

January 15, 2020

Review of the Canadian Organic Standards

Work continues on the revision of the Standard

The OFC is pleased to report on the key changes presented to the Technical Committee December 18, 2019 and resulting from the comments submitted during the 90-day public consultation on the proposed changes to the Canada Organic Standard held in the summer of 2020.

This report focuses on the significant technical changes and does not cover editorial changes (i.e., revised wording that does not alter the intent of the Standard).

Analysis of comments on livestock production (clause 5 of 32.310 and Tables 5.2 and 5.3 of the Permitted Substances Lists (32.311)) will be presented to the Technical Committee on March 12, 2020.

An unanticipated item will be added to the March meeting agenda: the feeding of bees during the dormant period. The Standards Interpretation Committee (SIC) received a question about the annual practice of feeding bees in the winter. The SIC response was then submitted [for public review](#) and received numerous comments from beekeepers. Hugh Martin, the Chair of the Technical Committee, therefore agreed that this new item should be added, albeit belatedly, to the COS 2020 revision work.

Report

Public review comments have an impact

Certain proposed changes were withdrawn

The sector is closely monitoring the revision work: the hundreds of comments submitted in the public review prompted the working groups to cancel or modify the recommendations approved by the Technical Committee in March 2019. Input from the public has helped to create a better standard – one that is easier to understand and better reflects the issues facing operators.

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Looking forward to spring?

Support the review of the Canadian Organic Standards so that when summertime comes, you can devour organic strawberries grown according to the Organic Standard!

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Dairy Farmers of Canada



BC Organic Fruit Tree Growers Association

Alberta Organic Producers Association



Perhaps the most notable turnaround is the Greenhouse Task Force's reversal from the allowance of 100% artificial lighting in greenhouses for a maximum period of 60 days.

The industry strongly disagreed with the recommendation and submitted numerous letters of protest with a petition with several thousand names.

Opponents to the artificial lighting clause argue that existing organic vegetable farms would face fierce competition from companies producing in closed environments (e.g., warehouse operations). Many also feel that the unnatural practice of using 100% artificial lighting may lead to less nutritious or less flavourful produce. They are concerned that growing crops in closed environments without natural light and in small volumes of soil would undermine the credibility of the Canadian organic industry within Canada and with our trading partners in other countries.

However, a derogation for artificial lighting has been added for starting transplants of annual crops that will be planted outside.

As a derogation annual seedling transplants started in winter or spring which will be planted in the operation's outdoor containers or fields may be started by the operation under 100% artificial lights.

The Maple WG modified a proposal regarding maple syrup recirculation

The Maple WG modified a proposal regarding maple syrup recirculation. The Maple WG had proposed to prohibit the recirculation of sap or concentrated sap to prevent the sale of organic bud syrup, a syrup with a bitter taste that can be temporarily masked by "reworking" the syrup using recirculation. But it appears that recirculation is used for other purposes and prohibiting it would prevent other practices considered acceptable in maple syrup production. The Maple WG therefore proposes to prohibit any manipulation carried out in order to mask flavour defects, mainly the buddy off-flavour.

Finally, the WG added that drinking water, along with the filtrate, can be used for the storage of osmosis membranes.

Revision of clauses 1.4 and 1.5 and of some definitions

The wording of clauses 1.4 and 1.5 has been improved and clarified. Equipment, harvesting or storage containers, storage facilities and packaging materials have been placed under 1.4 instead of 1.5; fungal growth regulators have been added to 1.5 (d), sulphites have been added to 1.5 (f) and substances derived from endangered species have been removed (because it was unnecessary as Canadian laws on such trade supersede the COS).

The decision tree for assessing input compliance has been revised.

In most cases, the words 'synthetic' and 'allopathic' have been replaced by 'non-biological' or 'specified in CAN/CGSB-32.311' or other wording.

CLEAN VERSION

1.4 Prohibited materials or techniques in organic production and preparation

If producing or preparing organic products, the following materials or techniques are prohibited since they are incompatible with the general principles of organic production:

- a) all products of and materials from genetic engineering (GE), as defined in this standard, and as specified in 4.1.3, 5.1.2 and 6.2.1 of CAN/CGSB-32.311;
- b) all products, materials or processes intentionally using nanotechnology, as defined in this standard, with the following exceptions:
 - 1) naturally occurring nano-sized particles or those produced incidentally through processes such as grinding flour;
 - 2) contact surfaces, such as equipment, work surfaces, or packaging, where transference of nano-sized particles to organic crops, livestock or products is unintended and unlikely to occur;
- c) irradiation, as defined in this standard, for the treatment of organic products and inputs used in the production of organic products, except as specified in CAN/CGSB-32.311;
- d) cloned livestock and its descendants;
- e) equipment, harvest and storage containers, storage facilities and packaging materials treated with fungicides, preservatives, fumigants and pesticides not listed in Can/CGSB-32.311, except as permitted in 8.2.3 and 8.3.3 of CAN/CGSB-32.310.

1.5 Prohibited substances in organic production and preparation

In addition to 1.4, when producing or preparing organic products, the following substances are prohibited since they are incompatible with the general principles of organic production:

- a) soil amendments, such as fertilizer or composted plant and animal material, that contain a substance not listed in CAN/CGSB-32.311;
- b) sewage sludge;
- c) any crop production aids or substances - not listed in CAN/CGSB-32.311;
- d) plant, fungal and animal growth regulators, except as specified in CAN/CGSB 32.311;
- e) veterinary drugs, including antibiotics and parasiticides, except as permitted by this standard;
- f) non-organic ingredients, food additives, and processing aids used in organic product preparation, including sulphates, sulphites, nitrates and nitrites, except as permitted by this standard or specified in CAN/CGSB-32.311;
- g) formulants except as specified in CAN/CGSB-32.311.

