

# 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 (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 final answers to questions raised by organic stakeholders, regarding the National Standards for Organic Agriculture.

## REPORT

**Public Comment Period  
August 31 to September 30, 2023**

**All of the following Questions and Answers have been moved to the [Final Questions and Answers](#) section on the OFC website on October 13, 2023.**

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## Organic principles and management standards

Test for detecting ammonia levels

### COMMENTED – REVISED WORDING

**Can an operator use the “smell test” if they feel confident that they can detect high ammonia levels, or is testing required to verify that livestock housing ammonia levels do not exceed 25 ppm (32.310 - 6.7.1 f)? (592)**

No. A “smell test” is not acceptable. ~~If air quality is a concern,~~ Use of reliable testing tools is required (e.g., meter, test strips).

UV-C light as an anti-microbial treatment

**Can the use of UV-C light as an anti-microbial treatment of crop surfaces be considered supplemental lighting per 7.5.4? (586)**

No. Supplemental light permitted by 7.5.4 is specifically for photosynthesis. UV-C disinfection devices' light in direct contact with organic products during production as a microbial sanitation treatment is not permitted.

Non-organic aquaculture ingredient

### COMMENTED – NOT MODIFIED

**Can a non-organic aquaculture ingredient, such as DHA Algal Oil, be added to an organic product as a non-organic ingredient? (583, 584)**

No. Non-organic aquacultural ingredients are not indicated as permitted per 9.2.1 d) (95% organic content (or more)) and 9.2.2.a) (70-95% organic content).

Note - 'Subject of a petition for the upcoming standards review.

## Permitted Substances Lists

Potassium bisulphite

**Is Potassium bisulphite permitted for use in wine production? (591)**

No. Potassium metabisulphite is permitted per PSL Table 6.3 Sulphur dioxide, anhydrous (SO<sub>2</sub>) listing, not potassium bisulphite.

Use of an unlisted substances

**If an organic product is treated under a mandatory government program (such as exports of potatoes to the US) with a pest control substance not listed under Table 8.2 of 32.311, does the organic product maintain organic status? (593)**

No. The only exception provided to substances listed in 32.311 Table 8.2 is described in 32.310 clause 8.3.3, which specifies that there shall be no risk to organic product status or integrity and that contact of organic products with unlisted substances was avoided. The treatment of an organic product with an unlisted substance would not comply with these requirements, as is also specified in 1.5 and 8.4.3 (32.310).