

## **Standards Interpretation Committee: Questions and Answers Regarding National Standards for Organic Agriculture**

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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/CGSB 32.311).

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**

### **Q1 Can parallel production be allowed if management to avoid co-mingling is documented?**

No, the intent behind the present standard (Section 5.1.2) is a prohibition on parallel production of non distinguishable crops on the same enterprise. Post harvest operations are not subject to this prohibition (Reference, 5.1.2).

### **Q2 Can seeds be considered an input as opposed to a crop, for the purpose of allowing seed companies to practice parallel production?**

No, because in the current Standards, seeds are not listed in the definition of inputs (Reference, 5.1.2).

### **Q3 What is the pathway for approving cleaners, or substances used?**

Operators should approach their Certification Bodies for approval of their cleaners. Ingredients in the cleaner must comply with the Organic Standards and the PSL.

### **Q4 Does the substrate for organic mushrooms need to be a) certified organic, b) composted?**

The operator should refer to 7.3.2. The growth substrate does not necessarily need to be composted. It does not need to be certified organic. Materials contained in the substrate, for which there are organic standards, must comply with 1.4.1 and be free from prohibited substances for a period of three years.

**Q5 Can chlorine be used to wash organic produce?**

Chlorinated water, up to the concentration used in the closest municipal water system, is acceptable for washing organic vegetables and does not require rinsing. Use of higher concentrations requires rinsing (Reference, PSL 7.4).

**Q6 Are there any exceptions to the rule against alternating between organic and non-organic production outlined in 5.1.6?**

The intent of 5.1.6 is to prevent deliberate alternation between organic and non-organic production. There are cases where an operator may cease organic production and then transition again to organic which are clearly not deliberate. Cases such as these are not clear violations of 5.1.6.

**Q7 Can uncertified garlic be used as a de-wormer in organic livestock operations?**

The standard does not prohibit the use of uncertified garlic as a de-wormer in the event that certified garlic is not commercially available (Reference, 6.7.9 b).

**Q8 Does the requirement, in 5.1.1, that land be in compliance with the Standard for 12 months prior to harvest apply to new fields added to an existing application?**

"The specific requirement of 5.1.1 for a production unit to have a full 12 months of supervision by a Certifying Body before a harvested crop, is intended for new operations. Existing operators adding fields to their management must demonstrate compliance with all other aspects of transition, including withdrawal periods for prohibited substances." (Reference, 5.1.1)

**Q9 Is copper sulphate allowed as a treatment for fence-posts on pasture?**

- The use of copper sulphate is permitted for use as a fungicide (wood preservative) for wood (e.g. fence posts) on organic production units.

**Q10 Are approved cleaners applicable only to food contact surfaces or to the whole processing facility?**

The restrictions on cleaners, disinfectants and sanitizers provided in the PSL do not apply to parts of the facility where there is no direct or indirect contact with the food products or food contact surfaces (Reference, PSL Tables 7.3 and 7.4).

**Q11 Is the buffer zone around treated posts permanent or transitional?**

The Standards do not prescribe any mandatory buffer zone around areas where treated posts have been used in compliance with the section 5.2.2 b of the Standards.

**Q12 How close to a certified sugar bush can the use of a prohibited substance be allowed, without compromising the certification of the sugar bush?**

According to 5.1.4 and 7.2.1, the use of prohibited substances around maple production units would require the maintenance of buffer strips the same as those required for crop production (Reference, 7.2.1 7.2.8).

**Q13 Which forms of lecithin are acceptable, according to the organic standard?**

The current standard should be interpreted to allow organic lecithin both bleached and unbleached, and non organic where organic is not commercially available. Non organic lecithin must still comply with 1.4.1 (Reference, PSL 6.3).

**Q14 What are the restrictions on the up to 5% of non-organic ingredients allowed in production of organic products in the OPR?**

Non-organic agricultural ingredients are allowed in products labelled as "organic," provided that the organic form is not commercially available, and they comply with the Standards, including 1.4.1 and 1.4.2 and section 8. The total non organic content of the final product must not exceed 5% if the product is labelled as "organic" (Reference, Organic Products Regulations, 2009).

**Q15 Are seeds produced on buffer strips able to be planted in organic fields?**

Seeds grown on buffer strips under the Standards are the same as those grown on conventional farms (see 5.1.5). Exceptions to the use of organic seeds are specified in section 5.3.2.1 (Reference, 5.3).

**Q16 Can non-organic common seed be used if organic common seed is not available?**

Yes, and also for the purposes of 5.3.2.1, "common" could be considered a varietal distinction subject to the exceptions to the use of organic seeds. See also section 3 Definition of "commercial availability."

**Q17 Are Corn and Soybeans considered "flower bearing crops" in reference to 7.1.9?**

Since the requirement for the 3000 metre buffer includes proximity to all substances prohibited in 1.4.1, the distinction between flower bearing and non flower bearing crops is irrelevant. Corn and soybean crops would still trigger the mandatory buffer zone unless managed in accordance with the Standards.

**Q18 Can a farmer irrigate land from an irrigation system that uses Magnicide?**

No, because active substances included in Magnicide are not allowed for application to organic production units. If equipment that has been in contact with prohibited substances is thoroughly cleaned and can be shown to be free from such substances, it may be used to irrigate organic farms. Flushwater used for such cleaning must not come in contact with soil or plants. Although irrigation equipment is not specifically mentioned in the standard, the principle outlined in 5.6.3 should apply.

**Q19 Can a non-organic processing aid be used in the production of a category 2 (70-95%) product?**

The PSL listing of processing aids (6.6) does not apply to processing aids used in the non organic ingredients used to produce the 70-95% organic products. However section 1.4.1 does apply. Use of non agricultural processing aids in the production of the final product is limited to those listed on 6.6.

**Q20 Do clauses 7.3 and 7.4 apply to the cleaning of: dedicated and non dedicated spraying equipment; of irrigation systems; and non-food contact surfaces such as floors, windows, staff toilets etc.?**

See answer #10. Tables 7.3 and 7.4 of the Permitted Substances List generally apply to food contact surfaces, food, and equipment in contact with food, unless otherwise annotated. While the cleaners listed in these tables may be used in other applications, cleaning of non-food contact surfaces is not restricted to these cleaners. In the case of use of substances not listed in 7.3 & 7.4, the operator is responsible to ensure that no residual contamination occurs on land and crops.