

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 Canadian Food Inspection Agency Office interpretive guidance on issues related to the National Standards for Organic Agriculture (CAN/CGSB-32.310 and CAN/CGSB-32.311).



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 cfia.opr-rpb.acia@canada.ca.

Public Comment period –24 March to 24 April 2021

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Organic Principles and management practices

6 Livestock production

Offspring born under transition

Can livestock offspring be considered organic for meat, if they were 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) (6.2.3.3 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 in T3 , as per 6.3.3? (409)

No. With reference to clauses 6.2.3.2 and 6.3.3 (6.2.3.3 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. Offspring can be considered organic for meat if they were born on or after the day that the land has completed the necessary transition period and been granted organic status. Furthermore, the offspring has to be fed organic milk (6.4.3 d) & f); the milk whether from a dairy cow or a beef cow or ewe can only be considered organic once the land has organic status.

7.5 Crops Grown in Structures or Containers

Scope of 7.5.2.1

Does section 7.5.2.1 refer to all growing media products used in a container system, or solely professional products used in greenhouse growing? (498.1)

Yes. 7.5.2.1 refers to any growing media used in a container system.

Applicable exception in 7.5.2.1

Does the exception for seedling/starter mixes (7.5.2.1 d) only pertain to the 10% compost, or is there an exception for the 2% mineral fraction as well? (498.2)

Seedling/starter mixes may contain less compost, but must contain a 2% mineral fraction per 7.5.2.1 c & d.

Compost in seedling/starter mixes

Do seedling/starter mixes need to contain any compost at all? (498.3)

No. 7.5.2.1 d does not indicate a minimum compost content.

Growing media for seedlings

Can annual seedlings be grown in a soilless media, even for the initial phase of propagation (1-2 weeks), and comply with organic standards? (204.1)

No. The growing media for annual seedlings needs to fulfill the requirements of soil as defined in 7.5.2.1 (as referenced by 5.3.3).

Growing media for propagules

7.5.2.1 describes acceptable soil composition for container systems. However, layering and cutting propagation techniques may require an initial soilless rooting medium that provides no nutrition to propagated plants (water, moist air, perlite, vermiculite, sand,

peat moss). Can soilless media be used for cutting and layering plant propagation? (204.2)

Plant nutrition must be based on soil as defined in 3.73 and 7.5.2.1 of CAN/CGSB-32.310. This nutrition cannot be brought through hydroponic or aeroponic production methods. However, when a propagule needs no nutrition (cutting, layering, pre-sprouting), it is possible to use a medium that does not meet criteria of 7.5.2.1 of CAN/CGSB-32.310 as long as it does not contain prohibited substances (see 1.5) and it is composed only of substances listed in Table 4.2 (Column 1) of CAN/CGSB-32.311 that do not provide plant nutrition.

Permitted substances lists

Mint oil as sprout inhibitor

Can any plant oil, such as mint, as identified in Table 4.2 column 2 "Plant extracts, oils and preparations", be used as a potato sprout inhibitor post harvest? (514)

Substances listed in Table 4.2, such as 'Plant extracts, oils and preparations' are for crop production, not for post-harvest unless otherwise annotated. Therefore, non-organic plant oils, other than clove oil, may not be used as they are not listed in Table 8.3, Post-harvest substances (see 8.3.5, 32.310). But ORGANIC mint oil products may be used as sprout inhibitors as they are not prohibited by 32.310 - 1.4 or 1.5.

Detergent biodegradability

Is the manufacturer of a detergent required to test the biodegradability of its product based on the definition of "biodegradable" in clause 3.11 of the Canadian Organic Standard (CAN/CGSB 32.310)? (515.1)

In the 2020 version of CAN/CGSB-32.310, the definition of "biodegradable" (3.11) applies specifically to inputs and production aids in crop and livestock production. For detergents, biodegradability shall be assessed based on OECD definitions and standards; refer to Detergents, Table 7.4 of the PSL. Therefore, the manufacturer shall demonstrate that the biodegradability of the detergent meets or exceeds the guidelines defined by the OECD when assessing conformity to CAN/CGSB-32.3210.

Can a so-called biodegradable detergent contain non-listed or restricted substances such as phosphoric acid, whose use is only permitted for dairy equipment? (515.2)

Yes. Detergents must meet the biodegradability requirements as outlined in Table 7.4 of Section 32-311. There are no other restrictions.