

# Final QAs – complying with 2020 Canadian Organic Standards CAN/CGSB-32.310

## 8. Maintaining organic integrity during cleaning, preparation and transportation

## 9. Organic Product Composition

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## 8 Maintaining organic integrity during cleaning, preparation and transportation

### Identification of organic products in storage

**Are signs identifying organic products as organic required on a storage unit if non-organic products also in storage are not GE? (620) July 22, 2024**

No. Identification as organic is only required on storage units when there is a risk of GE contamination (32-310 8.1.5 g)). However, an identification system is always required to distinguish between organic and non-organic products in any storage space (4.4.3).

### Staff training

**Are CBs required to verify that staff working in facilities where both organic and conventional foods are processed have the necessary training to result in compliance with the standard? (130)**

CB's are required to verify compliance with the standard. If in the course of inspecting a facility, it becomes apparent that the staff responsible for maintaining organic integrity lack the necessary training needed to differentiate between organic and conventional processes, this could be the basis of a report of non-compliance. See 32.310, 4.4 and 8.

### Irradiation (X-rays, ultraviolet radiation, microwave)

**Is ultraviolet radiation of milk, cheese and fruit juice acceptable under the COS? What about tree sap or packaging? (152, 338, 419)**

Near and medium ultraviolet (UV) rays are classified as non-ionizing radiation and can be used to treat milk, cheese and juices. But neither near nor medium ultraviolet rays can be used to boil (7.2.14) or sterilize (7.2.12.2) tree sap, such as maple or birch. Far ultraviolet radiation cannot be used on organic products. All forms of ultraviolet radiation can be used to sterilize packaging before it is filled with a product.

### X-Rays for inspection purposes

**Is the use of x-rays permitted for inspection purposes, such as detection of foreign materials, during the preparation of organic products? (556) 7 Oct 2022**

Yes, providing it is for inspection purposes only, and does not reach levels of irradiation treatment.

### **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) 19 December 2022**

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.

### **Water - Filtration**

#### **Can water that has been processed through an alkaline filtration system be used in the preparation or processing of an organic food product? (185)**

The resulting water is acceptable if it falls within Health Canada's Guidelines for Drinking Water; has a pH 6.5 to 8.5; and no prohibited substances have been added to the water or prohibited processes have been used.

#### **8.2 Cleaning, disinfecting and sanitizing**

### **Water - Product preparation and vegetable rinsing**

#### **What are the requirements for the quality of water used to wash organic vegetables or prepare organic products? (128, 5)**

Water must meet the requirements for potability as per local, provincial or federal authorities. When water is in contact with an organic product, the chlorine concentration must not exceed the levels permitted in municipal drinking water systems and rinsing is not required (Table 7.3).

### **Cleaners – Milking equipment**

#### **What is the distinction between acceptable cleaning agents for milking equipment on farms vs. those used in processing facilities? (209)**

8.2 gives direction for cleaning food contact surfaces which would be appropriate both on dairy farms and in off-farm dairy processing facilities.

### **Cleaning – Milk trucks**

#### **Is it necessary to wash milk trucks at a processing facility under the supervision of a certifying body in order to maintain certification of the milk? (108)**

No. There is no requirement to wash bulk milk trucks specifically at a processing facility placed under the supervision of a certifying body. In order to comply with the standard, documentation that substances used in the cleaning process have been removed, must be maintained to demonstrate compliance to 8.2.

### 8.3 Facility pest management and post-harvest management

#### **Pest control – Bait station location**

**When a pesticide not listed in the PSL is used in a baited station clamped to the inside wall of a facility preparing or storing organic products, is having it in the bait station sufficient to satisfy 8.3.3 requirement? (38)**

No. Only pesticides listed in PSL Table 8.3 may be used in the interior of a facility when organic products or packaging materials are present. This applies even if the pesticide is contained within a bait station and there is no potential contact between the pesticide and the organic products or packaging.

#### **Pest management - indoor/outdoor**

**Does 8.3.3 apply to pest control substances used inside facilities or to those used on the exterior? (212)**

8.3.3 applies to both indoor and exterior pest control for all operations that grow, handle, store and transport organic products. It is essential that pest control around farm buildings and storage areas does not compromise organic product integrity or the surrounding farm environment. 8.3.3 does not apply to exterior pest control at facilities when it is unlikely that organic product integrity will be compromised and unlikely that the surrounding environment will be contaminated (e.g.,, manufacturing facilities in industrial parks).The indoor/outdoor requirement is stated in 8.3.3 of 310 and reiterated in 8.1.1 a) of the PSL.

#### **Pest control in food processing facilities**

**Clause 8.3.2 states that Table 8.2 substances can be used in food processing facilities to control pests. Can substances listed in Table 4.2 (column 2) (e.g. pheromones, sodium tetraborate) also be used? (392)**

No. Only substances in the Table 8.2 can be used to control pests in food processing facilities. Substances in Table 4.2 (column 2) are strictly for crop production. Please refer to CAN/CGSB-32.310 clause 8.3.3 for alternative pest control options for food processing facilities.

## 9. Organic product composition

### Calculation of organic content – Aloe vera powder

**Can aloe vera juice or gel made from organic aloe vera powder and water be certified as organic for human consumption? How is the organic content calculated? (301.1)**

Yes. A reconstituted aloe vera juice or gel product can be certified as organic. If the principal display panel (PDP) states that the aloe vera is “reconstituted from concentrate”, the organic content of the juice or gel should be calculated using the amount of single-strength aloe vera made from the concentrate. If the PDP does not mention the reconstitution of aloe vera, the organic content of the juice or gel should be calculated by subtracting the total volume of water from the final product. (9.1.3.b)

**When organic aloe vera juice (reconstituted from 200X aloe vera powder and water) is used as an ingredient in a further food product, how is the organic content calculated for the secondary product? (301.2)**

Water used to reconstitute the powder should be excluded from the organic content calculation. For example, if 200 L of aloe vera juice (reconstituted from powder at 200X strength) is used as an ingredient in a further juice product, only 10 grams of the original aloe vera powder would be included in the calculation of the secondary product. (9.1.3 c).

