



Comparison between
CAN/CGSB-32.310-2015 amended 2018 and CAN-CGSB-32.310-2020

Sections 8 and 9 – Organic integrity and Product composition

Changes are highlighted in yellow

CAN/CGSB-32.310-2015

CAN-CGSB-32.310-2020

8 Maintaining organic integrity during cleaning, preparation and transportation

Clause 8 applies to all operations that handle, store and transport organic products for production and processing. During these activities, a central objective is to maintain the inherent organic qualities of the product through strict adherence to the procedures and principles of this standard. Operators are responsible for maintaining organic integrity at all points of the market supply chain, from production through point of sale to the final consumer.

8.1 Maintaining integrity

8.1.1 Preparation materials, such as counters, containers and conveyors, in contact with food shall be clean and of food-grade quality.

8.1.2 Incidental additives shall not compromise organic integrity:

- a) hand sanitizer substances, if used in direct contact with organic products, shall be listed in Table 7.3 of CAN/CGSB-32.311.
- b) culinary steam, that is, steam used in direct contact with organic products or packaging, shall only contain:
 - 1) substances listed in Tables 6.3-6.5 of CAN/CGSB-32.311; and/or
 - 2) food-grade cleaners, disinfectants and sanitizers authorized for organic product contact in Table 7.3 of CAN/CGSB-32.311.
- c) food-contact lubricants shall be listed in Tables 6.3-6.5 of CAN/CGSB-32.311.
- d) use of cleaners, disinfectants and sanitizers shall comply with the requirements in 8.2 of this

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- b) culinary steam, that is, steam used in direct contact with organic products or packaging, shall only contain:
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 - 2) food-grade cleaners, disinfectants and sanitizers authorized for organic product contact in Table 7.3 of CAN/CGSB-32.311.
- c) food-contact lubricants shall be listed in Tables 6.3, 6.4 or 6.5 of CAN/CGSB-32.311.
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standard.

8.1.3 Mechanical, physical or biological processes (such as fermentation and smoking) are permitted.

8.1.4 To prevent commingling, organic products shall be segregated or otherwise protected from non-organic products at all times, for example, during processing, storage, at bulk and unbound stages.

8.1.5 If a production unit prepares both organic and non-organic products:

- a) organic and non-organic products shall not be mixed at any stage of preparation;
- b) every measure shall be taken to ensure that the organic and non-organic identity of finished product is maintained;
- c) operators shall document removal events used to prevent cross-contamination of organic and non-organic production runs;
- d) preparation of organic products shall be carried out continuously until the run is complete;
- e) organic runs shall be separated by place or time from similar preparation of non-organic products;
- f) organic runs shall be planned in advance to prevent commingling; and
- g) additional measures are required to prevent accidental commingling of bulk at-risk organic seed or grain with non-organic grain which may contain trace GE contamination:
 - 1) Storage bins containing organic crops shall be visibly identified as organic using well-maintained, weather-resistant signage.
 - 2) When at-risk organic crops are being moved between bulk storage bins (for example, grain drying, lot mixing), temporary signage shall be attached to the wagon or truck to visibly identify the load in transit as organic.
 - 3) When organic crops are held in bulk bins for drying or roasting, temporary signage shall be attached to the bin to visibly identify the contents as organic.

8.1.6 Organic product packaging shall

- a) maintain organic product quality and integrity; and
- b) be minimal in a manner that is consistent with 8.1.6 a). Packaging materials that minimize harm to the environment throughout their life cycle are preferred; and
- c) comply with prohibitions in 1.4 b) and k).

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- c) comply with prohibitions in 1.4 b) and 1.4 e).

8.2 Cleaning, disinfecting and sanitizing

8.2.1 Food-grade cleaners, disinfectants and/or sanitizers listed in Table 7.3 of CAN/CGSB-32.311 may be used as annotated:

- a) on organic product contact surfaces, which include equipment, storage and transport units; and/or
- b) in direct contact with organic products.

8.2.2 If substances in Table 7.3 are ineffective, cleaners, disinfectants and/or sanitizers listed in Table 7.4 of CAN/CGSB-32.311 may be used on organic product contact surfaces, provided that documentation demonstrates:

- a) they are used as annotated; and
- b) removal event(s) have eliminated the substance(s) from organic product contact surfaces prior to organic production.

8.2.3 If substances in Table 7.4 are ineffective, other cleaners, disinfectants and/or sanitizers may be used on organic product contact surfaces, provided that documentation demonstrates:

- a) the efficacy of the alternative substance(s); and
- b) removal event(s) have eliminated the alternative substance(s) from organic product contact surfaces prior to organic production; and
- c) that effluent discharge was neutralized to minimize negative impact on the environment.

