

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

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Comment Period: March 25th to May 24th 2013

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General Principles and Management Standards

5. Crop production

Does the presence of animal droppings in fields, orchards and vineyards require a waiting period as prescribed in 5.5.2.5? (159)

5.5.2.5 does not apply to incidental animal droppings such as those from wild animals or birds, grazing or working animals; however, 5.5.2.4 (a) does apply and requires diligence on the part of the operator to ensure that any activities under his/her control do not cause pathogenic microbial contamination of the crop.

6. Livestock production

What are the indoor and outdoor space requirements for pullets (immature laying hens)?

(160)

While there are no indoor or outdoor space requirements for pullets specified in the Standard, Section 6.8 gives extensive guidance in evaluating living conditions, according to the needs of livestock. All of these requirements apply to pullets as well. In addition, since pullets are growing birds similar to broilers, the maximum density of 21 kg/m² set out for broilers in 6.8.11.9 can be used as guidance.

7. Specific Production requirements

Does any use of a prohibited substance within 3000 meters of an apiary automatically disqualify the honey from achieving compliance with the Standard? (115a)

The requirement contained in 7.1.9 for a buffer zone of 3000 meters does not allow the presence of prohibited substances or their residues that present a risk of contamination to bees and their products during the period when the bees are feeding. Products such as but not limited to systemic seed treatments, agricultural pesticides, herbicides or GMOs may not be present within the buffer zone. Non-agricultural incidental presence of prohibited substances used on residential properties within the 3000 m buffer zone may pose an insignificant risk and not prevent compliance with the standard. Contaminants used by neighbouring home owners and other non-agricultural prohibited substances must be assessed as to the risk they pose to the bees and the honey.

What potential contaminants are specifically prohibited, and which ones may be assessed according to the risk they pose? (115b)

Agricultural pesticides, herbicides and systemic seed treatments, as well as GMO crops within the 3000 m buffer zone always result in non-compliance. Potential contaminants used by neighbouring home owners and other non-agricultural prohibited substances can be assessed as to the risk they pose to the bees and the honey. Generally, low density rural residences within the 3000 m buffer zone may not present a high risk if it can be established (e.g. with an affidavit) that there is no routine use of prohibited pesticides or herbicides. High density housing areas such as subdivisions or cities are however not suited to organic honey production if within the buffer zone of the hives, as use of prohibited substances are more difficult to detect and control.

Organic honey production typically cannot take place if the following are found within the 3000 m buffer zone: golf courses, garbage dumps or landfill sites, industrial complexes, very busy roads, or commercial non organic greenhouses/nurseries. There may be extenuating circumstances that must be assessed by certification agencies in each case.

8. Preparation and handling of organic products

Does paragraph 8.2.1 c., which excludes salt from the calculation of organic percentage, apply only to sodium chloride, or could a sodium free substitute, such as potassium chloride also be excluded? (165)

Yes. The intent of 8.2.1 c. is to exclude salt from the calculation. If the sodium free substitute serves the same purpose as sodium chloride, it may be excluded from the calculation. The authors of the standard were likely referring to sodium chloride, but their intent could still be respected by treating sodium free salts with the same exclusion, provided that these serve only the same purpose in the product.

When processing a product which will be sold as 70-95% or 95% organic, must the operator use processing aids listed on the PSL (Table 6.6) exclusively? (20b)

When manufacturing a 70-95% or 95% organic product, all non-agricultural processing aids must be listed on in PSL 6.6 and all annotations complied with. If the processing aid is an agricultural substance the organic form must be used if commercially available. If not commercially available, non-organic agricultural processing aids can be used but must comply with 1.4.1.a, h, k and l and if listed in PSL 6.6 the annotations must be complied with.

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.

Permitted Substances Lists

4.2 Soil amendments and crop nutrition

Can potassium sulphate which has not been mined, but manufactured by combining mined potassium chloride, mined sodium sulphate and water, be used as a soil amendment in accordance with the PSL? (166)

No. The restriction to natural sources is clear in the notes for potassium sulphate in Table 4.2. Combining two mined sources to produce a new product through a chemical reaction in this case, creates a synthetic product not in compliance with the listing.

Can fertilizers used as soil amendment in organic production be supplemented with synthetic substances? (167a)

If a compliant soil amendment is enhanced or changed using additional substances, those substances must appear on Table 4.2 in order for the resulting soil amendment to be compliant.

What are the requirements for feedstock used to create microbial soil amendments? (167b)

The requirements for feedstock used to create microbial soil amendments are distinct for two separate groups of product; i) pure microbial products containing no residue of the substrate: for these, the feedstock does not require assessment. ii) product in which the microbial is

delivered along with a remnant of the feedstock : here feedstock materials must comply with Table 4.2 - PSL.

Can acetic acid solution be used as a weed control product in organic production? (172)

Yes - In a previous version of the PSL, acetic acid appeared as a substance for use in weed control with the annotation "non synthetic sources unless commercially unavailable". During a subsequent blending of several tables it was dropped. The use of acetic acid for weed control is not contrary to organic principles, but to date no commercial products have been registered for use by PMRA (Pest Management Regulatory Agency) within crops.

6. Permitted substances lists for processing

Does the Standard require that processing aids in the production of non-organic ingredients be listed on Table 6.6 PSL? (20a)

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

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 unless Table 6.3 of the PSL is revised to include them.