



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 – December 9^h 2016 to January 9th 2017

GENERAL PRINCIPLES AND MANAGEMENT STANDARDS	2
Livestock production	2
Embryo transfer	2
GE vaccines	2
Emergency Feed	2
Parallel production- Livestock	2
PERMITTED SUBSTANCES LISTS	2
Limestone	2
Rock phosphate	2

General principles and management standards

Livestock production

Embryo transfer

Can an animal which is the product of embryo transfer be brought into organic production? (214)

Yes, with the understanding the animal cannot be sold for slaughter, only used for breeding or dairy, subject to the transition requirements of 6.2.4 and 6.3.

GE vaccines

Can GE vaccines or vaccines grown on GE substrate be used in poultry if the conditions for the use of veterinary drugs (6.6.10) are met? (298)

Vaccines are categorized in the standard as 'veterinary biologics' not 'veterinary drugs'. GE vaccines that are products of genetic engineering, as defined in clause 3.27 of 32.310 cannot be used on two day old chicks and older birds. Vaccines grown on GE substrate may be used if no alternative is commercially available and that no traces of the GE substrate exist in the vaccine (32.311 - 5.1.2). Day-old chicks and fertilized eggs can be given any type of vaccine (6.2.3.1 b).

Emergency Feed

Can you give some guidelines around the use of the 10 day maximum in 6.4.7 a)? (89.2)

Ten consecutive days from any catastrophic event, is the maximum permitted given the intent of 6.4.7a which was to allow the operator time to source organic feed.

If the conditions outlined in 6.4.7, which allow for temporary use of non-organic feed are met, would this allowance also extend to the use of non-organic bypass fat? (95)

No, as the feed energy needed could be sufficiently provided by non-organic grains, silage and haylage after the catastrophic event. The allowance to use non-organic feeds is intended to allow the operator to maintain the health of animals following a farm catastrophe.

Parallel production- Livestock

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

Within the same production unit (definition 3.56) parallel livestock production is prohibited. This can be discerned by referring to the parallel production definition (3.46) that includes livestock; and 6.7.5 which stipulates all animals in a production unit must be managed organically whether or not all the animals have organic status. The non-organic animals must be clearly identified. An exception exists when there is more than one production unit in an operation and complete separation is ensured. This would require separate records, barns, separate feed and input storage areas, separate runs, and separate pasture, etc.

Permitted Substances Lists

Limestone

Under table 4.2 "Limestone", is "limestone from sugar processing" allowed without evaluating the manufacturing process? (306)

Lime from sugar processing and mined calcium carbonate are acceptable sources. Review of the manufacturing process is not required.

Rock phosphate

The listing for rock phosphate in table 4.2 restricts cadmium levels to 90 mg/kg P₂O₅. Is that to be calculated on the total P₂O₅ or the available P₂O₅? (305)

The amount of P₂O₅ used in the calculation is the total amount, not the available amount.