

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).



Comment period –March 11th to April 11th 2019 - REPORT

Note: The questions and answers in this report were published in the [Final Questions and Answers- Canadian Organic Standard](#) on April 19, 2019.

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General Principles and management standards

5 Crop production

Non-organic trees or grapevines planted before end of transition

If non-organic trees or grapevines are planted before the land has completed the 36 month transition, how long before the fruit would qualify as "organic"? (431)

The fruit would qualify as organic either after the completion of the 36-month transition period (5.1.1), or 12 months after the planting date (5.3 b) – whichever is later. For example, there is 4 months left in a land transition and the producer plants non-organic planting stock. The fruit could not be harvested as organic until 8 months after the land meets the 36 month transition requirement.

6 Livestock Production

Raising pullets for layer operations

May non-organic operations raise pullets for organic layer operations? (428)

No. Pullets must be produced by operations holding valid product certificates (32.310 1.1 a "...livestock..."). Even if the sub-contracted operation is inspected annually by the certifier of the layer operation for whom the pullets are being raised, and the pullets are under "continuous organic management" from the second day of life (6.2.3.1 a)), this does not meet the requirements of the scope of the standard.

7.2 Apiculture

Adding a nucleus hive

When adding a nucleus hive to an existing organic apiary, shall it be considered as introduced bees (subject to commercial availability) or a replacement colony (must be produced within operation or another established organic apiary)? (432)

An added nucleus hive (including both a queen and other bees) would be considered a replacement colony and therefore would be required to be produced within the operation or obtained from another established organic apiary.

7.2 Maple products

Well water through reverse osmosis

Does well water meet the criteria for potable water in 7.2.12.3 if it has been run through a reverse osmosis filtering system? (430)

Yes. Water purified by reverse osmosis is potable.

7.5 Greenhouse production

Soil and compost requirement in greenhouse production

Is biochar in a soil mix considered part of the mineral fraction? (424a)

No. Biochar should be counted as organic matter.

Are worm castings and vermicompost considered compost, and could they be used for the 10% requirement in 7.5.5.a)? (424b)

Yes. As they are both "products of carefully managed aerobic processes" (see 'compost' definition 3.15). Please also refer to 32.311 Table 4.2 Worm Castings.

Can the additional compost applications required in 7.5.5 b) be in the form of compost tea? (424c)

No. Compost tea does not contribute to organic content of the soil. Its use is twofold. A source of soluble nutrients and beneficial microorganisms.

10.3 Criteria for Examination of Particular Substances

Use of GE vaccines

To prevent livestock losses to deadly diseases (e.g. CircoVirus in pigs), can a genetically engineered vaccine be used, if we consider that it is 'necessary to prevent or treat livestock health problems when other treatments permitted by this standard are not available.' as stated in 32.310, 10.3 Criteria for Examination of Particular Substances, Table 9, under Livestock health care? (436)

No. At present the standard does not allow for the use of GE vaccines. Furthermore, clause 10 describes the process to be used when assessing additions or changes to the Permitted Substances Lists. Clause 10 is not a tool to justify the use of a specific input. The CGSB's Technical Committee on Organic Agriculture is discussing this issue during the current standards review.

Permitted substances lists

Table 6.3 Ingredients classified as food additives

Use of desiccants

Can desiccants, such as silica gel pouches, be added to containers of organic spices? (439)

Yes. Silica desiccants including silica gel pouches may be used as silica is silicon dioxide and silicon dioxide is listed in 6.3 with no restriction. Because the silica gel packs will be in direct contact with food, they are expected to be food-grade as are packaging and other food-contact surfaces (32.310 8.1.1)

Table 6.4 Ingredients not classified as food additives

Organic starch

Beyond non-organic rice or waxy maize starches, which are listed as permitted by the 'Starch' listing in Table 6.4, would starches made from other sources (i.e. tapioca, potatoes, arrowroot, cassava, etc.) have to be certified as organic? (433)

Yes. Unless the specific starch is listed in the PSL then certified organic varieties are required.

Anti-caking agents for grated cheese

What anti-caking agents are listed in the PSL that can be used in grated organic cheese? (435)

Currently none.

Tables 7.3/7.4

Conformity of a cleaning product

Manufacturers of concentrated sanitation products may provide Safety Data Sheets (SDSs) showing the ingredients of both the concentrated form and the diluted form (as used) on the same document, or they may provide two distinct SDSs - one specific to the concentrated form and another specific to the diluted (as used) form. Which SDS should

be used to evaluate the conformity of a cleaning product to the PSL if the ingredient listings are different? (437)

If the operation is using a diluted version, either purchased or diluted on site, the SDS for the diluted product is used for the evaluation compliance process.

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

Organic layers confined indoors

Is it permitted to raise organic layers confined indoors up to peak production based on 32.310 6.13.1.f) & g)? (427)

Yes. If it can be demonstrated that the layers are accessing the outdoors by the time of peak production. However, the rearing facility should closely match the conditions in the layer barn, including having access to an outdoor run (6.13.1 g). It is important to understand it is only permitted to keep the pullets indoors as an exception (i.e. when it is necessary for the immunization program and to ensure birds are confident in their laying sites).

Encouraging birds to go outdoors

How should 'managed in a way that encourages use by the birds' in 6.13.1 c) 3) be understood? Would management practices such as running electric wire in front of the openings to the outdoors (to prevent crowding along walls and in corners) or raising openings to the outdoors to above the eye level of hens standing on the floor (to prevent pests entering the barn) be compliant with the requirement of 6.13.1 c)? (413)

No. Management practices or structural impediments such as those cited in the question would hinder movement of the birds and thus are prohibited. There are many ways to encourage the birds to use the open-range; here are some practices to consider:

- Put in place cover on the range in the form of trees, shrubs or constructed shade to protect the birds from avian predators.
- Provide outdoor access or a covered porch to get the pullets outside and make them comfortable with the range they will have access to as adults.
- Provide separation in barns and runs to create multiple segregated flocks (i.e. 3000 to 5000).