

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 Canadian Food Inspection Agency Office interpretive guidance on issues related to the National Standards for Organic Agriculture (CAN/CGSB-32.310-2020 and CAN/CGSB-32.311-2020).



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 cfia.opr-rpb.acia@canada.ca.

Public Comment period – from 21 January to 21 February, 2021

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Organic Principles and management practices

6. Livestock production

Feed – livestock transportation

Is organic feed required during transport and handling of livestock when the duration of transit exceeds 5 hours (6.5.5)? (512)

Yes. The reference to *Code of Practice for the Care and Handling of Farm Animals: Transportation* relates to the humane treatment of the livestock and does not supersede 6.4.1 indicating feed ration shall be organic.

9. Composition of organic products

Organic percentage – liquid ingredients

When liquid ingredients are composed of solids dissolved in added water, is the added water excluded or included in the percent organic calculation? (416)

As per 9.1.3.b, it depends upon whether the addition of water is to reconstitute a concentrate to bring it to single-strength concentration and the final product makes a reconstitution claim either on the product label or on a specification sheet. If yes, then the added water to bring the ingredient or product to single-strength concentration is INCLUDED in the percent organic calculation. If no, and the water and salt are declared in the finished product's ingredient statement, then the added water and salt are EXCLUDED in the percent organic calculation of that or any future product that uses it as an ingredient.

When calculating the organic percentage of a multi-ingredient product, that is a mixture of solid and liquid ingredients (9.1.3c), and there are no reconstitution claims, is the mass of each ingredient used as-is, or should any salt or water in each of these ingredients be removed prior to the calculation? (417)

For such products the organic percentage calculation shall be made without including the water or salt that has been added by the current or prior processor and that is listed on the final product's ingredient statement.

Permitted substances lists

Gelling agents for crickets

Can gelling agents such as guar gum and xanthan gum be added into drinking water/feed for crickets? This will stop crickets from drowning especially as they are small when they first hatch. (511)

Yes. Gelling agents are permitted providing they are organic. Non-organic gelling agents are not permitted as none are listed in PSL Table 5.2.

Yeast foods with DAP

Can yeast foods containing diammonium phosphate (DAP) be used in alcoholic beverages such as distilled spirits and other fermented products such as vinegar. (508)

No. The annotation for Yeast foods in 32.311 Table 6.3 only permits the use of DAP in cider, mead and wine.

Preservatives for organic yeast

If organic yeast is not commercially available can non-organic yeast products containing preservatives such as sorbitan monostearate be used? (457)

Non-organic yeast may be used provided that all other prohibitions of 32.310 are met, including 9.1.2. 9.1.2 would allow the presence of sorbitan monostearate in the yeast product as long as the non-listed preservative does not have an effect on the final organic product, is not declared on the organic product label and is present only in insignificant amounts.

Sanitizing in apple packing lines

Can a calcium hypochlorite product containing additional components not included on Table 7.3: sodium chloride, calcium carbonate and calcium hydroxide, be used in apple packing lines? (513)

Yes. Calcium hypochlorite is listed on table 7.3 for use in direct contact with food, and these three secondary ingredients - sodium chloride, calcium carbonate and calcium hydroxide - are used to treat drinking water and so are permitted, as per 32.311 7.1.3 ("Other non-organic ingredients compounds used to treat drinking water"). Concentration of the calcium hypochlorite shall not exceed maximum levels for safe drinking water when in contact with the apples.

Revised wording

6.4 Livestock feed

Vegetable matter

Regarding the 'vegetable matter' other than grains requirement for poultry and pork (6.4.3 j -2015) (6.4.3 l -2020) (340, 507)

a) is organic vegetable matter required?

Yes. Organic vegetable matter is required.

b) would non-cereal grains (soybean, flax, corn) count as vegetable matter?

No. Vegetable matter is referring to fruit (apples, pears etc.) and vegetables (lettuce, potatoes, squash, etc.) and the associated crop waste and forage (straw, hay).

c) would straw and seed cleanings count?

Yes - for straw. No - for grain-based seed cleanings.

d) would a grassed access area count?

Yes. Organic pasture would qualify as vegetable matter.

e) would alfalfa meal or pellets count?

Yes. Organic alfalfa roughage in any format qualifies by virtue of being a forage plant.

f) do dried peas count?

No. Peas (unless fed as whole-plant forage) would be considered the same as other non-cereal grains.

Note: The intent of the vegetable matter requirement is to provide roughage and stimulate natural behaviours and not necessarily as a nutrient source. This vegetable matter fraction can be supplemental to the feed ration or can be included in the feed ration.

Permitted substances lists

Preservative for chymosin

Can we add sodium benzoate to chymosin as a preservative in a salt brine solution for cheese production? (151)

Non-GE chymosin extracted from conventional calf stomach linings is permitted, providing an organic source is not commercially available. See Enzymes, PSL, Tables 6.3 and 6.5. Additional requirements outlined in 6.2.1 of PSL must be addressed if the production of allowed chymosin products involves the use of substrates or growth media. When the sodium benzoate acts as a preservative for the chymosin, it is classified as a non-agricultural subpart having a functional

effect on the ingredient but not on the final product, nor is it declared on the product label, it is permitted (9.1.2 of 310) as of the 2020 revision of the standard.

Chlorine to disinfect poultry carcasses

Can chlorine or peracetic be used to disinfect livestock carcasses? Are there alternative substances or processes? (254) (476)

Chlorinated water may be used if chlorine level does not exceed maximum limits for safe drinking water (See Table 7.3 - Chlorine compounds). Peracetic acid, along with other direct use substances listed in 7.3 such as lactic acid, vinegar, acetic acid, etc. may be used in wash or rinse water in direct contact with plant and food including livestock and poultry carcasses. Alternative physical processes for disinfection such as steam, hot water or High-Pressure Processing (HPP) are allowed.