

# 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 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.

## REPORT

**Public Comment Period**  
February 20 to March 20, 2024

**All of the following Questions and Answers have been moved to the [Final Questions and Answers](#) section on the OFC website on April 29, 2024.**

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## Organic principles and management standards

### Certification of a new beekeeping operation

**If a new beekeeping operation submits an initial application for certification and purchases hives and colonies that are already certified organic, does the operation have to be under organic management for 12 months before its beekeeping products can be certified organic? (608)**

No. The bees and bee products can immediately obtain organic status as soon as the operation has been verified as compliant by the certification body, provided that the new operation does not include any cultivated land for certification and that the apiaries are protected by a 3 km buffer zone free of prohibited substances (7.1.10).

## Permitted Substances Lists

### Silicon, silica and silicates mixed with water

COMMENTED – NOT REVISED

**When used as a soil amendment, can mined sources of silicon, silica and silicates such as diatomaceous earth (DE) or silicon dioxide be mixed with water before being applied to fields and crops? (598)**

Yes, providing the addition of water does not create a new substance or derivative (3.22) that is not listed in Table 4.2 (per 32.310 1.4 & 1.5)

### Vitamins and minerals in supplemented foods

**Can vitamins and minerals be used in organic products categorised as Supplemented Foods, such as an energy drink? (612)**

No. Vitamins and minerals are permitted only if legally required or voluntarily added to non-dairy substitute products as listed in Table 6.4 32-311.

### Compliance of non-organic ingredients

COMMENTED – NOT REVISED

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

**i) shellac?**

It depends on its use.

No, if the shellac is used as a glaze or coating for confections, fruit or vegetables. The shellac would then be used as a food additive or processing aid (Health Canada) and is not listed as such in PSL Table 6.3 or Table 6.4.

Yes, if the shellac is used as a colouring agent as per the annotation for Colouring agents in Table 6.3.

## Reworded questions and answers

### Assessment of detergent biodegradability

**Can a so-called biodegradable detergent contain non-listed or restricted substances such as phosphoric acid? (515.2) (618)**

Yes. If the detergent meets the biodegradability requirement as outlined in Table 7.4 of Section 32-311, there are no other restrictions.

## Compliance of surfactants, stabilizers, foaming agents

COMMENTED –REVISED WORDING

**Must formulants, such as surfactants, stabilizers, foaming agents, contained in commercial cleaning products be listed on 7.3 and 7.4, or only the active ingredients? (453) – 26 Sept 2019 (610.1)**

- a) Without a removal event, all the non-organic ingredients listed on the Safety Data Sheets (SDS) must be listed in PSL Table 7.3. All other active and non-active ingredients, including formulants, must be listed in PSL Table 7.3 or be chemicals used to treat drinking water, or serve as product stabilizers. For example, HEDP listed on the SDS would not be allowed since it does not appear in Table 7.3, while it would be allowed if listed as a non-active ingredient on the label.
  
- b) When used on product contact surfaces followed by a removal event, all the non-organic ingredients on the SDS, and active ingredients on the label, must be listed in Table 7.3 and/or 7.4.

**If a cleaner/sanitizer SDS and label do not list ingredients, is the product allowed under Tables 7.3 and 7.4? (610.2)**

No. Active and non-active ingredient lists are needed from the manufacturer to assess compliance to Table 7.3 for substances used without a removal event. An active ingredient list is needed from the manufacturer to assess compliance to Table 7.3 and 7.4 when substances are used with a mandatory removal event.