



## **A Report on the 11<sup>th</sup> Meeting of the Canadian General Standards Board Committee on Organic Agriculture**

**by Priscilla Reimer**

Gathered in Cornwall for the 11<sup>th</sup> Meeting, members of the CGSB Committee on Organic Agriculture (Technical Committee or TC) broke into boisterous applause when Dr. Jaspindar Komal, former Director of the CFIA, announced that a five-year agreement between the CFIA and the CGSB had been reached making the Canadian Organic Standards available free of charge. While the Committee dealt with many important standards amendment issues over three days, 18-20 January 2010, this long awaited announcement stole the limelight.

### **Crops Standard**

The issue of parallel production was clearly the most contentious of the crops-related proposals on the agenda, if not of the entire proceedings. Three options were presented: The first, or Option A, would maintain the prohibition on parallel production in its current form. Option B would prohibit parallel production with exceptions consistent with CODEX and similar to EU derogations. And Option C would allow parallel production under the rigorous scrutiny of certification bodies. It did not take long for discussion to reach an impasse. A straw poll taken to determine the direction for additional work on the proposal indicated that a clear majority of voting members were not in favour of the status quo. They voted (16 in favour, 4 opposed and with 3 abstentions) for a blend of Option B and C that will go to ballot. The Committee was unable to reach consensus on a new definition of parallel production.

In spite of a clear lack of appetite for the status quo and a majority vote in favour of the new option, the issue remains unsettled. Dag Falck suggested that the Committee was asking the wrong questions. The questions that should be asked are: How do we prevent fraud or abuse? How does an organic operation meet the challenge of the parallel production prohibition? Another member recommended a Canada-wide survey of opinion. In order to facilitate an ongoing debate, the OFC is sponsoring a blog at <http://ofcfbc.wordpress.com/>.

Other crops-related issues voted on by the Technical Committee included a request that crops harvested from buffer zones be allowed for seed. The Working Group recommended the rejection of this proposal

and, in spite of the fact that both CODEX and the IFOAM standards allow the practice, the recommendation passed without any opposition. The request that treated seed be allowed as a last resort was also rejected.

The following items were among those that were sent back to the Working Group: 1) Mandatory soil testing prior to the application of mineral and manure inputs, 2) the burning of crop residue and 3) extending the 36-month rule to container soil.

### **Crops Permitted Substances List**

The Crops PSL Working Group submitted a 22-point agenda and the most obvious change when revisions are published may well be the merger of Tables 4.3 and 4.4 under the title *Crop Production Aids and Materials*. The tables were virtual mirror images of each other and only minor revisions were required as a result of the amalgamation.

Whether or not synthetic ethylene should be allowed for regulation of pineapple flowering (both the US and the EU allow it) generated considerable discussion at the 10<sup>th</sup> Meeting in April, 2009, and the PSL Working Group remained divided at subsequent meetings. Allowing synthetic ethylene would require a prior amendment of 32.310, Section 1.4.1 which specifically prohibits synthetic growth regulators. The PSL Working Group voted on a motion to recommend that 1.4.1 be amended to accommodate ethylene. The motion was defeated and voting members of the Technical Committee supported that decision at the 11<sup>th</sup> Meeting. Synthetic ethylene will, therefore, not appear in Table 4.3 when revised standards are published.

The Crops PSL Working Group rejected a number of requests that would have brought the Canadian PSL in line with the US National List, like the suggestion that the approval of pest control substances be based on active ingredients only. The Working Group received Technical Committee support and, in fact, all proposals put forward by the Group passed without noticeable opposition.

### **Maple Standard**

The maple standard was subject to a thorough revision and in keeping with a motion introduced at the Meeting, may now also be applied to birch syrup production.

### **Livestock Standard**

Of all the Working Groups, the Livestock Group may have worked hardest between the 10<sup>th</sup> and 11<sup>th</sup> Meetings. It presented numerous recommendations and thoroughly revised and expanded standards for poultry and hog production.

