

# 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 (Agri-SIC).

The objective of the Committee is to provide to the Canadian Food Inspection Agency 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 – 11 January to 11 February, 2022

All of the following Questions and Answers have been moved to the [Final Questions and Answers](#) section on the OFC website on March 8, 2022.

### Table of contents

#### Under public comment

##### General principles and management standards

Protection and promotion of ecosystem health..... 2

##### Permitted Substances Lists

Manure treatment ..... 2

Meat curing agent – Cherry extract ..... 2

Requirements for agricultural ingredients..... 2

##### Revised wording

Emergency feed..... 3

Physical alterations – Anti-inflammatories ..... 3

Processes in the manufacturing of mulches ..... 3

Wool as mulch..... 4

Lactic acid produced by fermentation and extraction ..... 4

Conformity of a cleaning product ..... 4

Under public comment

General principles and management standards

### Protection and promotion of ecosystem health

#### COMMENTED – NOT MODIFIED

**Are operators required to have management practices and features to promote and protect ecosystem health on their own operations when adjacent lands and territory have such measures or features? (542)**

Yes. These measures and features are required to be incorporated into the production system on every organic operation per 1.2 & 5.2.4 (32.310), as based on the General principles of organic production, Introduction 0.2.

Permitted Substances Lists

### Manure treatment

#### COMMENTED - REWORDED

**When manure is processed using centrifugation followed by distillation resulting in the isolation of various nutrient rich liquid fractions containing concentrated potassium and ammonia, can the resulting substances be considered as 'Animal Manure, processed' Table 4.2 and be permitted for use in crop production? (543)**

The solid fraction resulting from centrifugation, decantation or dehydration can be considered as processed manure. The concentrated liquid fractions obtained from secondary processes such as distillation cannot be considered as processed manure. The resulting nutrient dense liquids would feed the plant and not the soil, contrary to organic principles. The intent of the 'Animal manure, processed' listing was to indicate that simple physical processes resulting in a product such as heat-treated manure or pelleted manure are permitted.

### Meat curing agent – Cherry extract

**Is cherry extract powder permitted as a meat curing agent? (534)**

Yes, if the powder is organic. No, if it is not organic as the annotation for Meat curing agents (Table 6.3) does not indicate cherry.

### Requirements for agricultural ingredients

**Can non-organic skim milk powder be used as a minor agricultural ingredient in an organic food product, if the milk comes from cows fed with GE feed? (531.1)** Yes, provided organic skim milk powder is not commercially available. There are no requirements that animals be fed non-GE feed if the ingredient is non-organic.

**Can a minor non-organic agricultural ingredient be fortified? (531.2)** Yes, if legally required, such as fluid milk products, white flours, etc., or if legally permitted in non-dairy substitute products as per PSL 6.4 Vitamins and mineral nutrients. The ingredient and nutrients shall comply with prohibitions in 1.4 & 1.5 (32.310) as per PSL 6.2.1, and with 9.2.1 d) & 9.2.2 a) (32.310).

## Revised wording

**The Standards Interpretation Committee has updated some Final Questions and Answers to improve and clarify the wording of some interpretations.**

### Emergency feed

**6.4.7 b) allows for the feeding of non-organic forage to breeding herds in the case of a regional forage shortage. Which animals can be fed the non-organic feed and what are the implications for the status of meat and milk? (157)**

As per 6.4.7d), when forage shortages require exceptions indicated in 6.4.7 b) and c), the operator shall first develop and maintain a plan to avoid future shortages and should inform their CB before non-organic feed or forage is used.

As per 6.4.7 b), in the case of animals raised for meat, the operator may then start by feeding non-organic forage to breeding stock, which will lose their organic status if they had organic status and will have to be transitioned if they are destined for dairy production. The meat from these animals can never be considered organic again.

