



THE ORGANIC FEDERATION OF CANADA NEWSLETTER

December 2013

Canadian Organic Standards under the spotlight

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Summary of recommendations made by the Organic Technical Committee at the Canadian Organic Standards Review meeting held December 11-13 in Gatineau Report on the first meeting of the Technical Committee held in December 2013

From December 11 to 13, 2013, the CGSB Technical Committee on Organic Agriculture (TC) met to discuss the standard that defines organic production, to ensure that we have an authentic and reliable Canadian organic label.

Six Working Groups presented their recommendations on various requests for modifications to the standard. The TC accepted many of the 116 WG recommendations that were brought to its attention.

The meeting was chaired by Hugh Martin, with secretarial assistance from Mark Schuessler (CGSB) and Kelly Monaghan, our “organic scribe”.

Many of the recommendations called for improvements in translation and wording to make the text of the standards clearer. Other recommendations dealt with introducing or modifying organic production practices.

The following paragraphs present some of the decisions made by the Technical Committee on proposed recommendations. These recommendations (though some could be still reconsidered by Working Groups or by the TC) will be subjected to a public comment period and ballot in 2014.



From left to right: Kelly Monaghan (Ash Street Organics), Mark Schuessler (CGSB), Hugh Martin, Andy Hammermeister (OACC), and Sally Blackman (CPMA), considering recommendations made by the WGs.

Crop Production

The Crop Production WG, led by Jean Duval, presented a number of recommendations to the Technical Committee.

The TC supported the recommendation that seeds should not be categorized as organic inputs, since unlike substances, they are living organisms and can be certified organic. Their inclusion in the definition of “input” is possibly misleading.

In relation to existing certified operators adding new production units to their farm, the TC agreed that *“New production units which are added to a currently certified operation do not need the 12-month pre-certification; however they require a land-use affidavit to confirm that substances prohibited by par. 1.4.1 and substances not in PSL were not used”*.

The TC did not support the request for more soil testing, as it did not see a need to add more requirements to this section. The Permitted Substances Lists (PSL) already covers testing for the use of micronutrients and some secondary nutrients. In addition, par. 5.4.1 of the standards requires operators to aim for an optimal balance of nutrients, and par. 5.5.2.2 recommends soil testing for nutrient management in relation to manure applications.



The Technical Committee on Friday - From left to right: Kelly Monaghan, Mathew Holmes, Laura Telford, Elizabeth Corrigan, Mélissa Landry, François Labelle, Dag Falck, Roxanne Beavers, Jacques Dallaire, Shannon Jones, Rebecca Labonté, Anne Macey, Sally Blackman, Jean Duval, Gérard Bouchard, Connie Kehler, Rochelle Eisen, Ted Zettel, Arnold Taylor, Hugh Martin, Jennifer Hillard, Terry Caunter, Ron Hamilton, Maureen Bostock, Bill Barkley, Serge Lefebvre, Susan Smith, Nicole Boudreau.. In front: Mark Schuessler, Janine Gibson.

The use of burning for documented pest, disease and weed problems was clarified. The TC agreed that *“Organic management practices include cultural practices ...and physical techniques (e.g. flaming against weeds, heat against diseases)”* (par. 5.6.1).

The TC rejected requests to modify requirements related to off-farm sources of manure, as criteria that would need to consider stocking rates and distances from sources would be difficult to implement and enforce.

The TC also stated that when *“livestock are used as part of the cropping or pest control program, a management plan must be in place to ensure that the livestock are controlled and that their manure or manure-related contamination does not reach the harvested portion of the crop.”* (Modified in par. 5.5.2.5)

Par. 5.6.3, the rule applying to cleaning application equipment, was simplified: the TC suggested that the need to replace equipment parts from which residue cannot be removed should be erased. The standard will simply state that *“Application equipment (e.g. spray equipment) used for soil nutrient supplements, disease or pest management on the enterprise shall be cleaned thoroughly between applications to remove residues of applied substances prohibited by par. 1.4.1.”*

Several issues were sent back to the WG: the issue of using treated posts still requires thoughtful consideration and the use of plastic mulches has been submitted to the attention of the Crop PSL WG. No agreement was reached about adding hydroponics to organic production.

Specific production requirements

The Crop WG also analyzed petitions about maple and mushroom production. The section on maple production will be clarified, as the French and English versions were deemed to not be fully equivalent, but no major changes to the standard were recommended.

