

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 – June 5th to July 5th 2017

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Crop production

Certification of plantations

If culinary oils are harvested from an on-farm tree plantation, aka blocks of trees planted on a farm for this specific purpose, should these oils be certified under 'Crop production' (clause 5) or 'Wild crops' (clause 7.6) of the Canada Organic Standards? If the same culinary oils are harvested from private wood lots, or from Crown land timber which clause in the standards is applicable? (341)

The 'Crop production' requirements in the standard are applicable for the on-farm tree plantation scenario while the 'Wild crops' requirements are applicable for the wood lot and crown land situation. 'Wild crop' is defined in 3.71 of the standard as "plants collected or harvested in their natural habitat."

Livestock Production

References for animal transportation

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? (315a)

These two references are not in contradiction. Table 4 of the Code of Practice for Care and Handling cites the Health of Animal Regulations. This table shows maximum times for travel. When these maximums are reached, it requires that the animals be unloaded and given feed, water and 5 hours of rest time.

If I have a choice between two slaughterhouses - one is 2 hrs away and another 6 hours. Am I at liberty to use the facility 6 hours away? (315b)

No. 6.5.5 is explicit - "The duration of transportation shall be as short as possible." The Code of Practice care and handling recommendations become applicable when the closest facility is more than 5 hours away.

Wild crops

Buffer zone around wild crops

Can wild harvest sites be located less than one kilometre from potential sources of environmental contamination such as golf courses etc, if it is demonstrated that the wild crops are completely isolated from contact with prohibited substances by a clearly defined buffer, in accordance with section 7.6.4? (343a)

No. There is no latitude in the 7.6.4 of the standards to reduce wild crop buffer zones, where required, to less than 1km.

In the event that wild harvest cannot be certified (if 1KM requirement cannot be attained), is parallel production prohibited between crop production (plantation) and wild harvest? If so under what circumstances might it be allowed? (343b)

If the wild harvest cannot be certified, parallel production from an existing organic plantation would be permitted; however, a new organic plantation could not be established. (3.46, 5.1.5)

Maintaining organic integrity during cleaning, preparation and transportation

Ultraviolet radiation

Is ultraviolet radiation of milk, cheese and fruit juice acceptable under the COS? (152, 338)

Near and medium ultra-violet rays are classified as non-ionizing radiation and can be used to treat milk, cheese and juices. But neither near nor medium ultra-violet rays can be used to boil (7.2.14) or sterilize (7.2.12.2) tree saps such as maple or birch. Far ultra-violet radiation is prohibited for any use.

Permitted substances - Soil amendments and crop nutrition

Definition of fish farm waste

What is the definition of "fish farm waste" used in the listing of "Fish meal, fish powder, fish waste, hydrosylate, emulsions and solubles" in Table 4.2? Does it need to be composted? (333)

Fish farm waste consists of sludge and mortal remains (fish, bones, scraps, carcasses, etc.) collected at the fish farm. Such waste cannot be used raw; it must be composted or processed before use. Manufactured fish by-products, such as processed fish meals or liquid fish fertilizers made with farmed fish and/or fish farm waste, do not have to be composted before use.

Feather meal as mushroom substrate

Can feather meal, compliant with table 4.2, be used as a mushroom substrate without being composted? (344)

No. As currently written, uncomposted feather meal is not permitted as a mushroom substrate (7.3.2.3).

Permitted substances - Crop production aids and materials

Weed barriers

Could a woven polypropylene weed barrier cloth be left in place for 3-5 years in an orchard or vineyard? (347a)

Yes, it can be left in place as long as it doesn't start to degrade.

Can the same thing be done with 100% coconut fibre mats? (347b)

If the coconut fibre mats do not contain any prohibited materials, they can be used and left to degrade in place.

Non-complying formulants in pesticides

What is the status of a crop on which a pesticide was applied containing an active ingredient listed in table 4.3 of the PSL but also a formulant from List 3 of PMRA? (326a)

In most cases the crop cannot be certified because (with the exception of List 3 formulants in passive pheromone dispensers) only formulants from Lists 4a and 4b of PMRA may be used in pesticides allowed by table 4.3. However, if the List 3 formulant is covered by a different substance listing in Table 4.3 (e.g. essential oils and aloe vera gel under "plant extracts", soap under "Soaps", etc.) or Table 4.2 (talc under "Mined minerals", etc.), the crop could be certified.

Will a 36-month transition period be required for the piece of land used for growing the plants on which this pesticide was applied? (326b)

A 36-month transition will not be required if the List 3 formulant is a substance that could be included in one of the substances categories of table 4.3 or 4.2.

Permitted substances lists for cleaners, disinfectants and sanitizers

Annotation for surfactants and wetting agents

Can you clarify whether the annotation in "surfactants" and "wetting agents" means that the user needs to document that the substance complies with the Detergents listing in 7.4 AND the Soaps listing in 7.4, or simply either one of them? (345)

The annotation '*See Table 7.4 Detergents; Soaps.*' should be read with an "or" (soaps OR detergents). The nature of the product in which the surfactant or the wetting agent is an ingredient will determine which listing to use.