

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 Canadian Food Inspection Agency, 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

REPORT

Comment period – March 6 to April 6 2017

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32.310 Livestock Production

Treatment of stored feed

TRANSFERRED TO FINAL Q&AS

Can stored livestock feed (6.4.4) be treated with PSL 4.3 and 5.2 listed substances? (330)

Substances listed in 5.2 can be applied to or combined with stored livestock feed (6.4.4). Substances listed in Tables 8.2 and 8.3 may be used if their substance listing annotation does not prohibit direct contact with organic products. Substances in 4.3 can only be used during crop production - not post-harvest.

References for animal transportation

COMMENTED – REVISED ANSWER BACK TO PUBLIC COMMENT

Clause 6.5 refers to the *Code of Practice for Care and Handling of Farm animals: Transportation*. It also references in a note the *Health of Animals Regulations* under the *Health of Animal Act (CFIA)*. If these two sets of rules contradict one another, which one is to be referred to in evaluating compliance? (315)

Access to exercise yards

TRANSFERRED TO FINAL Q&AS

Must young herbivores be given access to exercise yards outside of the pasture grazing season (6.11.1)? (325)

Yes. Outside of the pasture grazing season, young herbivores must have access to exercise yards except if it can be demonstrated that doing so would jeopardize their health and/or welfare (6.11.1 c). Dairy calves must have access to pasture by 9 months of age (6.12.1.7).

Small breed exemption

TRANSFERRED TO FINAL Q&AS

Is the small breed exemption in Table 1 of 6.11.2 of 32.310 restricted to 'Dairy cows - individual maternity pens?' (329)

No. The exemption is applicable to the entire table. There was an editing error made during the last revision.

32.311 Permitted substances - Soil amendments and crop nutrition

Non-organic spent brewers' grains as amendment

COMMENTED - REWORDED

Can non-organic spent brewers' grains be used as a soil amendment? As a compost feedstock? (323)

To be acceptable for use as a soil amendment, non-organic spent brewers' grains must be non-GE and any non-agricultural substances added during the brewing process must be listed on Table 4.2 of 32.311 and comply with 1.4 a) and d) of 32.310. For example, diammonium phosphate (DAP) added during the brewing process would render spent brewers' grains non-compliant for use as a soil amendment in organic production. Non-organic spent brewers' grains from GE sources are an acceptable composting feedstock.

REVISED WORDING

To be acceptable for use as a soil amendment, non-organic spent brewers' grains must be non-GE and any non-agricultural substances added during the brewing process must be listed on Table 4.2 of 32.311 and comply with 1.4 a) and d) of 32.310. For example, diammonium phosphate (DAP) added during the brewing process would render spent brewers' grains non-compliant for use as a

soil amendment in organic production. Non-organic spent brewers' grains from GE sources are an acceptable composting feedstock, as GE residues do not persist after the thermophilic stage of the composting process. See 'compost feedstock in Table 4.2)

Wool as mulch

TRANSFERRED TO FINAL Q&AS

Can conventional wool be used as mulch? (324)

Yes. Even though wool is not specifically mentioned in the mulch listing in Table 4.3, wool from either organic or non-organic operations could be used as a mulch.

Non-complying formulants in pesticides

COMMENTED – REVISED ANSWER BACK TO PUBLIC COMMENT

Is a full 36 month transition period required if PMRA list 3 formulants are found in brand name pesticides that otherwise comply with Table 4.3? (326)

32.311 Permitted substances lists for preparation

Added vitamins and minerals to juices

COMMENT TRIGGERING A REVIEW

Can juice containing added Vitamin C or D, or calcium be certified as organic? (328)