### Organic percentage – liquid ingredients

**When liquid ingredients are composed of solids dissolved in added water, is the added water excluded or included in the percent organic calculation? (416) 24 March 2021**

As per 9.1.3.b, it depends upon whether the addition of water is to reconstitute a concentrate to bring it to single-strength concentration and the final product makes a reconstitution claim either on the product label or on a specification sheet. If yes, then the added water to bring the ingredient or product to single-strength concentration is INCLUDED in the percent organic calculation. If no, and the water is declared in the finished product’s ingredient statement, then the added water is EXCLUDED in the percent organic calculation of that or any future product that uses it as an ingredient.

**When calculating the organic percentage of a multi-ingredient product, that is a mixture of solid and liquid ingredients (9.1.3c), and there are no reconstitution**

**claims, is the mass of each ingredient used as-is, or should any salt or water in each of these ingredients be removed prior to the calculation? (417) 24 March 2021**

For such products the organic percentage calculation shall be made without including the water or salt that has been added by the current or prior processor and that is listed on the final product's ingredient statement.

#### **Non-organic aquaculture ingredient**

**Can a non-organic aquaculture ingredient, such as DHA Algal Oil, be added to an organic product as a non-organic ingredient? (583, 584) October 13, 2023**

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.

#### **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) 19 December 2022**

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.

#### **Gas as ingredient**

**Are gases (such as carbon dioxide for the carbonation of beverages) added as ingredients (under PSL table 6.3 or 6.4) required to be calculated as non-organic ingredients? (473) - 17 February 2020**

No. Gases are not included. Only solids and liquids must be accounted for when calculating organic content (9.1.3 in 32.310).

### **Ingredients – Organic and non-organic**

**Does the prohibition against using both the organic and non-organic form of an ingredient (9.2.1) apply to different varieties of grapes used in a wine or different flours (e.g., barley and wheat) used to bake a single bread? (173)**

It depends. Under 9.2.1, ingredients that are recognized as having distinct qualities could be considered as separate ingredients, even when they fall into the same general category of ingredients such as "flour" or "grapes". In the examples given, it would be possible to use one ingredient in its organic form and the other in its non-organic form without violating 9.2.1 provided the following restrictions are met.

For organic products with organic content equal to or >95%, the non-organic content must be less than 5% of the total and commercial unavailability must be confirmed annually for any non-organic agricultural ingredients. For products containing 70-95% organic content, commercial availability does not apply.

In both categories, the organic and the non-organic ingredients must be listed on the label to be compliant with labelling requirements in the SFCR and the guidelines from CFIA.

### **Status of components in a multi-component ingredient**

**Per 9.2.1 and 9.2.2, organic products *shall not contain an ingredient in both organic and non-organic form*. A cookie contains organic sugar, plus a multi-component ingredient (such as chocolate chips) that contains non-organic sugar. Is using organic sugar as an ingredient and non-organic sugar as a sub-part of a multi-component ingredient (chocolate chips) prohibited by 9.2.1 or 9.2.2? (636) 25 February 2025**

No. The single component ingredient (organic sugar) and the multi-component ingredient (chocolate chips) are different ingredients. In ingredients made up of sub-parts, the status of the sub-parts is not considered individually. It is therefore acceptable for a product to contain non-organic sugar as a sub-part of a non-organic ingredient, and organic sugar as a single ingredient.

### **Organic percentage of organic seed product**

**Do seed coatings or treatments need to be considered when calculating the organic percentage of an organic seed product? (519) 1 November 2021**

Seed coatings or treatments are not considered ingredients per the "ingredient" definition of CAN/CGSB-32.310 3.36 and therefore should not be taken into account when calculating the percentage of organic ingredients in an organic product. Any coating or treatment must be listed in PSL Table 4.2, columns 1 & 2.

### **Meal replacement**

#### **Is a "meal replacement" certifiable under the COR, given that it contains supplemental minerals and vitamins? (266)**

Yes. Meal replacement products may be certified organic if produced in accordance with this Standard and if they meet the nutritional profile set out by Canadian regulation for "meal replacement" products.

### **Fortification of organic food**

#### **Can juice formulated with vitamin C, vitamin D, or calcium be certified as organic? (328)**

It depends.

The answer is yes, if the calcium compounds and vitamin C (ascorbic acid) are used as acidity regulators, stabilizers, or preservatives as outlined in the individual listings in Table 6.3.

The answer is no, if vitamin C, vitamin D, or calcium is added for nutritional fortification. Juice is categorized as a voluntary fortification option by the Canadian Food & Drug Regulations and the PSL (Table 6.4) states that 'Vitamins and mineral nutrients' "shall be used if legally required". "Legally required" means that fortification is mandatory by government and that is not the case for juices.

Refer to CFIA's Foods to Which Vitamins, Mineral Nutrients and Amino Acids May or Must be Added [D.03.002, FDR] and to the "Vitamins and Mineral Nutrients" listing in Table 6.4 for details.

### **Processing Aids**

#### **Does the standard require that processing aids in the production of non-organic ingredients be listed on Table 6. 5 PSL? (20.1)**

No. The processing aids used by manufacturers of non-organic ingredients are not subject to the scrutiny of Certification Bodies.

