

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).



REPORT

Public Comment period –23 August to 27 September 2021

Unless otherwise noted, all of the following Questions and Answers have been moved to the [Final Questions and Answers](#) section on the OFC website on November 1, 2021

Table of content

Under public consultation

Organic principles and management standards

Strawberry planting stock	2
Vegetable matter in livestock feed	2
Organic percentage of organic seed product.....	2

Permitted Substances Lists

Palm oil.....	2
Formulants in livestock nutrition and health products.....	2

Final Q&As revised to comply with the 2020 Canadian Organic Standards

Organic principles and management standards

Outdoor access – veterinarian recommendations.....	3
Popholes are mandatory	3

Permitted Substances Lists

Tractor exhaust.....	3
Vaccines with preservatives	4

Organic principles and management standards

Strawberry planting stock

Commented – the SIC will report on this question at a later date

Can strawberries from non-organic strawberry planting stock be harvested within 12 months of planting if it is confirmed that the planting stock was not treated with any prohibited substances pre planting? (509)

Vegetable matter in livestock feed

Regarding the 'vegetable matter' element in the requirements for poultry and pork (6.4.3 I) a) is organic vegetable matter required? (340)

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.), 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

f) would pea hulls count?

Yes.

No. Peas (unless fed as whole plant forage) would be considered the same as other non-cereal grains.

Organic percentage of organic seed product

Commented – Revised wording

Do seed coatings or treatments need to be considered when calculating the organic percentage of an organic seed product? (519)

~~Seed intended for crop production does not fall under Clause 9 (which covers the preparation of consumable foods and feeds) – therefore a calculation of the percentage of organic ingredients is not applicable. In this case the seed needs to be organic, and any coating or treatment must be listed in PSL 4.2, 4.3 (Table 4.2, columns 1 & 2). Seed that is part of an organic product used for consumption would however fall under Clause 9 and be considered as an agricultural ingredient.~~

Seed coatings or treatments are not considered ingredients per the "ingredient" definition of CAN/CGSB-32.310 3.36 and therefore should not be taken into account when calculating the percentage of organic ingredients in an organic product. Any coating or treatment must be listed in PSL Table 4.2, columns 1 & 2.

Permitted Substances Lists

Palm oil

Is palm oil or its derivatives permitted as a feed ingredient for organic dairy production? (532)

Yes, like all other oils, palm oil and derivatives would be considered as energy feeds (see Table 5.2 of PSL), and as such, any palm derived products would have to be certified organic.

Formulants in livestock nutrition and health products

Which ingredients found in livestock boluses, or other health care products and production aids, are categorized as Formulants per Table 5.3 and are not subject to 32.310 1.4 or 1.5? (530)

Any substance other than the active ingredients intentionally incorporated in a formulation of a drug authorized for sale by Health Canada is considered as a formulant in Table 5.3 of the PSL."

Final Q&As revised to comply with the 2020 Canadian Organic Standards

Organic principles and management standards

Outdoor access – veterinarian recommendations

Under CAN/CGSB-32.310 Section 6.7.2, can operators limit access to the outdoors to their entire herd / flock (such as goats, sheep, cattle, poultry) for the entire winter if the operator provides a letter from their veterinarian stating that access to the outdoors is detrimental to the health of the particular species of livestock? (354)

No. The standards already provide sufficient flexibility to address the health and welfare of organic livestock with specific guidance and exceptions with regard to outdoor exercise and access to pasture (6.1.3, 6.11.1 & 6.13.1).

~~Possibly. For example, poultry may be kept indoors in the winter without a letter from a veterinarian. The standards already provide sufficient flexibility to address the health and welfare of organic livestock with specific guidance and exceptions with regard to outdoor exercise and access to pasture (6.1.3, 6.11.1 & 6.13.1).~~

Popholes are mandatory

When organic layers are pasture-raised throughout the grazing season, can the flock be housed during the non-grazing season in barns without popholes or other means of accessing the outdoors? (478)

~~No. 6.13.5 states "Poultry barns shall have sufficient exits (popholes) to ensure that all birds have ready access to the outdoors." As per 6.13.1 d), access to outdoors may only be restricted when outdoor access results in an imminent threat to the health and welfare of poultry.~~

No. 6.13.7 states "Poultry barns shall have sufficient exits (popholes) to ensure that all birds have ready access to the outdoors." As per 6.13.1 d), access to outdoors may only be restricted when outdoor access results in an imminent threat to the health and welfare of poultry. The exit requirements for poultry are outlined in 6.13.8 and 6.13.9. 6.13.9 does not eliminate the need for exits but explains the minimal conditions that must be met if for some reason 6.13.8 cannot be met (maybe in cases when barn renovation required from evolving organic standards cannot be done).

Permitted Substances Lists

Tractor exhaust

Is tractor exhaust, injected into the soil, acceptable under the standard? (32)

~~Tractor exhaust may be injected into the soil only if all the components of the tractor exhaust comply with the standard and PSL. This means 100% pure biodiesel exhaust would be acceptable while exhaust generated by a petroleum gas engine would not.~~

Tractor exhaust, regardless of the fuel source, may be injected into the soil only if all the components of the tractor exhaust comply with the standard and PSL.

Vaccines with preservatives

Are livestock vaccines containing bacteriostatic or fungistatic preservatives permitted? (402)

~~Yes. But do not overlook that 1) as stated in Table 5.3 of 32.11, "If there are no commercially available sources of non-GE vaccines, or if these are ineffective, GE sources can be used."; and 2) in the case of poultry, the vaccine is allowed only given before the chicks are 2 days old.~~

Yes. These ingredients are considered formulants as listed in Table 5.3 PSL.