8.2.4 Specific cleaning, sanitation and disinfection requirements in clause 7 of this standard supersede those specified in 8.2.

8.3 Facility pest management and post-harvest management

8.3.1 Good production and manufacturing practices shall be adopted to prevent pests. Pest management practices shall involve the following, in descending order:

- a) the removal of pest habitat and food;
- b) the prevention of access and environmental management (for example, light, temperature and atmosphere), to prevent pest intrusion and reproduction;

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8.2.2 Cleaners, disinfectants and sanitizers listed in Table 7.4 of CAN/CGSB-32.311 may be used on organic product contact surfaces, provided that documentation demonstrates:

- a) they are used as annotated; and
- b) removal event(s) have eliminated the substance(s) from organic product contact surfaces prior to organic production.

8.2.3 If substances in Tables 7.3 and 7.4 are ineffective, other cleaners, disinfectants or sanitizers may be used on organic product contact surfaces, provided that documentation demonstrates the following conditions:

- a) the efficacy of the alternative substance(s);
- b) removal event(s) have eliminated the alternative substance(s) from organic product contact surfaces prior to organic production;
- c) that effluent discharge was neutralized to minimize the negative impact on the environment.

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- c) mechanical and physical methods, such as traps;

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- d) lures and repellents, as listed in Table 8.2 of CAN/CGSB-32.311.

8.3.2 If the practices enumerated in 8.3.1 are ineffective, the operator may use pest control substances listed in Table 8.2 of CAN/CGSB-32.311. The operator shall record the target pests, substances used, start and end dates, and the location(s) of pest control devices.

8.3.3 If the practices specified in 8.3.2 are ineffective, substances not listed in Table 8.2 of CAN/CGSB-32.311 may be used whenever organic product preparation takes place, including off-site storage facilities, provided that there is no risk to organic product status or integrity. Operators shall ensure that organic products and/or the packaging materials are not present when these substances are used indoors. Operators shall clearly document:

- a) why permitted substances were not suitable or ineffective for pest management;
- b) how contact of organic products with unlisted substances was avoided;
- c) all activities involved in the use, storage and disposal of unlisted substances.

8.3.4 If pest and disease control substances that are not listed in Table 8.2 of CAN/CGSB-32.311 are used under any mandatory government program, operators shall monitor and document their use.

8.3.5 Substances in Table 8.3 of CAN/CGSB-32.311 may be used for post-harvest storage.

NOTE In the event of emergency pest or disease treatment, Canadian operators are required to notify their certification body immediately of any change that may affect organic product certification.

8.4 Transportation

8.4.1 Every measure shall be taken to ensure that the integrity of organic inputs, ingredients and products is not compromised in transit. Physical segregation or other protection methods shall be used to avoid commingling or substitution with non-organic inputs, ingredients and products.

8.4.2 The following information shall accompany organic product:

- a) the name and address of the person or organization responsible for the production, preparation or distribution of the product;
- b) the name of the product;
- c) the organic status of the product; and

- d) lures and repellents, as listed in Table 8.2 of CAN/CGSB-32.311.

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8.3.3 If the practices specified in 8.3.2 are ineffective, substances not listed in Table 8.2 of CAN/CGSB-32.311 may be used whenever organic product preparation takes place, including off-site storage facilities, provided that there is no risk to organic product status or integrity. Operators shall ensure that organic products or the packaging materials are not present when these substances are used indoors. Operators shall clearly document:

- a) why permitted substances were not suitable or ineffective for pest management;
- b) how contact of organic products with unlisted substances was avoided;
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8.3.4 If pest and disease control substances that are not listed in Table 8.2 of CAN/CGSB-32.311 are used under any mandatory government program, operators shall monitor and document their use.

NOTE In the event of emergency pest outbreak, Canadian operators are required to notify their certification body immediately of any change that may affect organic product certification.

8.3.5 Substances in Table 8.3 of CAN/CGSB-32.311 may be used for post-harvest storage.

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8.4.2 The following information shall accompany the organic product:

- a) the name and address of the person or organization responsible for the production, preparation or distribution of the product;
- b) the name of the product;

d) information that ensures traceability, for example, the lot number.

8.4.3 Organic products shall not be exposed to pesticides or pest control substances that are not listed in Table 8.2 of CAN/CGSB-32.311 during any stage of transit or at border crossings.

NOTE Owners are responsible for the organic integrity of organic product while it is in transit. This includes the use of common carriers and custom hauling. Transport companies share responsibility for organic integrity while loading, transporting, or off-loading certified organic product.

