

Final Questions and answers

Complying with 2020 Canadian Organic Standards

Permitted Substances Lists – CAN/CGSB-32.311

Tables 6.3 to 6.5, 7.3-7.4, 8.2-8.3.

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Permitted substances lists for preparation

Anti-caking agents for grated cheese

What anti-caking agents are listed in the PSL that can be used in grated organic cheese? (435, 235) - 19 Apr 2019

Currently none.

Magnesium carbonate as anti-caking agent

Can magnesium carbonate be used as an anti-caking agent in salt when used for food? (467.1) - 17 February 2020

No. Magnesium carbonate may only be used as an anti-caking agent in non-standardized dry mixes (e.g., seasonings) used in meat products with 70-95% organic content. See Magnesium carbonate, PSL, Table 6.3.

Bone Char

Is the use of bone char allowed in the processing of organic sugar? (192)

No. Although bone char is a form of Activated charcoal, it is not allowed because it is not from plant sources as required in Table 6.5 of the PSL.

Cheese Wax

Can a coloured wax containing paraffin waxes (hydrocarbon or microcrystalline wax) and a colouring agent be used to coat organic cheese? (154)

Paraffin wax may be used to coat cheese if organic waxes, e.g., organic carnauba or organic beeswax, are not commercially available and the coating is non-edible and completely peelable. See Waxes, PSL Table 6.5. The paraffin cannot contain synthetic colours, preservatives, bactericides or fungicides. Microcrystalline wax is prohibited.

Fermentation-produced chymosin

If a cheese producer makes cheese made with fermentation-produced chymosin FPC, can it still be labelled certified organic? (280)

No. FPC is produced by fermentation processes using bacteria, fungi or yeast that have had bovine rennet-producing genes inserted into them. This means FPC is a product of genetic engineering, which is prohibited for use in organic production (1.4 a) and 3.27 of 32.310.

Chymosin

For cheese production, can we use non-GE chymosin containing sodium benzoate? (151)

Non-GE chymosin extracted from conventional calf stomach linings is permitted, providing an organic source is not commercially available. See Enzymes, PSL, Tables 6.3 and 6.5. Additional requirements outlined in 6.2.1 of PSL must be addressed if the production of allowed chymosin products involves the use of substrates or growth media. When the sodium benzoate acts as a preservative for the chymosin, it is classified as a non-agricultural subpart having a functional effect on the ingredient but not on the final product, nor is it declared on the product label, it is permitted (9.1.2 of 310) as of the 2020 revision of the standard.

Use of desiccants

Are silica gel pouches in containers of organic spices permitted? (439) - 19 Apr 2019

Yes. Silica desiccants, which includes silica gel pouches, may be used as silica, that is silicon dioxide, is listed in 6.5 with no restriction (except for maple products). Because the silica gel packs will be in direct contact with food, they are expected to be food grade as are packaging (8.1.6, 32.310) and other food-contact surfaces (8.1.1, 32.310)

Dextrose

Can Dextrose be used as a flavouring agent in organic products? (236)

Yes. Organic dextrose may be used as a flavouring agent in organic production.

Carriers

Can permitted substances contain carriers? (376)

As of the 2020 version of the standard, there is a separate “Carrier” listing with detailed restrictions as follows: “Carriers of non-agricultural origin may be used if listed on Tables 6.3, 6.4 or 6.5. Non-organic carriers of agricultural origin (such as wheat starch) may be used if ingredients or processing aids containing organic carriers are not commercially available”. See Carriers, Table 6.3, PSL.

Gelatin – Alternatives

Are there acceptable alternatives to gelatin, such as seaweed and plant derived hypromellose? (118)

Plant substances such as seaweed extracts are acceptable alternatives to animal-derived gelatine. Hypromellose is a non-agricultural substance and therefore cannot be used because it is not specifically included in the PSL.

Indirect Processing Aids

Can products not listed on the PSL be used as “indirect processing aids”? (e.g., – mineral oil on cutter/slicer blades) (61)

Indirect processing aids aka “incidental additives” cannot compromise organic integrity.

