



2020 Revision Work of the Canadian Organic Standards

1st Consultation with the Organic Industry

The revision of the Canadian Organic Standard is underway. The OFC can now present the decisions made at the first meeting of the Committee on Organic Agriculture of the Canadian General Standards Board (TC) held October 29, 2018.

For each petition, we present the initial proposal, its context, the TC decision and the rationale for that decision.

Since the Organic Standards have a direct impact on your activities, we would like to gather your comments and bring these to the attention of the relevant working groups.

This consultation will allow us to assess the potential impact of the decisions, and then accept or re-evaluate them.

To submit your comments, please:

- identify the number of the decision
- clearly describe your argument
- include your email and phone number so that we contact you if we have questions. Your identity will not be disclosed to the working groups.
- submit your comment to marc-antoine.larrivee@organicfederation.ca

Regarding parallel production: the issue of parallel production is back! Because it concerns so many operators, we need a broad consultation and we have created a blog. Please enter your comment on that link - <https://wp.me/pN8tH-3X>

Thank you!

The COS Review Team.

Table of contents

Organic principles and management standards

5 Crop Production

10.513-3 Listing organic acreage & aiming for transition	3
10.521 Fences used as buffer zones.....	3
10.514-2 Parallel production	3
10.517-1 Alternating in and out of organic production	4
10.551-1 Prohibiting the use of non-organic manure	4
10.551-2 Manure from operations with some fully caged livestock	4
10.523-1-2-3 Treated fence posts	5

6 Livestock Production

10.672 Outdoor access.....	6
10.613 Codes of Practice	6
10.63 Transition of poultry.....	7
10.671j Management of outdoor runs.....	7
10.6.5.5 Transport and handling	7
10.643 Giving calves milk from cows that have received antibiotics.....	8
10.6231 Replacing the word “chicks” with “birds”	8
10.671g Non-agricultural bedding.....	8

7.2 Maple Products

10.72101-1 & 10.72101-2 Number of taps	10
10.72102 & 10.72101-1 Depth and diameter of taps	10
10.72104 Over-tapping.....	10
10.72111 Spouts.....	11
10.7.2.10.2-2 Depth and diameter of tap holes.....	11
10.72123 Allow the use of potassium metabisulfite.....	12
10.72124 Adding more sources of fuel	12
10.72132-1 & 10.72132-2 Changes to PWP tests.....	13
10.72133-1 Acetic acid for rinsing.....	13

Permitted Substances Lists

4 Permitted substances lists for crop production

Combining Tables 4.2 and 4.3.	14
------------------------------------	----

Organic principles and management standards

5 Crop Production

10.513-3 Listing organic acreage & aiming for transition

Proposal: (1) The organic certificate should specify the area (acreage) being certified organic. (2) Delete the requirement of 5.1.3 that “The enterprise shall aim at a complete transition of its production.”

Background: (1) To avoid fraud in split operations. (2) The petitioner believes this “serves no purpose” and cannot be enforced.

Decision. Rejected

Rationale: (1) Rejected because the request to include certified areas on the certificate was deemed to be a regulatory issue, and not related to organic standards, (i.e. inclusion of the information on the certificate does not indicate compliance with the organic standards). (2) Rejected because removing the requirement (i.e., goal of complete transition) could be perceived as weakening the standard.

10.521 Fences used as buffer zones

Proposal: Allow a fence rather than an 8-m buffer zone for grazing land when there is no obvious sign of spray drift. Add this to 5.2.1.

Background: The 8-m buffer zone may be impractical or expensive for large ranches.

Decision: Rejected.

Rationale: A fence is not a buffer zone (as described in 5.2.2) and is inadequate in preventing contamination of organic land by prohibited substances used on neighbouring non-organic land.

10.514-2 Parallel production

Proposal: In 5.1.4, allow parallel production for all crops.

Background: The current prohibition is leading operators to form separate companies which cannot be audited by the CBs. Also, parallel production is permitted under the NOP.

Decision: The WG rejected the proposal but the TC could not reach consensus and returned the petition to the WG. The Crops WG is encouraged to provide more details on the pros and cons of parallel production and the stance of other international standards on this issue. Also, the WG can provide ideas on how parallel production might work and under what conditions.

