

# Questions and Answers Regarding National Standards for Organic Agriculture

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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](mailto:OPR.RPB@inspection.gc.ca)

## Comment period – January 25 to February 25 2018 REPORT

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## General principles and management standards

### 6 Livestock production

#### Milk to replacement kids

##### **COMMENTED – NOT REVISED – TRANSFERRED TO FINAL Q&As**

##### **Can non-organic reconstituted milk be given to the replacement kids in an organic goat dairy herd if the 12 month transition for the kids is respected? (394)**

No. The exception for 6.2.3 only applies to herds and animals in transition to organic production. 6.4.3 d) provides specific requirement for lambs and kids which only permits organic milk (fresh whole or reconstituted). 6.4.7 only permits non-organic feed in the case of a catastrophic event or a regional shortage for breeding herds. 6.4.7b also specifies that 6.2.3 applies to offspring.

#### Parallel livestock production

##### **COMMENTED – NOT REVISED – TRANSFERRED TO FINAL Q&As**

##### **Can organic meat birds be raised on the ground floor with access to the outdoors and non-organic birds raised on the 2nd and 3rd floor of the same barn? (393)**

Using the same barn for organic and non-organic poultry production would be very difficult to achieve. For the ground floor of a barn to be considered a "separate production unit," complete separation would need to be ensured and documented. This would include having completely separate watering systems, air flows, pest control, biosecurity, effective equipment systems for dust control, feed and input delivery, storage, and preparation activities. Clear identification and separation of flocks would be required by breed and/or by stage of production

### 7.1 Apiculture

#### Treated hives

##### **COMMENTED-REWORDED**

##### **Reading clause 7.1.15.7, does the term "treated hive" apply to the containers present at the time of the treatment only or does it also apply to any clean or untreated temporary containers, such as honey supers in summer time, and unused frames? (391)**

The term "treated hive" only applies to the container(s) and colonies present at the time of the treatment, and not to supers or frames removed from a hive prior to treatment. However, the wax from any super or frames added to the treated hive during the 12-month transition period would need to be replaced with organic wax at the end of the transition period in order to return to organic production.

##### **REVISED WORDING – TRANSFERRED TO FINAL Q&AS**

The term "treated hive" applies to the container(s) present at the time of the treatment, and not to supers or frames removed from a hive prior to treatment. However, the wax from any honey super frame or brood frame of the treated hive present or added during the 12-month transition period would need to be replaced with organic wax at the end of the transition period in order to return to organic production.

The bees in the colonies, that is the hives plus bees, that were treated must also complete a transition period (7.1.8.1 in 32.310)

## 8 Maintaining organic integrity during cleaning, preparation and transportation

### Pest control in food processing facilities

#### **TRANSFERRED TO FINAL Q&As**

**Clause 8.3.2 states that table 8.2 & 8.3 substances can be used in food processing facilities to control pests. Can substances listed in Tables 4.2 & 4.3 be used as well? For example pheromones (4.3) and sodium tetraborate (4.2)? (392)**

No. Only substances in the table referenced are applicable. Please refer to CAN/CGSB-32.310 clause 8.3.3 for alternative pest control options for food processing facilities.

### Permitted substances lists

#### Table 4.2 Soil amendments and crop nutrition

### Calcium chloride

#### **COMMENTED-REWORDED**

**Is calcium chloride made from the purification of naturally occurring brine allowed under the listing of "Calcium" in Table 4.2? (384)**

No. The chemical alterations that occur during the sequence of steps in purifying the naturally occurring brine render the calcium chloride synthetic according to the COS (see "Mined Minerals, unprocessed" in Table 4.2). Only non-synthetic calcium chloride may be used to address nutrient deficiencies and physiological disorders.

