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 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.

Public Comment Period

March 19 to April 19, 2025

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Organic principles and management standards

Perennial crops managed as annual crops

If a producer manages a perennial crop (such as strawberries) as an annual (harvest within 12 months of planting) from seedlings, do the seedlings have to be organic? (641) If the perennial seedlings (considered as planting stock) have not been treated with prohibited substances, a crop may be harvested within 12 months of planting (like an annual crop).

NOTE The COS 2020 has not differentiated perennial seedlings/transplants (plants in soil) from perennial planting stock. This is under review for COS 2025.

Non-organic perennial planting stock

When non-organic perennial planting stock, such as bare-root strawberry plants and raspberry canes, has not been treated with prohibited substances, does the crop need to be under organic management for at least 12 months before a harvest can be organic? (642)

No. Per 5.3.2 d), 12 months under organic management prior to organic harvest is only required when the planting stock has been treated with prohibited substances.

Using perennial transplants

When using perennial transplants, does the soil and the soil amendments need to be listed in Table 4.2 of CAN/CGSB-32.311? (643)

That will depend.

Yes, if the perennial transplants are to produce an organic harvest within 12 months of planting. No. If the soil and the soil amendments are not listed in Table 4.2, the perennial transplants must be planted and managed in accordance with the standard for at least 12 months before an organic harvest, per 5.3.2 d) of CAN/CGSB-32.310.

COS 2020 has not differentiated perennial seedlings/transplants (plants in soil) from perennial planting stock. This is under review for COS 2025.

Permitted Substances Lists

Wood vinegar

Is wood vinegar (pyroligneous acid) permitted by Table 4.2 under Plant by-products and plants, or under Plant extracts, oils and preparations? (645)

No. Wood vinegar would require its own listing. It is a distillate of the compounds in the smoke created from the combustion of forestry (or plant) by-products during biochar production and cannot be considered a direct by-product or extract from plant material.