Rationale: The WG rejected the proposal because it was felt allowing parallel production may erode trust in the standards and create excessive work and other obstacles to the inspection process. Several members of the TC, however, stated that allowing parallel production would give CBs greater insight in the non-organic component of an operation. This would give inspectors better access to verify the entire supply chain on one operation. Other TC members felt this was a weakening of the standards.

Comment: please enter your comment on OFC Blog - <https://wp.me/pN8tH-3X>

10.517-1 Alternating in and out of organic production

Proposal: The petition is vague but essentially the petitioner proposes that the prohibition on alternating in and out of organic production in 5.1.7 be maintained even if the name of the business changes, or if a landowner rents land to one organic operator, followed by a non-organic farmer, then another organic operator. The petition also suggests that this ban be applied to not only crops but also greenhouses (both in-soil and containerized crops) and maple production. Lastly, the petition recommends records are kept for more than five years.

Background: The petitioner wants to strengthen the ban on rotating in and out of organic production on a production unit.

Decision: Rejected.

Rationale: Certain issues mentioned are regulatory (e.g., specifying how long files need to be kept for CBs) and not part of the standards. Other issues, such as preventing a change in business name, are not legally possible or practical.

10.551-1 Prohibiting the use of non-organic manure

Proposal: Non-organic sources of manure, blood meal and bone meal should not be allowed under any circumstances in 5.5.1.

Background: Residues from GE feedstocks may remain in the manure even after composting. Also, allowing these substances supports the non-organic livestock industry. Lastly, using these products may lead to lack of trust in the organic label.

Decision: Rejected.

Rationale: There is not enough organic manure currently available. At this time, the proposal would create huge barriers to organic production.

10.551-2 Manure from operations with some fully caged livestock

Proposal: Amend 5.5.1: (1) Allow manure from non-organic sources even if a minority of the animals in the operation are fully caged. (2) Remove the ban on using manure from livestock kept permanently in the dark.

Background: The petitioner suggests that the current standards are overly restrictive. For example, many non-organic swine operations have group-housed pigs along with sows in crates. The manure from all the animals is mixed and therefore is not allowed on organic farms. This may create a barrier to nearby organic farmers who need external source of manure to maintain soil fertility. No rationale was provided for the ban on manure from animals kept permanently in the dark.

Decision: Rejected.

Rationale: The petition would weaken the standards and possibly erode consumer trust in organic products.

10.523-1-2-3 Treated fence posts

Proposal: In 5.2.3 a): (1) Allow the use of treated posts in case of emergency, such as following a fire. (2) Prohibit the use of treated posts in existing organic production. (3) Replace the "commercially available" clause with a stronger and less ambiguous term.

Background: Untreated fenceposts cost more over time because they need to be replaced more often than treated posts. However, treated posts are now allowed in organic production if they already exist (e.g., in vineyards or orchards). The petitioner states that "Some operators change the posts before their conversion to organic, so they are producing under organic certification with treated posts, and therefore are deceiving consumers and having an advantage over other producers."

The NOP does not allow treated lumber in contact with organic products/livestock regardless of the commercial availability of alternatives.

Decision: The text was modified by WG and TC and sent back to the WG for final wording.

The main change was to not allow treated wood regardless of the commercial availability of alternatives, as stated below.

5.2.3 ~~Untreated~~ Fence posts or wood treated with substances listed in Table 4.3 of CAN/CGSB-32.311 are permitted.

a) For new installations or replacement purposes, fence posts or wood treated with prohibited substances are prohibited ~~unless~~. Alternatives, such as metal, plastic, concrete, or protective sleeves, ~~shall~~ may be used ~~are not commercially available~~.

Rationale: This modification changes the restriction into a prohibition. The WG concluded there are many alternatives to treated posts, and that no emergency requires the use of treated posts. On the other hand, prohibiting the use of treated posts that were installed before transition would be a significant barrier to transition.

6 Livestock Production

10.672 Outdoor access

Proposal: Rather than listing the reasons why temporary confinement may be allowed in 6.7.2 (e.g., inclement weather, threats to livestock health or safety, etc.), request documentation on how operators are changing their practices to reduce the need for confinement in the future.