#### **REVISED WORDING – TRANSFERRED TO FINAL Q&AS**

Yes and No. Yes. Calcium chloride that is purified from naturally occurring brine via evaporation is allowed. Such calcium chloride may be used to address nutrient deficiencies and physiological disorders. No. Other purification processes of naturally occurring brine that involve additional processing steps (e.g., bromine removal, sulphur oxide addition, use of strong acid precipitation agents or lime, etc.) render the calcium chloride synthetic according to the COS (see "Mined Minerals, unprocessed" in Table 4.2).

#### Table 7.3 - Food-grade cleaners, disinfectants and sanitizers permitted without a mandatory removal event

### Peracetic acid containing synthetic acetic acid

#### **COMMENTED-REWORDED**

**Is peracetic acid that contains synthetic acetic acid permitted? (390)**

Yes. Commercially, peracetic acid is produced by reacting synthetic acetic acid and hydrogen peroxide. Therefore both of these reactants are acceptable in peracetic acid products.

#### **REVISED WORDING – TRANSFERRED TO FINAL Q&AS**

Yes. Commercially, peracetic acid is produced by reacting synthetic acetic acid and hydrogen peroxide and residues of both reactants will more than likely be present. As there is no restriction in the peracetic annotation in PSL Table 7.3, peracetic acid products containing residual amounts of hydrogen peroxide and acetic acid are permitted for use in direct contact with organic products without a removal event.

## REWORDED Q&As

- **Q77 – Seed treatments - Original Q&A**

### **SUSPENDED – REVISED WORDING WILL BE SUBMITTED LATER**

Seed - Treatments

#### **What is the definition of “untreated seed” as it applies to 5.3 (32.310)? More specifically, does the use of “bleach cleaning” render the seed outside this definition? (77)**

Untreated seed is seed which has not been treated with pesticides prohibited by the standard. It does not denote seeds that have been cleaned. Table 4.3 lists substances which can be used to clean or disinfect seeds, including peracetic acid for example. Organic seed may not be cleaned with chlorine bleach as it is not listed on Table 4.3 for this purpose.

#### **Revised wording**

#### **What is the definition of “untreated seed” as it applies to 5.3 (32.310)? More specifically, does the use of “bleach cleaning” render the seed outside this definition? (77)**

Untreated seed is seed which has not been treated with pesticides or seed pelletizing/coating/priming substances not permitted by the standard. It does not refer to seeds that have been cleaned. 32.311 Table 4.3 lists substances which can be used to clean or disinfect seeds, including peracetic acid for example. Organic seed may not be cleaned with chlorine bleach as it is not listed on Table 4.3 for this purpose. (see Table 4.3 “Treated seed”)

- **Q12 – Treated posts - Original Q&A**

Treated posts

### **TRANSFERRED TO FINAL Q&AS**

#### **Is the buffer zone around treated posts permanent or transitional? (12)**

The standard does not prescribe any buffer zone surrounding treated fence posts. This must be determined on a case by case basis and would be based on installation date

#### **Revised wording**

#### **Is the buffer zone around treated posts permanent or transitional? (12a)**

The standard does not prescribe any buffer zone surrounding treated fence posts. The only time a buffer zone may be necessary is when a neighbour installs treated posts adjacent to your cropping zone. The status and width of the buffer in these circumstances will be determined on a case by case basis.

#### **What happens when an applicant installs treated posts? (12b)**

If a commercial availability search was not done, a 36 month transition period dating from the installation of the treated posts applies to the specific production unit (e.g. field(s)) where the posts were installed.

**What happens when an existing organic operation installs treated posts? (12c)** This could lead to decertification if proper commercial availability due diligence (5.2.3a) cannot be demonstrated.

- **Q166- Potassium sulphate - Original Q&A**

Potassium sulphate

**TRANSFERRED TO FINAL Q&AS**

**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)**

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. (see "Mined Minerals, unprocessed" PSL Table 4.2)

**Revised wording**

**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)**

Yes. Potassium sulphate produced from combining two mined minerals is permitted (see 'd' ) "potassium sulphate" under the potassium listing - PSL Table 4.2); however, in general, 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. (see "Mined Minerals, unprocessed PSL" Table 4.2)