

# Questions and Answers Regarding National Standards for Organic Agriculture

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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](mailto:OPR.RPB@inspection.gc.ca)

**Comment period – July 1<sup>st</sup> to August 1<sup>st</sup> 2017**

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## General principles and management standards

### Terms and definitions

#### Visually indistinguishable

**What is the criteria or definition for “visually indistinguishable” (3.46)? Is a crop considered visually distinguishable if can be identified by an expert such as a grader or plant breeder OR must it be visually distinguishable to a common person? (349)**

The criteria for 'visually indistinguishable' is that a common person could not distinguish one from the other if the products were positioned side by side.

### Livestock Production

#### Poultry peepers/blinders

**Are poultry Peepers/Blinders, with or without attachment pins allowed when used to prevent cannibalism? (350)**

Poultry peepers / blinders are permitted only without pins and only when all other management methods have been attempted and failed. As required per 6.1.6 documentation must be maintained to demonstrate strategies are in place for the reduction of blinder use.

#### Calculation of floor footage in multi-level aviary

**Does a raised floor above the nests in a multi-level aviary count in the overall square footage as well as for the perch length? (360)**

Yes. Per 6.13.10, the calculation of total floor footage includes all useful floor levels including perches.

### Apiculture

#### Non-organic sugar for feeding colony

**7.1.11.1 b) permits the use of non-organic sugar for colony feeding under certain conditions. Does this exception allow the use of sugar derived from genetically engineered beets? (363)**

No. The allowance in 7.1.11.1 b) is for non-organic, non-GE sugar to be used as the GE prohibition in 1.4 supersedes.

### Maple products

#### Heating option for maple syrup evaporator pans

**Can natural gas be used to heat maple syrup evaporator pans? (346)**

Yes, heating options, such as wood, heating oil, electricity, propane and natural gas, etc., that do not negatively affect the integrity of the syrup are permitted.

### Greenhouse crops

#### Application of 7.5.5

**Does 7.5.5 apply to determinate (non-staked) varieties, or only to indeterminate (staked) varieties grown in containers? (342a)**

7.5.5 covers containerized indeterminate varieties grown in greenhouses for an extended period (e.g. 7 months or more) and that are supported by a trellis system (e.g. stakes, strings or wires). 7.5.5 is not applicable to non-staked determinate varieties or crops with shorter production cycles (e.g. where harvest is finished within a period of less than 7 months).

### Artificial lighting

#### **Are systems reliant only on artificial lighting allowed under COS? (342b)**

Microgreens and shoot production may use systems reliant only on artificial lighting. For greenhouse crops, however, artificial lighting is permitted only as a supplement to natural light (see 7.5.6). Note: The organic greenhouse standards were not developed with growth chamber-like systems in mind. A persuasive petition for their inclusion would need to be submitted to the CGSB Organic Technical Committee for consideration.

### Organic product composition

#### Fortification of organic food

#### **Can juice formulated with Vitamin C or D, or calcium be certified as organic? (328)**

It depends. The answer is yes, if the calcium compounds and Vitamin C (ascorbic acid) are being used as acidity regulators, stabilizers, preservatives per the individual listings in Table 6.3. The answer is no, if Vitamin C or D, or calcium are being added for nutritional fortification. Juice is categorized as a voluntary fortification option by the Canadian Food & Drug Regulations and the PSL 'Vitamins and mineral nutrients' annotation in 6.4 reads "shall be used if legally required". "Legally required" means fortification is mandatory by government and that is not the case for juices. Refer to CFIA's Foods to Which Vitamins, Mineral Nutrients and Amino Acids May or Must be Added [D.03.002, FDR] and to the "Vitamins and Mineral Nutrients" listing in Table 6.4 for details.

### Permitted substances lists

#### Soil amendments and crop nutrition

#### Heavy metal analysis of off-farm sourced compost

#### **Is a heavy metal analysis required for each individual compost ingredient used in the manufacture of off-farm sourced compost? (353)**

"No. It is not necessary to test each ingredient of a compost before the composting process. Heavy metal analysis is required at the end of the composting process, before it is blended with any other substances, such as potting mixes, minerals, other composts, etc. (See 'Compost from off-farm sources', Table 4.2.)