Background: If situations within the control of the operator result in a restriction of outdoor access, steps to correct and improve those situations should be taken (and documented) to avoid restricting access in the future. Change the emphasis to solving the problems that lead to temporary confinement

Decision: The intent is maintained but wording changed.

6.7.2 Access to the outdoors and freedom of movement may be restricted for the following reasons, provided that confinement is temporary:

a) inclement weather;

b) conditions in which livestock health or safety is jeopardized, given the stage of production; and

c) soil, water or plant quality would be compromised.

The operator shall document the reasons for and duration of confinement. Measures taken to reduce the need to restrict outdoor access in the future shall also be documented when circumstances are within the operator's control.

Rationale: The WG wants to ensure that operators are proactive regarding outdoor access. The aim is to avoid situations where outdoor access is restricted.

10.613 Codes of Practice

Proposal: In 2.5, add references to Codes of Practice for poultry, sheep, goats and rabbits.

Background: The Codes of Practice are useful references for basic living conditions, such as number of nests, feeders or waterers, which are not specifically outlined in the COS. Section 6 refers to 'best management practices' (6.13.3 and 6.13.7), for which the relevant Codes of Practice can be used as a minimum when needed. Adding these codes as part of the Normative References would make it easier for CBs to refer applicants to these and for operators to find the resources they need.

Decision: Accepted and the WG added the Codes for Transportation and Bison. The WG proposed adding "Note: In case of differences between any Codes of practice and the Organic Standards, the operators shall comply with the Organic Standards." The TC supports the intent but has requested the WG add the content of the note into Section 6, rather than in 2.5.

2.5 National Farm Animal Care Council (NFACC)

Code of Practice for the Care and Handling of Dairy Cattle

Code of Practice for the Care and Handling of Beef Cattle

Code of Practice for the Care and Handling of Pigs

Code of Practice for the Care and Handling of Hatching Eggs, Breeders, Chickens and Turkeys

Code of Practice for the Care and Handling of Poultry - Layers

Code of Practice for the Care and Handling of Sheep

Code of Practice for the Care and Handling of Goats

Code of Practice for the Care and Handling of Rabbits

Code of Practice for the Care and Handling of Bison

Code of Practice for the Care and Handling of Farm Animals: Transportation

Rationale: The Codes are in the Standards as a reference and fill an educational purpose. As there are differences between the Codes and the Organic Standards, it is important to mention in Section 6 that the Standards are mandatory as the Codes are not.

10.63 Transition of poultry

Proposal: (1) Change the title of 6.3 so to clarify that the transition of poultry is covered in 6.13.1.c.1, not 6.3. **OR (2)** Add 6.13.1.c.1 as a new clause in 6.3.

Background: The transition of poultry is covered in 6.13.1.c.1, not 6.3 (the general section on livestock transition). It's important to clarify that organic poultry for meat cannot be raised on transitional pastures; outdoor areas must be free of prohibited substances for 36 months prior to use (6.13.1.c.1). In the case of pullets, land can be in transition when pullets are started, but the 36-month mark must have been reached and the land certified by the time birds are ready to go out to pasture.

Decision: Change title: 6.3 Transition of livestock production units to organic production, **except poultry covered by 6.13.1.c.1**

Rationale: Clarifies the issue.

10.671j Management of outdoor runs

Proposal: In Livestock living conditions (6.7.1), add “j) management of outdoor runs and pasture so that soil degradation, long-term damage to vegetation and the contamination of water are avoided.”

Background: There are cases in which the design and construction of outdoor runs does not allow for or encourage use by the livestock year-round, such as cattle exercise areas that consistently become covered with ice in the winter due to poor drainage or poultry runs that provide all the requirements of the standard but do not make the birds feel safe. Design of outdoor areas should allow and encourage the livestock to use them as much as possible while also preventing damage to soil, water, and vegetation. Avoiding soil degradation or water contamination should not be a reason to restrict access to the outdoors, rather, outdoor access should be designed in a way that allows it to be used and avoid degradation.

Decision: Accept but reword: “j) Construction and management of outdoor exercise areas runs and pastures to encourage appropriate year-round uses by livestock and to avoid so that soil degradation, long-term damage to vegetation and the contamination of water are avoided.”

Rationale: The change puts the emphasis on the design and good use of outdoor exercise areas and pastures.

