

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 – April 10 to May 10 2017

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32.310 Crop production

Manure from confined operations

Can manure from confined animals feeding operations where 5.5.1 and 5.5.2 have been met be applied on organic land even if it contains prohibited substances? (322)

Yes. Manure can be used directly as long as it follows 5.5.1 and 5.5.2.

32.310 Livestock Production

Indoor pens for dairy calves

Can dairy calves be raised in indoor pens until such time as they are weaned? (317)

Yes, considering that weaning of calves cannot be done before the age of 3 months (6.4.3 c) and that dairy heifers aged 9 months and older must have access to pasture in season (6.12.1.7).

Vegetable matter

Regarding the 'vegetable matter' element in poultry and pork feed rations (6.4.3 j): (340)

a) is organic vegetable matter required?

Yes. Organic vegetable matter is required.

b) would non-cereal grains (soybean, flax, corn) count as vegetable matter?

No. Vegetable matter is referring to fruit (apples, pears etc.) and vegetables (lettuce, potatoes, squash, etc.) and the associated crop waste and forage (straw, hay).

c) would straw and seed screenings count?

Yes - for straw. No - for grain based seed screenings.

d) would a grassed access area count?

Yes. Organic pasture would qualify as vegetable matter.

Outdoor access – veterinarian recommendations

Under CAN/CGSB-32.310 Section 6.7.2, can operators limit access to the outdoors to their entire herd / flock (such as goats, sheep, cattle, poultry) for the entire winter if the operator provides a letter from their veterinarian stating that access to the outdoors is detrimental to the health of the particular species of livestock? (354)

No. The standards already provide sufficient flexibility to address the health and welfare of organic livestock with specific guidance and exceptions with regard to outdoor exercise and access to pasture (6.1.3, 6.11.1 & 6.13.1).

32.311 Permitted substances - Soil amendments and crop nutrition

Amino acids

Are amino acids permitted for crop fertility purposes? (337)

Yes. Amino acids are permitted for crop fertility purposes. Amino acids are substances requiring microbial action to make nitrogen plant available.

Elemental sulphur

Is mined elemental sulphur permitted as a soil amendment? What other sources of elemental sulphur are permitted? (321)

Mined (non-synthetic) elemental sulphur is permitted as a soil amendment, as well as reclaimed sources of elemental sulphur.

Expanded perlite

Is expanded perlite permitted under the listing of 'Clay' on Table 4.2? (335)

Yes. The physical expansion of perlite during its manufacturing is permitted as the process does not change the molecular structure of the substance.

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.

Inert substances and materials as growing media

Can inert substances and materials be used in production of sprouts, microgreen and shoots under 7.4.1 (produced in water)? For shoots and microgreens under 7.4.2 (produced in soil)? What about growing on burlap cloth? On coconut coir/fibre? Can the 'soil' (7.4.2) be sterilized? (299)

For water-based sprout, shoot, and microgreen production systems (7.4.1): inert containers made of stainless steel and food-grade plastic are permitted. No growing media, such as burlap, coconut coir, coconut fibre (inert or not) are permitted in water-based sprout, shoot, and microgreen production systems. For soil-based shoot and microgreen production systems (7.4.2): the growing media must meet the definition of soil as defined in 3.62 (32.310): A 'mixture of minerals, organic matter and living organisms.' This means the soil cannot be sterilized (which would kill the living organisms). Burlap, coconut coir or coconut fibre could be used as part of the 'soil' or could function as the 'container' in a soil-based shoot or microgreen production system. The operator must confirm that these materials are free from and/or have not been treated with prohibited substances.

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 absence of petrochemical residues may need to be confirmed by testing. (See Table 4.2 'Composting Feedstocks')

Vitamin D

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

Yes. Vitamin D sources containing non-listed preservatives are allowed in organic fluid milk products as the addition of Vitamin D to milk is required by law and a commercial availability search element was not included in the 'Vitamin and mineral' annotation in Table 6.4 (refer to 6.2.3 of the PSL for insights into commercial availability search requirements). Keep in mind GE rules regarding the inclusion of substrates as outlined in 6.2.1 (32.311) do have to be addressed.