Standards Interpretation Committee
Questions and Answers Regarding
National Standards for Organic Agriculture

Commented/Revised Answers

The Canada Organic Office has received comments about some of the answers posted under the public comment period ending January 30th 2012; the Standards Interpretation Committee considered all comments and, when appropriate, revised these answers. In some cases, comments did not result in a change in the Q&As.

This is the first list of the commented and/or revised Questions and Answers. These Q&As are final and not subject to further comments; they will be integrated into the final Q&As under the CCO website.

The second list will be published soon.

General Principles and Management Standards

5. Crop production

5.1 Land Requirements for Organic Crop Production

Can manure from livestock raised in cages be used, if the farm has a nutritional deficit and no other manure is available within a reasonable distance? (83)

As per 5.1.1.a, only manure from caged animals that cannot turn 360 is prohibited (e.g. manure from sows in farrowing crates). There are no exceptions.

5.3 Seeds and Planting Stock

What is the definition of "untreated seed" as it applies to 5.3.2.1 (32.310)? More specifically, does the use of "bleach cleaning" render the seed outside this definition? (77)

Untreated seed in 32.310 5.3.2.1 is defined as seed which has not been treated with synthetic pesticides prohibited by this standard. It does not denote seeds that have been cleaned. Table 4.3 lists substances which can be used to clean seed, including peracetic acid for example. Organic seed may not be cleaned with chlorine bleach as it is not listed on Table 4.3 for this purpose.

5.5 Manure Management

Is the manure from a conventional farrowing operation compliant with the standard? (90)

Manure from systems where the sows are in traditional farrowing crates and not able to turn around is prohibited under 5.5.1. This is the intent of the Standard. The wording of 5.5.1 a. leads to the need for interpretation of the term 'fully caged system'. The part of the operation where traditional farrowing crates are used constitutes a 'fully caged system' under the standard and manure from those animals would be prohibited, notwithstanding the fact that some other animals in the barn are housed differently.

6. Livestock production

6.2 Origin of Livestock

Please clarify the meaning of 6.2.2 d. iii. Does it allow that animals could be repeatedly fed conventionally until the last trimester of pregnancy, and still give birth to offspring compliant with the Standard? (87)

Section 6.2.2 d. iii applies only to animals in transition. For animals already under organic management, the feeding of non-organic feed at any time during gestation would render the mother and offspring non-compliant. Beef cattle and dairy breeding herds cannot be rotated in and out of organic production. Refer to 6.2.4.

6.4 Livestock Feed

Is the operator required to obtain pre-approval for use of non-organic feed during a catastrophic event? (89.1)

No, the operator does not need pre-approval. However, the operator should notify their CB and explain the situation as soon as possible. It is the responsibility of the operator to adequately and successfully demonstrate to the CB that 6.4.1 is applicable and the instructions laid out there have been met.

6.7 Livestock Health Care

Can oxytocin be used to treat postpartum complications? If so what are the withdrawal rules? (78.6)

Yes. 6.7.7 specifies that hormones are acceptable if the use is therapeutic, not preventive. For oxytocin, the animal does not lose status for use as organic meat. The withdrawal time is double what is stated on the label or 14 days, whichever is longer. (Table 5.3 Oxytocin and 6.7.6 d - 32.310.)

Please clarify the meaning of the standard regarding use of parasiticides in 6.7.9 iv (slaughter) and v (milk) as to the loss of organic status and withdrawal periods.(78.2)

Parasiticides not listed in the PSL may be used on slaughter animals: once preventative measures have failed (6.7.9 b), fecal samples indicate there are parasites (6.7.9 b i), there are

written instructions from a veterinarian specifying the product and method of parasite control to be used (6.7.9 ii). Withdrawal times are twice the label requirement or 14 days whichever is longer (6.7.9 b iii) and there can only be one treatment for slaughter animals under a year old and a maximum of two treatments in the life of the animal.(6.7.9 b iv). For dairy animals combined treatments of antibiotics and parasiticides must not exceed two per year. (6.7.6 e iv).

6.8 Livestock Living Conditions

What is the outdoor access requirement for rearing pullets? (86)

6.8.1 requires "…fresh air and natural daylight suitable to the species, its stage of production". As pullets going outdoors at a young age predisposes the birds to going outside later on as adults, it is especially necessary. See also 6.8.11.1.

Permitted Substances Lists

4.2 Soil Amendments and Crop Nutrition

With regard to materials other than livestock manure, are all the materials used to make compost required to be free from toxins, or can it be determined that some or all toxins present in the compost feedstock will break down and be purified during the composting process? (76)

The notes in table 4.2 (32.311) under the headings "Compost obtained from off-farm sources", "Compost produced on the farm" and "Composting Feedstocks" give extensive instruction as to what is required, permitted or prohibited in the production of compost. The underlying assumption is that the composting process is capable of degrading some contaminants that are present in the original material. When materials are used that may contain prohibited substances, it is the responsibility of the operator to document or "prove" the process of degradation. The notation allows for two possible methods; 1) analysis of the final composted material or 2) reference to scientific literature which establishes the common degradation of contaminants during the composting process. In the case of materials obtained from an urban setting, e.g. leaves or yard waste; it should be assumed that persistent chemicals, including pesticides may be present and it would be appropriate to consider the degradation of these contaminants. It is the CB's responsibility to assess the risk and require documentation specific to each situation.

5.2 Feed, Feed Additives and Feed Supplements

Is L-Lysine allowed in the feed for organic birds? (80)

Yes. Table 5.2 allows for the use of non-synthetic amino acids such as L-Lysine. L-lysine is terminology which does not distinguish whether the substance is synthetic or not. Synthetic lysine, such as L-Lysine HCL, is not permitted.