10.6.5.5 Transport and handling

Proposal: Remove the last sentence to remove the derogation in 6.5.5. “The duration of transportation shall be as short as possible. If animals are in transit for more than 5 h,

recommendations regarding maximum transit times and minimum feed and water requirements, and rest times, as provided in the Code of Practice for the Care and Handling of Farm Animals: Transportation, shall apply.”

Background: It is already very difficult to monitor and enforce livestock welfare during transport, especially long-distance transport of organic livestock. Providing a “recommendation” and then saying that the operator can justify why they are not following the recommendation makes it nearly impossible to enforce. Removing the last sentence will allow the enforcement of the Code of Practice and reduce potential non-compliance.

Decision: Accepted.

Rationale: The Code is already designed to deal with unpredicted events, such as blocked roads or accidents. The Working Group does not want to allow operators to find reasons to avoid meeting the Code.

10.643 Giving calves milk from cows that have received antibiotics

Proposal: Allow the use of the milk of a cow which received treatment with antibiotics for feeding organic calves (after a 15-day withdrawal period), without the calves losing their organic status as slaughter animals.

Background: It is disappointing to see such a large amount of milk thrown away by organic producers during the withdrawal period after antibiotic use.

Decision: Accepted as follows: 6.4.3 c) ... eCalves can be fed milk from an organic cow that received treatment with antibiotics if a withholding period twice the label requirement, or 14 days, whichever is longer, is applied;

Rationale: This recommendation is consistent with the rest of the Standards and will reduce the waste of milk.

10.6231 Replacing the word “chicks” with “birds”

Proposal: Change the word "chicks" for "birds" in 6.2.3.1b.

Background: The expression "day-old chicks" is restrictive; the term should include poults, ducklings and other types of birds.

Decision: Accepted as follows: 6.2.3.1 b) neither day-old poultry ~~chicks~~ nor the fertilized eggs they hatched from shall be given medication other than vaccines.;

Rationale: It is more consistent with the rest of the Standards to use "poultry" instead of "birds."

10.671g Non-agricultural bedding

Proposal: Allow non-agricultural types of bedding in 6.7.1.g. provided they are not from GE plants and have not been treated with (or contain) prohibited substances.

Background: Following the recommendation #318, the SIC committee recommends clarifying article 6.7.1.g as it does not mention the non-agricultural source of bedding.

Decision: Accepted as follows: 6.7.1.g) appropriate resting and bedded areas that meet the needs of the animal. Indoor areas shall be large enough, solidly built, comfortable, clean and dry. Resting areas shall be covered with a thick layer of dry bedding that absorbs excrement. If organic bedding is commercially unavailable, bedding material from non-genetically engineered crops ~~bedding material~~ that is free of prohibited substances for at least 60 days prior to harvest may be used; non-agricultural absorbent bedding sources (minerals, cellulose, sawdust, paper products, etc.) can be used for livestock bedding as long as they are not GE products (1.4 a), and do not contain and/or have not been treated with prohibited substances (1.4 l).

Rationale: There are no reasons to restrict those materials, as long as the reference is consistent with the restrictions on prohibited substances and GE plants.

7.2 Maple Products

10.72101-1 & 10.72101-2 Number of taps

Proposal: Allow a tap to be added on trees 12" in diameter if the spout is 5/16" and not disposable. Also, take into account whether a vacuum system is present and update Table 7 in 7.2.10.1 to specify diameter classes. Table 7 should include the sap potential that can be extracted given the number of taps.

Background: 1) Forestry practices now use diameter classes instead of fixed diameters. The table should be updated.
2) Tapping practices have evolved. Taps are not as deep, causing less damage to trees. However, the new disposable spouts can increase the production of some taps by nearly 50%. This new practice damages trees and is harmful to the environment. The standard should take into account the type of spout used and the presence or absence of a vacuum system so that producers are on an even footing.

Decision: Rejected.

Rationale: Forestry plans are made by measuring the diameter using a forestry caliper. Estimates of diameter can vary depending on the angle of the tool. This technique is not convenient for producers and inspectors because it is cumbersome to handle a timber caliper.

10.72102 & 10.72101-1 Depth and diameter of taps

Proposal: Decrease the maximum diameter of the taps to 7.9 mm (5/16") from the current 11 mm (0.4375 in.) in 7.2.10.2.

