

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/CGSB32.311).

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: January 23rd to March 22nd 2013

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1.Scope

Is Lysine, produced using a fermentation process and a specially selected bacteria synthetic or non-synthetic? Providing the bacteria are non-GE, would this form of Lysine be compliant with the standard if used as an ingredient in livestock feed? (145)

Lysine products such as lysine sulphate produced through biological fermentation fall within the Standard's definition of non-synthetic and are allowed. The bacteria which are used in the fermentation process must be non-GMO. Products grown on GMO substrate are allowed only if there is no commercially available alternative. All forms of lysine HCL are non-compliant due to post fermentation chemical processing.

6. Livestock production

Can the allowance of non-organic feed in catastrophic circumstances (6.4.1 a) be expanded to include commercial or logistical challenges outside the operator's control? (e.g. a shipment is held up by border inspection) (156)

No. The examples of farm scale catastrophic events cited in 6.4.1 (fire, flood, extreme climatic conditions) do not extend to commercial or logistical problems.

Is the space requirement for cattle (6.8.8) the same for all breeds or can an adjustment be made for smaller animals such as Jerseys? (158)

The Standard does not make a distinction for breeds of different sizes. The space requirements are the same for all cattle.

7. Specific Production Requirements

Is the rinsing of sprouts with chlorinated water allowed? If so, in what concentration? (150)

Chlorinated water may be used to rinse sprouts (7.4.2) provided the level of chlorine does not exceed the limit for safe drinking water.

8. Preparation and Handling of Organic Products

Is the use of ultraviolet radiation to diminish microbial flora admissible in foods such as milk and cheese? (152)

No. Ionizing radiation, which includes violet light, is prohibited in section 8.1 and 1.4.1 h for organic food.

For cheese production, can we use chymosin in a salt brine solution with sodium benzoate added as a preservative? (151)

Chymosin produced by genetically modified micro-organisms is prohibited as per 1.4.1 a. Chymosin extracted from calf stomach linings is permitted and should be from an organic source when commercially available (refer to 'enzyme' listing in PSL 6.4). According to 8.2 & 8.2.7 of 32.310 only preservatives listed in Section 6 of 32.311 can be used. As sodium benzoate is not listed on the PSL, allowed chymosin products may not be preserved with sodium benzoate.

Can the ingredient "cultured celery powder" be used as a source of nitrite? (153)

Yes. If the cultured celery powder is organic, it may be used as a source of nitrite in the curing of organic meat.

Permitted Substances Lists

For soil amendments and crop production aids, is it enough that the active ingredients are compliant, or does the certifier need to review the list of inert ingredients and formulating agents? (168)

All substances contained in soil amendments and crops production aids must be disclosed by the supplier for review by the CB. Table 4.3, under the heading "Formulants" provides some guidance in evaluating non-active ingredients (inerts) in crop production aids.

Does the inclusion of Calcium Phosphate (monobasic, dibasic and tribasic forms) on table 6.3 for use in processing imply that these substances can also be used as soil amendment or Crop Production Aids? (Tables 4.2 and 4.3) (155)

No. The inclusion of substances on Table 6.3 for processing does not make them compliant for other uses. However, Table 4.2 does list mined minerals, making the natural form of calcium phosphate (apatite) acceptable as a soil amendment.

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

No. Wax as listed in table 6.4 and 6.6 must be non-synthetic only: a) carnauba wax and b) wood resin (processing product of resin component). The requirements for colouring agents are; "From non-synthetic sources only and shall not be produced using synthetic solvents and carrier systems or any artificial preservative".

Questions & Answers commented, reworded and [archived](#) (not back to comment period)

Is a yeast derived protein included under the definition of micro-organisms and yeasts in section 5.2 of the PSL? (120)

A yeast derived protein is not a yeast; it is a protein. Protein for use in organic livestock rations must be in compliance with section 6.4.4.(32.310) Protein derived from organic yeast could be compliant with the Standard, depending on the method of fractionation.

In 8.2 of the Standard, what does the term "constituent of an ingredient" mean? Are incidental components or carriers considered constituents? (131)

Constituents refer to all the components contained in an ingredient. Every constituent of every ingredient including carriers or preservatives needs to be included in the calculation of constituents' percentages and reviewed with regard to compliance with the PSL.