Standards Interpretation Committee 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/CGSB 32.311).

Below are proposed answers to questions, raised by organic stakeholders, regarding the National Standards for Organic Agriculture. The proposed responses are subject to a 60 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Comment Period: May 10 to July 10 2012

General

Are "cell fusion" techniques used by seed breeders acceptable under the Standard? (123)

Cell fusion is only allowed within the same taxonomic family. Refer to the definition of Genetic Engineering in Section 3 (32.310)

Crop production

5.1 Land requirements for organic Crop production

Does the exemption from the rule prohibiting parallel production allow greenhouses to transition only part of their operation? (109)

Yes, the propagation portion of the operation may practice parallel production.

A producer is feeding all his organic livestock feeds to non-organic livestock. During storage they may be comingled with non -organic feeds purchased from off the farm. Is there any risk that by doing this the producer would compromise the ability to certify future crops from the same fields? (97.1)

No. At the point in time where separation between organic and non-organic feed is compromised, the feedstuff in question loses organic status. This has no effect on the organic

integrity of the field and the capability to produce organic feed in subsequent years. If feeding occurs on the field it must be non GMO feed.

Can parallel production be allowed if management to avoid co-mingling is documented? (1)

The standard (Section 5.1.2) prohibits parallel production of most non distinguishable crops by the same enterprise. Some exemptions do exist (e.g. perennial crops (already planted), agricultural research facilities, production of seed, vegetative propagating materials and transplants) with conditions. Refer to Section 5.1.2 for further details. Post harvest operations are not subject to this prohibition

5.3 Seeds and planting Stock

Does the requirement to use organic seed, tubers etc. (5.3.1) preclude the use of seed grown on transitional land within the same operation? (113)

Seed grown on transitional land is acceptable since it meets the requirements of 5.3.1 "grown in accordance with this standard", and has not been grown using prohibited substances or techniques.

5.6 Crop pest, disease and weed management

Can the Magnacide treated canal be considered the same as equipment and thereby be permitted for use if the water carried by the canal can be shown to be free from Magnacide residue? (104)

Yes. Although active substances in Magnicide are not allowed for application to organic production units, when a farm is using irrigation water not under the operator's control, the operator must take reasonable precautions against contamination with prohibited substances.

Livestock production

When livestock are being confined in the final finishing phase (see 6.8.7b), and are not subject to pasture requirements, must the confinement facility be located on an organic enterprise? (116)

Yes. Compliance to the Standard and verification by the CB is required of the areas used for finishing including all buildings, facilities and outdoor access areas which are utilized by the organic livestock. The remainder of the farm is not required to be organic.

Specific Production Requirements

7.1 Apiculture

Does any use of a prohibited substance within 3000 m. of an apiary automatically disqualify the honey from achieving compliance with the Standard? (115)

Yes. During the period when bees are feeding, the requirement contained in 7.1.9 for a buffer zone of 3000 meters is absolute and does not allow any leniency based on the concentration of, or probable risk posed by the prohibited substance.

Is the use of paraffin wax to treat hive materials acceptable in organic apiaries? (112)

Yes. The use of paraffin wax in this application being similar to plastic foundation, it is permitted if it is coated with beeswax (7.1.12.3)

7.1.9 states that apiaries must be separated by a buffer zone of 3000 meters from sources or zones where prohibited substances are present. Is there a transition time required between the last use of a prohibited substance in the buffer zone and the production of organic honey? (124)

There is no transition period required for the 3000 meter buffer zone. No prohibited substances can be present when bees are feeding.

Does the three year transition period apply to apiaries? (121)

No. The apiary site must comply with 7.1.7.1 which specifies that 12 months of organic hive management is required prior to the harvest of organic honey.

Preparation and handling of organic products

8.2 Product composition

Is collagen casing allowed in the production of organic sausage? (105)

Yes. Collagen casings are acceptable as an "agricultural product" and non-organic sources can be used if organic sources are not commercially available. All prohibitions listed in 1.4.1 apply.

Permitted Substances Lists

PSL for crop production

4.2 Soil amendments and crop nutrition

Can Potassium Sorbate be used as a preservative in kelp and fish products used as fertilizers? (110a)

Yes. Potassium sorbate can be used as a preservative in kelp and fish fertilizers provided it is from a non-synthetic source. The annotation for Aquatic plants & aquatic plant products and Fish Products in 4.2 states that synthetic preservatives, such as potassium sorbate from potassium hydroxide, are not permitted.

The manufacturer of a fish product soil and plant fertilizer desires to stabilize the product by reducing the pH below 3.5. Is this allowable? (114)

No. Table 4.2 (see "Fish products") states that using acid to achieve a pH level below 3.5 is prohibited

4.3 Crop production aids and materials

If fatty acids are allowed in organic production systems as a pesticide (PSL 4.3), are fatty acids allowable in fish and aquatic plant products used as organic fertilizers? (110b)

Fatty acids from plant and animal sources are allowed in fish and aquatic plant products used as organic fertilizers. They are not allowed if they are from synthetic sources, such as fatty acids extracted using hexane. For a synthetic to be allowed as an ingredient in an organic fertilizer, the substance must be included on the PSL Table 4.2.

Can a pesticide and a fertilizer be combined under the COR? (110c)

Yes. An operator wishing to use a pesticide in a fertilizer formulation must ensure that the requirements of 32.310 5.6.1 and 5.6.2 are fulfilled. Pest control substances listed on the PSL 4.3 can only be used when other cultural approaches fail and require the documented presence of the pest organism. Fertilizer applications must be applied according to plant's requirements based upon the plant’s growth stage.

PSL for livestock production

5.2 Feed, Feed Additives and Feed Supplements

Is a yeast derived protein included under the definition of micro-organisms and yeasts in section 5.2 of the PSL? (120)

A yeast derived protein is not a yeast. Protein sources for use in organic livestock rations must be in compliance with section 6.4.4.(32.310)

PSL for processing

6.6 Processing aids

Are there acceptable alternatives to gelatin, such as seaweed and plant derived hypromellose? (118)

Plant substances such as seaweed extracts are acceptable alternatives to animal-derived gelatine. Hypromellose is a synthetic, non-agricultural substance and therefore cannot be used because it is not specifically included in the PSL.