9 Organic product composition

Clause 9 applies to all operations involved in organic product preparation and resale, including retailers who prepare the product.

9.1 Product composition

9.1.1 Organic product formulations shall consist primarily of organic whole or processed agricultural ingredients and organic processing aids. Other permitted ingredients and processing aids, as described in 9.2, shall be kept to a minimum.

9.1.2 Evaluation and calculation of organic percentages shall account for all constituent ingredients or ingredient sub-parts, distinguishing between organic and non-organic components of each ingredient contained in the product.

9.1.3 The percentage of all organic ingredients in an organic product shall be calculated as follows:

- a) Solid products (except livestock feed) — Divide the net mass, excluding water and salt, of all organic ingredients in the formulation or finished product, whichever is more relevant, by the net mass, excluding water and salt, of all ingredients.
- b) Liquid products — If the product and its ingredients are liquid, divide the fluid volume of all organic ingredients, excluding water and salt, by the fluid volume of all ingredients, excluding

c) the organic status of the product; and

d) information that ensures traceability, for example, the lot number.

8.4.3 Organic products shall not be exposed to pesticides or pest control substances that are not listed in Table 8.2 of CAN/CGSB-32.311 during any stage of transit or at border crossings.

NOTE Owners are responsible for the organic integrity of the organic product while it is in transit. This includes the use of common carriers and custom hauling. Transport companies share responsibility for organic integrity while loading, transporting, or off-loading certified organic products.

9 Organic product composition

Clause 9 applies to all operations involved in organic product preparation, including retailers.

9.1 Product composition

9.1.1 Organic product formulations shall consist primarily of organic whole or processed agricultural ingredients, organic whole or processed aquaculture ingredients, and organic processing aids. Other permitted ingredients and processing aids, as described in Clause 9.2, shall be kept to a minimum.

9.1.2 The evaluation of product composition shall exclude non-agricultural sub-parts of ingredients listed in Tables 6.3 and 6.4 in CAN/CGSB-32.311 that have a technical or functional effect on the ingredient but not on the final organic product, and are not declared on the final organic product label. These ingredient sub-parts may be present in the final organic product but only in insignificant amounts. This includes non-agricultural sub-parts of ingredients, such as anticaking agents, carriers and fillers, preservatives, stabilizers, pH adjusters or buffers. The calculation of organic percentages shall account for all constituent ingredients or ingredient sub-parts, distinguishing between organic and non-organic components of each ingredient contained in the product.

9.1.3 The percentage of all organic ingredients in an organic product shall be calculated as follows:

- a) Solid products [except livestock feed: see 9.1.3 d)] — Divide the net mass, excluding water and salt, of all organic ingredients in the formulation or finished product, whichever is more relevant, by the net mass, excluding water and salt, of all ingredients.
- b) Liquid products — If the product and its ingredients are liquid, divide the fluid volume of all organic ingredients, excluding water and salt, by the fluid volume of all ingredients,

water and salt. If the principal display panel uses phrases like “reconstituted from concentrates” to describe the product, single-strength concentrations of the ingredients or the finished product shall be used to calculate organic percentages.

- c) Solid products and liquid products — Divide the combined net mass of solid organic ingredients and the net mass of liquid organic ingredients, excluding water and salt, by the total mass, excluding water and salt, of all ingredients in the finished product.
- d) Livestock feed shall contain 100% organic agricultural ingredients and necessary feed additives or supplements listed in Table 5.2 of CAN/CGSB-32.311. Divide the total net mass, excluding water, salt and calcium compounds, of combined organic ingredients in the formulation or the finished product, whichever is more relevant, by the total mass, excluding water, and salt and calcium compounds, of all ingredients.

9.1.4 The percentage of all organic ingredients in an organic product shall be rounded down to the nearest whole number.

9.2 Categorization of organic products

Based on the percentage of their organic ingredients, organic products fall into two categories:

9.2.1 95% organic content (or more)

Such products may not contain an ingredient in both organic and non-organic form.

Such products may contain up to 5% of the following:

- a) “ingredients classified as food additives”, and “ingredients not classified as food additives,” as listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, respectively, subject to requirements specified in substance listing annotations and restrictions specified in 6.2 of CAN/CGSB-32.311. Listed ingredients of agricultural origin shall meet the requirements in 1.4 a), 1.4 c), 1.4 h) and 6.2 of CAN/CGSB-32.311;

excluding water and salt. If the principal display panel, specification sheet or certificate of analysis uses phrases like “reconstituted from concentrates” to describe the final product, single-strength concentrations of the ingredients or the finished product shall be used to calculate organic percentages. Any user of an ingredient, to which water or salt has been added by a prior processor, and is declared as water or salt on the ingredient declaration of the finished product is required to exclude this added water or salt when calculating organic percentages.

