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 – September 20 to October 20 2017

General principles and management standards

Permitted substances lists

General principles and management standards

Livestock production

Justification to keep poultry confined indoors

Is there a temperature difference between the inside of a poultry barn and the outside environment (for example, a 2 degree C differential) that will allow operators to keep poultry confined indoors? (368)

No. A slight temperature difference in and of itself is not sufficient justification to keep poultry confined indoors, because other factors, such as relative humidity, rainfall, wind velocity, presence of predators, etc., must also be considered (6.1.3, 6.7.2, and 6.13.1).

Percentage of organic ingredients for feed

May livestock be fed organic food waste containing 95% or more organic ingredients? What about food waste stemming from products only containing 70-95% organic ingredients? (372)

Livestock may be fed organic food waste (≥ 95% organic content). Food products containing 70-95% organic ingredients may not be fed to livestock unless it is necessary and essential for animal health (See 6.4.1 & 6.4.4).

Maple products

Waxed cardboard as fuel

Can waxed cardboard pellets be used as fuel in maple syrup evaporators? (373)

Yes. As long as the operator can demonstrate that this type of fuel does not affect the integrity of the maple syrup.

Wild crops

Weed control for wild crops

Can salt be used for weed control on ground here organic wild harvested crops are stored? (367)

No. First, the wild harvest area is to be "relatively undisturbed" (7.6.3) so using salt as a 'herbicide' in the area, even on a rock outcrop is prohibited as it is would change the ecosystem. Second, salt is not authorized as an herbicide in Table 4.3.

Permitted substances lists

Table 4.3 — Crop production aids and materials

Acceptable substances in biodegradable mulches

Can biodegradable mulches contain substances listed in PSL 4.2 or 4.3? (371a)

Yes.

If yes, do the annotations for those PSL 4.2 and 4.3 substances used have to be addressed? (371b)

Annotation restrictions apply even if substances are used as components of a biodegradable mulching material. For example if embedding micronutrients into the material, the annotation for micronutrients must be addressed.

Table 6.4 — Ingredients not classified as food additives

Ingredients used for micro-organism preparation

A) Are the requirements of 6.2.1 of the PSL applicable to "ingredients used for micro-organism preparation" (see 'Micro-organisms' listing in Table 6.4) if the micro-organisms preparation does not include the substrate? B) Can the micro-organisms product include synthetic preservatives? (375)

a) Yes, no matter if the micro-organism preparation includes the substrate or not, the requirements of 6.2.1 apply to each ingredient produced using substrates or growing media that is a component of a micro-organism preparation (see 9.1.2).

b) Micro-organism preparations cannot contain synthetic preservatives (see 1.4 j).

Permitted substances lists for cleaners, disinfectants and sanitizers

Botanical compounds as cleaners

Can botanical compounds, such as essential oils, be used to clean organic products or organic product contact surfaces? (366)

Botanical compounds such as essential oils cannot be used to clean organic products because they are not listed in 32.311 Table 7.3. Botanical compounds such as essential oils may be used to clean organic product contact surfaces in accordance with 32.310 8.2.3, or if used as wetting agents (see 32.311 Table 7.4 Wetting agents).

Rewording of question 44

Removal of plastic mulch

Can you clarify the requirement for removal of plastic mulch from fields? (44)

Previous answer

Only fully 100% biodegradable films composed exclusively of biobased substances plus formulants and ingredients listed in PSL Tables 4.2 and 4.3 may be left to decompose in fields. All other non-biodegradable or semi-biodegradable mulch films or films containing prohibited components such as biodegradable polymers, or Carbon Black from GE or petroleum sources, must be lifted at the end of the growing cycle.

Revised answer

Only fully 100% biodegradable films composed exclusively of biobased substances plus formulants and ingredients listed in PSL Tables 4.2 and 4.3 may be left to decompose in fields. All other non-biodegradable or semi-biodegradable mulch films or films containing prohibited components such as biodegradable polymers, or Carbon Black from GE or petroleum sources, must be lifted before they begin to degrade.

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.

Feather meal as mushroom substrate

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

Feather meal made from organic poultry could be used as a mushroom substrate without being composted. 32.310 7.3.2.3 requires that other sources of feather meal be composted.

Substances for egg cleaning

Can substances listed in Table 7.4, with a removal event, be used to clean eggs? Is potable water required to wash eggs? (351)

Only substances listed in Table 7.3 as permitted for direct contact with organic product may be used to clean eggs. Water used for egg washing must be potable. See CFIA 'Shell Egg Manual' requirements. Take note however that organic vegetable oils, or other appropriate non-organic processing aids in PSL Tables 6.5 such as, e.g. silicon dioxide, could be used as defoaming agents during egg washing.

Lactic acid produced by fermentation and extraction

Is lactic acid produced by fermentation and extraction allowed under the Canadian Organic Standards? Is that lactic acid considered to be synthetic? (331)

Lactic acid produced by fermentation and extraction is permitted. Extraction processes must use permitted extractants (See Extractants, Table 4.2 and 4.3 and Extraction solvents, carriers and precipitation aids, Table 6.3). Lactic acid produced by fermentation and extraction is considered to be non-synthetic under the Canadian Organic Standards. Requirements with regard to substrates/growth media must be met. Chemical processes used to purify and/or extract substances are permitted as long as they do not create new molecules or involve processes specifically prohibited by the standard. (See synthetic substance, 3.65 (32.310)).

Gibberellic acid produced by fermentation and extraction

Is gibberellic acid produced by fermentation and extraction allowed under the Canadian Organic Standards? Is that gibberellic acid considered to be synthetic? (332)

Gibberellic acid produced by fermentation and extraction is permitted. Extraction processes must use permitted extractants (See Extractants,Table 4.2 and 4.3). Gibberellic acid produced by fermentation and extraction is considered to be non-synthetic under the Canadian Organic Standards. Requirements with regard to substrates/growth media must be met. Chemical processes used to purify and/or extract substances are permitted as long as they do not create new molecules or involve processes specifically prohibited by the standard. (See synthetic substance, 3.65 (32.310))