

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).



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.

Public Comment Period – May 5 to June 5, 2022

Table of contents

UNDER PUBLIC COMMENT

ORGANIC PRINCIPLES AND MANAGEMENT STANDARDS

Parallel production after harvest	2
Frass from insects in mushroom production.....	2
Sunlight calculation in greenhouse	2

PERMITTED SUBSTANCES LISTS

Cobalt and selenium.....	2
Frass from insects.....	2

REWORDED Q&AS

Transition – New management	3
Growing media for propagules.....	3

UNDER PUBLIC COMMENT

Organic principles and management standards

Parallel production after harvest

Do organic and conventional crops need to be visually distinguishable while in the field, or only once harvested such as organic corn grown for grain and conventional corn grown for silage? (552)

Organic and conventional crops only need to be visually distinguishable after harvest to not be considered parallel production.

Frass from insects in mushroom production

In organic mushroom production, is insect frass considered an 'other agricultural substance' as per CAN/CGSB-32.310: 7.3.2.3, and would insect feed need to be organic? Or would the final product need to be composted? (548.2)

Without a listing in the PSL, insect frass shall be considered as Animal manure. From an organic source or not, insect frass, shall be composted for use in mushroom production as per 7.3.2.2

Sunlight calculation in greenhouse

How much sunlight is needed to fulfill the requirement of primary source of light as indicated by 7.5.4? (551)

The photosynthetically active radiation (PAR) coming from sunlight delivered to the photosynthetic area must exceed 50% over the total crop production period. The operator must demonstrate that the average daily light integral (DLI) or moles of light delivered to the crop is provided by more than 50% natural sunlight.

Permitted substances lists

Cobalt and selenium

Are the micronutrients permitted under the Canadian Organic Standards limited to the micronutrients listed under PSL Table 4.2? Are unlisted micronutrients such as cobalt and selenium permitted, and if yes, are there any restrictions to the type of cobalt and selenium that can be used? (553)

The permitted Micronutrients listing is definitive. Other unlisted substances are permitted if they comply with other entries such as Mined Minerals, unprocessed. Use of these substances shall not exceed plant requirements or contaminate crops or water bodies (3.46 & 5.4.4, 32.310).

Frass from insects

Should frass from insects (i.e., black soldier fly larvae) be reviewed as per CAN/CGSB-32.311 Table 4.2 Worm castings for use as input in crop production? (548.1)

No. Without a listing in the PSL Table 4.2, insect frass shall be considered as Animal manure, shall be from organic insects if commercially available (32.310 - 5.5.1) and comply with either 5.5.2 or 5.5.3. Insect frass would also be a permitted Compost feedstock (Table 4.2).

REWORDED Q&As

Transition – New management

In the case where there is a change in management of an operation, is a 12-month transition period necessary? (58)

~~A change in management or control of an organic operation does not necessitate a 12-month transition period. It is a new operation that requires a minimum of 12 months of oversight by a CB, not a new operator.~~

No. A change in management or control by a new owner/operator/manager of an organic operation does not require a 12-month transition period. A minimum of 12 months of oversight by a CB (5.1.1) is required for land not previously certified and upon initial application for certification - not a new owner/operator/manager.

Growing media for propagules

7.5.2.1 describes acceptable soil composition for container systems. However, layering and cutting propagation techniques may require an initial soilless rooting medium that provides no nutrition to propagated plants (water, moist air, perlite, vermiculite, sand, peat moss). Can soilless media be used for cutting and layering plant propagation? (204.2)

Plant nutrition must be based on soil as defined in 3.73 and 7.5.2.1 of CAN/CGSB-32.311. This nutrition cannot be brought through hydroponic or aeroponic production methods. However, when a propagule needs no nutrition (cutting, layering, ~~pre-sprouting~~ initial seed sprouting stage), it is possible to use a medium that does not meet criteria of 7.5.2.1 of CAN/CGSB-32.311 as long as it does not contain prohibited substances (see 1.5) and it is composed only of substances listed in Table 4.2 (Column 1) of CAN/CGSB-32.311 ~~that do not provide plant nutrition.~~