

# 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](mailto:OPR.RPB@inspection.gc.ca)

**Comment period – January 17<sup>th</sup> to February 17<sup>th</sup> 2017**

## Table des matières

### First public comment

32.310 Livestock Production	
Health care for poultry .....	2
32.310 Greenhouse crops	
Growing media in greenhouse production.....	2
32.311 Table 4.2	
Biodegradable bags as compost feedstock .....	2
32.211 Preparation	
Calculation of organic content – Aloe vera powder .....	3

### Second public comment

32.210 Apiculture	
Reduction of buffer zone .....	3
32.311 Table 4.3 – Crop production aids and materials	
Processes in the manufacturing of mulches.....	3
32.311 Permitted substances lists for preparation	
Vitamin D .....	4

## Revised wording – back to Final Q&As

32.310 5. Crop production	
Manure sources .....	4
32.310 7.4 Sprout, shoots and micro-greens production	
Seed cleaning .....	4
32.311 5.3 Health care products and production aids	
Lanolin.....	4

## First public comment

### 32.310 Livestock Production

#### Health care for poultry

**Is it correct to interpret clause 6.2.3.1 as indicating that day-old birds and/or fertilized eggs can ONLY be given vaccines, while day two and older can be given vaccines and/or other medication, if required? (339)**

Yes, fertilized eggs and day old birds may only be vaccinated, while medications used for older birds are restricted to the constraints in 6.2, 6.6.10, 6.6.11 and 6.6.12 (32.310).

### 32.310 Greenhouse crops

#### Growing media in greenhouse production

**Does 7.4 allow the production of sprouts or shoots grown on misted burlap cloth? On coconut fibre? (299)**

No. 7.4 does not allow the production of sprouts or shoots on alternative growing media.

### 32.311 Table 4.2

#### Biodegradable bags as compost feedstock

**Can residential food waste collected in biodegradable bags be used as a compost feedstock resulting in compost for organic production? (302)**

Yes, as long as the biodegradable bags and the residential food waste decompose effectively during the composting process. The recyclable bags in use must leave no petrochemical particle residue after composting. This can be verified by an analysis of the molecular weights of the components in the residual material.

### 32.211 Preparation

#### Calculation of organic content – Aloe vera powder

##### **Can Aloe Vera Juice or Gel made from organic aloe vera powder and water be certified as organic? How is the organic content calculation done? (301a)**

A. Yes. A reconstituted Aloe vera juice or gel product can be certified as organic. If language stating that the Aloe vera “reconstituted from concentrate” is included on the principal display panel (PDP), the organic content of the juice or gel should be calculated using the amount of single-strength Aloe vera made from the concentrate. If the PDP does not mention reconstitution of Aloe vera, the organic content of the juice or gel should be calculated by subtracting the total volume of water from the final product. (9.1.3.b)

##### **301b. Q: When Aloe Vera Juice (reconstituted from 200X Aloe Vera Powder and water) is used as an ingredient in a further food product, how is the organic content calculation for the secondary product to be done? (301b)**

Water used to reconstitute the powder should be excluded from the organic content calculation. For example, if 200 L of Aloe vera juice (reconstituted from powder at 200X strength) is used as an ingredient in a further juice product, only the 10 gram weight of the original Aloe vera powder would be included in the calculation of the secondary product. (9.1.3 c)

### Second public comment

*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.*

### 32.210 Apiculture

#### Reduction of buffer zone

##### **How far and under what circumstances may the 3,000 m. buffer zone around organic apiaries be reduced? (276)**

The buffer zone may be reduced to less than 3,000 m (7.1.10) when ALL of the following are met:

- there are natural features such as forests, hills or waterways that would reduce the likelihood of bees traveling farther,
- there is abundant compliant forage within the reduced zone to meet the bees' needs,
- there are no crops treated with prohibited substances or GE crops present within the reduced zone, except fertilizers.

### 32.311 Table 4.3 – Crop production aids and materials

#### Processes in the manufacturing of mulches

##### **For a biobased biodegradable mulch, what are the acceptable processes in the manufacturing of the film? Could a biobased film become non-compliant because of the manufacturing process that would disqualify it from being used on organic farms? (284)**

"No. Biobased biodegradable mulches must meet the requirements listed in Table 4.3 of the PSL and have been evaluated according to the criteria specified in Clause 10.3, Table 8. These criteria give preference to non-synthetic substances and consider the environmental impact of manufacture but do not specify any current restrictions on manufacturing processes."

### 32.311 Permitted substances lists for preparation

#### Vitamin D

#### **Is the use of vitamin D allowed for fluid milk products if it contains a preservative not listed on the PSL? (137)**

Organic operations in Canada remain subject to all applicable laws and regulations (PSL Introduction). Since the addition of vitamin D to milk is required by law, it must be included. The source containing a non-approved preservative may be used only if a fully compliant formulation is not commercially available. Keep in mind GE rules regarding the inclusion of substrates as outlined in 6.2.1 (32.311) do have to be addressed.

Revised wording – back to Final Q&As

### 32.310 Crop production

#### Manure sources

#### **Is the manure from a conventional farrowing operation compliant with the standard? (90)**

Manure from ~~systems where the sows that~~ are kept in traditional farrowing crates and not able to turn around is prohibited under 5.5.1 a). This is the intent of the standard. The wording of 5.5.1 a) leads to the need for interpretation of the term 'fully caged system'. The part of the operation where traditional farrowing crates are used constitutes a 'fully caged system' under the standard and manure from those animals ~~would be~~ is prohibited, notwithstanding the fact that some other animals in the barn are housed differently. If the manure from the sows in the traditional farrowing crates can be segregated, the rest of the manure will be acceptable.

### 32.310 7.4 Sprout, shoots and micro-greens production

#### Seed cleaning

#### **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 substances listed for seed cleaning in Table 4.3, such as peracetic acid, may be used (see 7.4.1.5).

### 32.311 5.3 Health care products and production aids

#### Lanolin

#### **Is Lanolin allowed for use on dairy cows teats? (55)**

~~Yes. Lanolin is classified as homeopathic medicine by the Health Care Products and Production Aids list published by CFIA and listed in Health Canada's Natural Health Products Ingredient Database. Homeopathy and biotherapies are listed in PSL Table 5.3 may be used. The SIC is aware that lanolin or similar preventative balms are not listed in PSL Table 5.3; but simultaneously they are neither prohibited by 6.6.2 of 32.310.~~