In short, agricultural products not on the PSL can only be used as processing aids if they are organic. Non-agricultural products must be on the PSL. See Incidental additives, 3.35, “” and 8.1.2 in 32.310.

Mineral Salts of Ascorbic Acid

Can the mineral salts of ascorbic acid (calcium ascorbate and sodium ascorbate) be used as food additives (Table 6.3)? (163)

No. Ascorbates are not the same substance as ascorbic acid, and therefore cannot be used.

Nitrates

Are nitrates forbidden in all processed foods? Is it possible to produce organic bacon with culture celery powder? (56, 153)

Nitrates such as those found in celery or chard extracts, juices or cultured powders may be used. Organic supplies must be used if commercially available. See Meat Curing Agents, Table 6.3, PSL.

Meat curing agent – Cherry extract

Is cherry extract powder permitted as a meat curing agent? (534) 8 March, 2022

Yes, if the powder is organic. No, if it is not organic as the annotation for Meat curing agents (Table 6.3) does not indicate cherry.

Stevia

Can stevia be used as a sweetener in organic products? Is non-organic stevia admissible under the 5% non-organic ingredients rule? (171)

Stevia is a plant product which can be used in the manufacture of organic products. As stevia is commercially available in organic form, this form must be used.

Starch

Beyond non-organic rice or waxy maize starches, which are listed as permitted by the 'Starch' listing in Table 6.4, would starches made from other sources (i.e., tapioca, potatoes, arrowroot, cassava, etc.) have to be certified as organic? (433) - 19 Apr 2019

Yes. Unless the specific starch is listed in the PSL then certified organic varieties are required.

Sources of tocopherol in food preparation

When preparing food products that legally require the addition of vitamins and minerals, does the annotation for 'Tocopherols and mixed natural concentrates' in Table 6.3 of the PSL apply? (564) (19 December, 2022)

No. If the vitamins and minerals are legally required (Table 6.4 of PSL), there is no other restriction to the source of Vitamin E (tocopherol) apart from being compliant with clauses 1.4 & 1.5 of CAN/CGSB-32.310 and clause 6.2.1 a) & b) CAN/CGSB-32.311 (if applicable). The annotation applies when tocopherols are added as antioxidants.

Requirements for agricultural ingredients

Can non-organic skim milk powder be used as a minor agricultural ingredient in an organic food product, if the milk comes from cows fed with GE feed? (531.1) 8 March, 2022

Yes, provided organic skim milk powder is not commercially available. There are no requirements that animals be fed non-GE feed if the ingredient is non-organic.

Can a minor non-organic agricultural ingredient be fortified? (531.2) Yes, if legally required, such as fluid milk products, white flours, etc., or if legally permitted in non-dairy substitute products as per PSL 6.4 Vitamins and mineral nutrients. The ingredient and nutrients shall comply with prohibitions in 1.4 & 1.5 (32.310) as per PSL 6.2.1, and with 9.2.1 d) & 9.2.2 a) (32.310).

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) December 13, 2023

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) 13 Dec 2023, 29 Apr 2024

a) dried fruit with added sulphites?

No, sulphites are prohibited per 1.5 f) (with one exception for alcohol production see Sulphur dioxide, anhydrous (SO₂) 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)

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.

Vitamin D

Is the use of vitamin D allowed for fluid milk products if it contains a preservative not listed on the PSL? (137)

Yes. Vitamin D sources containing non-listed preservatives are allowed in organic fluid milk products as the addition of Vitamin D to milk is required by law. Keep in mind that GE rules regarding the inclusion of substrates as outlined in 6.2.1 (32.311) do have to be addressed.

Vitamins and minerals added to organic products

Can vitamins and minerals be used to fortify organic products if not legally required? (500.1) - 18 Dec 2020

No. Organic products may not be voluntarily fortified with vitamins and minerals even if legally permitted. The only exceptions permitting voluntary fortification of organic products are a) dairy substitutes that are plant based, and b) fortification with ferrous sulfate when legally required or voluntarily if legally permitted. See Vitamins and mineral nutrients, PSL 6.4.

