

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 – November 7 to December 7, 2022

Table of contents

Organic Principles and Management Standards

Offspring of breeding stock treated with antibiotics	2
Raising requirements for organic calves	2
Organic percentage for standardized alcohol	2
UV-C light use in product preparation and handling	2

Permitted Substances Lists

Sodium nitrate	3
Use of silicon, silica and silicates	3
Sources of tocopherol in food preparation	3

Organic Principles and Management Standards

Offspring of breeding stock treated with antibiotics

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

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. 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

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.