

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 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 60 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Comment period – May 5th to June 6th 2016

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Crop Production

Are the seeds used to grow green manure crops, intended for incorporation into the soil, required to be organic? (269)

Yes. All seeds used in the organic production system, whether the plant is used for food, feed or soil incorporation have the same requirements outlined in 5.3 - *Seeds and planting stock*. They must be organic except under the specific exceptions listed.

Livestock Production

Does the one-year period after the publication of the standard apply to requirements 1 & 2 of section of 6.12.1.1 b)? (291)

Operators requiring new infrastructure to comply with 6.12.1.1 must be able to comply with ONE of 6.12.1.1 b)'s two requirements immediately to avoid being issued a non-conformity. According to the Memo issued by the Canada Organic Office February 23 2016, [« Implementation of revised Canadian Organic Standards »](#), any issued non-conformity must be addressed prior to November 25, 2016.

In other words: either 1) tethered cows shall have an exercise period every day, whenever possible, but at least twice a week OR 2) there shall be no tethering of heifers or dry cows. Operators must comply with BOTH of these requirements (6.12.1.1 b) 1 and 2) by November 25, 2020.

What justification must be given in order for beak-trimming of day-old chicks to be compliant with the Standard? (275)

Since beak trimming is only effective if done before problematic behaviour starts the operator can point to previous experience or to the shared experience of operators to reasonably predict that problems would emerge to justify day-old beak trimming. The procedure for trimming must be minimal (6.6.4 c) and the operator must document the other measures taken to reduce or eliminate behavioural problems in flocks.

Apiculture

How far and under what circumstances may the 3,000 m. buffer zone around organic apiaries be reduced? (276)

The standard maintains 3000 metres as the default buffer zone. It then defines specific criteria for possible reduction of the zone; “natural features that would reduce the likelihood of bee travel such as forests, hills or waterways and abundant forage”. The option for allowing organic hives in a location that has conventional agriculture (and the use of substances prohibited by the Standard) within 3,000 m. is based on the assumption that given an abundance of foraging

opportunities in close proximity to the hive, bees are unlikely to travel further abroad to collect pollen which could be exposed to contaminants. As an example; If the operator is able to demonstrate that throughout the feeding season there is an abundance of untreated clover, buckwheat, or other flowering crops or wild flowers around the hives, sufficient for the needs of the bees, the presence of conventional corn or soybeans, cereal or forage crops within the 3000 m. zone presents only a minimal risk to the integrity of the product. A buffer zone defined by the outer perimeter of the bees' anticipated foraging area would be deemed appropriate.

Is there a transition period required between the last use of a potential contaminant and the time when the bees are feeding? (278)

No. There is no transition period required for the foraging area. No prohibited substances, excluding fertilizers, can be present when bees are feeding.

Does any use of a prohibited substance within the buffer zone automatically disqualify honey from achieving compliance with the Standard? (115a-277)

No - not always. All types of fertilizers are allowed. GE crops and agricultural pesticides prohibited by the standard, including systemic seed treatments, are not allowed (7.1.5 in 32.310). Other sources of potential contaminants (for example - products prohibited by the Standard which are being used by households within the buffer zone) should be assessed as to the level of risk they present as they may be tolerated.

Permitted Substances Lists

Crop production

In Table 4.2 blood meal is allowed only if sterilized. What does it mean for blood meal to be sterilized? (262)

The Fertilizers [Act](#) and [Regulations](#) requires that fertilizers and supplements not contain any substances likely to be generally detrimental or seriously injurious to domestic animals or public health. Blood meal is defined as "collected blood of slaughtered animals, dried and ground, containing not less than 12% nitrogen». Blood meal is considered to be "sterilized" if it does not 'present a risk of harm to human, animal or plant health or the environment'. Commercial manufacturing of blood meal requires a heating/drying phase to meet the definition of sterilization and the requirements of the Fertilizers Act and Regulations.

Livestock production

Can Zinc Sulphate be used as a treatment added to foot baths for livestock? (270)

Yes, as it is considered a mineral under the listing in Table 5.3 - *Minerals, Trace Minerals and Elements*.

Is Zinc Oxide allowed as health remedy in organic livestock production? (279)

Yes. Table 5.3 "Health Care Products and Production Aids" lists "Minerals, Trace Minerals, Elements". Zinc Oxide would fall under this listing.

Is colloidal silver allowed for use in livestock health care? (273)

Yes, the use of colloidal silver would fall under the "*Minerals, trace minerals, elements*" listing in PSL table 5.3. But due diligence is required to make sure the form of colloidal silver is acceptable. Colloidal silver produced using electrolysis is allowed, as is colloidal silver produced by a biofermentation process as long as the Genetically Engineered restrictions specified in 1.4 a (32.310) are met. Both of these forms are consistent with the exception pertaining to nanotechnology provided in 1.4 b) 1) of 32.310.

Preparation

If a cheese producer makes cheese made with fermentation-produced chymosin FPC, can it still be labelled certified organic? (280)

No. FPC is produced by fermentation processes using bacteria, fungi or yeast that have had bovine rennet-producing genes inserted into them. This means FPC is a product of genetic engineering, which is prohibited for use in organic production (1.4 a) and 3.27 of 32.310).

Cleaners, disinfectants and sanitizers

Can colloidal silver be used as a cleaning product for food contact surfaces? (274)

Use of colloidal silver as a cleaning product must comply with 8.2.3 and 1.4 of 32.310.