

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 21 to July 21, 2019

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General Principles and management standards

Parallel production

Is the word 'simultaneous' in 3.46 defining "parallel production" applicable to:

- 1) geography - i.e. does it relate to a farm in isolation from other farms owned and operated by the same organic operation)?**
- 2) crop rotations - i.e. where the operation has two production units, can a non-organic crop be grown in Field 1 (always conventional) in Year A and an organic crop of the same type grown in Field 2 (always organic) in Year B when Field 1 has a different crop? (450a)**

1 - The requirement is that same or similar crops grown conventionally and organically within an operation are visually distinguishable by a common person, regardless of specific site within that operation.

2- In the example given this same crop would be planted in different years, so the growing of that crop would be considered neither simultaneous nor parallel.

5.1.4 states that parallel production is an exception to an enterprise's entire conversion to organic. "Operation" is defined at 3.41 and may have multiple production units but "enterprise" is not defined in the Standards. What is the difference between enterprise and operation? (450b)

Enterprise and operation are synonymous. It is anticipated that this will be clarified in the 2020 standards revision.

Does the term "farm, company or organization" included within 3.41 definition of an operation encompass separate and distinct divisions of one overall food conglomerate, each division having a separate business name, management and geographical location for crop production? (450c)

If each division is a legal entity they need to be certified individually. If the food conglomerate is the certified entity then regardless of its divisions having separate names, any parallel production within the conglomerate (even if the production took place at different divisions) would be prohibited. (See 'legal entity' description in C.2.4.4 in the COR Operating Manual)

Ratio of cows to stalls

Do the requirements under CAN/CGSB-32.310 section 6.12.2 (ratio of cows to stalls shall not exceed 1:1) apply in a situation where dairy cows have access to the outdoors and an outdoor bedding pack year-round? (452)

Where a group of animals is housed in a free stall system, the 1:1 animal to stall ratio is required, regardless of outdoor access. This ensures during periods of weather-induced confinement that each animal can ruminate and rest.

Permitted Substances Lists

Non-organic Potato Dextrose Agar

Can non-organic Potato Dextrose Agar (PDA) be used to propagate mycelium (the initial genetic material) to produce organic mushroom spawn?

If so, can it include compounds and micronutrients that are not listed? (451)

Yes. Non-organic PDA is permitted if it can be demonstrated that organic is not commercially available and it does not contain GE ingredients (see Table 4.2, Agar). 2.

Included compounds and micronutrients used must also be listed in Table 4.3 of 32.311 (see 32.310 7.3.3).

Ketoprofen

If ketoprofen is used therapeutically, is there a withdrawal period? (449)

No. Non-steroid anti-inflammatories such as ketoprofen are included in table 5.3 of the PSL. Products listed in the PSL do not require any withdrawal times unless specified in the annotation or on the product label.

Detergent biodegradability

For detergents listed in CAN/CGSB-32.311 Table 7.4, is the OECD biodegradable definition in test 310 considered as equivalent to the biodegradable definition under CAN/CGSB-32.310 section 3.10? (446)

Yes. OECD 310 approvals may be used as documentation of biodegradability.

Revised Questions & answers

Acetic acid

Can acetic acid be used for acidifying drinking water for animals? (201)(456)

Yes. Non-synthetic acetic acid may be used to acidify livestock drinking water. (See 'Acids' Table 5.3).

Surfactant, spreaders, stabilizers, foaming agents

Must formulants, such as surfactant, spreaders, stabilizers, foaming agents, contained in commercial cleaning products be listed on 7.3 and 7.4, or only the active ingredients?? (55.1) (453)

When commercial cleaning products are used without a removal event on direct contact or on contact surfaces with organic products, all the ingredients listed on the Safety Data Sheets (SDS) and the cleaning product label, including any formulants, must be listed in PSL Table 7.3 or be chemicals used to treat drinking water, or serve as product stabilizers. When used on product contact surfaces followed by a removal event, only the ingredients on the SDS, including formulants, must be listed in Table 7.3 and/or 7.4.