



Discover the World

January 6, 2009

All Trade Associations

REVISED

Dear Sir/Madam,

Re: Update on New Canadian Organic Regulations

The Canadian government has given notice that the implementation date for the new Organic Products Regulations has been postponed to June 30, 2009 (the original implementation date was December 14, 2008). Some changes to the standard, pertinent to organic wine, may be made during this period.

Adjusting to this change, the LCBO will not require evidence of organic certification to the Canadian standard until the new implementation date. The LCBO will also accept certificates of organic certification to any recognised organic standard after June 30, 2009 for products with a vintage indicated on the label of 2008 or earlier.

LCBO Requirements Up to June 30, 2009 (amended)

- An organic product label must state the name of the certification body/organisation that has certified the product as organic. A logo that does not name the certification body/ organisation is not adequate to meet this requirement.
- Certificates or letters from the certifying agency must be submitted to the LCBO to support all organic claims. Any recognised organic standard may be the reference for certification. The certificate must specify the organic products covered. If the organic documentation includes an attached list of products, it must be submitted with the certificate. The certificate must cover the appropriate time period (e.g. a certificate for organic grapes must cover 2003 if given in support of a 2003 vintage wine).
- Any product claiming to be “organic” must be certified as organic in the production sense in addition to organic ingredients. Brand names using the word “organic” in any form (e.g. organica, organico) or marketing text using the word “organic” without specific reference to organic ingredients/agriculture are considered to be a claim of that the product is fully organic.
- The maximum allowable limits of sulphites for “organic wine” are 30 mg/L for FSO₂ and 100 mg/L for TSO₂ irrespective of the organic standard used for certification. No maximum allowable limit is set for wine from organically grown grapes.

- Wine from organically grown grapes can make a claim referring to organic grapes or organic agriculture but not to organic status unless it is certified against a recognised standard for organic wine.
- A certificate or letter from the certifying agency must be submitted to the LCBO to support any biodynamic claim. The certificate must cover the time period appropriate to the vintage of the wine.
- Suppliers must be prepared to provide proof of any claim involving sustainable agriculture, “green” practices, etc.

Changes to LCBO Requirements after Implementation

- Certificates or letters from an organic certifying agency stating that the product meets the Canadian organic standard must be submitted to the LCBO. Only two exceptions will be made:
 - Certificates against other organic standards will be accepted if a reciprocal recognition agreement has been made between the Canadian government and the appropriate authority for the other organic standard.
 - Certificates of organic certification to any recognised organic standard will be accepted for products with a vintage indicated on the label of 2008 or earlier.
- Requirements for wine from organically grown grapes will be defined after the Canadian government has indicated how the standard will apply to this product.
- Products must meet sulphite limits stipulated in the Canadian standard.

Current information for the Canadian organic regulations and standards are available through the following links.

<http://laws.justice.gc.ca/en/SOR-2006-338> (regulations)

http://www.pwgsc.gc.ca/cgsb/on_the_net/organic/index-e.html (standards)

Sincerely,



George Soleas, M. Sc., Ph.D., SCLM
Vice President, Quality Assurance & Specialty Services

c.c. Bob Peter, President & Chief Executive Officer
Bob Downey, Senior Vice President, Sales & Marketing
Roy Ecker, Senior Vice President, Retail Operations
Tom Wilson, Vice President, Vintages
Shari Mogk-Edwards, Vice President, Merchandising
Bill Kennedy, Executive Director, Corporate Communications
Patrick Ford, Senior Director, Corporate Policy
Leonard Franssen, Manager, Quality Services
Stephen Cater, Manager, QA Laboratory
Carol Drummond, QA Quality Officer
Michael Nachuk, Assistant Manager, Quality Services Logistics Operations