

# 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).



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](mailto:OPR.RPB@inspection.gc.ca)

## Comment period – September 5 to October 5 2018

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## General principles and management standards

### 3 Definitions

#### Definition of 'production unit'

**What is the definition of production unit for agricultural enterprises? Does each field or each greenhouse, each livestock building constitute a production unit or is it all fields, greenhouses, buildings managed by a company? (403)**

A production unit is defined as "identifiable portion of an operation in which production or preparation of an organic product occurs." Therefore, each field, greenhouse, or livestock building - even a contiguous portion thereof that is identified separately in an operation's organic system plan - would be considered a separate production unit if requirements pertaining to segregation, traceability, buffer zones, organic integrity, etc. were maintained for that identifiable portion. All production units shall have distinct, defined boundaries (5.1.6 in 32.310).

### 5 Crop production

#### Definition of "untreated seed"

**What is the definition of "untreated seed" as it applies to 5.3 (32.310)? Can bleach be used on seeds? (77)**

Untreated seed is seed to which no pest control products, plant growth regulators, inoculants, or fertilizers, pelletizing agents, coatings, priming substances etc., have been added. Seed treatments assist with field performance and are applied to the seed after storage, either pre or post sowing. No, bleach cannot be used on organic seeds to either clean or treat them. Bleach cannot be used on non-organic seeds post-purchase by an organic operation.

### 6 Livestock production

#### Non-organic feed when transitioning entire dairy herds

**Is GE feed permitted in the 20% non-organic feed allowance for first time transitioning entire dairy herds (6.3.1 a)? (407)**

Yes. GE feed may be used in the 20% non-organic feed allowance when initially transitioning an entire dairy herd, and this information should be documented in the operation's organic plan.

### Permitted substances lists

#### About 'Origin and usage'

**If there is nothing showing in the "origin and usage" column of the PSL, does this mean that any form of the substance may be used? In previous versions of the PSL there were restrictions on ascorbic acid regarding its non-synthetic or synthetic nature and this is what gave rise to our question. (423)**

Yes. If nothing is written in the "origin and usage" column then there are no restrictions as to the origin and/or usage for that substance in accordance with the scope of the PSL table in which they are listed. In the case of ascorbic acid, the annotation was removed after new information indicated that all commercially available ascorbic acid is synthetic which made the annotation allowing both forms redundant.

## REWORDED Q&As and UPDATES on [Final Q&As](#)

### 7.4 Sprouts, shoots and micro-greens production

Substances for sanitizing seeds for sprouting and sanitizing sprouts, shoots and microgreens

**Which substances are compliant for sanitizing seeds for i) sprouting, ii) shoot and microgreen production, and iii) for sanitizing harvested sprouts, shoots or microgreens? (303)**

Substances used for these activities are limited to the following Table 4.3 substances: hydrogen peroxide and peracetic acid (peracetic acid listing) and hot water (water listing) (32.310 7.4.1.5). Chlorination of water shall not exceed maximum levels for safe drinking water. (Table 7.3).

### 7.5 Greenhouse crops

Container size

**Are greenhouse containers used for staked crops that are not 12 inches deep but contain 70 L/m<sup>2</sup> (1.2 gal/ft<sup>2</sup>) of soil volume compliant? (288)**

Yes. The amended standard published MAR 2018 removed the container depth requirement introduced in the 2015 published version and simultaneously reduced the volume requirement to 60 L/m<sup>2</sup>.

### Permitted substances Lists

#### Table 4.3 Crop production aids and materials

Formulants in crop production

**Must pesticide formulants used in crop production listed on PMRA 4A and 4B tables be GE free? (281)**

No. The amended standard published MAR 2018 includes a derogation for PMRA List 4A, 4B and List 3 formulants (Table 4.3 -32.311).

### Substrates for probiotics

Substrates for probiotics

**Can a non-organic agricultural substance such as whey be used as the growing media to manufacture probiotics used as a feed supplement or as an ingredient for food? (252)**

It depends. Non-organic agricultural ingredients such as whey, can be used as the growth media or substrate to manufacture probiotics used as a feed supplement or as an ingredient for food, as long as their use complies with the requirements of 32.311 5.1.2 and 6.2.1, as follows:

a) if the probiotic includes the substrates or growth media, the substrate or growth media ingredients shall be listed in PSL tables 5.2 (feed), 6.3 or 6.4 (food). If listed in the PSL, any use of non-organic agricultural substances listed in the PSL must comply with substance listing annotations;

b) if the probiotic does not include the substrates or growth media, it shall be produced on non-genetically engineered substrates or growth media, if commercially available.

This means each substrate needs to be assessed individually for compliance. For example, whey residues are not permitted in a probiotic product because whey is not listed in the required tables. Probiotic products without whey residues are permitted without a commercially available search because at present there is no milk being produced from genetically engineered animals.