- c) Solid products and liquid products — Divide the combined net mass of solid organic ingredients and the net mass of liquid organic ingredients, excluding water and salt, by the total mass, excluding water and salt, of all ingredients in the finished product. Any user of an ingredient, to which water or salt has been added by a prior processor, and is declared as water or salt on the ingredient declaration of the finished product is required to exclude this added water or salt when calculating organic percentages.
- d) Livestock feed shall contain 100% organic agricultural ingredients and necessary feed additives or supplements listed in Table 5.2 of CAN/CGSB-32.311. Divide the total net mass, excluding water, salt and calcium compounds, of combined organic ingredients in the formulation or the finished product, whichever is more relevant, by the total mass, excluding water, and salt and calcium compounds, of all ingredients.

9.1.4 The percentage of all organic ingredients in an organic product shall be rounded down to the nearest whole number.

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- a) “ingredients classified as food additives” and “ingredients not classified as food additives” as listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, respectively, subject to requirements specified in substance listing annotations and restrictions specified in 6.2 of CAN/CGSB-32.311. Listed ingredients of agricultural origin shall meet the requirements in 1.4 a), 1.4 c), 1.4 d) and 6.2 of CAN/CGSB-32.311;

- b) non-organic agricultural processing aids that meet the requirements in 1.4 a), 1.4 b), 1.4 c), and 1.4 h), and any annotations listed in Table 6.5 of CAN/CGSB-32.311;
- c) non-agricultural processing aids as listed in Table 6.5 of CAN/CGSB-32.311, subject to the requirements specified in substance listing annotations;
- d) non-organic agricultural ingredients that meet the requirements in 1.4 a), 1.4 c) and 1.4 h). These ingredients are also subject to organic commercial availability requirements.

9.2.2 70-95% organic content

Such products may not contain an ingredient in both its organic and non-organic form.

Such products may contain up to 30% of the following:

- a) non-organic agricultural ingredient subject to the requirements in 1.4 a), 1.4 c), and 1.4 h);
- b) “ingredients classified as food additives”, and “ingredients not classified as food additives,” as listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, respectively, subject to the requirements specified in substance listing annotations and restrictions specified in 6.2 of CAN/CGSB-32.311. Listed ingredients of agricultural origin shall meet the requirements in 1.4 a), 1.4 c), 1.4 h) and 6.2 of CAN/CGSB-32.311;
- c) non-organic agricultural processing aids that meet the requirements in 1.4 a), 1.4 b), 1.4 c), and 1.4 h), and any annotations listed in Table 6.5 of CAN/CGSB-32.311;
- d) non-agricultural processing aids listed in Table 6.5 of CAN/CGSB-32.311 subject to the requirements specified in substance listing annotations.

NOTE See Annex A for a summary of clause 9.

- b) non-organic agricultural processing aids that meet the requirements in 1.4 a), 1.4 b), 1.4 c), and 1.4 d), and any annotations listed in Table 6.5 of CAN/CGSB-32.311;
- c) non-agricultural processing aids as listed in Table 6.5 of CAN/CGSB-32.311, subject to the requirements specified in substance listing annotations;
- d) non-organic agricultural ingredients that meet the requirements in 1.4 a), 1.4 c) and 1.4 d). These ingredients are also subject to organic commercial availability requirements.

9.2.2 70-95% organic content

Such products shall not contain an ingredient in both its organic and non-organic form.

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- a) non-organic agricultural ingredient subject to the requirements in 1.4 a), 1.4 c), and 1.4 d);
- b) “ingredients classified as food additives”, and “ingredients not classified as food additives,” as listed in Tables 6.3 and 6.4 of CAN/CGSB-32.311, respectively, subject to the requirements specified in substance listing annotations and restrictions specified in 6.2 of CAN/CGSB-32.311. Listed ingredients of agricultural origin shall meet the requirements in 1.4 a), 1.4 c), 1.4 d) and 6.2 of CAN/CGSB-32.311;
- c) non-organic agricultural processing aids that meet the requirements in 1.4 a), 1.4 b), 1.4 c), and 1.4 d), and any annotations listed in Table 6.5 of CAN/CGSB-32.311;
- d) non-agricultural processing aids listed in Table 6.5 of CAN/CGSB-32.311 subject to the requirements specified in substance listing annotations.

NOTE See Annex A for a summary of clause 9.