Do vitamins and minerals have to be certified organic to be used in organic products with 95% or above organic content? If yes, are commercial availability searches required? (500.2) - 18 Dec 2020

No. Vitamins and minerals are not agricultural products and hence are not certifiable to organic standards. Vitamins and Minerals used in organic products are ingredients classified as food additives and are listed in PSL 6.4. Per 9.2.1 a, ingredients classified as food additives are subject to substance listing annotations and restrictions specified in 6.2 of CAN/CGSB-32.311. As there are no organic commercial availability requirements listed in the annotation for Vitamins and Minerals in PSL 6.4, commercial availability is not applicable. However, there are restrictions in the listing annotations on when they may be used. See Vitamins and mineral nutrients, PSL 6.4.

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) 29 Apr 2024

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.

Slaughter by-products in vitamins and minerals

Does 32-310 6.4.4 e) restricting mammalian or avian slaughter by-products in feed apply to vitamins in feeds? (622) July 22, 2024

No.

Omega-3 Fatty Acid in infant formula and baby food

Can Omega-3 Fatty Acid for use in an organic baby food or infant formula be reviewed for compliance as a legally required nutrient under the listing of Vitamins & mineral nutrients in Table 6.4 of PSL? (624.1) July 22, 2024

No. It is not a vitamin or mineral. Infant formula (and not baby food) is legally required to provide a ratio of essential fatty acids (omega-3 and omega-6) per the Food and Drug Regulations and would need to be supplied by organic ingredients.

When reviewing Omega-3 Fatty Acid, such as the docosahexaenoic acid (DHA), as an ingredient, do all sub-parts including preservatives need to comply with 32.311 Section 6? (624.2)

The consideration of subparts is not applicable as Omega-3 Fatty Acids including DHA are not agricultural ingredients nor are they listed in Section 6.

Substrate for probiotics

Can a non-organic agricultural substance such as whey be used as the growing medium to manufacture probiotics used as an ingredient for food? (375.2)

Probiotics are covered by “Micro-organisms” in Table 6.4 and may contain residues of agricultural and biological substances as long as they are from non-genetically engineered sources (1.4 a). Probiotics may also contain non-agricultural subparts, such as carriers, or stabilizers that have a functional effect on the ingredient (the probiotic) but not on the final product in which the probiotic is being added (9.1.2 in 32.310).

Use of calcium chloride in beer making

May calcium chloride be used as an ingredient in beer making? (482) - 29 April 2020

No. Calcium chloride as an ingredient is restricted to milk, fat, soybeans and fruit and vegetable products. See Table 6.3, Calcium chloride. However, water as an ingredient is outside the scope of the standard, if calcium chloride is used as a water treatment - before the water enters the production stream, it would be permitted.

Yeast foods with DAP for alcoholic beverages

Can yeast foods containing diammonium phosphate (DAP) be used in alcoholic beverages such as distilled spirits and other fermented products such as vinegar. (508) 24 March 2021

No. The annotation for Yeast foods in 32.311 Table 6.3 only permits the use of DAP in cider, mead and wine.

Preservatives for organic yeast

If organic yeast is not commercially available can non-organic yeast products containing preservatives such as sorbitan monostearate be used? (457) 24 March 2021

Non-organic yeast may be used provided that all other prohibitions of 32.310 are met, including 9.1.2. 9.1.2 would allow the presence of sorbitan monostearate in the yeast product as long as the non-listed preservative does not have an effect on the final organic product, is not declared on the organic product label and is present only in insignificant amounts.

Amidated, low-methoxyl pectin

Do food products containing amidated, low-methoxyl pectin qualify for use in products with $\geq 95\%$ or 70-95% organic content? (357)

Yes, amidated versions are permitted as there are no constraints in the annotation for pectin in Table 6.3.

Vegetable cooking spray

What are the requirements for the propellants found in a manufactured organic vegetable cooking spray? (528.1) 6 December, 2021

Propellants present in organic cooking sprays would be a food additive and needs to be listed in Table 6.3 - Ingredients classified as food additives.