As part of the formula for calculating poultry stocking densities, the Working Group recommended that *additional flooring in an aviary system shall be included in the total floor space*. This sentence alone generated more discussion than any of the other livestock proposals and will not go to ballot. Those who opposed the recommendation expressed concerns that the density of birds on the main or ground floor of the multi-tiered structures—three is the maximum number of tiers currently used in Canada—might exceed the maximum allowable numbers for single-floor systems. Or, to put it another way, that a concentration of birds on the main floor would lead to overstocking and exceed the density allowed for single-floor systems. Supporters of aviary-style production argued that birds are free to and will avoid overcrowding by moving to a different tier. No one challenged the argument that aviaries accommodate poultry in a manner that is in every way more hospitable to natural bird behaviour than traditional

single-floor systems and, therefore, more compatible with organic production. (Videos of aviary systems in operation are available at <http://www.vencomatic.com/en-GB/Home.cms> or <http://www.vencomatic.com/fr-FR/Home.cms>).

At least two issues related to livestock feed and feeding were dealt with at the 11<sup>th</sup> Meeting. The volume of grain rations allowed in the final stage of beef production was one and, the other, the question of how to maintain organic integrity during a feed shortage in an unanticipated emergency like ongoing drought, for example. The current ten-day allowance for the use of non-organic forage, is no longer sufficient for situations that producers find themselves in.

The latter raises the question whether organic standards are now being revised due to climate change and the former, as one member put it, whether the organic standard is moving towards feedlot practices. The Working Group proposal added the following clause to the existing livestock rations standard: *As an exception, slaughter animals may be finished on a ration of up to 60% grain for up to 10% of the life of the animal, provided the cattle have free-choice access to long-fibre forage (>10 cm stem length).* After re-negotiation, the percentage was reduced to 50.

### **Livestock Permitted Substances List**

There were a minimal number of livestock substances on the agenda, however, several are note worthy. Formulants (inerts, excipients) have been added to Table 5.3 and the exception for synthetic amino acids (DL-methionine, DL-methionine—hydroxy analog, and DL-methionine—hydroxy analog calcium) has been revised from a specific end date of 01 October 2010 to the following: *This exception will be re-evaluated at the next revision of this standard.* There was no opposition.

A proposal with regard to livestock vaccines that generated intense debate at the 10<sup>th</sup> Meeting was resolved at the 11<sup>th</sup>, thanks to the hard work of the PSL Working Group. A proposed amendment to 32.310, Section 1.4.1 was approved, creating an exception for livestock vaccines similar to the exceptions already allowed by the US and EU. Vaccines grown on a genetically engineered substrate like GE soy, for example, will be allowed if they are not themselves products of genetic engineering. The commercial availability clause also applies. There was one negative vote and the exception will be reviewed before the end of 2012.

### **Processing Standard**

Due to a negative vote at the previous ballot and subsequent reconsideration of the issues involved—the current standard does not allow for processing aids that are not listed in Table 6.6, even when an organic version is not commercially available—the Processing Working Group introduced a more thorough revision of the clauses pertaining to processing aids. The proposal underwent further changes at the meeting itself with the following result: *All non-organic processing aids of agricultural origin are subject to the requirements of par. 1.4.1 (a, h, k, and l) and may be used if not commercially available in organic form, subject to annotations for that substance as listed in par. 6.6 of CAN/CGSB-32.311, Organic Production Systems — Permitted Substances Lists.*

A proposed change will allow the use of cleaners, disinfectants and sanitizers not listed in Tables 7.3 and 7.4, but only after considerable discussion and re-drafting of the proposal in Cornwall. Here is the proposal going to ballot for 32.310, Section 8.3.8: *If the substances given in par 7.3 or 7.4 can be demonstrated to be ineffective, cleaners, disinfectants and sanitizers not included in these lists may be used to sanitize organic food contact surfaces provided that: (a) documented procedures have verified the efficacy of the chosen removal event; (b) that their removal from such surfaces as per (a) is*

