

# Questions and Answers Regarding National Standards for Organic Agriculture

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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).



## Comment period – November 20 to December 20 2017 REPORT

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## General principles and management standards

### 7.3 Mushroom production

Non-agricultural substances as mushroom substrate

#### **TRANSFERED TO FINAL Q&As**

**Can non-agricultural substances including peat moss be used as a mushroom substrate/growth media or as a casing layer on top of a mushroom bed without being composted first? (385)**

Peat moss is a substance in Table 4.2 of 32.311 which has no specific use or restriction of usage. Therefore, it can be considered as an applicable entry for mushroom production under 7.3.1 of 32.310. Other non-agricultural substances of Table 4.2 can be considered as well unless their annotations restrict the substance to a specific usage which does not include mushroom production. Composting is only mandatory for substances of conventional agricultural origin in mushroom production (7.3.2.3).

### 7.6 Wild crops

Honey harvested from wild bees

#### **TRANSFERED TO FINAL Q&As**

**Can honey harvested from wild bees be certified to the "Wild Crop" requirements in Clause 7.6? (382)**

No. Wild animal products are not covered by the Canadian Organic Standards.

## Permitted substances lists

### Table 4.2 Soil amendments and crop nutrition

Activated biochar

#### **TRANSFERED TO FINAL Q&As**

**Is activated biochar permitted? (377a)**

Yes, if the activation is done with permitted substances, activated biochar may be used. Additional requirements, such as the genetic engineering prohibition (1.4 a in 32.310) and annotation restrictions in the substance listing, would need to be addressed.

**Can it be used as soil substitute in organic containerized greenhouse production systems? (377b)**

No, biochar cannot be used as a soil substitute as it does not meet the requirements of a soil/growth media (see 32.310 7.5.4). It may be used as a soil amendment as listed in 32.311 4.2.

Non-organic oilseed meal in a multi-ingredient fertilizer

#### **Commented-reworded**

**When used in a multi-ingredient fertilizer, is the use of non-organic oilseed meal subject to the commercial availability restriction? (387)**

Yes. Even when used as a component of a multi-ingredient fertilizer a commercial availability search is required as per the annotation for "Oilseed meals" (Table 4.2).

## REVISED WORDING – TRANSFERRED TO FINAL Q&As

Yes. Even when used as a component of a multi-ingredient fertilizer a commercial availability search is required as per the annotation for "Oilseed meals" (Table 4.2). Therefore, an operator wishing to use this fertilizer blend would need to perform a commercial availability search for a fertilizer blend that is fully compliant before using this product.

## Definition of wastes from crops

### TRANSFERRED TO FINAL Q&As

**Under "Plants and plant by-products" in PSL 4.2, does the restriction "Wastes from crops that have been treated or produced with prohibited substances may be used as composting feedstocks" apply only to wastes from crops or does it apply to all plant materials? What is the definition of "wastes from crops"? (388)**

"Wastes from crops" is referring to vegetal matter (plant and plant waste) from any source

## Table 5.2 – Feed, feed additives and feed supplements

## Sprayed substances on dry hay

### TRANSFERRED TO FINAL Q&As

**Can stored organic hay be sprayed with substances listed in 4.3 and/or 5.2 of PSL? (381)**

No. Only substances listed under "Hay or silage preservation products" in Table 5.2 of 32.311 can be used with dry hay. Although salt is not specifically mentioned in this annotation of "Hay or silage preservation products", it would be allowed for hay treatment, as salt is a livestock feed.

## Table 5.3 — Health care products and production aids

## Synthetic thyme oil

### TRANSFERRED TO FINAL Q&As

**Can synthetic thymol (thyme oil) be used to prevent and treat hoof problems? (379)**

Yes. Synthetic thyme oil (thymol) is permitted as it is included in Miscellaneous section of the "[Animal Health Care Products and Production Aids](#)" listings approved for use in livestock husbandry.

## Enzymes from genetically-engineered bacteria

### COMMENTED – NOT REVISED- TRANSFERRED TO FINAL Q&As

**Can enzymes such as phytase be compliant to the standard even if the enzyme is produced by genetically-engineered bacteria? (380)**

No. Clauses 1.1 and 5.1 in 32.311 and 1.4 a in 32.310 apply to enzymes in Tables 5.2 & 5.3 in 32.311.

## Table 6.3 — Ingredients classified as food additives

Carriers derived from a substance

### TRANSFERED TO FINAL Q&As

**When present in permitted substances, are carriers that are themselves "derived" from a substance subject to the requirements of 'Extraction solvents, carriers and precipitation aids' (PSL Table 6.3) (376)**

Yes, carriers present in permitted substances are subject to the requirements of "Extraction solvents, carriers and precipitation aids" unless they are organic ingredients.

## Livestock production

Percentage of organic ingredients for feed

### TRANSFERED TO FINAL Q&As

**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 ( $\geq 95\%$  organic content). Food products containing 70-95% organic ingredients can only be fed according to the derogation in 6.4.7."

## REWORDED Q&A

### Original Q&A

Chlorine to disinfect poultry carcasses

### TRANSFERED TO FINAL Q&As

**Can chlorine be used to disinfect poultry carcasses? (254)**

Poultry carcasses may be washed with chlorinated water, provided the concentration of chlorine does not exceed the maximum limits applicable under regulations for safe drinking water. See Table 7.3 - Chlorine compounds.

### Revised Q&A

**Can chlorine be used to disinfect poultry carcasses? Are there alternative substances or processes? (254)**

Poultry carcasses may be washed with chlorinated water, provided the concentration of chlorine does not exceed the maximum limits applicable under regulations for safe drinking water. See Table 7.3 - Chlorine compounds. As an alternative peracetic acid can be used at disinfecting rates (Table 7.3). Alternative physical processes such as High Pressure Processing (HPP) are allowed.