

# Standards Interpretation Committee 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 **revised National Standards for Organic Agriculture** ([CAN/CGSB 32.310-2015](#) and [CAN/CGSB 32.311-2015](#)).



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)**

## Public Comment Period – March 7 to April 7 2016

### Table of contents

|  |   |
|--|---|
| General Principles and Management Standards.....                       | 2 |
| Crop production .....  | 2 |
| Greenhouse Crops.....  | 2 |
| Permitted Substances Lists.....  | 3 |
| Crop production .....  | 3 |
| Livestock production - Preparation.....                                | 3 |
| Cleaners, disinfectants, sanitizers .....                              | 3 |
| Modified answer following the COS review – Archived – Final Q&As ..... | 4 |
| Livestock production .....   | 4 |

## General Principles and Management Standards

### Crop production

#### **Is copper sulphate allowed as a treatment for fence-posts on pasture? (9)**

No. Copper sulphate is not listed as treatment for wood product; however both copper hydroxide and borate are allowed in table 4.3 of PSL. For new installations or replacement purposes, metal, plastic, concrete, or protective sleeves should be used as alternatives for fence posts. For further information consult 5.2.3 (32.310).

### Greenhouse Crops

#### **Under section 7.5.5 d. of 32.310, how should the soil volume of 70 L/M2 be defined and how should the total growing area be defined? (286)**

The calculation for soil volume requirement shall be done on the greenhouse's total area available for photosynthesis by plants. This includes not only the surface of containers but also the surface of alleys between rows of plants. It does not include header houses, service alleys (perpendicular to the rows), staff rooms, offices, propagation houses, or storage areas.

The soil volume requirement is expressed this way so that growers have a certain freedom depending on the staked crops they grow (tomatoes, cucumbers, peppers, eggplants), the varieties they grow, the planting density they choose, the alley width they prefer, etc. The requirement of 70 L/m<sup>2</sup> must be met upon inspection of the operation, i.e. the inspector shall find an effective soil volume in place in the container, not a purchased volume. If part of the greenhouse is not occupied by crop production but could be, it can be excluded from the calculation.

#### **Under section 7.5.5 a) of 32.310, is the requirement of 10% compost by weight or by volume? (287)**

The compost requirement of 7.5.5 a) is calculated by volume.

#### **Under section 7.5.5 c. of 32.310, what does the container height of 12 inches mean? (288)**

The 30 cm (12 inches) minimum is measured vertically from the deepest point of the soil to the topmost edge of the container. This requirement does not mean that the container needs to be filled up to 30 cm all the time if the volume requirement is met otherwise. In case of a greenhouse system where soil is contained in other ways (for example, using troughs and soil mounding), the 30 cm is measured from the deepest point of the soil to the topmost.

## Crop production

### **What is the definition of biodegradability as it pertains to the Canadian Organic Standards? (263)**

Biodegradable is defined in the standard as “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” (see 3.10 in CAN/CGSB-32.310).

### **Q. Are bioplastic mulches, made from corn, accepted as “biodegradable films” that can be left to decompose in the soil? (79) (253)**

To be acceptable as biodegradable and left to decompose in the soil, a bioplastic mulch made from corn:

- 1) cannot be made using GE plant material;
- 2) cannot contain substances such as biodegradable polymers, Carbon Black from GE or petroleum.

Mulches containing biodegradable polymers and Carbon Black from GE or petroleum sources which were considered to be compliant in 2014 can be used and left in fields without removal as a temporary exemption until January 1, 2017 (see Mulches PSL Table 4.3 in 311 and the definition of biodegradable in 3.10 in 32.310).

## Livestock production - Preparation

### **Q: Can a non-organic agricultural substance such as whey be used as the growing media to manufacture probiotics used as a feed supplement or as an ingredient for food? (252)**

A: Yes. Non-organic agricultural ingredients such as whey, can be used as the growth media or substrate to manufacture probiotics used as a feed supplement or as an ingredient for food, as long as their use complies with the requirements of 32.311 5.1.2 and 6.2.1, as follows:

- a) if the probiotic includes the substrates or growth media, the substrate or growth media ingredients shall be listed in PSL tables 5.2 (feed), 6.3 or 6.4 (food). If listed in the PSL, any use of non-organic agricultural substances listed in the PSL must comply with substance listing annotations;
- b) if the probiotic does not include the substrates or growth media, it shall be produced on non-genetically engineered substrates or growth media, if commercially available.

## Cleaners, disinfectants, sanitizers

### **Is electrolysed water allowed by the Canada Organic Standards? (290)**

Electrolysed water is permitted as long as it meets the requirements for chlorine compounds provided in Tables 7.3 and 7.4

Modified answer following the COS review – Archived – [Final Q&As](#)

### Livestock production

**Does 6.3.3 apply to pasture used for poultry? In other words can the raising of pullets be timed to coincide with the transition of land rather than waiting until the pasture is CO to start a new flock? (99)**

6.3.3 applies to pasture used by a herd or a flock of sheep and not to pasture used for poultry. Pasture for poultry must be free of prohibited substances for 36 months prior to use (6.13.1 c). In other words, land can be in transition still when pullets are started, but the 36-month mark must have been reached and the land deemed to have certified status by the time birds are ready to go out to pasture. The pasture land of operators making their initial application must be under surveillance by a certifier for at least 12 months before it can be used by organic poultry (5.1.1)