altogether, to work with and support natural ecosystems, to enhance livestock welfare and natural behaviours, to support smaller and more biodiverse farms, to build soil health and ensure that agriculture remains soil-based, and to learn to farm in a genuinely sustainable way. This means reducing distance in the food system – whether that’s the distance between farms and those they feed or the distance between farmer and reviewer. We need to help each other do better on our farms and in our paperwork. We need personal accountability and a re-orientation to the goals of organic agriculture. If that means that our share of the export economy drops, but we feed more local people, then we have actually achieved what we wanted.

Organic agriculture was not developed to support agribusiness and multinational corporations, fully housed 80,000 bird poultry farms and processed food, professionalized systems where everyone makes

money except the farmer. It was developed to build soil, ecosystems and biologically appropriate farming. We have 20 years of experience working with those goals, before the current internationalist, export-based regulatory system was adopted – we know how to do it. We need to now address the influence of capitalism, reductionism and regulation on the system we have devolved into.

The CGSB (Canadian General Standards Board) has dictated a great deal about standards development since the move to a national certification system. The CGSB is in charge of creating and enforcing standards for everything from food labelling to tents, office supplies, furniture and textiles. It is self described as being “in business” - although it is in fact not a business, but an arm of government. Our organic standards are housed within the CGSB.

The Organic Federation of Canada has been working to address parts of this issue at the federal level, where the standards and enforcement are maintained. For the next review of standards, we hope to have changed the language around the membership of the various review committees, to ensure that they are weighted in favour of actual producers rather than industry representatives, and to put in place a commitment to the overall principles of organic agriculture as the measure for evaluating changes. The goal of these surprisingly difficult changes is to shift the attitude of the system to a more sustainable vision. They will not, however, change the actual structure or the ideology of the final authority, the CGSB. They will also not change the existing model of prescriptive standards.

There is a place for the current system, certainly. It ameliorates the worst of the excesses of industrial toxic agriculture, and gives people straightforward measurable goals to achieve in their work. It's comprehensive and detailed, and strives to be up to date with new materials and systems as they are developed. It is quantifiable, and the check boxes simplify every complex operation, and allow even (or especially) large processors and farms to carry an organic label, with all the trust and confidence built over the last 30 years. It allows for surety in an increasingly distanced food system.

There is also a definite place for local, peer-reviewed, adaptive and ecosystem based organic certification. We can maintain the certainty that certification gives us in the shorter distances between farmer and consumer within local food systems, and that could be translated up the system as well, allowing regional certification to be integrated into the federal system rather than operating at parallel. We can maintain not only the letter but the spirit of organic systems, both on farms and in communities. We can be on the forefront of creating better standards, more descriptive standards, that allow farmers to constantly improve their practices in everything from soil health to worker treatment to livestock welfare to packaging. Communities create more resources and more resilient and adaptive economic and ecological systems.

Far from relegating peer-reviewed, local and bioregionally based certification to a quaint but outdated notion, let us support and reinforce our structures. Let us find resources to support peer certification committees, with appropriate training and regular rotation, so that all our partners can and do become involved in the process of certification. Let us discuss and debate our standards in public, in groups of farmers and in the context of ecosystem health. Let us share knowledge widely and in community, consulting with each other to improve our work.