The entire section on mushroom production will be reorganized. The TC also supported the use of non-organic substrates, if organic substrates are not commercially available: *“The operator may use non-organic ones provided that they are composted according to the composting requirements for soil amendments as outlined in CAN/CGSB-32.311. If not composted, they must come from an organic source.” (par. 7.3.2)*

The Apiculture Working Group, led by Bill Barkley, proposed to modify the 3-km buffer zone requirement in par. 7.1.9 and to redefine some requirements related to organic honey production. To encourage organic honey production in the context of the loss of honey bees in Canada, the WG proposed to exclude fertilizers from the list of substances prohibited in the 3-km buffer zone, as bees only forage when crops are flowering, and not when fertilizers are used. The WG even proposed to allow a small percentage of GE crops in the buffer zone, as long as they are not insect-pollinated. The TC considered these proposals and suggested some modifications, which will be reviewed by the WG and presented at the next TC meeting.



Thank You, Sponsors of the Canadian Organic Standards Review!

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These sponsors are part of the Canadian organic economy, and OFC and the whole sector thank them all!

Livestock Production

Chaired by Anne Macey, the Livestock WG submitted many recommendations that were supported by the TC. The main decisions are summarized in the following paragraphs.

There was no support for relaxing the rules to allow for transitioning meat animals in organic pork production, and the TC deemed it unnecessary to change this section. There is already an allowance for non-organic bred gilts or sows, if they are fed organically for the last trimester. The additional time a farmer who wants to establish a pig herd would need to have a certified organic pork product wouldn't be significant, especially when a sow has a life of 3-4 years.

Par. 6.2.2.d.i was revised to be more precise; the term “birds” was replaced with “these day old chicks or the eggs they hatch from”. This paragraph now reads: *Poultry used for edible poultry products shall be poultry that has been under continuous organic management, in accordance with this standard, beginning no later than the second day of life; these day old chicks or the eggs they hatch from shall not have been given any medication other than vaccines.*



Rules about breeding stock were reaffirmed; par. 6.2.3 will require non-commercial availability to be documented for non-organic breeding stock. It will also specify that ...*“Livestock from non-organic sources shall not be considered as organic breeding stock outside the organic operation or as organic slaughter stock.”*

The TC refused to adhere to the skip-a-day feeding practice for breeding birds to prevent obesity. It held that a better option is the inclusion of cut hay in the ration to increase volume without leading to weight gain. Par. 6.4.3.f reads: *“For poultry, feed shall be available every day. Breeding birds shall not be on a “skip-a-day” feeding regime”.*

Another revision provides greater flexibility to modify grain rations in order to maintain the weight of animals over the winter months, while still ensuring that the principles of organics are upheld and animal health is not compromised. Par 6.4.1 c reads: *“An increase in the grain ration is allowed to ensure the animal's nutritional requirements are met when there is extreme cold or when forage quality is compromised due to extreme weather events.”* However, par. 6.4.3 b is still predominant: *“For ruminants, ... at least 60% of dry matter in daily rations consists of hay, fresh/dried fodder or silage”.*

The TC endorsed the use of sexed semen if it is mechanically separated. The members also revised the guidelines about transportation of animals, proposing that *“animals shall be assessed for fitness for transport before loading. Unfit or ill animals shall not be transported.”*

A new paragraph states that euthanasia *“shall be performed by competent personnel with appropriate equipment. The method used shall be quick and cause the least possible pain and distress”.*

The TC refused to reconsider the length of the transition period for poultry, as the current standard is no longer an impediment to small producers and family farms, and since organic pullets are now available.

A new paragraph recognizing the use of multi-level systems will be added at 6.8.11.10: *“Multi-level systems for layer flocks (aviary systems) shall have no more than three levels (tiers) above ground level. Total floor space for calculations of solid area requirement (6.8.11.6) and bird density (6.8.11.9) shall include all usable floor levels. When winter gardens are used to provide required scratching areas they shall be accessible year round.”* The Livestock WG and the TC believe that aviary systems provide additional welfare benefits, as they supply an enriched environment that allows birds opportunities to express natural behaviours.



From left to right: Nicole Boudreau (OFC), Dag Falck (ALL PSL Convener), Jean Duval (Crop WG Convener), Roxanne Beavers (PSL Processing Convener), Hugh Martin (Chair of the TC), Anne Macey (Livestock WG Convener), Ted Zettel (Permanent PSL Committee Convener), Rochelle Eisen (Preparation Convener). Sitting: Janine Gibson (PSL Livestock Convener).

