

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 – May 1, 2020 to May 30, 2020

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General Principles and management standards

5.1 Land requirements for organic production

Owning organic and non-organic operations

If an owner owns two operations, where one is organic and the other conventional, does 5.1.3 and 5.1.4 apply to the non-organic operation? (489)

If the non-organic operation is a separate legal entity, then it is not subject to organic certification requirements. But if the non-organic operation is not a separate legal entity 5.1.3 & 5.1.4 are applicable and the operation is subject to the purview of the CB. (See 'legal entity' description in C.2.4.4 in the COR Operating Manual)

6.4 Livestock feed

Vegetable matter

Regarding the 'vegetable matter' element in requirement for poultry and pork (6.4.3 j) (340)

a) Is organic vegetable matter required?

Yes. Organic vegetable matter is required.

b) Would non-cereal grains (soybean, flax, corn) count as vegetable matter?

No. Vegetable matter is referring to fruit (apples, pears etc.) and vegetables (lettuce, potatoes, squash, etc.) and the associated crop waste and forage (straw, hay).

c) Would straw and seed cleanings count?

Yes - for straw. No - for grain-based seed cleanings.

d) Would a grassed access area count?

Yes. Organic pasture would qualify as vegetable matter.

This vegetable matter fraction can be supplemental to the feed ration or can be included in the feed ration.

7.5 Greenhouse crops

Use of a prohibited fungicide in greenhouses

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.

Could this container soil be used for organic production after 12 months?

No. Even though the soil was covered, and testing was done 7 months later showing no residue - 36 months of transition is needed from the fungicide application for a compliant soil (see 'Soil' Table 4.2 of PSL). The 12-month period is only applicable to new operations per 5.1.1. Furthermore, keep in mind it is up to the CB if there was deliberate abuse alternating between organic and non-organic methods in this production unit which may lead to decertification. (See SIC Q&A #6)

Permitted Substances Lists

Livestock production

Hydrogen peroxide for drinking water

Can hydrogen peroxide that is used to treat drinking water for humans but is not necessarily rated 'food-grade' be used to treat livestock drinking water? The hydrogen peroxide annotation in PSL table 5.3 stipulates "food-grade" is required. (486)

Yes, Hydrogen peroxide approved to treat drinking water for humans is considered equivalent to food-grade for the purpose of treating livestock drinking water.

Reworded Questions & Answers – Livestock Production

Offspring born under transition

Can livestock offspring be considered organic for meat, if they are born on a production unit, prior to the end of the final 12 months of the 36 month transition period, as long as the dam has been under organic management for the last third of gestation (6.2.3.2 b), including eating pasture and feed produced within the operation, which is considered organic when consumed by the transitioning herd or flock on the same production unit, as per 6.3.3? (409)

No. With reference to subclauses 6.2.3.2 and 6.3.3, livestock offspring born on land in transition would not be considered organic for meat. 6.3.3 allows for the final third of gestation to occur during the final months of transition, so that offspring born on or after the day that the land has *completed the necessary transition period and been granted organic status* can be considered organic for meat.

Pasture-Poultry

Does 6.3.3 apply to pasture used for poultry? In other words, can the raising of pullets be timed to coincide with the transition of land rather than waiting until the pasture is CO to start a new flock? (99)

6.3.3 applies to pasture used by a herd or a flock of sheep and not to pasture used for poultry. Pasture for poultry must be free of prohibited substances for 36 months prior to use (6.13.1 c). In other words, land can be in transition still when pullets are started, but the land must have *completed the necessary transition period and been granted organic status* by the time birds are ready to go out to pasture. Pasture is considered an organic crop and operators making their initial application must be in full compliance with the Standard for at least 12 months before it can be used by organic poultry (5.1.1).

Transition – outdoor runs

Does the requirement for a 36-month transition of land for crop production apply to the outdoor runs required to permit poultry access to the outdoors? (225)

Yes. Poultry eat when they go outside, even ingesting small amounts of soil. Since organic feed is required (6.4), all outdoor runs/pasture must have *completed the necessary transition period and been granted organic status* before being accessed by organic poultry.