

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 30 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Comment period – March 6 to April 6 2017

32.310 Livestock Production	
Treatment of stored feed	2
References for animal transportation	2
Access to exercise yards	2
Small breed exemption	2
32.311 Permitted substances - Soil amendments and crop nutrition	
Non-organic spent brewers' grains as amendment	2
Wool as mulch	2
Non-complying formulants in pesticides	3
32.311 Permitted substances lists for preparation	
Added vitamins and minerals to juices	3

32.310 Livestock Production

Treatment of stored feed

Can stored livestock feed (6.4.4) be treated with PSL 4.3 and 5.2 listed substances? (330)

Substances listed in 5.2 can be applied to or combined with stored livestock feed (6.4.4). Substances listed in Tables 8.2 and 8.3 may be used if their substance listing annotation does not prohibit direct contact with organic products. Substances in 4.3 can only be used during crop production - not post-harvest.

References for animal transportation

Clause 6.5 refers to the *Code of Practice for Care and Handling of Farm animals: Transportation*. It also references in a note the *Health of Animals Regulations under the Health of Animal Act (CFIA)*. If these two sets of rules contradict one another, which one is to be referred to in evaluating compliance? (315)

These two references are not in contradiction. In fact [table 4](#) of the Code of Practice for Care and Handling is citing the Health of Animal Regulations. This table shows maximum times for travel. When these maximums are reached, it requires that the animals be unloaded and given feed, water and 5 hours of rest time.

Access to exercise yards

Must young herbivores be given access to exercise yards outside of the pasture grazing season (6.11.1)? (325)

Yes. Outside of the pasture grazing season, young herbivores must have access to exercise yards except if it can be demonstrated that doing so would jeopardize their health and/or welfare (6.11.1 c). Dairy calves must have access to pasture by 9 months of age (6.12.1.7).

Small breed exemption

Is the small breed exemption in Table 1 of 6.11.2 of 32.310 restricted to 'Dairy cows - individual maternity pens'? (329)

No. The exemption is applicable to the entire table. There was an editing error made during the last revision.

32.311 Permitted substances - Soil amendments and crop nutrition

Non-organic spent brewers' grains as amendment

Can non-organic spent brewers' grains be used as a soil amendment? As a compost feedstock? (323)

To be acceptable for use as a soil amendment, non-organic spent brewers' grains must be non-GE and any non-agricultural substances added during the brewing process must be listed on Table 4.2 of 32.311 and comply with 1.4 a) and d) of 32.310. For example, diammonium phosphate (DAP) added during the brewing process would render spent brewers' grains non-compliant for use as a soil amendment in organic production. Non-organic spent brewers' grains from GE sources are an acceptable composting feedstock.

Wool as mulch

Can conventional wool be used as mulch? (324)

Yes. Even though wool is not specifically mentioned in the mulch listing in Table 4.3, wool from either organic or non-organic operations could be used as a mulch.

Non-complying formulants in pesticides

Is a full 36 month transition period required if PMRA list 3 formulants are found in brand name pesticides that otherwise comply with Table 4.3? (326)

Yes. 36 months of transition would be required unless the pesticide used was a passive pheromone (See 'Formulants' in Table 4.3).

32.311 Permitted substances lists for preparation

Added vitamins and minerals to juices

Can juice containing added Vitamin C or D, or calcium be certified as organic? (328)

No. Juice products are not identified as requiring mandatory fortification in D.03.002 of the Food and Drug Regulation; and the 'vitamins and mineral nutrients' listing in PSL Table 6.4 says only fortification that is mandatory is acceptable (juice products are not listed in [column 1 of the Table of D.03.002](#) of the Food and Drug Regulation).