

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/CGSB32.311).



Comment period – May 1, 2020 to May 30, 2020

REPORT

Note: The questions and answers in this report were published in the Final [Questions and Answers – Canadian Organic Standard](#) on June 29 2020.

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General Principles and management standards

5.1 Land requirements for organic production

COMMENTED-REWORDED

Owning organic and non-organic operations

If an operator owns two land-based operations, where one is organic and the other conventional, does the non-organic operation have to transition to organic as outlined in 5.1.3 and 5.1.4? (488)

If the non-organic operation is a separate legal entity, then it is not subject to organic transition certification requirements in 5.1.3 and 5.1.4. But if the non-organic operation is not a separate legal entity 5.1.3 & 5.1.4 are applicable and the operation is subject to the purview of the CB. (See 'legal entity' description in C.2.4.4 in the COR Operating Manual).

6.4 Livestock feed

COMMENTED-MODIFIED

Vegetable matter

Regarding the 'vegetable matter' element in requirement for poultry and pork (6.4.3 j) (340):

- a) is organic vegetable matter required?**
Yes. Organic vegetable matter is required.
- b) would non-cereal grains (soybean, flax, corn) count as vegetable matter?**
No. Vegetable matter is referring to fruit (apples, pears etc.) and vegetables (lettuce, potatoes, squash, etc.) and the associated crop waste and forage (straw, hay).
- c) would straw and seed cleanings count?**
Yes - for straw. No - for grain-based seed cleanings.
- d) would a grassed access area count?**
Yes. Organic pasture would qualify as vegetable matter.
- e) would alfalfa meal or pellets count?**
Yes. Alfalfa in any format satisfies the current requirements.

This vegetable matter fraction can be supplemental to the feed ration or can be included in the feed ration.

7.5 Greenhouse crops

COMMENTED – NOT MODIFIED

Use of a prohibited fungicide in greenhouses

If a grower covered the soil in a greenhouse container system and then sprayed a prohibited substance, can the soil be used in containers in subsequent cropping cycles if tests show that it does not contain any residues of the prohibited substance? (477)

No. Residue testing cannot be used as a substitute for required organic management practices; organic operators must not apply prohibited substances as per 1.4.

Could this container soil be used for organic production after 12 months?

No. Even though the soil was covered, and testing was done 7 months later showing no residue - 36 months of transition is needed from the fungicide application for a compliant soil (see 'Soil' Table 4.2 of PSL). The 12-month period is only applicable to new operations per 5.1.1. Furthermore, keep in mind it is up to the CB if there was deliberate abuse alternating between organic and non-organic methods in this production unit which may lead to decertification. (See SIC Q&A #6)

Permitted Substances Lists

COMMENTED AND REWORDED

Formulants – Soil amendments & crop production aids

Are the restrictions in the formulant listings in Table 4.2 & 4.3 only applicable when formulants are specifically mentioned in an annotation? Or do the annotations for formulants apply whenever a substance contains a formulant? Case in point, may repellents contain formulants? (483)

The formulant listings apply whenever a substance contains a formulant unless a specific derogation is identified in an annotation. In the case of repellants: PMRA List 4 formulants are allowed in *Repellents* listed in Table 4.3.

Livestock production

Hydrogen peroxide for drinking water

Can hydrogen peroxide that is used to treat drinking water for humans but is not necessarily rated 'food-grade' be used to treat livestock drinking water? The hydrogen peroxide annotation in PSL table 5.3 stipulates "food-grade" is required. (486)

Yes, Hydrogen peroxide approved to treat drinking water for humans is considered equivalent to food-grade for the purpose of treating livestock drinking water.