New guidelines for the large-scale production of pullets were proposed. To help build resistance in a system where medications are not used, young birds undergo an immunization program before they have access to the outdoors. A clause would thus be added to 6.8.11.1 that specifies: *(6.8.11.1f) Pullets may be kept indoors until birds are fully immunized.*

Onset of lay is very stressful for birds and often makes them more susceptible to disease. Furthermore, in most of Canada, layers are confined for 5-6 months in winter. Despite this, a minimum outdoor access period of one third of its laying life, or 4 months, is possible in all regions. The TC hence proposes the following: *Laying birds may be confined during onset of lay (i.e. until peak production is reached). The laying flock shall have outdoor access for a minimum of 1/3 of its laying life.*

Finally, the TC accepted to amend par. 6.8.11.9 and to propose the following stocking rates:

	Indoors	Outdoor runs
Layers	6 birds/m ²	4 birds/m ²
Pullets 0-8 weeks	<u>24 birds/m²</u>	
Pullets 9-18 weeks	<u>15 birds/m²</u>	
Broilers	21kg/m ²	21 kg/m ²
Turkeys/large birds	26kg/m ²	17 kg/m ²

Preparation and handling of organic products

Rochelle Eisen is the Convener of the Preparation WG, which also manages modification requests related to the Definitions and Introduction of the 32.310.

The TC began by agreeing that it would be premature to create a personal care product or a textile task group, as the current Organic Products Regulations are limited to food and livestock feed.

Par. 1.4.1 has been subject to a major modification proposition: microorganisms and other products of biofermentation that are grown on genetically engineered substrates, but that are not themselves a product of genetic engineering, will be permitted only when specifically allowed in Permitted Substances Lists. In the current standards, only vaccines grown on GE substrates are allowed. The extension to microorganisms and other products of biofermentation will help prevent disruption of organic production where products grown on non-GE substrates are not commercially available.



In relation to record keeping, supporting documents such as visual aids (maps, work-flow charts etc.) have been suggested to help clarify organic production and processing activities. The TC also decided that the petition to reduce the length of time that records must be retained was not persuasive.

Par. 8.3.5 was revised to read: “When organic products require packaging, it should be kept to the minimum required to prevent loss of organic integrity. Packaging materials that minimize harm to the environment throughout their life cycle are preferred.”

Use of lures and repellents listed on the PSL has been clarified in par 8.4.1. The TC also rejected a petition to prohibit the use of fluoridated water in organic preparation, as there are a number of compounds in water systems that could be of equivalent concern. Introducing such criteria would require operators to install reverse osmosis (RO) systems wherever water is fluoridated. RO is not considered a benign technology either.

The TC rejected the proposition to include calcium compounds in the total net mass of combined organic ingredients used to calculate the percentage of organic ingredients in livestock feed. Most poultry feeds would not qualify for >95% organic status (only 70-95%) if calcium compounds are not subtracted from the total net mass (which also excludes water and salt).

Finally, the TC refused to impose mandatory rinsing with water and to modify 8.3.8 to remove non-approved cleaners. Depending on equipment configuration, purging, for example, may be the preferred removal procedure. As currently worded, the standard allows the operator and the Certifying Body to determine if the removal process used is sufficient.

Par 8.5.1 will also remain unmodified: there should be no need for milk trucks to be washed in a certified facility, provided there is documentation available to show that the substances used in the cleaning process have been removed.



Permitted Substances Lists in Crop Production

The PSL Crop WG was led by Linda Edwards. The TC made the following decisions regarding recommendations put forward by the WG:

- Add Meat meal to Table 4.2 with the proposed annotation:
“Meat meal will require processing (such as drying, heat sterilization and/or composting). Shall not include any substances prohibited by par. 1.4.1 of CAN/CGSB-32.310, Organic Production Systems - General Principles and Management Standards.”

