



# Activity report

June 21 2013

The Standards Interpretation Committee (SIC) has analyzed comments issued under the two last public consultations on answers to questions issued by the organic sector. The SIC final answers are described below. All these final questions have been transferred to the SIC Final Q&As posted on [OFC website](#).

## **Q&As commented under the January 23<sup>rd</sup> to March 22<sup>nd</sup> 2013 public comment period**

### **General Principles and Management Standards**

#### **1. Scope**

**Is Lysine, produced using a fermentation process and a specially selected bacteria synthetic or non-synthetic? Providing the bacteria are non-GE, would this form of Lysine be compliant with the standard if used as an ingredient in livestock feed? (145)**

REVISED ANSWER:

Lysine products such as lysine sulphate produced through biological fermentation fall within the Standard's definition of non-synthetic and are allowed. The bacteria which is used in the fermentation process must be non-GMO. Products grown on GMO substrate are allowed only if there is no commercially available alternative. Product grown on GMO substrate must be tested to ensure that the final product contains no GMO material. All forms of lysine HCL are non-compliant due to post fermentation chemical processing. Preference should be given to sourcing high lysine grains and legumes.

**Is the use of ultraviolet radiation to diminish microbial flora admissible in foods such as milk and cheese? (152)**

REVISED ANSWER

Ultraviolet light does not fall within the definition of Food Irradiation as set out in "Definitions" (3.1) and prohibited in (1.4.1 h). It is therefore not prohibited as a treatment of organic food at this time, however 7.2.12.2 prohibits the use of ultraviolet light to sterilize sap. The question of

whether or not to revise the Standard to include a clarification of the use of ultraviolet radiation has been referred to the Organic Technical Committee.

## **5. Livestock production**

**Is the space requirement for cattle (6.8.8) the same for all breeds or can an adjustment be made for smaller animals such as Jerseys? (158)**

ANSWER NOT REVISED

The Standard does not make a distinction for breeds of different sizes. The space requirements are the same for all cattle.

## **Permitted Substances Lists**

**Can a coloured wax containing paraffin waxes (hydrocarbon or microcrystalline wax) and a colouring agent be used to coat organic cheese? (154)**

REVISED ANSWER

No. Wax may be considered a component of the aging and processing of the final product. Therefore wax as listed in table 6.4 and 6.6 must be non-synthetic only: a) carnauba wax and b) wood resin (processing product of resin component)". The requirements for colouring agents are ; "from non-synthetic sources only and shall not be produced using synthetic solvents and carrier systems or any artificial preservative".

## **Q&As commented under the**

**March 25<sup>th</sup> to May 24<sup>th</sup> 2013 public comment period**

## **General Principles and Management Standards**

### **7. Specific Production Requirements**

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

ANSWER NOT REVISED

The requirement contained in 7.1.9 for a buffer zone of 3000 meters does not allow the presence of prohibited substances or their residues that present a risk of contamination to bees and their products during the period when the bees are feeding. Products such as but not limited to systemic seed treatments, agricultural pesticides, herbicides or GMOs may not be present within the buffer zone. Non-agricultural incidental presence of prohibited substances used on residential properties within the 3000 m buffer zone may pose an insignificant risk and not prevent compliance with the standard. Contaminants used by neighbouring home owners and other non-agricultural prohibited substances must be assessed as to the risk they pose to the bees and the honey.

**What potential contaminants are specifically prohibited, and which ones may be assessed according to the risk they pose? (115b)**

ANSWER NOT REVISED

Agricultural pesticides, herbicides and systemic seed treatments, as well as GMO crops within the 3000 m buffer zone always result in non-compliance. Potential contaminants used by neighbouring home owners and other non-agricultural prohibited substances can be assessed as to the risk they pose to the bees and the honey. Generally, low density rural residences within the 3000 m buffer zone may not present a high risk if it can be established (e.g. with an affidavit) that there is no routine use of prohibited pesticides or herbicides. High density housing areas such as subdivisions or cities are however not suited to organic honey production if within the buffer zone of the hives, as use of prohibited substances are more difficult to detect and control.

Organic honey production typically cannot take place if the following are found within the 3000 m buffer zone: golf courses, garbage dumps or landfill sites, industrial complexes, very busy roads, or commercial non organic greenhouses/nurseries. There may be extenuating circumstances that must be assessed by certification agencies in each case.

