

Standards Interpretation Committee 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 Canada Organic 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 60 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Comment Period: July 16 to September 17 2012

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General Principles and Management Standards

1. Scope

Can inputs, which have been produced using substrates from GE plants, be used in organic food production? (88)

The Standards Interpretation Committee (SIC) has received a number of questions which relate to the approval of inputs which may have been produced using a substrate derived from GM plants, usually corn or soybeans. The Canadian Organic Standard states in section 1.4.1:

“When producing or handling organic products it is forbidden to use any of the following substances or techniques; a) all materials and products produced from genetic engineering... except for vaccines only that have been grown on genetically engineered substrates but are not themselves a product of genetic engineering.”

In stating a specific allowance of “vaccines only” grown on genetically engineered (GE) substrate, the Standard implies that all other inputs grown on GE substrates are prohibited. However, in researching the question, the SIC identified many other inputs that are currently in use, which cannot be sourced from a supplier who is able to guarantee that no GE substrates are involved. For example:

- **Farm Inputs:** antibiotics, *Bacillus subtilis*, compost starters, *Rhizobium* sp, and vaccines.
- **Food Additives & Processing Aids:** ascorbic acid, citric acid, cultures, vitamin B, vitamin C, yeast products, xanthum.

Preliminary research by the SIC also revealed that many of these products are vital to the organic sector, and that to rule according to the strictest interpretation of the Standard and prohibit them would effectively prevent some current operations from continuing. The practices of our two major trading partners, with whom we have equivalency agreements, were also looked at. It appears that neither the US or EU have resolved the discrepancy between principle and practice. The global practice, in fact, seems to be very similar to our own, where the status quo is to allow inputs grown on GE substrates where no substitute is available.

In Canada, the body responsible for revision of the Standard is the CGSB Committee on Organic Agriculture (Technical Committee). The SIC has referred this question to the Technical Committee (TC), since a definitive conclusion must come from them by way of revision of section 1.4.1. However, at the time of this statement (June, 2012), the Canadian General Standards Board (CGSB) is inactive due to absence of funding. Certifying Bodies and operators need clarification, and without some clear statement on the issue, various interpretations could result in confusion and disadvantage for some operators. The SIC is therefore recommending to the Canada Organic Office, that as an interim measure, until such time as the TC is reconvened and able to debate a possible revision of 1.4.1, the following direction be taken:

As an interim interpretation, and until such time as the Canadian Organic Standard is revised, inputs produced using GE substrates may be used with the following restrictions:

- 1) Operators must only use inputs grown on GE substrates when it has been documented that there is no commercially available non-GM alternative.
- 2) Inputs resulting from the use of genetically modified microorganisms are prohibited.
- 3) Operators must obtain from the supplier written confirmation that no traces of the GM material persist in the final product.

5.2 Environmental factors

Are the lubricants used in harvesting equipment regulated by the Standard? (122)

There is no reference to the maintenance or lubrication of harvesting equipment in the Standard. Maintenance and lubrication of harvesting equipment is included under 5.2 Environmental Factors which states "measures shall be taken to minimize the physical movement of substances prohibited by 1.4.1." Equipment must be well maintained to minimize potential contamination.

5.4 Soil fertility and crop nutrient management

Does the definition of crop rotation in section 3 of the Standard mean that growing the same crop 2 years in a row is inadmissible? (134)

While the standard states that crop rotation shall be as varied as possible, growing the same annual crop two years in a row is not prohibited. 5.4.1 and 5.4.2 require that a soil fertility and crop nutrient management program be maintained. A regular soil monitoring program can be used as evidence of "practices that maintain or increase humus levels, that promote an optimum balance and supply of nutrients, and stimulate biological activity in the soil".

5.5 Manure Management

If GMO plants are used in the production of compost, can that compost be used to fertilize organic farms? We are concerned with families who buy conventional food and add the household waste to their compost. (129)

Based on 5.5.1, the presence of GMO plant material is strongly discouraged, but does not eliminate the possibility of use as compost feedstock. (see table 4.2, 32.311 "Plant and Plant by-products")

6.7 Livestock Health care

In the case of antibiotic use in dairy cows, if the operator provides test results to show that there is no residue in the milk, can the compulsory 30 day withdrawal period be shortened? (125)

No. 6.7.6 e. ii states the minimum withdrawal of 30 days after the use of any antibiotics, even topical applications in milking cows. No exceptions are specified.

The standard states in 6.7.6 e. iv that "Dairy animals shall undergo only two treatments of combined antibiotics and parasiticides per year" Does this mean two separate incidents of treatment with antibiotics and paraciticides administered in combination or total of two treatments per year including each incident of an antibiotic or parasiticide as one treatment? (135)

6.7.6 e. iv means that the maximum allowable is a total of two treatments per year including each incident of an antibiotic or parasiticide as one treatment. For example when a combination of two drugs is supplied at the same time, they count as two treatments.

8. Preparation and handling of organic products

Are CB's 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 staff who are 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, 8.1, 8.3.10 c)

What are the requirements for water quality, where the water is used to wash organic vegetables? (128)

There is no requirement for water quality in the Standard which applies specifically to washing vegetables. Other regulations which govern handling of food products (e.g. CFIA's Code of Practice for Minimally Processed Ready-to-Eat Vegetables) apply to organic vegetables.

Permitted Substances Lists

4.2 Soil amendments and crop nutrition

What documentation is required to substantiate "common degradation of such contaminants during the composting process" as outlined in table 4.2 "composting feedstocks"? (133)

Acceptable documentation would consist of published academic studies. Claims made by manufacturers must be verified by independent research. Operators also have the option of analysis of the final product to confirm that no contaminants persist.

4.3 Crop production aids and materials

In the production of organic mushrooms, can table salt be used as a spot control measure for disease on mushrooms? (132)

No. This substance is not listed on table 4.3 as a pest control product.

Can PVC tubing be used as structural material to hold insect nets? (136)

Yes. PVC tubing may be used. The prohibition of poly vinyl chloride for mulches and row covers does not apply to the structural material that would be used to suspend the row cover.