

# Standards Interpretation Committee Questions and Answers Regarding National Standards for Organic Agriculture

---

The Canadian Food Inspection Agency, in partnership with the Organic Federation of Canada, has developed the Organic Standards Interpretation Committee (SIC). The objective of the Committee is to provide, to the Canada Organic Office, interpretive guidance on issues related to the National Standards for Organic Agriculture (CAN/CGSB 32.310 and CAN/CGSB32.311).



Below are proposed answers to questions, raised by organic stakeholders, regarding the National Standards for Organic Agriculture. The proposed responses are subject to a 60 day comment period. All comments regarding these answers should be sent to [OPR.RPB@inspection.gc.ca](mailto:OPR.RPB@inspection.gc.ca)

## **Public Comment Period: March 5<sup>th</sup> to May 7<sup>th</sup> 2014**

### **New Questions & Answers under public comment**

Crop Production .....	2
Livestock production .....	2
Sprout Production .....	2
Greenhouse Crops Production .....	3
Preparation and Handling of Organic Products.....	3
Permitted Substances Lists.....	3

### **Q&A from last comment period - revised by the SIC – back to public comment.....3**

### **Final Questions & Answers– Archived**

Q&A from last comment period - commented, not revised .....	4
Q&A from last comment period – not commented .....	4
Definitions and terminology.....	4
Livestock Production .....	4
Permitted Substances Lists.....	5

## **New Questions & Answers under public comment**

### **Crop Production**

**Are propagules produced through plant tissue culture micropropagation included within the provisions of CAN/CGSB-32.310 par. 5.3.1, requiring that they be produced in accordance with the Standard? (203)**

Yes. 5.3.1 applies to propagules produced through plant tissue culture micropropagation.

### **Livestock production**

**Are electric trainers allowed to manage animals in tie-stalls? (206)**

Electric trainers are not explicitly prohibited by the Standard and can be used in dairy tie-stall barns as part of a management strategy to keep cows clean and prevent disease, in accordance with the requirements of 6.1.5 (minimize stress, prevent disease) and 6.7.1 c) (sanitation practices to minimize the occurrence and spread of disease). However, if the use of electric trainers is not carefully monitored and managed by the operator, violation of 6.7.1 d) (...provide conditions that allow for exercise, freedom of movement, and reduction of stress appropriate to the species...) or 6.8.1 c) (... provide sufficient space and freedom to stand up, stretch their limbs, turn freely and express normal patterns of behavior) would render the use of the devices non-compliant with the Standard.

**Can a sow that has been treated with antibiotics produce piglets that are eventually sold as organic meat? (202)**

Yes. If the antibiotic treatment and subsequent withdrawal period do not occur during either gestation or nursing, the offspring of a treated sow may be compliant with the Standard.

### **Sprout Production**

**Please describe the difference between shoots and sprouts. (191)**

Unlike sprouts, which are grown only in water, shoots may be seeded into a growth medium, as per 7.4.5. Shoot production must comply with all criteria in Subsection 7.4. (sprout production)

**Can organic and conventional sprouts be produced in the same facility if grown in visually distinguishable containers? (211)**

No. Growing organic and non-organic sprouts of the same plant variety at the same time is parallel production and is prohibited. Where different varieties of the same species are produced simultaneously, the organic and non-organic crop themselves must be visually distinguishable.

**Can synthetic acetic acid be used for the cleaning of seeds used for sprouts, as seeds are neither considered as food nor as a plant (PSL Table 7.3)? (210)**

No. Only non synthetic acetic acid and other substances which can come in contact with food and are listed on table 7.3 can be used for cleaning seeds used for sprouts (per par. 7.4.6 in CAN/CGSB-32.310).

## **Greenhouse Crops Production**

**Does the use of culture medium (which is soil-less, but otherwise comprised of organic matter) during the initial phase of propagation (2 – 3 weeks) preclude this type of production from organic certification as per the requirements of CAN/CGSB-32.310 par. 7.5.1? (204)**

The use of a culture medium, which does not meet the definition of soil but complies with the Standard, is allowed in the case of plant propagation.

## **Preparation and Handling of Organic Products**

**What is the distinction between acceptable cleaning agents for milking equipment on farms vs. those used in processing facilities? (209)**

Section 8 of the Standard applies to the preparation and handling of organic products. In particular 8.3.7 and 8.3.8 give direction for cleaning food contact surfaces which would be appropriate both on dairy farms and in off-farm dairy processing facilities.

