

# 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 –April 18<sup>th</sup> to May 18<sup>th</sup>, 2019 – REPORT

**Note: The questions and answers in this report were published in the [Final Questions and Answers- Canadian Organic Standard](#) on June 21, 2019.**

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## General Principles and management standards

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Transition of a GE crop field

**When calculating the 36-month transition period, does it begin on the date that a prohibited GE crop was last sown? Or last harvested? (459a)**

The 36-month transition period is calculated from the date on which a prohibited GE crop was destroyed (e.g. harvested, tilled, ploughed).

**Transferred to Final Q&As**

Oversight of the CB during transition

**During the transition period, does an operator need to consult with their CB before applying any crop amendments? (459b)**

Detailed input records must be kept during the 36-month transition period so that compliance can be verified by the certification body. The standards require a certification body's oversight during the last 12 months of transition, not the full 36 months.

**Transferred to Final Q&As**

Manure from nonorganic animals raised on an organic operation

**5.5.1 states "Animal manure produced on the operation shall be used first." If the operation raises non-organic animals, should this manure be used first before the operation attempts to source organic animal manure from off-farm? (438)**

Yes. Animal manure, whether from organic animals or not, produced on-farm shall be used first. On-farm nutrient cycling is an important principle of organic production. The organic matter produced on the operation shall be the basis of the nutrient cycling program. There is confusion on this issue between the English and French versions of the standard which this also seeks to address.

**Transferred to Final Q&As**

Urgent confinement of organic poultry

**Can a regional authority make the decision that organic poultry must be confined (kept indoors) based on an imminent threat to the health of the birds, and would this be sufficient to establish the requirements needed for emergency confinement of all organic poultry in a given region, as per 6.13.1 d)? (440)**

No. Ultimately each operator must make the decision that an imminent threat to health and welfare exists, and document the reasons and the length of the confinement. A documented 'High Risk' alert from a regional poultry authority may be used as one of the documented reasons for emergency confinement, but the decision to confine must be made by each operation individually.

## Permitted Substances Lists

### Crop production

**Commented – not revised – transferred to Final Q&As**

Hay preservatives with prohibited substances in an organic field

**If a hay preservative containing prohibited substances is applied while baling, and the hay is being sold as non-organic, does the field lose its organic status? (445)**

Yes. The field would lose organic status as there is no means to ensure the field will not become contaminated to some degree. Only hay preservatives approved for organic use or those containing active ingredients listed in 4.2, 4.3 & 5.2 are permitted.

**Transferred to Final Q&As**

Testing of ash

**Do all sources of ash have to be tested for heavy metals? (448a)**

No. Ash from plant and animal sources is permitted without testing if the source is known and there is no risk of there being heavy metals in the source. Testing is required when the ash source is unknown or it is known there is a possibility of the ash containing prohibited substances. Testing is to ensure the heavy metal levels are within the limits established in the Guideline for the Beneficial Use of Fertilising Residuals.

**May ash from plant and animal sources not meeting the heavy metal levels limits in the Guideline for the Beneficial Use of Fertilising Residual be used in organic crop production? (448b)**

b) No. Ash from plant and animal sources not meeting the heavy metal levels limits in the Guideline for the Beneficial Use of Fertilising Residual cannot be used in organic crop production.

**Transferred to Final Q&As**

Dried deposits of guano

**What is meant by "Shall be decomposed, dried deposits" in the Guano 4.2 PSL listing? Does it mean fresh dry deposits from wild bats or birds cannot be used? Or does it mean that the guano must have been decomposed in situ, not dried elsewhere? (434)**

Wild bat and seabird guano must decompose at the site of deposit, not be dried elsewhere, and have been in place for sufficient time to decompose and dry before collection. Collection shall not impact an active colony.

**Table 7.4 — Cleaners, disinfectants and sanitizers permitted on organic product contact surfaces for which a removal event is mandatory**

**Transferred to Final Q&As**

Assessment of detergent biodegradability

**Does each component (e.g. surfactant, chelating agent, enzyme, and dispersant) of a detergent need to be assessed individually for its biodegradability? (444)**

No. The purchased "detergent" product must be rated as biodegradable.