- Refusal to add ammonium citrate to Table 4.2, as it is a synthetic fertilizer
- Add Biochar to Table 4.2 with the proposed annotation:
 “Produced through high-heat (greater than 500 degrees C) pyrolysis from plant material which has not been treated with and to which no ingredients have been added that are prohibited by 1.4.1. (See also Plant and plant by-products.)”
- Add synthetic citric acid for the adjustment of pH to fish products (Table 4.2)
- Allow the use of citric acid as an herbicide
- Refusal to allow use of waxed cardboard as composting feedstock
- Allow the use of acetic acid for weed control
- Refusal to allow use of ammoniated soaps of fatty acids as herbicide
- Specify that dormant oil is not allowed as a dust suppressant
- Add Dust suppressants to Table 4.3, with the proposed annotation:
 “For soil amendments and other purposes, non-synthetic substances listed in 4.2 and 4.3 such as lignosulphonate, molasses, vegetable oils, lactic acid, are allowed; petroleum products are prohibited.”
- Amend annotation to pheromones and other semiochemicals as follows:
 “Allowed for use in pheromone traps or **passive** dispensers. Both synthetic and non-synthetic pheromones and semiochemicals may be used for pest control.”
- Amend annotation related to plastic mulches as follows:
 “Non-biodegradable and semi-biodegradable materials shall not be incorporated into the soil or left in the field to decompose. Use of polyvinyl chloride as plastic mulch or row cover is prohibited.”
- Amend annotation to energy feeds and forage concentrates (grains) and roughages (hay, silage, fodder, straw) as follows:
 “Shall be obtained from organic sources and may include silage preservation products (see “hay or silage preservation products)”
- Propose new entry into Table 5.2: Hay or silage preservation products, with the following annotation:
 “Preference should be given to bacterial or enzymatic additives derived from bacteria, fungi and plants and food by-products [e.g. molasses and whey]. The following acids may be used: lactic, propionic and formic.”
- Reject the addition of salt to Table 4.3

Permitted Substances Lists for Livestock

Led by Janine Gibson, the PSL Livestock WG made a few recommendations. The TC made the following decisions:

- Amend annotation to energy feeds and forage concentrates (grains) and roughages (hay, silage, fodder, straw) (5.2) as follows:
“Shall be obtained from organic sources and may include silage preservation products (see “hay or silage preservation products)”
- Add the following new entry into Table 5.2:
“Hay or silage preservation products
Preference should be given to bacterial or enzymatic additives derived from bacteria, fungi and plants and food by-products [e.g. molasses and whey]. The following acids may be used: lactic, propionic and formic.”
- Reject proposal to add oyster shell to 5.2, as it is already covered under non-synthetic minerals
- Reject proposal to remove oxalic acid from 5.3.
- Reject proposal to modify annotation to Colostrum, Table 5.3.

Permitted Substances Lists for Processing

Led by Roxanne Beavers, the PSL Processing WG submitted 16 recommendations to the TC. The TC’s decisions were as follows:

- Reject the addition of amino acids to table 6.3 (Non-organic ingredients classified as food additives) and table 6.6 (Processing aids)
- Reject amending Gellan Gum and Ascorbic acid in Table 6.3
- Modify the name and annotation of Magnesium chloride (nigari) to have the following:
“Magnesium chloride
Derived from seawater”
- Refusal to modify annotation to whey protein.
- In Table 6.4, amend name and annotation of dairy cultures to include:
“Micro-organisms
Including starter and dairy cultures and any preparations of micro-organisms normally used in product processing. Organisms must be produced without genetic engineering, enzymes derived from genetic engineering, or chemosynthetic substances, except as otherwise permitted by the PSL.”
- Reject addition of Kombu (6.4), Bark preparation (6.6), Hazelnut Husks (6.6)
- Reject change to Bentonite, Clay, Enzymes (6.6)
- Reject addition of Lignosulfonates to 6.6 (already in 4.3)
- Add to 6.7: Pheromones, other semiochemicals
“Allowed for use in pheromone traps and passive dispensers. Both synthetic and non-synthetic pheromones and semiochemicals may be used for pest control.”
- Reject addition of Ammonium sanitizer products to 7.3 and 7.4
- Propose an annotation to Lime in 7.4
“All forms of lime, including calcium carbonate, calcium hydroxide and calcium oxide.”

COS Review for all

Organic sector invited to submit requests for modifications to the COS

The Review of the COS is exhaustive: all sections of the standards have to be revised. The review exercise will take 2 years, and the objective is to publish the fully revised standard in 2015.

The first phase of the review was to establish the WGs, coordinate their meetings, and hold an initial meeting to address the issues already listed on the organic work list. Now that these steps have been completed, the WG Conveners are ready to hear the sector's concerns about the Canadian standard. To do so, please fill out and submit a form to describe the modification that you are proposing and provide adequate background information. Without this basic information, your request cannot be considered by the WGs or the Technical Committee.

