

# 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](mailto:cfia.opr-rpb.acia@canada.ca).

## Public Comment Period – 2 November to 2 December, 2021

### Table of contents

#### Organic Principles and management practices

##### Crop production

Digester feedstock .....	2
--------------------------	---

##### Livestock production

Non-organic animals in organic operations .....	2
---	---

Testing of water source for livestock .....	2
---	---

Anaesthetics containing hormones .....	2
--	---

Off-label veterinarian prescription .....	2
---	---

##### Permitted substances lists

Vegetable cooking spray .....	3
-------------------------------	---

##### For information purposes ..... 3

Tissue culture .....	3
----------------------	---

## Organic Principles and management practices

### Crop production

#### Digester feedstock

##### **Do compost feedstocks (Table 4.2) need to be composted if used as feedstock for an anaerobic digester? (526.1)**

No. The annotation for Digestate, anaerobic (Table 4.2) states that the materials added to the digester shall be listed in Table 4.2 (Column 1), which includes 'Compost feedstocks'

##### **When manure was a feedstock of an anaerobic digestate, can the requirement of manure land application specified in 5.5.2.5 be waived if the digestate is dried or heat treated before being applied to land? (526.2)**

No. Unless it can be demonstrated that the drying or heating process has eliminated the presence of human pathogens (Table 4.2 Animal manure, processed).

### Livestock production

#### Non-organic animals in organic operations

##### **Can non-organic animals that have been incorporated into the organic system become acceptable a) for breeding? b) for slaughter? (48) (529)**

a) Yes. Breeding animals transferred from conventional to organic management may be used as breeding stock in organic production according to the terms specified in the standard (see 6.2.2, 6.2.3, 6.2.3.2, and 6.2.4), but cannot be cloned animals or be the descendants of cloned animals (1.4) and must be managed organically in accordance with the standard including being fed organic feed (6.7.5).

b) No. Meat from a non-organic animal will never be considered organic even if the animal has been integrated into the organic system and permitted to be used as organic breeding stock.

#### Testing of water source for livestock

##### **When initially testing the main water source for livestock, such as beef cattle, what exactly are the potential livestock toxins to be included in the water test prescribed in 6.4.5 of 32.310? (517)**

As of COS 2020 revision, testing of water shall be to guidelines outlined by the relevant Code of Practice and industry associations quality assurance programs 32.310 (2020) 6.4.5 in this case "[Code of Practice for the Care and Handling of Beef Cattle](#)", Section 2.2.

#### Anaesthetics containing hormones

##### **If an animal is administered a local anaesthetic that contains a hormone, is it considered as a "hormonal treatment" per 6.6.3 of CAN/CGSB-32.310? (521)**

No. If a local anaesthetic contains a non-steroidal hormone (i.e. epinephrine) as an ingredient, the use of this local anaesthetic is not considered a hormonal treatment. Meat from the treated animal would not lose organic status as a result of this use.

#### Off-label veterinarian prescription

##### **What is the withdrawal period of a livestock health care product if prescribed by a veterinarian for a condition not indicated on the label or prescribed 'off-label'? (520)**

That will depend. If the substance in the health care product is not listed in Table 5.3, the prescription becomes the de facto label and the withholding period specified on the prescription is

therefore doubled or extended to 14 days, whichever is longer (6.6.10 d). If the substance is listed in Table 5.3, such as anti-inflammatories, there is no withholding period unless specified in the annotation or the veterinarian prescription.

## Permitted substances lists

### Vegetable cooking spray

#### **What are the requirements for the propellants found in a manufactured organic vegetable cooking spray? (528.1)**

Propellants present in organic cooking sprays would be a food additive and needs to be listed in Table 6.3 - Ingredients classified as food additives.

#### **What are the requirements for a non-organic vegetable cooking spray (when organic oil is not commercially available (per Tables 6.3 and 6.5 Vegetable oil listings), including the propellant, used to coat baking trays as a release agent during organic preparation? (528.2)**

Non-organic cooking sprays used to coat surfaces during preparation, leaving negligible amounts on the organic product, are classified as incidental additive 32-310 3.35. The agricultural components (and not the propellant) need to be listed in Tables 6.3, 6.4 or 6.5, per 32.310 8.1.2 c).

## For information purposes

### Tissue culture

#### **Confirmation of a Q&A**

#### **Are propagules produced through plant tissue culture micropropagation included within the provisions of 5.3 (32.310) requiring that they be produced in accordance with the standard? (203)**

Yes. 5.3 applies to propagules produced through plant tissue culture micropropagation.