“NOTE See the PSL Decision Tree in Annex B for a methodology that may assist in the completion of input reviews.”

The definition of 'biodegradable' has been clarified as follows:

crop inputs and production aids capable of microbial decomposition within 24 months in soil (with the exception of plant biomass), one month in aerated water, two months in anaerobic water, with minimal impact on the environment

The definition of antibiotics is being reviewed: this term has been removed from *Table 4.2 Soil amendments and crop nutrition & Crop production aids and materials* and Section 5 of 32.310; the WG on Livestock Production will evaluate the use of this term.

Parallel production during final 24 months of transition maintained

No comments containing new information were received on the amendment to the parallel production clause. Clause 5.1.4, which will be put to a vote, therefore reads as follows:

The operation can be converted one production unit at a time, and each converted production unit shall respect the requirements of this standard. The exception to this norm, parallel production, is only allowed in the following cases: annual crops harvested during the final 24 months of the transition period when fields are added to existing operations, perennial crops (already planted), agricultural research facilities and production of seed, vegetative propagating materials and transplants.

Table 4.2 of Permitted Substances Lists is improved

Nearly 100 comments were submitted in response to the proposed changes to Table 4.2 (formerly Tables 4.2 and 4.3), the substances permitted in crop production.

The following are some of the changes to the annotations approved by the Technical Committee.

The allowance of sodium benzoate and potassium sorbate in water-extracted aquatic plant products (e.g., kelp extract) was maintained, but the wording was strengthened to avoid confusion. The following sentence was added:

Sodium benzoate and potassium sorbate may be used as preservatives for water-extracted aquatic plant products. All other preservatives are prohibited unless listed in Table 4.2 (Column 1 or 2); however, *Formulants used in crop production aids* are prohibited.

The use of potassium and sodium silicates has been restricted to crop production aids, rather than crop nutrition.

Sodium and potassium silicates are permitted only for Crop protection (Column 2).

New uses were allowed for acetic acid, cardboard and carbon dioxide.

Acetic acid

As an adjuvant, pH regulator and for the control of pests (including weeds) and seed cleaning.

Cardboard

Used as mulch, ~~or~~ as compost feedstock or as pest trapping material.

Carbon dioxide.

For use in soil and greenhouses, ~~and~~ for controlled atmosphere storage and pest control in storage.

Some entries are eliminated to avoid redundancy: magnesium chloride, calcium chloride, calcium silicate.

For *Biodynamic preparations for compost, soil and plants*, it is now specified they meet the requirement 'As described in Annex 10 of the Demeter Production Standard'.

Due to the complexity of the issue of formulants following the merging of *Table 4.2 Soil amendments and crop nutrition* with *Table 4.3 Crop production aids and materials*, it was decided to make two separate entries: Formulants used in soil amendments and, separately, Formulants used in crop production aids. The clean copies of the annotations are below:

Formulants used in soil amendments:

Formulants used in soil amendments shall be derived from biological or mineral sources unless a substance annotation allows the use of a specified formulant. For example, see *Table 4.2 Aquatic plants and plant products; Fish products; Humates, humic acid and fulvic acid*.

Formulants used in crop production aids.

Formulants used in crop production aids may only be used with substances listed in Column 2 of this table. Only formulants classified as List 4A or 4B by the Pest Management Regulatory Agency (PMRA) or derived from biological or mineral sources may be used with substances in Table 4.2 (Column 2).

Formulants classified as List 3 by PMRA may be used with passive pheromone dispensers.

Formulants classified as List 4A, 4B or 3 by PMRA are not subject to 1.4 and 1.5 of CAN/CGSB-32.310.

Formulants classified as List 1 or 2 by PMRA are prohibited.

The use of *Microorganisms and microbial products* was also specified:

Microbial fertilizers or soil amendments derived from substances that cannot be verified or derived from materials not listed in Table 4.2 (Column 1 or 2), may be used with the exception of municipal sewage sludge, which is prohibited. When used, microbial fertilizers shall not exceed the limits (category C1) for acceptable levels (mg/kg) of arsenic, cadmium, chromium, γ lead and mercury, as specified in *Guidelines for the Beneficial Use of Fertilising Residuals*. Shall not cause a build-up of heavy metals or micronutrients in soil.

Pharmaceuticals derived from or by biological sources, such as natamycin, penicillin, streptomycin, are prohibited even if registered as pesticides.

Since the term 'antibiotics' is removed from Table 4.2, the annotation for *Biological Organisms* has also been modified:

Biological organisms (living, dead or as extracts), such as viruses, bacteria, protozoa, phages, fungi, insects and nematodes. Pharmaceuticals derived from or by biological sources, such as natamycin, penicillin, streptomycin, are prohibited even if registered as pesticides.

See Table 4.2 *Invertebrates, Microorganisms and microbial products*

Note that three separate annotations for *Arthropods, Arthropod Pathogens, Arthropod Predators and Arthropod Parasitoids* in Table 4.2 have been incorporated into the annotation for *Invertebrates*.

The annotation for *Treated seed* has been streamlined and includes only the following:

See Table 4.2; *Peracetic acid; Seed treatments* and refer to CAN/CGSB-32.310- 5.3.2.

The preamble to sections 8 and 9 has been completed:

Clause 8 (or 9) applies to all operations that handle, store ~~and~~ or transport organic products for production ~~and~~, processing, packaging or labelling.