

# Questions and Answers Regarding National Standards for Organic Agriculture

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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).



## REPORTS

**Public Comment Period – October 11 to November 11, 2022**

**Public Comment Period – November 7 to December 7, 2022**

All of the following Questions and Answers have been moved to the [Final Questions and Answers](#) section on the OFC website on December 19, 2022.

## Table of contents

### Public Comment Period – October 11 to November 11, 2022

|                                                          |          |
|----------------------------------------------------------|----------|
| <b>Organic Principles and Management Standards</b> ..... | <b>2</b> |
| Status of crops grown after first application .....      | 2        |
| Rock mineral compounds as mineral fraction .....         | 2        |
| <b>Permitted Substances Lists</b>                        |          |
| Detergent as a cleaner .....                             | 2        |

### Public Comment Period – November 7 to December 7, 2022

|                                                            |   |
|------------------------------------------------------------|---|
| <b>Organic Principles and Management Standards</b>         |   |
| Offspring of breeding stock treated with antibiotics ..... | 3 |
| Raising requirements for organic calves .....              | 3 |
| Organic percentage for standardized alcohol .....          | 3 |
| UV-C light use in product preparation and handling .....   | 3 |
| <b>Permitted Substances Lists</b>                          |   |
| Sodium nitrate .....                                       | 4 |
| Use of silicon, silica and silicates .....                 | 4 |
| Sources of tocopherol in food preparation .....            | 4 |

### SPECIAL NOTIFICATION - Withdrawal of 2 Final Q&As

|                                                |   |
|------------------------------------------------|---|
| Conversion of calves and heifers (555.2) ..... | 5 |
| Use of cobalt and selenium (553) .....         | 5 |

## Public Comment Period – October 11 to November 11, 2022

### Organic Principles and Management Standards

#### Status of crops grown after first application

**Can crops grown during the season of the first inspection of a new COR applicant be stored and sold as organic in the following year after the client receives certification? (570)**

No. Per 32.310 5.1.1, the standard needs to be fully applied (after application) for 12 months on the production unit before the first harvest. Therefore, only crops seen at the second inspection will be eligible for certification.

#### Rock mineral compounds as mineral fraction

##### COMMENTED – REVISED

**Can rock mineral compounds, such as dolomite or gypsum, added to a soil/growing media be considered part of the mineral fraction as required in containerized production (7.5.2.1 e)? (563)**

Yes. Sand, silt and clay as described in 7.5.2.1 e) refers to particle size and would encompass rock mineral compounds (excluding perlite and vermiculite) permitted by this standard. ~~The use of actual sand, silt and clay soils is permitted, but not required.~~

### Permitted Substances Lists

#### Detergent as a cleaner

##### COMMENTED – NOT REVISED

**Is a detergent considered a cleaner under clauses 7.1.2 and 7.1.3 of CAN/CGSB-32.311 (PSL)? What differentiates a detergent from a cleaner? (558)**

Per PSL 7.1.1, any substance used to remove dirt, filth and foreign matter from organic products and organic product contact surfaces is a cleaner. A cleaner is only a detergent if specifically formulated for cleaning through the process of detergency as defined by ISO 862:1984(en) - Surface active agents <https://www.iso.org/obp/ui/#iso:std:iso:862:ed-1:v1:en>. Detergency is result of the action of several physico-chemical phenomena and a detergent is a combination of many components including surfactant, chelating agent, enzyme, and dispersant.

## Public Comment Period – November 7 to December 7, 2022

### Organic Principles and Management Standards

#### Offspring of breeding stock treated with antibiotics

##### COMMENTED – NOT REVISED

**Is it permitted to give antibiotics to breeding stock (excluding poultry) such as sows, to treat a medical problem without affecting the organic status of the offspring? (565)**

Yes. If the breeding stock is treated with antibiotics before the last third of gestation, the organic status of the offspring shall not be impacted per 6.2.3.3 (b). If given antibiotics during the last third of gestation, the offspring shall lose organic status. Treatment cannot be withheld from any breeding stock with a medical problem to preserve the organic status of the offspring (6.6.6).

