

# 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 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 – February 6<sup>th</sup> to March 6<sup>th</sup> 2017

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## 32.310 Crop production

### GE seeds in an organic field

#### **If GE seeds are deposited in an organic field accidentally, would that field require a 36 month transition to regain compliance? (313a)**

No. However, the GE seeds and any plants that have sprouted from them have to be removed as soon as the accidental deposition is noted.

#### **If GE seeds are accidentally planted in an organic system, is a 36 month transition required? (313b)**

Yes. Plants that have sprouted from these GE seeds have to be destroyed prior to seed set and as soon as the accidental planting is noted. The 36-month transition will be calculated from the point in time at which the GE plants have been destroyed (e.g tilled, mowed).

#### **If GE seeds were purposefully planted in an organic system, would the 36 month transitional period be required after removal of the plants? (313c)**

No. The certification for the impacted production unit would be cancelled and the decertified production unit would not qualify for certification again. Alternating in and out of organic is prohibited. (see 5.1.7 of 32.310)

## 32.310 Livestock Production

### Treated fence posts in livestock production

#### **Treated fence posts are prohibited in areas where organic crops are grown, in 5.2.3 a). Does this prohibition also apply to barns, corrals and handling facilities? (314)**

Yes. As livestock production is a land related activity (6.1.3), the treated post prohibition in 5.2.3 a) applies to both organic crop and livestock production units, including livestock facilities.

### Composition of bedding

#### **What materials can be used as livestock bedding? (318)**

In addition to the materials described in 6.7.1 g, non-agricultural absorbent bedding sources (minerals, cellulose, sawdust, paper products, etc.) can be used for livestock bedding as long as they are not GE products (1.4 a), and do not contain and/or have not been treated with prohibited substances (1.4 l).

### Level of natural light in poultry barns

#### **Can we have some guidance on how to evaluate the level of natural light in poultry barns? 6.13.8 requires the ability to read a newspaper but this reference is subjective and variable depending on the person's eyesight and the level of light outside. (316)**

The enforceable norm for windows in poultry barns is stated in 6.13.8: "The total window area shall be no less than 1% of the total ground-floor area..." If a poultry barn's window area does not meet that minimum, 6.13.8 also offers an alternative means of demonstrating effective natural lighting: "unless it can be demonstrated that natural light levels are sufficient to read a document such as a newspaper anywhere in the barn." In other words, a newspaper that can be read outdoors using natural light must also be legible inside the barn on the same day at the same time.

### 32.210 Apiculture

#### New production sites in apicultural operations

**When a certified organic apicultural operator wants to add new production sites, does the application for those new sites need to be received 12 months prior to first harvest of honey on the new sites? (OPR article 12 (1) seems to apply for first applicant). (312a)**

No. Operators holding valid certification should simply list new production sites, be they fields, gardens, etc., on their annual application for certification, to be inspected along with the rest of the operation.

**Does the CB need to inspect new sites before they are added to an existing organic honey operation? (7.1.8.1 Colonies shall be under continuous organic management for at least 12 months before products may be considered organic). The standard is clear for adding land (5.1.2) but has no mention for livestock production. (312b)**

No. The operator must document that the new sites comply with organic standards, and include this documentation in their annual application for certification.

### 32.310 Maple products

#### Magnetization of maple water

**In maple production, is it permissible to use an anode that magnetises maple water in order to keep the minerals in suspension and prevent calcareous deposits in the pan? (304)**

No. It is prohibited to use technologies that may alter the intrinsic qualities of the product (7.2.7) and magnetisation has that potential.

### 32.311 Permitted substances - Soil amendments and crop nutrition

#### Testing of compost used as ingredient

**When compost is used as an ingredient in a blended fertilizer product, should the analysis for heavy metals, foreign matter, and pathogens occur on the compost ingredient prior to blending or on the final blended fertilizer? (334)**

Compost must meet the required specifications, regardless of whether it is applied directly to the soil or blended with other ingredients. Therefore, in the case of a blended product, the compost analysis shall be performed prior to blending with other ingredients.

#### Rotenone

**Is Rotenone allowed for use in organics? (308)**

Rotenone is a substance that qualifies under the annotation for botanical pesticides. However, in countries such as Canada, where rotenone products are no longer registered for agricultural use, they cannot be used for organic production.

#### Prevention of salt buildup

**Does the salt buildup restriction for 'calcium' apply only to calcium chloride? (336)**

No. The restriction applies to any calcium product with the potential to cause a salt buildup

### 32.311 Permitted substances lists for cleaning

#### Substances used as cleaners

**Can substances listed as food additives (PSL 6.3) or processing aids (PSL 6.5), such as tartaric acid, be used as cleaners in facilities where organic product preparation takes place? (319)**

If substances listed in 32.311 7.3 & 7.4 have been shown to be ineffective, substances listed in Tables 6.3 and 6.5, such as tartaric acid, or any other non-listed substance, can be used to clean organic product contact surfaces in facilities where organic product preparation occurs, as per criteria stated in 310 8.2.3.