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 30 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Comment period – October 17h to November 17th 2016

FIRST PUBLIC COMMENT

SECOND PUBLIC COMMENT

REVISED WORDING – BACK TO FINAL Q&AS

First public comment

Crop production

Eliminating risks of GE pollen contamination

My sweet corn field is surrounded by GE corn. Since I do multiple plantings, I know that there are times when pollen from the GE corn contaminates my crop, but I have nowhere to locate the corn where this will not be the case. Can this crop still be compliant in light of the new GE risk management criteria in 4.4.4 and 5.2.2 d)? (296)

The product of farms whose operators engage consistently in implementing mitigation strategies aimed at eliminating risks of GE pollen contamination will be considered compliant.

Table 4.2 – Soil amendment and crop nutrition

Paper mill sludge

Can paper mill sludge be used on organic farms? (294)

No. Sludge from paper mills is not listed in CAN/CGSB-32.311, and is therefore not permitted for use on organic farms (32.310 1.4 d). Any synthetic extractants, solvents or additives used when generating plant by-products are prohibited, except as specified in the annotations of substances listed on Table 4.2.

Table 4.3 – Crop production aids and materials

Substances for sanitizing seeds for sprouting and sanitizing sprouts, shoots, microgreens

In the Standard, which tables should be referred to when choosing compliant substances for sanitizing seeds for sprouting and for sanitizing sprouts, shoots or microgreens? (303)

Substances used for sanitizing seed for sprouting and sanitizing sprouts, shoots and microgreens shall be limited to the following Table 4.3 substances: hydrogen peroxide and peracetic acid (peracetic acid listing) and hot water (water listing) (32.310 7.4.1.5).

Streptomycin

Is streptomycin allowed in apple production to control fire blight? (311)

Streptomycin in its natural form would be allowed by the biological organism entry (Table 4.3). Synthetic versions such as Streptomycin sulphate are prohibited.

8.2 Facility pest management substances

Neem oil and diatomaceous earth

Can neem oil and diatomaceous earth (listed in table 8.2) be permitted in direct contact with organic food products? (310)

Yes. While the title of 8.2 is "facility pest management substances", there is no restriction on the use of diatomaceous earth, carbon dioxide or neem oil in relation to food contact post-harvest.

Second public comment

Livestock Production

As a result of industry comments, the following Q&A has been revised and the Standards Interpretation Committee submits the revised answer to public comment.

Parallel production- Livestock

Is parallel production in livestock prohibited? If so under what circumstances might it be allowed? (283)

Within an operation, there is no prohibition on parallel production of livestock. When organic and non-organic management is used in the same operation the animals must be managed in separate production units, and livestock products must not be commingled. See 3.56 and 6.7.5 in 32.310.

Greenhouse crops

Proposed revision in the context of the amendment of the Canadian Organic Standards

Soil volume - Calculation of greenhouse area

Under section 7.5.5 d. of 32.310, how should the soil volume ~~of 70 L/M²~~ be defined and how should the total growing area be defined? (286)

The calculation for soil volume requirement shall be done on the total area available in the greenhouse for photosynthesis by plants. This includes not only the surface of containers but also the surface of alleys between rows of plants. It does not include header houses, service alleys (perpendicular to the rows), staff rooms, offices, propagation houses, or storage areas. The soil volume requirement is expressed this way so that growers have a certain freedom depending on the staked crops they grow (tomatoes, cucumbers, peppers, eggplants), the varieties they grow, the planting density they choose, the alley width they prefer, etc. The requirement ~~of 70 L/M2~~ must be met upon inspection of the operation, i.e. the inspector shall find an effective soil volume in place in the container, not a purchased volume. If part of the greenhouse is not occupied by crop production but could be, it can be excluded from the calculation.

Note of the SIC: the proposed answer is related to the current amendment of the Canadian Organic Standards that should be concluded by November 25 2016.