#### Lactic acid produced by fermentation and extraction

#### **Is lactic acid produced by fermentation and extraction allowed under the Canadian Organic Standards? Is that lactic acid considered to be synthetic? (331)**

Lactic acid produced by fermentation and extraction is permitted and the extraction process must use listed extractants (See Extractants, Table 4.2 and 4.3 and Extraction solvents, carriers and precipitation aids, Table 6.3). Lactic acid produced by fermentation and extraction is considered to be non-synthetic under the Canadian Organic Standards and is permitted as specified in the PSL as long as requirements with regard to substrates/growth media are met. Chemical processes used to purify and/or extract substances are permitted as long as they do not create new molecules and unless they are specifically prohibited by the standard. (See Synthetic substance, 3.65 (32.310))

#### Gibberellic acid produced by fermentation and extraction

#### **Is gibberellic acid produced by fermentation and extraction considered to be synthetic or non-synthetic under the Canadian Organic Standards? (332)**

Gibberellic acid produced by fermentation and extraction is considered to be non-synthetic under the Canadian Organic Standards and is permitted as specified in the PSL as long as requirements with regard to substrates/growth media are met. Chemical processes used to purify and/or extract substances are permitted as long as they do not create new molecules and unless they are

specifically prohibited by the standard. (See Synthetic substance, 3.65 (32.310) and Extractants, Table 4.2 and 4.3 (PSL)).

## Crop production aids and materials

### Kraft lignin in biodegradable planting containers

#### **Is Kraft lignin allowed as an ingredient in biodegradable planting containers that are left in the soil to decompose? (352)**

Yes. Most papers are produced using the Kraft process. If all other ingredients are listed in Table 4.2, planting containers that contain Kraft lignin can be left to decompose in soil. See Table 4.3 Biodegradable plant containers.

### Sulphonates manufactured with non-listed substances

#### **Are lignin sulphonates manufactured with non-listed substances (e.g. calcium bisulfate) permitted? (355)**

All lignin sulphonates, except ammonium lignin sulphonates, are allowed, as crop production aids, if used as chelating agents, formulants, or as dust suppressants. (See 'Lignin sulphonates' Table 4.3, and PSL 4.1.1 b).

### Synthetic pesticides in pheromone traps

#### **Are synthetic pesticides permitted in pheromone traps? (362)**

No. There is no provision for the inclusion of synthetic insecticides in pheromone traps (see Pheromones and other semiochemicals, Table 4.3).

## Livestock production

### Propionic acid containing ammonium hydroxide

#### **Is propionic acid containing ammonium hydroxide permitted as a hay or silage preservation product under CAN/CGSB-32.311 Table 5.2? (356)**

No. The allowance in the PSL 5.2 listing 'Hay or silage preservation products' is for propionic acid, not for propionic products containing prohibited compounds such as ammonium hydroxide. 1.4 f) prohibits the use of "synthetic crop production aids and materials", except as specified in CAN/CGSB-32.311.

## Ingredients classified as food additives

### Metabisulphite in alcohol production

#### **Is potassium metabisulphite allowed in alcohol production? (348)**

Yes. It is listed in the PSL (table 6.3) for use as a preservative in alcoholic beverages (as an alternative to SO<sub>2</sub>). Minimal use of either sulphite form is recommended, and the "maximum allowable levels" as listed in the "Anhydrous sulphur dioxide, sulphurous acid (sulphur dioxide, SO<sub>2</sub>)" PSL annotation should be followed.

### Amidated, low-methoxyl pectin

#### **Do food products containing amidated, low-methoxyl pectin qualify for use in products with ≥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.

## Permitted substances lists for cleaners, disinfectants and sanitizers

### 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)**

No. Only substances listed in Table 7.3 as permitted for direct contact with organic product may be used to clean eggs. Water used for egg washing must be potable. See CFIA 'Shell Egg Manual' requirements.