**Does 8.4.3 only apply to substances for pest control used inside facilities or also to substances used on the exterior? (212)**

Section 8.4 applies to both indoor and exterior pest control. Note additional restrictions on indoor use. (8.4.3)

## **Permitted Substances Lists**

**Can acetic acid be used for acidifying drinking water for animals? (201)**

If the acetic acid is intended to lower the pH, this is acceptable providing the resulting water falls within Health Canada's Guidelines for Drinking Water: pH 6.5 to 8.5.

## **Q&A from last comment period - revised by the SIC – back to public comment**

**If perennial planting stock not treated with prohibited pesticides is planted on an organic farm, can the harvest be considered organic in the first year? (200)**

Previous answer: Yes. One year of transition is not required, assuming the conditions of 5.3.2.1 are met. 5.3.2.2 applies only when the non-organic perennial planting stock is treated with prohibited pesticides.

Revised answer:

The fruit from non-organic perennial planting stock can be compliant after organic management for 1 year (par. 5.3.2.2)

## Final Questions & Answers– Archived

### Q&A from last comment period - commented, not revised

#### **When calculating compliance with 6.4.3.c) of a summer ration for ruminants, can pasture be considered “long-fiber forage”? (194)**

No. 6.4.3.c addresses feed rations when animals are not on pasture. During the grazing season, 6.1.3 a) applies, and requires that ruminants obtain a minimum of 30% of their total forage intake from grazing calculated on dry matter basis.

#### **Can the organic operator choose to keep pigs confined, not allowing outdoor access, even when there is no risk to the animal caused by weather or stage of production? (196)**

No. Complete confinement of pigs is non-compliant (par. 6.8.13.2). The standard sets out as the norm for animal husbandry, access to outdoors. It then states in 6.8.2 the specific exceptions to the rule which apply to all livestock.

### Q&A from last comment period – not commented

#### **Definitions and terminology**

##### **Is cell fusion allowed in organic production? (199)**

No. Cell fusion which combines plants of different taxonomic families (such as sagebrush and grape) is not allowed. Cell fusion is only allowed between members of the same taxonomic family. See the definition of 'Genetic Engineering' in Section 3.

#### **Livestock Production**

##### **If a producer purchases non-organic non-gestating sows for breeding, brings them into a new operation site, then uses hormones to trigger and synchronize estrus, would the piglets born from these sows on this site be considered «organic» if these females have been under continuous organic management from the beginning of the last third of their gestation period? (195)**

While the Standard allows for the introduction of non-organic breeding stock into an organic operation, it requires that from the moment of introduction, the operator complies with all the rules for organic livestock husbandry. The use of hormones to trigger estrus is specifically prohibited in 6.5.d), therefore the use of this technique would be a serious non-compliance.

#### **Mushroom Production**

##### **Can conventional straw be used as a compost feedstock for compost that is used to grow organic mushrooms? (178) (Ref: Q 142)**

If the substrate (the medium on which the mushrooms are grown) is compost, it must adhere to the compost guidelines in the Standard and the rules governing composting feedstock (see table 4.2 Compost and Composting Feedstocks), i.e. conventional straw may be used. If the substrate is not composted in accordance with the Standard (hay, straw, etc.) it must be free from prohibited substances according to 7.3.2 c). It is strongly recommended to source organic composting feedstock. (see 7.3.1)

## Permitted Substances Lists

**If paper containers are placed in the ground as transplant containers and allowed to decompose, what are the requirements for the paper? (187)**

The requirements are the same as for mulch. No glossy paper or coloured ink.

**Does the use of flotation reagents in extraction & purification of mined minerals render the product prohibited? Is a producer required to demonstrate the absence of flotation reagents in the final product? (189)**

Minerals which have been extracted using flotation reagents that are not intended to form part of the mineral substance are allowed. Given that flotation reagents are removed and reused by the mining industry, the operator is not required to prove the purity of the final product.

**Is the use of bone char allowed in the processing of organic sugar? (192)**

No. Although bone char is a form of 'Activated charcoal', it is not allowed because it is not from plant sources as required in Table 6.6 of the PSL.