What are the requirements for a non-organic vegetable cooking spray (when organic oil is not commercially available (per Tables 6.3 and 6.5 Vegetable oil listings), including the propellant, used to coat baking trays as a release agent during organic preparation? (528.2) 6 December, 2021

Non-organic cooking sprays used to coat surfaces during preparation, leaving negligible amounts on the organic product, are classified as incidental additive 32-310 3.35. The agricultural components (and not the propellant) need to be listed in Tables 6.3, 6.4 or 6.5, per 32.310 8.1.2 c).

Potassium bisulphite in wine production

Is Potassium bisulphite permitted for use in wine production? (591) October 13, 2023

No. Potassium bisulphite is not listed per PSL Table 6.3 Sulphur dioxide, anhydrous (SO₂) listing.

Use of collagen casings

Are collagen casings listed in Table 6.4 of CAN/CGSB-32.311 permitted for use in the preparation of pork, beef or veal sausages? (639) 25 February 2025

No. Collagen casings are permitted only for poultry sausage as indicated in the listing annotation.

Cleaners, disinfectants and sanitizers

Conformity of a cleaning product

Manufacturers of concentrated sanitation products may provide Safety Data Sheets (SDSs) showing the ingredients of both the concentrated form and the diluted form (as used) on the same document, or they may provide two distinct SDSs – one specific to the concentrated form and another specific to the diluted (as used) form. Which SDS should be used to evaluate the conformity of a cleaning product to the PSL if the ingredient listings are different? (437-539) – 13 December 2021

If using a diluted version, either purchased or diluted on-site, the SDS pertaining to the diluted substance applies. In the event that no SDS was issued for the diluted version – the SDS of the concentrate applies. Further, if used without a removal event (PSL Table 7.3), the label of the concentrated product is referred to for both the concentrated and diluted version PSL 7.1.3.

Chlorine to disinfect poultry carcasses

Can chlorine be used to disinfect livestock carcasses? Are there alternative substances or processes? (254, 476) -24 March 2021

Yes. Livestock, including poultry, carcasses, may be disinfected with chlorinated water, provided the concentration of chlorine does not exceed the maximum limits applicable under regulations for safe drinking water. See Table 7.3 – Chlorine compounds. As an alternative peracetic acid can be used at disinfecting rates (Table

7.3). Alternative physical processes such as steam, hot water or High-Pressure Processing (HPP) are allowed.

*Water quality falls under the jurisdiction of provincial and territorial governments. Health Canada's Guidelines for Canadian Drinking Water Quality indicates "Free chlorine concentrations in most Canadian drinking water distribution systems range from 0.04 to 2.0 mg/L". The US Centers for Disease Control and Prevention (CDC) state "chlorine levels up to 4mg/L (4ppm) are considered safe in drinking water".

Detergent as a cleaner

Is a detergent considered a cleaner under clauses 7.1.2 and 7.1.3 of CAN/CGSB-32.311 (PSL)? What differentiates a detergent from a cleaner? (558) 19 December, 2022

Per PSL 7.1.1, any substance used to remove dirt, filth and foreign matter from organic products and organic product contact surfaces is a cleaner. A cleaner is only a detergent if specifically formulated for cleaning through the process of detergency as defined by ISO 862:1984(en) – Surface active agents <https://www.iso.org/obp/ui/#iso:std:iso:862:ed-1:v1:en>. Detergency is result of the action of several physico-chemical phenomena and a detergent is a combination of many components including surfactant, chelating agent, enzyme, and dispersant.

Assessment of detergent biodegradability

Does each component (e.g., surfactant, chelating agent, enzyme, and dispersant) of a detergent need to be assessed individually for its biodegradability? (444) – 21 June 2019

No. The purchased "detergent" product must be rated as biodegradable.

Is the manufacturer of a detergent required to test the biodegradability of its product based on the definition of "biodegradable" in clause 3.11 of the Canadian Organic Standard (CAN/CGSB 32.310)? (515.1) 1 July 2021

In the 2020 version of CAN/CGSB-32.310, the definition of "biodegradable" (3.11) applies specifically to inputs and production aids in crop and livestock production. For detergents, biodegradability shall be assessed based on OECD definitions and standards; refer to Detergents, Table 7.4 of the PSL. Therefore, the manufacturer

shall demonstrate that the biodegradability of the detergent meets or exceeds the guidelines defined by the OECD when assessing conformity to CAN/CGSB-32.3210.