*documented prior to each organic production run; (c) that the disposition of all such substances is recorded to ensure that the effluent discharge is neutralized to minimize negative environmental impact.*

### **Processing Permitted Substances List**

Gelatine is an excellent example of the kind of consensus building that occurred on a number of occasions at the 11<sup>th</sup> Meeting, where work frequently continued over lunch and into the evening. This relatively innocuous substance generated considerable discussion and three negative votes in the first round. Discussion focused on animal vs. plant sources—the EU Regulation allows gelatine from animal sources as an ingredient—and the appropriate use of gelatine as an ingredient. After the recommendation was re-drafted, one member abstained from the vote and the proposal passed without further opposition.

Gelatine will be subject to the commercial availability clause and both plant and animal sources—for canned meat or as gelling agent for gummed candy—will be allowed. If derived from cattle, gelatine must be guaranteed free of specified risk materials.

In spite of its best efforts, the Processing PSL Working Group was unable to fully unravel the confusion surrounding the current *Potassium Tartrate made from Tartaric Acid* entry in Table 6.3 prior to the Meeting. Simply changing the substance name to *tartaric acid* did not cover all the concerns raised by the suggestion for amendment. As a result, the following three substances will appear in the table: 1) Tartaric acid (C<sub>4</sub>H<sub>6</sub>O<sub>6</sub>. INS 334), 2) Potassium tartrate (K<sub>2</sub>C<sub>4</sub>H<sub>4</sub>O<sub>6</sub>. INS 336) and 3) Potassium acid tartrate (KC<sub>4</sub>H<sub>5</sub>O<sub>6</sub>). The discussion of tartaric acid underscored the fact that a background in chemistry can be foundational to good decision making.

It should come as no surprise that bleach was on the agenda. It was only a matter of time, given the conflicting comments in the current annotation and the confusing, if not meaningless, restriction to a 10% solution. The substance name was changed to *chlorine compounds* and the annotation revised for clarity and efficacy. Chlorine compounds were also added to Table 7.3 with a unique annotation.

The PSL Working Group did an excellent job of reworking the bleach annotation which proved to be an example of how thorough research and preparation prior to meetings can facilitate a complex and potentially contentious issue. Quebec expressed concern that the proposal as presented would allow for the use of chlorine in sprout production and there were four negative votes in the first round. After introducing the phrase “except for sprout production,” however, the motion passed without opposition.

The proposal not to list lecithin, now that it is widely available in organic form, did not survive the Technical Committee vote. Again, after more work in Cornwall, the following annotation was approved: *Shall be organic unless the required form is commercially unavailable. Bleached form is allowed if processed in accordance with the requirement of 1.4.1. j.*

Several gums—xanthan, carrageen, agar—are already listed separately in Table 6.3. Therefore, in order to promote consistency, the current *gums* listing was deleted and each of the gums in the annotation listed separately—arabic, guar, karaya, tragacanth, and carob. *Gellan gum* was also added to the table.

With each round of amendments, a number of substances that are currently on the US National List but not on the Canadian, are added to Canada’s PSL, as was the case at the 11<sup>th</sup> Meeting. Others, like the three boiler chemicals, cyclohexylamine, diethylaminoethanol and octadecylamine, were rejected.

## **Summary**

Out of 90 Technical Committee members, 43 attended in-person and another five via teleconference, and under the capable leadership of new chairperson, Kelly Monaghan, they considered 119 proposals prepared by the volunteer working groups. Of these, 113 will go to ballot. None of the proposals take effect until the final ballot is complete and tallied, any negative votes and comments are resolved, and the revised standards are published.

**Priscilla Reimer has been active in the organic sector for more than a decade as an organic consumer, inspector and consultant. She is the president of the Manitoba Organic Alliance and its representative to the Organic Federation of Canada.**