

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 – February 17, 2020 to March 17,2020

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Questions and answers under public comment

Organic Principles and management practices

Livestock production

Popholes are mandatory

When organic layers are pasture raised throughout the grazing season can they be overwintered in barns without popholes or other means of accessing the outdoors? (478)

No. 6.13.5 states "Poultry barns shall have sufficient exits (popholes) to ensure that all birds have ready access to the outdoors." As per 6.13.1 d), access to outdoors may only be restricted when outdoor access results in an imminent threat to the health and welfare of poultry.

Greenhouse production

Prohibited substances in greenhouse production

If a grower covered the soil in a greenhouse container system and then sprayed a prohibited substance, can the soil be used in containers in subsequent cropping cycles if tests show that it does not contain any residues of the prohibited substance? (477)

No. Residue testing cannot be used as a substitute for required organic management practices; organic operators must not apply prohibited substances as per 1.4.

Permitted Substances Lists

Use of formulants in crop production

Are the restrictions in the formulant listings in Table 4.2 & 4.3 only applicable when formulants are specifically mentioned in an annotation? Or do the annotations for formulants apply whenever a substance contains a formulant? (483)

The formulant listings apply whenever a substance contains a formulant unless a specific derogation is identified in an annotation.

Use of ingredients in beer making

May calcium chloride be used as an ingredient in beer making? (482)

No. Calcium chloride as an ingredient is restricted to milk, fat, soybean and fruit and vegetable products. (see Table 6.3, Calcium chloride). However, water as an ingredient is outside the scope of the standard, if calcium chloride is used as a water treatment - before the water enters the production stream, it would be permitted.

Reworded Questions and answers

Calculation of buffer zone

"Could a buffer zone larger than 8 m. be required in special circumstances, for example when prohibited substances are being applied on the windward side of the organic crop? (138.2)

Yes. 5.2.2 states that ""distinct buffer zones or other features sufficient to prevent contamination are required"". If there is a risk of contamination, an 8m or wider buffer (5.2.2 a)) or other

effective barriers (5.2.2 b)) must be employed. For isolation distances relevant to GE crops, refer to 5.2.2 d). "

Annotations to permitted substances

CAN/CGSB-32.311 Section 4.1.3 a) & 5.1.2. a) state that if a listed substance includes substrates or growth media, the substrates or growth media ingredients shall be listed in Crop Tables 4.2 & 4.3 and Livestock Tables 5.2 & 5.3. In this situation do the origin and usage annotations for these substrates or growth media ingredients listed in 4.2, 4.3, 5.2 and 5.3 apply? (389)

Yes. Substance annotations must always be addressed. One exception is pesticide formulants listed on PMRA Lists 4A, 4B and 3. The MAR 2018 amended standard clarifies that pesticide formulants on these three PMRA lists are not subject to 1.4 of CAN/CGSB-32.310. This means 4.1.3 a) is not applicable to pesticides made from microbial products containing some substrate or growth media as long those compounds used as a substrate or growth media are listed either on PMRA List 4A, 4B, or 3. However, there is no exemption from the requirements of 4.1.3 a) for microbial products used as fertilizers. In the case of an amino acid preparation fed to livestock produced on a molasses substrate and which contains molasses, the molasses must be organic (see 'Molasses' Table 5.2).

Use of antibiotics in orchards

Is streptomycin allowed in apple production to control fire blight? (311)

No. The amended standard published MAR 2018 clarifies that antibiotics, including streptomycin, are prohibited in crop production. (see 'Biological organisms' 32.311 Table 4.3)