

Standards Interpretation Committee 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/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 60 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Comment Period: October 4th to December 3rd 2012

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1. Scope

Is the use of cloned animals allowed? (148)

No. All of the conditions listed in 1.4.1 (a to l) are forbidden. The origin or lineage of animals (1.4.1 k) needs to be known to ensure that no cloned animals are used.

5. Crop Production

How should the minimum buffer zone be measured in an orchard? (138.1)

The distance is measured from drip line to drip line between an organic orchard and adjacent non-organic block. If a portion of some of the trees is within the 8 meters, the entire harvest from those trees is harvested and sold as non-organic. As tree canopies expand with time such buffer areas need to be checked annually to reaffirm compliance."

Could a buffer zone larger than 8 m. be required in special circumstances, for example when prohibited substances are being applied on the windward side of the organic orchard? (138.2)

5.1.4 states that "distinct buffer zones or other features sufficient to reasonably prevent contamination are required". If there is a risk of contamination, an 8m or wider buffer (5.1.4 a) or other means (5.1.4 b) must be employed. The choice of methods used and responsibility to employ sufficient means lies with the operator and must be approved by the CB.

Are there any guidelines for cleaning farm equipment that is shared with non-organic operators. Could the sharing of equipment jeopardize certification? (147)

5.2.1 states "Measures shall be taken to minimize the movement of substances prohibited by 1.4.1 from neighbouring areas onto organic farmland and crops". Where there is a risk that shared equipment could convey prohibited substances, seed, or crop, it must be adequately cleaned to ensure that contamination of organic product is prevented. The operator must document the cleaning process.

6. Livestock Production

6.4.1 allows for the feeding of non-organic forage to breeding herds in the case of a regional forage shortage. If a producer anticipates running out of organic forage: (157)

a) Can they prepare by sourcing the non-organic feed before they run out?

Yes. The operator may source the non-organic forage ahead of time, and before feeding, must demonstrate compliance with the conditions of 6.4.1 b: record keeping, segregation, preference for forage grown without prohibited substances.

b) Which animals can be fed the non-organic feed and what are the implications for the status of meat and milk?

With the agreement of the CB, the non-organic forage may be fed to; 1) non-lactating dairy animals - without affecting their status in future lactation. 2) beef cows or ewes that are not nursing offspring, without affecting the status of offspring in utero.

Can livestock feed harvested from the buffer zones around organic cropland be fed to livestock in transition to organic? (149)

As per 5.1.5, feed harvested from the buffer zones is non-organic. When transitioning livestock to organic status, feeding the buffer zone feed would be the same as feeding conventional feed.

7. Specific Production Requirements

7.3 Mushroom Production

Is conventional straw acceptable as a substrate for the production of mushrooms? (142)

No, the materials used as substrate must be either organic or "obtained from vegetation grown in areas free of substances prohibited by 1.4.1 for at least three years" (7.3.1).

8. Preparation and Handling of Organic Products

8.2 Product composition

In 8.2 of the Standard, what does the term "constituent of an ingredient" mean? Are incidental components or carriers considered constituents? (131)

The "constituents" are all the substances which make up the ingredients listed under; a) Solid products, b. liquid products, etc. All constituents, for example carriers and preservatives, even those that have no function in the final product need to be included in the calculation and reviewed with regard to compliance with the PSL.

Permitted Substances Lists

Is the use of vitamin D allowed for fluid milk products if it contains a preservative not listed on the PSL? (137)

Organic operations in Canada remain subject to all applicable laws and regulations (PSL Introduction). Since the addition of vitamin D to milk is required by law, it must be included. The source containing a non-approved preservative may be used only if a fully compliant formulation is not commercially available.

Soil Amendments and Crop Nutrition (Table 4.2)

Calcium phosphate is allowed in food processing; can it be used as soil amendment? (140)

Naturally occurring Calcium Phosphate (apatite) is allowed as a soil amendment under table 4.2 "Mined Minerals and Unprocessed Mined Minerals" The annotation outlines certain restrictions, including "acceptable if the substance is not processed or fortified with synthetic chemicals".

Can green char be used in organic agriculture? (Biochar) (139)

Biochar may be considered a form of ash and can be used in organic agriculture as part of the crop nutrient management program provided that the feedstock used is compliant with the annotations for "ash" in 32.311 table 4.2.

Can "meat meal" or meal made from animal products or by-products be used as a soil amendment? (144)

While animal products are listed in table 4.2 under "composting feedstock", they are not allowed as a direct soil amendment except for blood meal, bone meal and feather meal which are allowed. Meat meal is a specific product which under the standard, must be composted before application to the soil.

What forms of citric acid may be used as a pH adjuster in fish products? There appears to be a contradiction between tables 4.2 and 4.3 when it comes to the acceptable form of citric acid. (146)

There is an apparent contradiction which has been referred to the Organic Technical Committee. Citric acid is permitted under 4.3 'Crop Production Aids' as either synthetic or non-synthetic for use as a pH adjuster. Under 4.2; "Soil Amendments and Crop Nutrition", the annotation for Fish Products requires citric acid if used, to be organic.

Crop Production Aids and Materials (Table 4.3)

May a bacteria for use as an organic crop production aid, be produced using prohibited materials in the substrate? (141)

Table 4.3 allows the use of "biological organisms", which includes bacteria, providing they are not genetically modified. The annotation accompanying "biological organisms" does not restrict or regulate the medium in which these organisms are grown.