

# 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)

## REPORT

### Comment period –January 8<sup>th</sup> to February 8<sup>th</sup>, 2019

Note: The questions and answers in this report were published in the [Final Questions and Answers- Canadian Organic Standard](#) on April 19, 2019.

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## TRANSFERRED TO FINAL Q&AS

### General Principles and management standards

#### 1.4 Prohibited substances, materials or techniques in organic production and preparation

##### Ultraviolet radiation of organic products

#### **Is ultraviolet radiation of organic products such as milk, cheese and fruit juice acceptable under the COS? (152, 338, 419)**

Near and medium ultra-violet rays are classified as non-ionizing radiation and can be used on organic products. But neither near nor medium ultra-violet rays can be used to boil (7.2.14) or sterilize (7.2.12.2) tree saps such as maple or birch. Far ultra-violet radiation cannot be used on organic products. All forms of ultra-violet radiation can be used to sterilize packaging prior to filling.

##### Parasiticide treatment after 12 months

#### **How many parasiticide treatments may be given to meat animals older than 12 months? (406)**

A meat animal can receive one parasiticide treatment within its first year. A total of two parasiticide treatments are permitted within a meat animal's lifespan (see 32.311 6.6.11 d).

##### Bedding for poultry

#### **Is an operator obligated to provide bedding for poultry (as in 6.7.1g), or is it enough to allow litter to "build up" from poultry waste without adding anything? (426)**

Yes. Per 6.7.1g bedding must be provided from the onset of a cycle to "establish and maintain animal living conditions that accommodate the health and natural behaviour of animals". The bedding should be sufficient enough to maintain the animals clean, dry and comfortable. It should also permit the birds to express their "scratching" behavior. Note: 6.13.6 may mislead readers to think litter may be supplied, but the sentence should be read as "Bedding shall be provided and litter kept dry."

##### Laying hens sold for organic meat

#### **In order for spent organic laying hens to be sold at the end of their laying life for organic meat or organic processing, are they required to meet the requirements in 6.13.1 h) that barn raised meat chickens have daily outdoor access by 25 days of age? (411)**

The issue of spent hens has not been specifically addressed in the standards and will be during the current review. Pullets with access to outdoors (6.13.1 h) - 2nd sentence) would easily meet the requirements for meat birds. Pullets that are confined miss the intent of the requirements and therefore cannot be sold as organic meat (6.13.1 h - 1st sentence). Another approach is a comparison on life cycles. As 25 days represents approximately 2/3 of the life of a meat bird raised to an average of 40 days, this means that for approximately 1/3 of its life (15 days), this bird must be able to get outside. Based on that logic, a spent hen slaughtered at 18 months of age (548 days) would have needed to spend 183 days outside to qualify as organic meat, unless weather conditions endanger the health or safety of the birds.

### Measurement of outdoor space

**Does the outdoor space requirement for poultry described in 6.13.9 refer to the total pasture area available for the year, or to the total area available at any given time? In other words, if an operator is rotating poultry between pastures, is each pasture required to meet the space requirements, or is it calculated from the total pasture that will be available throughout the year? (425)**

6.13.9 refers to the total area available at any given time and does not include the pasture the flock cannot access. Read 6.13.11 for further insight.

### Calculation of poultry densities

**Are the poultry densities in Table 4 of 32.310 per flock? Or averaged over a year? (415)**

32.310 6.13.9 Table 4 states maximum densities at any given time. This aspect of the standard is currently under review.

COMMENTED – REVISED – TRANSFERRED TO FINAL Q&AS

## 6 Livestock Production

### Offspring born under transition

**Can livestock offspring be considered organic for meat, if they are born on a production unit in transition, prior to the end of the final 12 months of transition, 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 is ~~considered certified organic~~ has completed the 36-month transition can be considered organic for meat.

### Organic food waste as feed

**May livestock be fed organic food waste containing 95% or more organic ingredients? What about food waste stemming from products only containing 70-95% organic ingredients? (418-372)**

Livestock may be fed organic food waste ( $\geq 95\%$  organic content) certified in accordance with 32.310 subclause 9.2.1. Food products containing 70-95% organic ingredients and compliant with 32.310 subclause 9.2.2 can only be fed to livestock according to the derogation in 6.4.7. The subject of this Q&A is under review by the 2020 CGSB Technical Committee.

## Permitted substances lists

### Tables 4.2-4.3

### Amino acids produced by hydrolysis processes

**Are amino acids produced by hydrolysis processes using sulphuric and phosphoric acid permitted? (422)**

No. When used in crop production, amino acids ~~extracted or isolated~~ cannot be produced by hydrolysis ~~cannot be treated with~~ using chemicals such as sulphuric or phosphoric acid. See 32.311 4.2 and 4.3 Amino acids b).