Can a so-called biodegradable detergent contain non-listed or restricted substances such as phosphoric acid, whose use is only permitted for dairy equipment? (515.2) 29 Apr 2024

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

Elimination of a detergent

Regarding the annotation for the Detergents listing in Table 7.4 of the PSL, how can you determine that a detergent is “readily eliminated during wastewater treatment such that harm to the environment is minimized”? (559) 22 March 2023

The annotation is not about the quality of the detergent or the manufacturer’s ability to demonstrate that it is “readily eliminated...”; this annotation requires that wastewater treatment be in place to eliminate potential environmental harm when a nonbiodegradable detergent is used. The ingredients of any non-biodegradable detergent must comply with 7.1.3 (32.311) or the conditions of 8.2.3 (32.310) must be met.

Anti-stick film after rinsing

Is a detergent used on organic product contact surfaces that leaves an anti-stick film after rinsing permitted? (596) December 13, 2023

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).

Substances for egg cleaning

Can substances listed in Table 7.4, with a removal event, be used to clean eggs? Is potable water required to wash eggs? (351)

Only substances listed in Table 7.3 as permitted for direct contact with organic products may be used to clean eggs. Water used for egg washing must be potable. See CFIA ‘Shell Egg Manual’ requirements. Take note, however, that organic vegetable oils, or other appropriate non-organic processing aids in PSL Tables 6.5 such as, e.g., silicon dioxide, could be used as defoaming agents during egg washing.

Non-food Contact Surface Cleaning

Do clauses 7.3 and 7.4 apply to the cleaning of: dedicated and non-dedicated spraying equipment; of irrigation systems; and non-food contact surfaces such as floors, windows, staff toilets etc.? (21.1, 10)

Tables 7.3 and 7.4 of the Permitted Substances Lists generally apply to products (7.3) and product contact surfaces (7.3 and 7.4). While the cleaners listed in these tables may be used in other applications, and are preferred, cleaning of non-product contact surfaces is not restricted to these cleaners. In the case of the use of substances not listed in 7.3 & 7.4, the operator is responsible for ensuring that no residual contamination occurs on land and crops.

Substances used as cleaners

Can substances listed as food additives (PSL 6.3) or processing aids (PSL 6.5), such as tartaric acid, be used as cleaners in facilities where organic product preparation takes place? (319)

If substances listed in 32.311 7.3 & 7.4 have been shown to be ineffective, substances listed in Tables 6.3 and 6.5, such as tartaric acid, or any other non-listed substance, can be used to clean organic product contact surfaces in facilities where organic product preparation occurs, as per criteria stated in 310 8.2.3.

Botanical compounds as cleaners

Can essential oils be used to clean organic products or organic product contact surfaces? (366)

Essential oils compliant to the restrictions described in the new Essential oils listing in Table 7.4 may be used to clean surfaces in contact with organic products. But they cannot be used to clean organic products as they are not listed in Table 7.3.

Surfactant, spreaders, stabilizers, foaming agents

Must formulants, such as surfactant, spreaders, stabilizers, foaming agents, contained in commercial cleaning products be listed on 7.3 and 7.4, or only the active ingredients? (453, 610.1) – 29 Apr 2024

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) 29 Apr 2024

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.

Cleaning of dairy equipment

Is sodium phosphate tribasic dodecahydrate permitted for use as a cleaner, disinfectant and sanitizer on dairy equipment as a derivative of phosphoric acid? (493) – 18 August 2020

No. Cleaning substances, including derivatives, must be listed in Tables 7.3 or 7.4. (7.1.3 in CAN/CGSB-32.311, SIC Final Questions and answers -Q&A 453) unless the derogation in 8.2.3 of CAN/CGSB-32.310 is pertinent.