**Permitted Substances Lists**

**Can potassium sulphate which has not been mined, but manufactured by combining mined potassium chloride, mined sodium sulphate and water, be used as a soil amendment in accordance with the PSL? (166)**

REVISED ANSWER

Yes. Potassium sulphate produced from combining two mined minerals is permitted; however, mined minerals may not be processed or fortified with synthetic chemicals except where specifically permitted in the annotation. Potassium sulphates made using reactants such as sulfuric acid or ammonia are prohibited.

**What are the requirements for feedstock used to create microbial soil amendments? (167b)**

REVISED ANSWER

The requirements for feedstock used to create microbial soil amendments are distinct for two separate groups of product; i) microbial products containing no residue of the substrate: for these, the feedstock does not require assessment. ii) product in which the microbial is delivered along with a remnant of the feedstock : here feedstock materials must comply with Table 4.2 - PSL.

**Can acetic acid solution be used as a weed control product in organic production? (172)**

ANSWER NOT REVISED

Yes - In a previous version of the PSL, acetic acid appeared as a substance for use in weed control with the annotation "non synthetic sources unless commercially unavailable". During a subsequent blending of several tables it was dropped. The use of acetic acid for weed control is not contrary to organic principles, but to date no commercial products have been registered for use by PMRA (Pest Management Regulatory Agency) within crops.

## **Q&As not commented under March 25<sup>th</sup> to May 24<sup>th</sup> 2013 comment period**

### **General Principles and Management Standards**

#### **5. Crop production**

**Does the presence of animal droppings in fields, orchards and vineyards require a waiting period as prescribed in 5.5.2.5? (159)**

5.5.2.5 does not apply to incidental animal droppings such as those from wild animals or birds, grazing or working animals; however, 5.5.2.4 (a) does apply and requires diligence on the part of the operator to ensure that any activities under his/her control do not cause pathogenic microbial contamination of the crop.

#### **6. Livestock production**

**What are the indoor and outdoor space requirements for pullets (immature laying hens)? (160)**

While there are no indoor or outdoor space requirements for pullets specified in the Standard, Section 6.8 gives extensive guidance in evaluating living conditions, according to the needs of livestock. All of these requirements apply to pullets as well. In addition, since pullets are growing birds similar to broilers, the maximum density of 21 kg/m<sup>2</sup> set out for broilers in 6.8.11.9 can be used as guidance.

#### **8. Preparation and handling of organic products**

**Does paragraph 8.2.1 c., which excludes salt from the calculation of organic percentage, apply only to sodium chloride, or could a sodium free substitute, such as potassium chloride also be excluded? (165)**

Yes. The intent of 8.2.1 c. is to exclude salt from the calculation. If the sodium free substitute serves the same purpose as sodium chloride, it may be excluded from the calculation. The authors of the standard were likely referring to sodium chloride, but their intent could still be respected by treating sodium free salts with the same exclusion, provided that these serve only the same purpose in the product.

**When processing a product which will be sold as 70-95% or 95% organic, must the operator use processing aids listed on the PSL (Table 6.6) exclusively? (20b)**

When manufacturing a 70-95% or 95% organic product, all non-agricultural processing aids must be listed on in PSL 6.6 and all annotations complied with. If the processing aid is an agricultural substance the organic form must be used if commercially available. If not commercially available, non-organic agricultural processing aids can be used but must comply with 1.4.1.a, h, k and l and if listed in PSL 6.6 the annotations must be complied with.

**Can stevia be used as a sweetener in organic products? Is non-organic stevia admissible under the 5% non-organic ingredients rule? (171)**

Stevia is a plant product which can be used in the manufacture of organic products. As stevia is commercially available in organic form, this form must be used.

**Permitted Substances Lists**

**4.2 Soil amendments and crop nutrition**

**Can fertilizers used as soil amendment in organic production be supplemented with synthetic substances? (167a)**

If a compliant soil amendment is enhanced or changed using additional substances, those substances must appear on Table 4.2 in order for the resulting soil amendment to be compliant.

**6. Permitted substances lists for processing**

**Does the Standard require that processing aids in the production of non-organic ingredients be listed on Table 6.6 PSL? (20a)**

No. The processing aids used by manufacturers of these ingredients are not subject to the scrutiny of Certification Bodies.

**Can the mineral salts of ascorbic acid (calcium ascorbate and sodium ascorbate) be used as food additives (Table 6.3)? (163)**

No. Ascorbates are not the same substance as ascorbic acid, and therefore cannot be used unless Table 6.3 of the PSL is revised to include them.