

February 2017

Standards Interpretation Committee

Two public comment periods underway

Below is the list of questions raised by organic stakeholders, regarding the National Standards for Organic Agriculture.

New public comment period – February 6 to March 6 2017

- If GE seeds
 - are deposited in an organic field accidentally, would that field require a 36 month transition to regain compliance?
 - are accidentally planted in an organic system, is a 36 month transition required?
 - were purposefully planted in an organic system, would the 36 month transitional period be required after removal of the plants?
- 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?
- What materials can be used as livestock bedding?
- 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. Can we have some guidance on how to evaluate the level of natural light in poultry barns?
- 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).
- 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.
- 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?
- 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?

- Is rotenone allowed for use in organics?
- Does the salt buildup restriction for 'calcium' apply only to calcium chloride?
- 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?

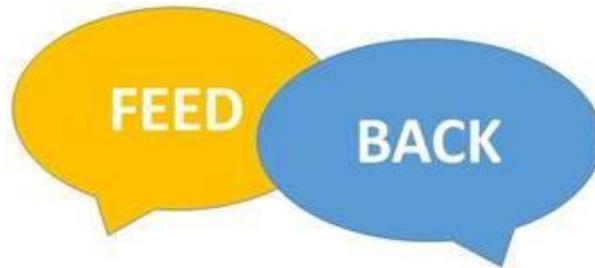
The proposed responses are posted on [OFC website](#), and are subject to a 30 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Current public comment period – January 17 to February 17 2017

- 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?
- Does 7.4 allow the production of sprouts or shoots grown on misted burlap cloth? On coconut fibre?
- Can residential food waste collected in biodegradable bags be used as a compost feedstock resulting in compost for organic production?
- 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?
- 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?
- How far and under what circumstances may the 3,000 m. buffer zone around organic apiaries be reduced?
- 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?
- Is the use of vitamin D allowed for fluid milk products if it contains a preservative not listed on the PSL?

The proposed responses are posted on [OFC website](#), and are subject to a 30 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

OFC SURVEY
What about non-compliance?



ADD YOUR INPUT TO OUR PRELIMINARY REPORT!

In order to help operators succeed in their certification process, the OFC wants to know how easy or difficult the process is.

- Are there many non-compliances, and if so, is it difficult to resolve non-compliances?
- Are operators well informed about the Canadian Organic Standards and about the OPR requirements?

The partial preliminary report displayed below shows strong tendencies.

PRELIMINARY REPORT – Non-compliances	
Non-compliance description	% of operators
Lack of data in record-keeping system	81%
Parallel production	8%
Unefficient prevention of contamination (from pesticides or GMOs)	3%
Agricultural practice not allowed in organic production	0%
Issue related to buffer zone	15%
Use of a forbidden input	0%
Commercial unavailability not well documented	27%
Issues related to animal welfare	11%
Issues related to medical treatment of livestock	6%
Organic certificate not available for ingredient used in processed food	17%

[Click here](#) to respond to the survey and add your input!

Knowing the difficulties and challenges encountered through the certification process will help facilitating the process and provide better training.

**Please note that you do not have to identify yourself when you answer to the survey.
So all information provided is strictly confidential. Thanks for your participation!**

**[Organic Federation of Canada](#)
info@organicfederation.ca - 514-488-6192**