Background: The diameter of taps has decreased over the years to promote healing. The section should reflect advancements in practices and equipment. The spouts available on the market are 5/16" or 1/4". These smaller spouts reduce tree compartmentalization and promote healing and growth.

Decision: Accepted as follows: 7.2.10.2: Depth of tap holes shall be no more than 4 cm (1.6 in.), not counting the bark, or 6 cm (2.4 in.) if the measurement is made from the surface of the bark. Diameters shall not be greater than ~~11 mm (0.4375 in.)~~ 7.93 mm (5/16 in.).

Rationale: This change will help maintain the health of trees.

10.72104 Over-tapping

Proposal: Remove the word "Over-tapping" in the title of 7.2.10.4. Simplify the wording about double tapping, prohibit retapping, and do not define the production season.

Background: (1) The title of the section must be amended to eliminate the term and concept of "over-tapping," which is not an advisable practice in a sugar bush operation.
(2) Retapping, even if the diameter is not changed, is not a common practice and is detrimental to the integrity of the vacuum system.
(3) Autumn syrup should continue to be banned, but depending on the region, the "maple syrup season" may extend over a very long period. With climate change, the season may also shift in time depending on the year and region.

Decision: Accept modification of the title, simplify the wording and prohibit double tapping. Change as follows: 7.2.10.4 ~~Over-tapping~~, Renewing the tap and removal of spouts. Maple trees shall only be tapped once a year. The practice of retapping a previously tapped tree ~~during the same season~~ or double tapping is prohibited. ~~Renewing the same hole is allowed if the diameter is not changed.~~ To allow trees to heal, spouts shall be removed no later than 60 days after the final, seasonal sap flow. Maple trees shall only be tapped during the sugar bush operation period (maple syrup season). It is prohibited to tap the trees in the fall.

Rationale: Restricting tapping to one tapping per year systematically prohibits fall syrup. This prohibition is repeated in last sentence for better clarity. Retapping is already prohibited. We can keep mentioning the maple syrup season because it helps inspectors verify that tapping is done at the right time of the year. We don't want to mention specific months because seasons are rapidly changing.

10.72111 Spouts

Proposal: Prohibit disposable spouts in 7.2.11.1.

Background: Plastic spouts produce a lot of waste, which goes against the principles of organic agriculture.

Decision: Rejected but a note is added to 7.2.11.2. Vacuum collection system.

“All parts of the collection system that may come in contact with sap shall be made of materials suitable for use in the manufacture of food products. Pumps shall be well-maintained and used oil shall be collected and disposed of so as to not contaminate the environment.

Note: it is recommended to recycle all materials of the components of the collection system.”

Rationale: The use of disposable spouts may present important and significant advantages. It is recommended to target recycling of material instead of imposing specific prohibitions. For example, using polycarbonate spouts (recyclable) instead of nylon spouts (non-recyclable). The inspector can hardly verify the multi-year use of spouts; that proposal is rejected.

10.7.2.10.2-2 Depth and diameter of tap holes

Proposal: Add numbering and define ‘regular tapping standards’ in “7.2.10.2 Depth and diameter of tap holes.”

Background: The explanations in the paragraph are difficult to understand. A numbering system with letters (proposed here) or numbers could make it easier to understand and reduce the risk of confusion. Similarly, the reference to “regular tapping standards” without an accompanying definition may also cause confusion. “Regular tapping standards” should be defined.

Decision: Accepted in part as follows: 7.2.10.2 Depth and diameter of tap holes

Depth of tap holes shall be no more than ~~4 cm (1.6 in.)~~, 5 cm (1.9 in.) not counting from the surface of the bark for trees with a diameter smaller than 25 cm (9.8 in.), or 6 cm (2.4 in.) from the surface of the bark for trees with a diameter higher than 25 cm (9.8 in.), ~~if the measurement is made from the surface of the bark.~~ Diameters shall not be greater than 11 mm (0.4375 in.). If a tree is diseased, infested with pests, and/or has decaying or tap holes that are not healing properly, stricter standards shall be implemented: the number of taps per tree shall be reduced to 2 where 7.2.10.1 allows 3, and 1 where 2 are allowed. When the diameter at breast height is less than 25 cm (~9 7/8 in.), tapping is prohibited. If a majority of trees are affected, tapping shall comply with

table 7 of 7.2.10.1 ~~regular tapping standards apply~~. However, spouts with a smaller diameter shall be used or trees, in the affected area, shall not be tapped

