



Canadian Food  
Inspection Agency

Agence canadienne  
d'inspection des aliments



## Standards Interpretation Committee: Questions and Answers Regarding National Standards for Organic Agriculture

### CROP PRODUCTION and SPECIFIC PRODUCTION REQUIREMENTS

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Below are proposed answers to questions, raised by organic stakeholders, regarding crop production and specific production requirements under the National Standards for Organic Agriculture. All comments regarding these answers should be sent to [OPR.RPB@inspection.gc.ca](mailto:OPR.RPB@inspection.gc.ca)

#### **Q1: Can parallel production be allowed if management to avoid co-mingling is documented?**

The intent behind the present standard (Section 5.1.2) is a prohibition on parallel production of non distinguishable crops on the same enterprise. Post harvest operations are not subject to this prohibition (Reference, 5.1.2).

#### **Q2 :Can seeds be considered an input as opposed to a crop, for the purpose of allowing seed companies to practice parallel production?**

In the current Standards, seeds are not listed in the definition of inputs (Reference, 5.1.2).

#### **Q4 :Does the substrate for organic mushrooms need to be a) certified organic, b) composted?**

The operator should refer to 7.3.2. The growth substrate does not necessarily need to be composted. It does not need to be certified organic. Materials contained in the substrate, for which there are organic standards, must comply with 1.4.1 and be free from prohibited substances for a period of three years.

**Q6: Are there any exceptions to the rule against alternating between organic and non-organic production outlined in 5.1.6?**

The intent to section 5.1.6 is to prevent deliberate abuse. CB's may be faced with situations that fall in this definition; but, that do not demonstrate a deliberate abuse of alternating production. In these cases, the CB should note that the operator has violated 5.1.6, but recommend an exception to the rule (Reference, 5.1.6). These cases could include:

- instances where the loss of certification was beyond the control of the operator (e.g. mandated use of a prohibited substance, natural disaster, financial failure of the enterprise)
- instances where the loss of certification is unconnected to the management or operational decision making connected to the organic operation (e.g. death of a family member, marital distress, inter-generational transfer).

Other valid examples might also be presented.

**Q8 :Does the requirement, in 5.1.1, that land be in compliance with the Standard for 12 months prior to harvest apply to new fields added to and existing application?**

"The specific requirement of 5.1.1 for a production unit to have a full 12 months of supervision by a Certifying Body before a harvested crop, is intended for new operations. Existing operators adding fields to their management must demonstrate compliance with all other aspects of transition, including withdrawal periods for prohibited substances." (Reference, 5.1.1)

**Q11: Is the buffer zone around treated posts permanent or transitional?**

The Standards do not prescribe any mandatory buffer zone around areas where treated posts have been used in a compliance with the section 5.2.2 b of the Standards: *Acquisition of any additional material with these wood treatments is prohibited for new installations or replacement purposes. Exceptions may be granted in vast rangeland and semi-arid regions, and will consider the availability of alternate materials.* (Reference, 5.2.2).

**Q12: How close to a certified sugar bush can the use of a prohibited substance be allowed, without compromising the certification of the sugar bush?**

According to 5.1.4 and 7.2.1, the use of prohibited substances around maple production units would require the maintenance of buffer strips the same as those required for crop production (Reference, 7.2.1 7.2.8).

**Q15 :Are seeds produced on buffer strips able to be planted in organic fields?**

Seeds grown on buffer strips under the Standards are the same as those grown on conventional farms (see 5.1.5). Exceptions to the use of organic seeds are specified in section 5.3.2.1 (Reference, 5.3).

**Q16: Can non-organic common seed be used if organic common seed is not available?**

For the purposes of 5.3.2.1, "common" could be considered a varietal distinction subject to the exceptions to the use of organic seeds. See also section 3 Definition of "commercial availability."

**Q17: Are Corn and Soybeans considered "flower bearing crops" in reference to 7.1.9?**

Since the requirement for the 3000 metre buffer includes proximity to all substances prohibited in 1.4.1, the distinction between flower bearing and non flower bearing crops is irrelevant. Corn and soybean crops would still trigger the mandatory buffer zone unless managed in accordance with the Standards.

**Q18: Can a farmer irrigate land from an irrigation system that uses Magnicide?**

Active substances included in Magnicide are not allowed for application to organic production units. If equipment that has been in contact with prohibited substances is thoroughly cleaned and can be shown to be free from such substances, it may be used to irrigate organic farms. Although irrigation equipment is not specifically mentioned in the standard, the principle outlined in 5.6.3 should apply.

**Q26: Does the use of a "peat moss/compost etc. mix" satisfy the requirements of 7.5.1 for "a container system with soil"**

A26: Section 7.5.1 allows for container grown production with soil and prohibits hydroponics and aeroponics. In hydroponic production the soil is replaced by an inert substance. A compost and peat moss mixture does not constitute an inert substrate thus satisfies the requirements of "a container system with soil".

**Q32: Do the restrictions in 5.5.2.5 apply also to the livestock grazing in orchards?**

A32: The requirements of 5.5.2 are intended to prevent contact and possible bacterial contamination between the manure and the crop. This section does not necessarily apply to the harvest of orchard crops exclusively from the trees (no ground picking) and the presence of grazing animals and their droppings in the orchard does not violate the standard.