

# 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 (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 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](mailto:cfia.opr-rpb.acia@canada.ca).**

## Public Comment Period

**November 14 to December 13, 2023**

### Table of contents

#### **Organic principles and management standards**

Cleaning/sanitizing containers of maple products .....	2
Compliance of mushroom spawn including a substrate.....	2

#### **Permitted Substances Lists**

Acidified water.....	2
Sub-parts of non-organic agricultural ingredients.....	2
Compliance of non-organic ingredients .....	2
a) dried fruit with added sulphites.....	2
b) tea extract extracted with a solvent not listed in 32.311 .....	2
c) alcohols (rhum, tequila, etc. ....	3
d) sugar substitutes such as xylitol and erythritol .....	3
e) candy sparkles (containing multiple ingredients including colouring agents not from biological sources) .....	3
f) cured meat (ex. Bayonne ham) .....	3
g) wild harvested herbs .....	3
h) hydrogenated palm oil.....	3
Anti-stick film after rinsing .....	3

#### **REVISED WORDING**

Mushroom substrate.....	4
-------------------------	---

## Organic principles and management standards

### Cleaning/sanitizing containers of maple products

#### **What are the products that can be used to clean or sanitize containers in maple production? (597)**

Sodium hypochlorite, fermented sap and products based on acetic acid, hydrogen peroxide or peracetic acid per 32.310 - 7.2.11.3 and 7.2.13.1 Table 9.

### Compliance of mushroom spawn including a substrate

#### **When mushroom spawn including a substrate (stick, log, brick) is listed on an organic certificate, is the permissibility of the substrate covered under certification? (603)**

Yes. The mushroom spawn log could not be listed on an organic certificate unless the mushroom spawn (mycelium) is organic and the substrate materials are approved for use per 32.310 7.3.2.

## Permitted Substances Lists

### Acidified water

#### **Can acidified water (acid added) or plasma activated water (PAW) be used as a soil amendment or crop aid in organic production? (605)**

Acidified water is allowed only if a permitted acid per Table 4.2 is added to water. Plasma activated water (PAW) is not listed in Table 4.2 therefore is not permitted.

### Sub-parts of non-organic agricultural ingredients

#### **When non-organic agricultural ingredients contain food additives or ingredients not classified as food additives, do these sub-parts need to be listed in PSL Tables 6.3 or 6.4? (589.1)**

All sub-parts of the non-organic agricultural ingredient need to be assessed for compliance except processing aids if present (SIC Q&A 20.1).

### Compliance of non-organic ingredients

#### **Can a prepared organic product contain the following non-organic ingredient: (589.2)**

##### **a) dried fruit with added sulphites?**

No, sulphites are prohibited per 1.5 f) (with one exception for alcohol production see Sulphur dioxide, anhydrous (SO<sub>2</sub>) listing PSL Table 6.3.)

##### **b) tea extract extracted with a solvent not listed in 32.311?**

Yes, providing that all sub-parts of the tea extract, except processing aids such as extractant solvents (SIC Q&A 20.1), are listed in PSL Table 6.3 or 6.5 per 1.5 f) (32.310), and conditions of 9.2.1.d) (95% organic content) or 9.2.2 a) (70-95% organic content) have been met.

**c) alcohols (rhum, tequila, etc.)?**

Yes, providing that all sub-parts, except processing aids (SIC Q&A 20.1), are listed in PSL Table 6.3 or 6.5 as per 1.5 f) (32.310), and conditions of 9.2.1.d) (95% organic content) or 9.2.2 a) (70-95% organic content) have been met.

**d) sugar substitutes such as xylitol and erythritol?**

No. These sweeteners are classified as food additives (Health Canada) and are not listed in PSL Table 6.3.

**e) candy sparkles (containing multiple ingredients including colouring agents not from biological sources)?**

No. All sub-parts including additives such as a colouring agent, except processing aids (SIC Q&A 20.1), must be listed in PSL Table 6.3 or 6.4.

**f) cured meat (ex. Bayonne ham)?**

Yes, if cured and prepared without prohibited substances per 1.5 f) and all sub-parts, except processing aids (SIC Q&A 20.1), are listed in PSL Table 6.3 or 6.4 and conditions of 9.2.1.d) (95% organic content) or 9.2.2 a) (70-95% organic content) have been met.

**g) wild harvested herbs?**

Yes, if prepared without prohibited substances listed in 1.5 f) and all sub-parts, except processing aids (SIC Q&A 20.1), are listed in PSL Table 6.3 or 6.4 (if applicable) and when conditions of 9.2.1.d) (95% organic content) or 9.2.2 a) (70-95% organic content) have been met.

**h) hydrogenated palm oil?**

No. Hydrogenation modification (chemical reaction) of oil is not permitted. (32.310 8.1.3 & 9.1.1)

**Anti-stick film after rinsing**

**Is a detergent used on organic product contact surfaces that leaves an anti-stick film after rinsing permitted? (596)**

Yes, if the remaining anti-stick substance is listed in Tables 6.3, 6.4 or 6.5 (32.311) per 8.1.2 c) (32.310).

## Reworded Questions & Answers

### Mushroom substrate

**Can feather meal, ~~compliant with as listed in Table 4.2~~ be used as a added to a mushroom substrate without being composted? (344)**

Feather meal made from organic poultry could be used as in a mushroom substrate without being composted. 32.310 7.3.2.3 requires that other sources of feather meal be composted.

**Does all the agricultural substances of the substrate (including all soil amendments and crop production aids) used at all phases of organic mushroom production need to be a) certified organic, or b) composted?**

**Can conventional straw be used as compost feedstock for a composted substrate used to grow organic mushrooms? (4, 178, 602)**

MATERIAL TYPE	ORGANIC	COMPOSTED
Wood	No, but must be free of prohibited materials	No
Manure	5.5.1 (32.310) outlines acceptable sources. Organic must be used if available	Yes, and: 1) the compost feedstock requirements in PSL Table 4.2 apply; and, 2) Either the 'compost produced on the farm' or the 'compost from off-farm sources' criteria in PSL Table 4.2 apply.
Other agricultural substances (hay, straw or grains, etc.)	Yes if available	1) If organic is not available then the materials must be composted. 2) The compost feedstock requirements in PSL Table 4.2 apply; and, 3) Either the 'compost produced on farm' or the 'compost from off-farm sources' criteria in PSL Table 4.2 apply.