

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



Public Comment Period: June 4th to August 4th 2014

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New Questions & Answers under public comment

Livestock production

What are the restrictions to the offspring if a non-organic animal is bred using embryo transfer and brought onto an organic farm? (214)

The offspring would be organic if the restrictions in 6.2.2 d and 6.2.3 are met.

Can immunological castration of pig in finishing phase be used to replace castration of young pig? (218)

No. The substance used would have to be listed on 5.3 of the Permitted Substances Lists in order to be acceptable.

When a beef cow herd is being transitioned to organic, does 6.3.3 give permission to use the transitional feed being produced on the farm, to feed gestating animals whose offspring will be eligible for sale as organic? (179)

Yes. Provided that the timing of the completion of the transition of the land on which the feed has been grown coincides with or precedes the birth of the organic offspring.

Does the requirement for a 36-month transition of land for crop production apply to the outdoor runs required to permit poultry access to the outdoors? (225)

Yes. Poultry eat when they go outside, even ingesting small amounts of soil. Since organic feed is required, the 36 month transition period for outdoor runs is mandatory. (6.4.1) However, in the final year of transition the pasture is usable for organic birds (6.3.3)

Can hens be confined for part of each day during the laying period? (226)

No. Restricting outdoor access of laying hens may only occur during onset of lay as per 6.8.11.1e or for reasons outlined in 6.8.2 . Further restriction of outdoor access is not permitted.

Maple products

Can the filtrate be used to clean evaporators during the season? (215)

Yes. the filtrate (water that passes through the membrane in the osmosis technique of removing water from sap) may be used to clean the evaporator.

Preparation and Handling of Organic Products

Does the prohibition against using both the organic and non-organic form of an ingredient (8.2.5) apply to different varieties of grapes used in a wine, or different flours (e.g. barley and wheat) used to bake a single bread? (173)

Yes, under 8.2.5, ingredients recognized as having distinct qualities may be considered separate ingredients, even when they fall into the same general category of ingredients such as "flour" or "grapes". In the examples given, it would be possible to use one ingredient in its organic form and the other in its non-organic form without violating 8.2.5 provided the following restrictions are satisfied. For organic products equal to or >95%, the non-organic content must be less than

5% of the total and commercial unavailability must be confirmed annually for any non-organic agriculture ingredients. For products containing between 70-95% organic content, commercial availability does not apply.

Is the use of a microwave oven in organic food preparation compliant with the Standard? (220)

Yes. While the Standard prohibits ionizing radiation, the use of non-ionizing radiation such as that generated by a microwave oven is not prohibited. For maple products cooking using microwaves is forbidden. (7.2.14)

Permitted Substances Lists

Must biological organisms be living in order to be compliant under table 4.3 "Biological organisms"? (224)

No. Either living, dead or non-viable biological organisms are compliant.

Peracetic Acid (peroxyacetic acid) is listed on table 7.3 PSL. Are all forms of this substance allowed, regardless of method of production? (221)

Yes. There are no restrictions on the method of production in the annotation for peracetic acid

Is calcined kaolin clay a permitted substance under Canadian Organic Standards? (223)

Yes. There are no restrictions on the form of kaolin clay allowed.

Report on Comment Period – March –May 2014

Q&A revised & archived

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

Previous answer

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.

Revised answer:

The standard requires that from the moment of introduction, breeding stock comply with all organic animal husbandry rules. Section 6.7.4 permits the use of antibiotics when all other methods fail. Par. 6.7.8 states that animals which receive antibiotic treatment can never be sold as organic meat. 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.

Q&A archived as Final Q&A

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.

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.

Correction of Q&As already archived

Can oxytocin be used to treat postpartum complications? If so what are the withdrawal rules? (78.6)

Yes. 6.7.7 specifies that hormones are acceptable if the use is therapeutic, not preventive. For oxytocin, the animal does not lose status for use as organic meat. The withdrawal time is ~~double~~ what is as stated on the label or 14 days, whichever is longer. (Table 5.3 Oxytocin and 6.7.6 d - 32.310.)

Please clarify the outdoor space requirements for poultry. Can a flock be split so that use of the outdoor area is rotated between groups? If so, does the total area required diminish? (37)

While the standard allows for exceptions to the outdoor access requirements, (temporary confinement) the total area available for birds outdoors must allow for the entire flock to be outside at the same time without exceeding the densities set out in ~~6.8.11.2~~ 6.8.11.9 – for all poultry.