It is proposed to amend clause 7.5.5 that defines the minimal soil volume requirements for greenhouse crop production in containers and the proposed SIC answer defines the calculation method of the greenhouse area and, therefore, the soil volume that would be required to comply with the standard. The wording of 7.5.5 that will be balloted by the Canadian General Standards Board is:

7.5.5 The following conditions apply to containerized, staked crops (for example, tomatoes, sweet peppers, cucumbers, eggplant):

a) at the start of production, the total volume of soil shall consist of at least 10% compost;

b) additional compost applications shall be included in the fertility program;

c) the soil volume shall be at least 60 L/m² (1.2 gal./sq.ft), based on the total growing area;

d) operators of an existing greenhouse production unit, which was under organic management in November 2016, and does not comply with 7.5.5 c) are allowed to continue producing staked crops using a soil volume smaller than 60l/m^2 (1.2 gal./sq.ft);

e) after November 2016, all new built greenhouses (production units), facility expansion or major renovation of existing operations are required to comply with the requirements of 7.5.5 a), b) and c), including the greenhouses of producers that are granted an exemption in 7.5.5 d).

Revised wording – back to Final Q&As

Livestock production

Pasture - Poultry

Does 6.3.3 apply to pasture used for poultry? In other words can the raising of pullets be timed to coincide with the transition of land rather than waiting until the pasture is CO to start a new flock? (99)

6.3.3 applies to pasture used by a herd or a flock of sheep and not to pasture used for poultry. Pasture for poultry must be free of prohibited substances for 36 months prior to use (6.13.1 c). In other words, land can be in transition still when pullets are started, but the 36-month mark must have been reached and the land deemed to have certified status by the time birds are ready to go out to pasture. Pasture is considered an organic crop and operators making their initial application must be in full compliance with the Standard for at least 12 months before it can be used by organic poultry (5.1.1) ~~The pasture land of operators making their initial application must be under surveillance by a certifier for at least 12 months before it can be used by organic poultry (5.1.1)~~

Tie stalls - exercise

Does the one-year period after the publication of the standard apply to requirements 1 & 2 of 6.12.1.1 b)? (291)

By Nov 2016 the operator has to have submitted the plans for the new construction or renovation to address any structural changes needed. Because by Nov 2020 they must be exercising lactating cows at least twice a week and heifers and dry cows can longer be tethered. So this is how it was to work:

1) As of Nov 2015, tie tall operations had to either start exercising tethered milking cows twice a week, or stop tethering heifers or dry cows.

2) As of Nov 2016, submit their plans;

3) As of Nov 2020, be exercising milking cows twice a week, and no tethering heifers or dry cows.

~~Yes. Operators requiring new infrastructure to comply with 6.12.1.1 must be able to comply with ONE of 6.12.1.1 b)'s two requirements immediately to avoid being issued a non-conformity. According to the Memo issued by the Canada Organic Office February 23 2016, « Implementation of revised Canadian Organic Standards », any issued non-conformity must be addressed prior to November 25, 2016.~~
~~In other words: either 1) tethered cows shall have an exercise period every day, whenever possible, but at least twice a week OR 2) there shall be no tethering of heifers or dry cows. Operators must comply with BOTH of these requirements (6.12.1.1 b) 1 and 2) by November 25, 2020.~~

Permitted Substances Lists – Crop production

Compost feedstocks

With regard to materials other than livestock manure, are all the materials used to make compost required to be free from toxins, or can it be determined that some or all toxins present in the compost feedstock will break down and be purified during the composting process? (76)

The notes in PSL Table 4.2 (32.311) under the headings "Compost from off-farm sources", "Compost produced on the farm" and "Compost Feedstocks" give extensive instruction as to what is required, permitted or prohibited in the production of compost. The underlying assumption is that the composting process is capable of degrading some contaminants that are present in the original material. When materials are used that may contain persistent prohibited substances, it is the responsibility of the operator to document or "prove" the process of degradation. The notation allows for two possible methods; 1) analysis of the final composted material or 2) reference to scientific literature which establishes the common degradation of contaminants during the composting process. In the case of materials obtained from an urban setting, e.g. leaves or yard waste; it should be assumed that persistent chemicals, including pesticides are present and due diligence as outlined above should be practiced. It is the CB's responsibility to assess the risk and require documentation specific to each situation.