#### Raising requirements for organic calves

##### COMMENTED - REVISED

**Due to disease, such as coccidiosis, or other animal health or welfare issues, can calves born on an organic dairy farm be raised under conventional conditions (e.g., using conventional milk replacer and/or medicated starter) and then transitioned to organic to join the milking herd? (575)**

No. Livestock used for organic livestock products must be managed organically throughout their lifetime (6.2.3.1). According to 6.7.5, "All livestock in a production unit shall be managed organically". Clauses 6.4.3b, 6.6.2, 6.6.4, 6.6.5, 6.6.10, 6.6.11 detail standards for disease management in organic dairy operations, including care of calves and the use of veterinary substances. As per 6.4.3 c) and 6.6.10 f), the use of treatments not listed in 32.311 Table 5.3, including medicated feed, to prevent or control the spread of contagious disease would require written instructions from a veterinarian, including an action plan for prevention and eradication. Treatment cannot be withheld to preserve the organic status of an animal (6.6.6).

#### Organic percentage for standardized alcohol

**An operator who produces a standardized alcohol (as per the Food and Drug Regulations) is not required to list ingredients on a product label (per CFIA alcohol labelling requirement). Under organic preparation requirements, does an operator who has used a previously processed complex ingredient to which water has been added (but not 'reconstituted from concentrates') need to exclude the water added to its multi-ingredient ingredient when calculating the total organic percentage (9.1.3.b) of the alcoholic beverage? (567)**

Yes. Regardless of the consumer labelling requirement exception for standardized alcohols, the water as indicated on the product specifications or Certificate of Analysis of the ingredient (if any, when not 100% pure) shall be excluded from the organic percentage calculation along with all water added during the preparation of the standardized alcoholic beverage.

#### UV-C light use in product preparation and handling

##### COMMENTED – NOT REVISED

**Can UV-C light be used to treat organic products, such as frozen foods, during preparation and handling? (560)**

No. UV-C light in direct contact with organic products as a microbial sanitation treatment is not permitted. A persuasive petition for the inclusion of UV-C treatment in the Canadian Organic Standards would need to be submitted to the CGSB Technical Committee on organic agriculture for

consideration. UV-C light treatment of organic contact surfaces such as equipment or packaging (prior to packaging organic product) is permitted.

## Permitted Substances Lists

### Sodium nitrate

**Is sodium nitrate which has not been mixed with petroleum products permitted for use as a soil amendment (per PSL Table 4.2 'Mined mineral, unprocessed' annotation)? (580)**

No. Sodium nitrate in any form is prohibited.

### Use of silicon, silica and silicates

**Are sodium silicate and potassium silicate the only silicon products specifically prohibited as soil amendments under the listing of 'Silicon, silica and silicates' in Table 4.2 of the PSL? (561.1)**

No. Any other silicon products that are not from mined sources are prohibited.

**Can a silicon product from a mined source be processed and/or combined with other mined minerals? (561.2)**

Yes. Providing the process does not chemically alter the resulting compound (per 3.78)

### Sources of tocopherol in food preparation

**When preparing food products that legally require the addition of vitamins and minerals, does the annotation for 'Tocopherols and mixed natural concentrates' in Table 6.3 of the PSL apply? (564)**

No. If the vitamins and minerals are legally required (Table 6.4 of PSL), there is no other restriction to the source of Vitamin E (tocopherol) apart from being compliant with clauses 1.4 & 1.5 of CAN/CGSB-32.310 and clause 6.2.1 a) & b) CAN/CGSB-32.311 (if applicable). The annotation applies when tocopherols are added as antioxidants.

## SPECIAL NOTIFICATION - Withdrawal of 2 Final Q&AS

### Conversion of calves and heifers (555.2)

As there are no commercial availability conditions in clause 6.2.3.3 applicable to the conversion of herds and individual animals from within or from outside an organic operation, the Standards Interpretation Committee has decided to withdraw the following Question and Answer from the list of [Final Q&As](#) posted on the website of the Organic Federation of Canada and to submit the question to the 2025 review process of the Canadian Organic Standards.

**Is it permitted for an organic dairy operation to sell organic calves or heifers born on-farm instead of keeping them as replacement breeding stock while purchasing non-organic breeding stock to convert to organic with a 12-month transition period for organic milk production (as per 6.2.3.3 a)? (555.2)**

No. Per 6.2.4 a), breeding stock shall be organic unless not commercially available. In the example questioned, replacement breeding stock is available from within the operation.

### Use of cobalt and selenium (553)

Since there is no mention of cobalt and selenium in the Permitted Substances Lists, and the role of these substances was not considered during the last revision of the COS, the Standards Interpretation Committee, whose mandate is strictly devoted to the interpretation of the COS, cannot issue any interpretation that would introduce concepts not defined in the current wording of the COS. This question will be addressed under the 2025 review process of the Canadian Organic Standards.

**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).