In the case of dairy animals, the operator may start by feeding non-organic forage to replacement stock, males, and non-lactating females. These animals will lose their organic status and must be re-transitioned before producing organic milk as per 6.3.1. Normally switching back and forth from organic to non-organic production is not permitted. However, this exception allows for breeding/replacement stock under these specific circumstances to be fed non-organic feed and then re-transitioned.

If non-organic forage is fed to animals during the last trimester of gestation, the offspring will not be organic. Similarly, if lactating females are fed non-organic forage, the nursing young will lose their organic status or the milk will lose its organic status.

As per 6.4.7c), if organic forage is in such short supply that the shortage continues even after the breeding/replacement stock is fed with non-organic forage, the remaining animals in the ruminant herd can be fed non-organic forage but (i) it can make up no more than 25% of their forage intake, and (ii) all other requirements of 6.4.7 c) are met (including the order of preference of sources). The animals fed with 25% non-organic forage will then remain organic (milk and meat).

Note: the 25% non-organic forage allowance differs from the limit of 20% non-organic feed permitted under specific transition requirements for dairy cows in 6.3.1.

### Physical alterations – Anti-inflammatories

**Are steroid anti-inflammatory drugs allowed during physical alterations? (78.3)**

No. Only “non-steroid anti-inflammatory analgesics” are permitted during physical alterations (6.6.4 c 2), This means steroid anti-inflammatory drugs are prohibited for minimizing pain and stress during physical alteration.

### Processes in the manufacturing of mulches

**Could a biobased film become non-compliant because of the manufacturing process that would disqualify it from being used on organic farms? (284)**

No. The manufacturing of a biobased biodegradable mulch does not come into scope when a CB reviews a product for use. Biobased biodegradable mulches must meet the requirements listed in Table 4.2 of the PSL.

## Wool as mulch

### **Can conventional wool be used as mulch? (324) 2020**

Yes. Wool is mentioned in the mulch listing in Table 4.2. Organic wool is preferred if commercially available. If organic is not available, conventional wool may be used, provided that the wool has not been treated with prohibited substances 60 days prior to shearing.

## Lactic acid produced by fermentation and extraction

### **Is lactic acid produced by fermentation and extraction allowed as a formulant in soil amendments and crop production aids under the Canadian Organic Standards? (331.1)**

Yes, with a few soil amendment exceptions. In general, lactic acid produced by fermentation and extraction is permitted as a formulant for both soil amendments and crop production aids. It cannot be used as a formulant in soil amendments that have extraction restrictions in their annotation such as "Aquatic plants and plant products"; "Fish products"; and "Humates, humic acid and fulvic acid" (see 'Formulants used in soil amendments' in PSL Table 4.2). With regards to crop production aids, as lactic acid is listed in PMRA Formulant List 4A and is derived from biological sources it may be used with all crop production aids (see 'Formulants used in crop production aids' in PSL Table 4.2).

### **Is lactic acid produced by fermentation and extraction considered to be synthetic? (331.2)**

The synthetic/non-synthetic criteria is not applicable. When lactic acid is a formulant in either soil amendments or crop production aids, for example, it is the requirements of the pertinent listing as outlined in SIC Q&A 331.1 (above) that must be met. Otherwise, when lactic acid is used as a food additive or as a preservative, it must be derived by fermentation and extraction of a biological source, and the requirements with regard to substrates/growth media must be met.

## Conformity of a cleaning product

### **Manufacturers of concentrated sanitation products may provide Safety Data Sheets (SDSs) showing the ingredients of both the concentrated form and the diluted form (as used) on the same document, or they may provide two distinct SDSs - one specific to the concentrated form and another specific to the diluted (as used) form. Which SDS should be used to evaluate the conformity of a cleaning product to the PSL if the ingredient listings are different? (437) - 19 Apr 2019**

If using a diluted version, either purchased or diluted on-site, the SDS pertaining to the diluted substance applies. In the event that no SDS was issued for the diluted version - the SDS of the concentrate applies. Further, if used without a removal event (PSL Table 7.3), the label of the concentrated product is referred to for both the concentrated and diluted version PSL 7.1.3.