

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

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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 **revised National Standards for Organic Agriculture (CAN/CGSB 32.310-2015 and CAN/CGSB32.311-2015)**.



Below are proposed answers to questions, raised by organic stakeholders, regarding the National Standards for Organic Agriculture. The proposed responses are subject to a 30 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 – January 15 to February 15 2016

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## General Principles and Management Standards

### Crop production

#### **Does the crop in a buffer zone need to be visually distinguishable from the organic crop? (272)**

No. The same crop can be planted in the buffer zone as long as the buffer crop is harvested and directed out of the organic stream, and such activity is documented.

### Livestock production

#### **Can the use of feed from transitional land allowed in 6.3.3 be extended to apply after the transition of the livestock is complete? (257)**

Feed produced on land in the final year of transition (commonly referred to as T-3 feed), is considered as organic within the farm unit while the herd or flock of sheep is in transition. The T-3 feed produced and harvested before herd transition is complete may continue to be used as organic within the farm after herd transition is completed. T-3 feed harvested after herd transition is complete has no organic status even within the farm.

#### **Can birds hatched from eggs treated with antibiotics be certified organic? (271)**

No. 6.2.3.1.2) states "*neither day-old chicks nor the fertilized eggs they hatched from shall be given medication other than vaccines*".

Note: in the 2006 version of 32.310, poultry used for edible products had to be under continuous management beginning no later than the second day of life. This meant that the treatment of eggs was not the responsibility of the operator. That clause has been revised and operators have one year from the November 25, 2015 date of publication to comply.

### Maple products

#### **The Standard allows NaOH (caustic soda) for cleaning membranes (7.2.13.2). Is a cleaner containing NaOH or other allowed substances such as the active ingredient, but also containing other substances (surfactants, etc.) allowed? (251)**

Yes, any NaOH based soap is allowed under 7.2.13.2.

### Greenhouse Crops

#### **Can a greenhouse operator take soil from outside and move it into the greenhouse? (267)**

Yes, providing the soil has not been exposed to substances prohibited by the Standard for 36 months.

### Organic product composition

#### **Is a "meal replacement" certifiable under the COR, given that it contains supplemental minerals and vitamins? (266)**

Meal replacement products may be certified organic if produced in accordance with this Standard and if they meet the nutritional profile set out by [Canadian regulation](#) for "meal replacement" products.

## Permitted Substances Lists

### Crop production

#### **Can neem oil be used to treat powdery mildew in cucumbers? (268)**

Registered neem based pesticides can be used as a Crop Production Aid based on the listing in Table 4.3 of the PSL "*Botanical Pesticides*", with restrictions noted in the "Origin and Usage" column. Formulants included in these pesticides also have to comply with PSL requirements.

### Livestock production

#### **Can Zinc Sulphate be used as a treatment added to foot baths for livestock? (270)**

Zinc Sulphate is not listed on the PSL. The use of this product requires written instructions from a veterinarian and a withdrawal period of 14 days (6.6.10 c) and d)) from the last treatment.

### Cleaners, disinfectants, sanitizers

#### **Can chlorine be used to disinfect poultry carcasses? (254)**

Poultry carcasses may be washed with chlorinated water, providing the concentration of chlorine does not exceed the maximum limits applicable under regulations for safe drinking water. See Table 7.3 - *Chlorine compounds*.

## Modified answers following the COS review

### General principles and management standards – 8.3.3

#### **If vitamin and mineral premixes that do not contain preservatives are unavailable, how can organic farmers meet the nutritional needs of their animals? (65.2)**

The annotations in the listing of *Pre-mixes*, *Vitamins*, and *Minerals, trace minerals, elements* in table 5.2 (PSL) make it permissible to use pre-mixes that contain preservatives, if no fully compliant product is available. See "*Commercially Available*" definition - 3.13 (32.310).

### Permitted substances lists - Table 5.2

#### **Does 8.3.3 only apply to substances for pest control used inside facilities or also to substances used on the exterior? (212)**

8.3.3 applies to both indoor and exterior pest control for all operations that handle, store and transport organic products. The indoor/outdoor requirement is reiterated in the PSL (8.1.1). It is essential that pest control used around farm buildings and storage areas does not compromise organic product integrity or the surrounding farm environment. 8.3.3 does not apply to situations involving exterior pest control at facilities where it is unlikely that organic product integrity will be compromised, or the surrounding environment contaminated.