Colloidal silver

Can colloidal silver be used as a cleaning product for food contact surfaces? (274)

Use of colloidal silver as a cleaning product must comply with 8.2.3 and 1.4 of 32.310.

Neem oil and diatomaceous earth

Can neem oil (listed in Table 8.2) be permitted in direct contact with organic food products? (310)

Yes. While the title of 8.2 is “Facility pest management substances”, there is no restriction on the use of diatomaceous earth, carbon dioxide or neem oil in relation to food contact post-harvest.

Peracetic Acid

Peracetic Acid (peroxyacetic acid) is listed on table 7.3 PSL. Are all forms of this substance allowed, regardless of method of production? (221)

Yes. There are no restrictions on the method of production in the annotation for peracetic acid

Peracetic acid containing synthetic acetic acid

Is peracetic acid that contains synthetic acetic acid permitted? (390)

Yes. Commercially, peracetic acid is produced by reacting synthetic acetic acid and hydrogen peroxide and residues of both reactants will more than likely be present. As there is no restriction in the peracetic annotation in PSL Table 7.3, peracetic acid products containing residual amounts of hydrogen peroxide and acetic acid are permitted for use in direct contact with organic products without a removal event.

Electrolyzed water

Is electrolyzed water allowed by the Canada Organic Standards? (290, 491) – 18 August 2020

As of 2020, electrolyzed water is listed under Chlorine compounds, Tables 7.3, 7.4, PSL: ‘c) hypochlorous acid generated via electrolyzed water’.

Sanitizing in apple packing lines

Can a calcium hypochlorite product containing additional components not included on Table 7.3: sodium chloride, calcium carbonate and calcium hydroxide, be used in apple packing lines? (513) 24 March 2021

Yes. Calcium hypochlorite is listed on table 7.3 for use in direct contact with food, and these three secondary ingredients – sodium chloride, calcium carbonate and calcium hydroxide – are permitted as they are used to treat drinking water as per 32.311 7.1.3 (“Other non-organic ingredients shall be limited to compounds used to treat drinking water”). Concentration of the calcium hypochlorite shall not exceed maximum levels for safe drinking water when in direct contact with organic products such as the apples.

*Water quality falls under the jurisdiction of provincial and territorial governments. Health Canada’s Guidelines for Canadian Drinking Water Quality indicates “Free chlorine concentrations in most Canadian drinking water distribution systems range from 0.04 to 2.0 mg/L”. The US Centers for Disease Control and Prevention (CDC) state “chlorine levels up to 4mg/L (4ppm) are considered safe in drinking water”.

Use of detergents to wash clothing of employees

Must laundry detergents used to wash clothing of employees comply with the Canadian Organic Standards when they work in an operation manufacturing organic products? (489) 18 August 2020

When clothing is in direct contact with organic food intentionally (i.e., fabric gloves), laundry detergents must comply with clause 8.2 of CAN/CGSB-32.310. Otherwise,

the clothing is not considered a food contact surface, and is outside the scope of the standard.

Use of piperonyl butoxide

Are pyrethrin products containing piperonyl butoxide as a synergist permitted for use in organic facility pest management programs? The annotation in 8.2 of CAN/CGSB-32.311 specifically prohibits piperonyl butoxide as a carrier. (490) – 18 August 2020

No. The annotation for pyrethrin is to prohibit its use if it contains piperonyl butoxide. When used as a synergist, piperonyl butoxide is considered an active ingredient under the Pest Management Regulatory Agency and would need to be listed in CAN/CGSB-32.311 to be acceptable in organic production.

Mint oil as sprout inhibitor

Clove oil is permitted as a post-harvest sprout inhibitor for potatoes (Table 8.3). Can other plant oils, such as mint oil, be used for this purpose? (514) 1 July 2021

Although only clove oil is specified in Table 8.3, following consultation with the PSL Preparation Working Group, the SIC has clarified that oils from three plant families, specifically Lamiaceae (mint family), Apiaceae/Umbelliferae (celery family) and Myrtaceae (clove family), may be used as post-harvest sprout inhibitors for potatoes.

Use of 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) October 13, 2023

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).