Rationale: It is too difficult to measure the depth of the tap inside (without the bark) because the diameter of the tap complicates the process. The current proposal considers that the growth of the bark is proportional to the diameter of the tree. The maximal depth will take into account the different type of measurement. That should not create practical changes, and will facilitate inspection and measurement. For reducing confusion about regular tapping standards, there is a reference to table 7.2.10.1, which describes the number of taps per diameter.

10.72123 Allow the use of potassium metabisulfite

Proposal: Add potassium metabisulfite, a similar chemical compound, as an alternative to sodium metabisulfite, which is already permitted under the standard in 7.2.12.3.

Background: Sodium metabisulfite (SMBS) and/or potassium metabisulfite (PMBS) may be added to the filtrate to prevent mould growth. If SMBS or PMBS is used, the membrane shall be rinsed before next use with a volume of water equal to the hourly capacity of the membrane [for example, 2728 L (600 gal.) of water for a 2728 L/h (600 gal./h) membrane]. Off-site storage of the membrane (for example, by the membrane supplier) shall be documented.

Decision: Accepted as follows in 7.2.12.3. Sap may be concentrated via reverse osmosis. Only reverse osmosis and nano-filtration (ultra-osmosis) membranes are allowed. In the off-season, osmosis membranes shall be stored, in filtrate, in a hermetically sealed container and kept in a frost-free location. Sodium metabisulfite (SMBS) or potassium metabisulfite (PMBS) may be added to the filtrate to prevent mould growth. If SMBS or PMBS is used, the membrane shall be rinsed before next use with a volume of water equal to the hourly capacity of the membrane (for example, ~~2271~~ ~~2728~~ L (600 gal.) of water for a ~~2271~~ ~~2728~~ L/h (600 gal./h) membrane). Off-site storage of the membrane (for example, by the membrane supplier) shall be documented.

Rationale: There is an allergenic risk but this product (potassium metabisulfite) is authorized for use in the food industry provided the operator has to rinse well after use. It is a cleaning product, so there should not be residues in the final product. The current procedure eliminates traces of cleaners.

10.72124 Adding more sources of fuel

Proposal: In 7.2.12.4 Evaporator, list additional sources of fuel: ~~Permitted Fuels such as include~~ wood, ~~and~~ heating oil, electricity, propane, natural gas, etc. that do not affect the integrity of the syrup are allowed.

Background: Regarding a decision by the organic standard interpretation committee on the use of natural gas to heat evaporator pans (#346), it would be advisable to clarify the intent of the standard. The standard currently reads as if fuels are restricted to wood and heating oil, which is not the intent.

The interpretation committee consulted a Quebec expert in maple syrup production, who said that wood and heating oil were the two most common fuel types when the standard was written and that is why they were included as examples. The intent was not to exclude other types of fuel, as long as the integrity of the syrup is maintained.

** Another proposal suggested that the standards do not mention the fuels to avoid the risk of leaving some out.

Decision: Cut the reference to fuel: ~~Permitted fuels include wood and heating oil. Used oils may be used as a primary or supplementary fuel. ...~~

NOTE In Canada, additional provincial requirements may apply to the use of used oils.

Rationale: Remove the mention of fuels as it is redundant; all types of fuels allowed by law are allowed. But we have to ensure that producers are aware of the regulations governing used oils; so the WG recommends keeping the note.

10.72132-1 & 10.72132-2 Changes to PWP tests

Proposal: (1) In 7.2.13.2a1, change the cleaning limit from 85% to 90% in “If a Pure Water Permeability (PWP) test indicates that controlled efficiency is less than ~~85~~90% of the controlled efficiency recorded at the beginning of the season, a caustic soda-based soap (NaOH) recommended by the manufacturer for membrane cleaning is permitted. (2) In 7.2.13.2a4, specify that rinse water must be neutralized.