[Click here](#) for the Revision Proposal Forms for 32.310 (General Principles and Management Standards) and 32.311 PSL (Permitted Substances Lists).

COS Review Working Groups welcome new participants

The first Technical Committee meeting was very successful, thanks to the work of the Working Groups.

Are you interested in joining one of the Working Groups dedicated to the COS Review?

If yes, please contact the OFC, at info@organicfederation.ca, 514-488-6192.

The basic Work Groups are:

- Crop WG, Livestock WG, and Preparation WG for 32.310 Organic Standard:
- PSL Crop WG, PSL Livestock WG, and PSL Processing WG for 32.311 Permitted Substances List.

Required skills and expertise related to the organic sector:

- Organic farming or processing
- Materials/Chemical substances
- Veterinary medicine/nutrition and supplements
- Apiary
- Environmental
- Animal welfare

...and, of course, experience in organic production.

Participation in Working Groups is voluntary and not paid, and the WG meetings are held by toll-free teleconference. The Chairs of the WGs coordinate the work and agenda of the meetings.

The time commitment can be up to one 2-hour call every second week, as needed.

The COS Review is underway and industry funding is required to match AAFC's contribution
Contribute generously to fund the COS Review

How much will the review cost in total?	Costs covered by CGSB	\$ 680,000
	Costs covered by industry	\$ 379,000
	AAFC	\$ 297,000
	<u>Industry contribution</u>	<u>\$ 82,000</u>
	<u>Total budget for COS Review</u>	<u>\$ 1,059,000</u>

We encourage all businesses that depend on strong organic regulations to contribute generously to funding the COS revision.

If you become a sponsor of the COS revision, you will:

- be the subject of a short article (100 words) that describes you and your business. The article, along with an accompanying photo or logo, will be distributed on all the mailing lists of the member associations of the OFC;
- be promoted and posted on the website of the OFC in a section devoted to the COS revision;
- have the satisfaction of supporting a collective exercise to modernize the standards that govern all organic production in Canada.

Help us fund the review of the Canadian Organic Standards!

Minimal contribution: \$500. Please send your contribution by cheque or bank draft, to the office of the OFC, 12-4475, Grand Boulevard, Montreal (QC) H4B 2X7. To read more about the fundraising campaign, [visit the OFC Website](#).

Questions and Answers on issues related to the Canadian Organic Standards

Are herbicidal soaps allowed under the Standard?

When calculating summer ration for ruminants, can pasture be considered "long-fiber forage"?

Revised answer to the following question: Can conventional straw be used as a compost feedstock for compost that is used to grow organic mushrooms?

The Organic Standards Interpretation Committee (SIC) provides interpretive guidance to the Canada Organic Office on issues related to the National Standards for Organic Agriculture (CAN/CGSB 32.310 and CAN/CGSB 32.311). [Click here](#) to see the proposed answers to various questions raised by organic stakeholders, regarding the National Standards for Organic Agriculture.

The proposed responses are subject to a 60-day comment period from December 5th to February 5th 2014.

All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Archives - Final Questions and Answers

All final questions and answers will be posted on the [OFC website](#) (as a pdf).

Kelly Monaghan joins the Standards Interpretation Committee (SIC)

The OFC has confirmed the election of Kelly Monaghan as a member of the SIC.

Kelly is an active organic inspector, consultant, and trainer. She is an Accredited Process Inspector of the International Organic Inspectors Association (IOIA), and consults with companies of all sizes regarding organic certification and standards compliance. She is the Guelph Food Technology Centre's organic consultant and specialist and she works for governmental agencies and private institutions to teach certifiers, inspectors and producers about organic standards and regulations. Kelly currently sits on the boards of Canada Organic Trade Association, the Guelph Organic Conference and is working with OMRI Canada as a Review Panel Member and member of OMRI's Canadian Project Committee. She is a past Chair of Canada's Organic Technical Committee (the industry group that writes and revises the Canadian Organic Standard) and remains on that Committee as a representative of the IOIA. She has an MBA from York University in Toronto and is the owner of [Ash Street Organics](#). Welcome Kelly!



To see the full list on the members of the SIC, [click here!](#)



Rudolph, the Red Nosed Reindeer, loves organic forage.

**The Organic Federation of Canada wishes you
a wonderful holiday season
and a happy and prosperous organic 2014!**