

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

Comment period – December 2, 2019 to January 13, 2020

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General Principles and management standards

5.3 Seeds and planting stock

Use of non-organic planting stock

When using non-organic planting stock (such as plant tissue/cuttings) due to the fact that the organic form it is not commercially available (as permitted under 32.310 Section 5.3), at what stage would the resulting plant or transplant considered to be organic and be able to be sold as such? (475)

A cutting is not considered organic until one year (perennial) or one crop season (annual) under organic management.

5 Livestock production

Outdoor pastures and outdoor areas

What is the difference between outdoor pastures and outdoor areas? (458a)

Outdoor pastures are what is required during the grazing season (see 32.310 6.1.3 a) and outdoor areas are required to ensure the animals have access to open air at other times.

Space requirements for rabbits

Why are the space requirements for rabbits the same at all ages when other livestock in the standard have different space requirements for different ages? (458b)

Due to the short period from kit to slaughter of rabbits, it seems impractical to have an interim stocking rate requirement during this period. When the standard was first written, the only reference standard that had different requirements for different ages was assessed to be a lesser standard and so these were not adopted. There have been no requests from the industry to create these distinctions.

7.1 Apiculture

Bee feeding

Is non-organic sugar permitted as a regular food source for bees that produce organic honey? (474)

No. Sufficient honey and pollen are to be maintained in the hive to support the colony at all times, including dormant periods, therefore feeding should not be a regular yearly event. Organic honey and organic sugar may only be supplied as a temporary solution during exceptional circumstances (7.1.11.1(a)). Non-GE non-organic sugar may only be used when the health of the colony is at risk (32.310 7.1.11.1(b)).

7.3 Mushroom production

Spawn marketed with growing substrate

When marketing mushroom starter materials containing living spawn (e.g. mycelium loose in grain/or sawdust or embedded in a grow block/log/loave/brick) as organic, are the components other than the mycelium exempt from the calculation of total percent organic ingredients in the final product? (471)

Mushroom starter materials in any format do not fall under Clause 9, therefore a calculation of percentage of organic ingredients is not applicable. Spawn must comply with 7.3.3 and the makeup of the starter material must comply with 7.3.2.

Greenhouse crops

Disposal of greenhouse soil

Under 32.310 clause 7.5.12, can operators dispose of greenhouse soils in cases where there is a risk of disease or pest propagation? (465)

Disposal of greenhouse soil to minimize the spread of a transmissible pest or disease is permitted only when a regulatory directive has been issued requiring such a practice "treatment" (32.310, 4.4.6).

Forestry by-products as greenhouse compost

Can bark or forestry by-products alone fulfill the 10% compost criteria for greenhouse container growing? (461b)

No. Compost is a product of a carefully managed aerobic process (32.310 3.15).

9 Organic crop composition

Gas as ingredient

Are gases (such as carbon dioxide for the carbonation of beverages) added as ingredients (under PSL table 6.3 or 6.4) required to be calculated as non-organic ingredients? (473)

No. Gases are not included. Only solids and liquids must be accounted for when calculating organic content (9.1.3 in 32.310).

Permitted Substances Lists

About fused minerals

Are fused mineral fertilizers (created by heating and blending minerals) compliant to COR? (464)

No. Unless specifically listed in the PSL, minerals that have undergone such a change are not permitted.

Forestry by-products as compost feedstock

Can bark or forestry by-products be used as a compost feedstock? (461a)

Yes. Forestry by-products can be used as compost feedstocks providing it can be demonstrated they do not contain a substance prohibited by 1.4 of CAN/CGSB-32.310 known to be persistent in compost. Table 4.2 Compost Feedstocks

Coloured ink in compost feedstock

If tests demonstrate acceptable levels of heavy metals, foreign matter and human pathogens, as specified in Guidelines for Compost Quality, is compost made from Municipal Source Separated Organic (SSO) household waste, which is composed mainly of vegetal and animal origin but could contain some coloured newsprint (added to household containers to absorb moisture and odors), and possibly other prohibited substances, permitted? (470)

No. Regardless of whether testing indicates acceptable levels of heavy metals, finished compost must conform to the compost feed stocks annotation, which, for example, prohibits paper with coloured ink other than yard waste bags. See 32.311 table 4.2 Compost feedstocks.

Magnesium carbonate as anti-caking agent

Can magnesium carbonate be used as an anti-caking agent in salt when used for food? (467a)

No. Magnesium carbonate may only be used as an anti-caking agent in non-standardized dry mixes (e.g. seasonings) used in meat products with 70-95% organic content. (see "Magnesium carbonate" PSL 6.3).

Can magnesium carbonate be used as an anti-caking agent in salt when used for livestock? (467b)

Yes. As magnesium carbonate may be included in feed as a source of nutrition. (see "Minerals, trace mineral, elements" PSL 5.3)