Background: (1) “Compliance with this standard reduces the efficiency of the membranes since when you start a new production day with membranes that are 85 or 86% efficient—particularly at the beginning of the season when the sap is difficult to filter—you quickly end up with membranes that are 75% efficient, so that in the middle of the day you have to stop concentrating to rinse, wash with NaOH, and rinse again, which wastes several hours and can cause the membranes to be considerably less efficient for the rest of the season. In addition, letting the efficiency drop below 85% increases the demand for soap during cleaning.”

(2) Rinse water disposal after cleaning with NaOH (sodium hydroxide) should also be regulated because of its negative impact on the environment. Wastewater could be neutralized with citric acid, peracetic acid, or acetic acid, products already permitted for use in cleaning at the end of the season.

Decision: Both proposals are rejected. Add the need for measuring PWP after rinsing with warm filtrate as follows in 7.2.13.2a1. “If after rinsing with warm filtrate (in an open or closed circuit), a Pure Water Permeability (PWP) test indicates that controlled efficiency is less than 85% of the controlled efficiency recorded at the beginning of the season, a caustic soda-based soap (NaOH) recommended by the manufacturer for membrane cleaning is permitted.”

Rationale: The industry would like daily cleaning with soap. The standard favours a minimal use of soap, including NaOH. In theory, the PWP test should be done after rinsing with water or warm filtrate for more than 30 minutes at greater than 40°C. If that procedure is not followed, the PWP results will be lower than 85 and we will have to clean (using soap). It is not the role of the inspector or of the standard to provide technical advice. There is consensus that the operators shall accurately calculate the PWP. Mentioning that the rinsing with warm filtrate shall be done before the PWP is measured will allow inspectors to correct and educate operators who do not calculate PWP accurately and who, consequently, produce more soap waste than necessary. Mentioning the open or closed circuit will allow the use of different rinsing methods.

Regarding rinsing water, there are currently no verified methods allowing an efficient neutralization. More research needs to be done before making a decision.

10.72133-1 Acetic acid for rinsing

Proposal: Replace the word “vinegar” in the in 7.2.13.3 with “acetic acid” to permit its use in-season and specify rinsing procedures for rinsing evaporators with glacial acetic acid (e.g., double rinsing is mandatory and the second rinsing shall be done under hot conditions).

Background: (1) The standard generally refers to acetic acid under its scientific name “acetic acid” rather than one of its more common forms, “vinegar.” For end-of-season cleaning, glacial

acetic acid (99%) is permitted while acetic acid solution (56%) is not. Replacing the word “vinegar” in the section with “acetic acid” would clarify things.

(2) Due to a lack of sufficient data on the use of vinegar in-season and its impact on the product, it has always been prohibited. The Acer Centre’s findings demonstrate the efficacy of acetic acid (Ali et al., 2017). The physical, chemical, and sensory properties are not significantly altered if proper washing and rinsing procedures are followed. Evaporators should be permitted to be cleaned with acetic acid in-season, and rinsing procedures should be specified

Decision: Accepted and modified by the WG and TC as follows: “7.2.13.2 Evaporators may be cleaned with potable water, ~~or filtrate at any time or~~ acetic acid at any time. ~~Vinegar or with fermented sap may be used at the end of the season.~~ If acetic acid is used, double rinsing is mandatory and the second rinsing shall be done with hot water, filtrate or sap.”

Rationale: The word “vinegar” is obsolete, as acetic acid at highest concentrations is now used. There is a debate about the mid-term risk of contamination of the syrup by residues on the stones or if rinsing procedures are not well applied. The proposal is accepted as it reduces the risk of fraud (use of phosphoric acid as an example) and risk of contamination is low. It is probable that some producers will decide to use two sets of pans to allow them to clean one pan while using the other in order to avoid slowing down production.

Permitted Substances Lists

4 Permitted substances lists for crop production

Combining Tables 4.2 and 4.3.

Background: There is considerable overlap in the content of Table 4.2 (Soil amendments and crop nutrition) and Table 4.3 (Crop production aids and materials). Many substances are listed in both tables and some substances are listed only in one table but may be used for both crop nutrition and plant protection.

Decision: Accepted.

Rationale: The WG acknowledges that there will be challenges in combining the tables particularly due to the differences in the annotations for formulants. However, this is outweighed by the potential benefits. A single table for crop inputs will be less confusing for farmers and may simplify the WG’s work in the future.