



Canadian Food
Inspection Agency

Agence canadienne
d'inspection des aliments



Standards Interpretation Committee: 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/CGSB 32.311).

Below are proposed answers to questions, raised by organic stakeholders, regarding the National Standards for Organic Agriculture. The proposed responses will be subject to a 60 day comment period once posted on the [COO website](#).

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

The following question has already been posted on COO website and has been revised following the published amendments of the COS or comments received during public consultation period

11-1 - Please confirm whether sulphates of magnesium, copper, manganese and cobalt produced using sulphuric acid may be used to correct deficiencies determined by soil or plant tissue testing? Q 43

IRON & ZINC Sulphates produced using sulphuric acid are prohibited. The following can be used to correct documented deficiencies for 1) copper - copper sulphate & basic copper sulphate, but only “in a manner that prevents excessive copper accumulation”; 2) magnesium - mined Kieserite, Epsom salts or synthetic magnesium sulphate if not fortified with substances prohibited in the standard; 3) cobalt (not specifically mentioned in 32.311 but covered under the annotation for trace elements) – natural sources that are “unchelated or chelated by substances that are allowed”; 4) manganese – natural sources of manganese oxide and manganese sulphate that are “unchelated or chelated by substances natural sources of that are allowed”. Relevant PSL listings in 4.2: Magnesium sulphate, Manganese products, Mined mineral and unprocessed mine minerals, Sulphate of zinc or iron, Trace elements (micronutrients).

The following question has already been posted on COO website and has been revised following the published amendments of the COS or comments received during public consultation period

11-2 Can insecticidal soaps that contain isopropyl alcohol, in addition to the fatty acids derived from animal or vegetable oils, be used in organic production? Q67

Yes it can be used since Isopropyl alcohol (1-Propanol) is a formulant (as per 32.311 4.3) and is listed in 4b of PMRA.

11-3 What is the definition of “untreated seed” as it applies to 5.3.2.1 (32.310)? More specifically, does the use of “bleach cleaning” render the seed outside this definition? Q77

Yes 4.3 does list substances which can be used for seed cleaning, including peracetic acid. Hydrogen peroxide and acetic acid would also be permitted as they are the components of peracetic acid."

11-4 Are bioplastic mulches, made from corn, accepted as “fully biodegradable films” as the term is used in the annotation for mulches, table 4.3 of PSL? Q79

A bioplastic mulch could be accepted as fully biodegradable provided that;

- 1) The mulch is not made using GMO plant material.
- 2) There are no substances prohibited under 1.4.1 present.

11-5 -Is L-Lysine allowed in the feed for organic birds? Q 80

Yes. Table 5.2 allows for the use of non-synthetic amino acids.

11-6 Does housing for broilers require windows for sunlight to enter while the birds are confined? Q82

As per 6.8.1, natural light inside the barn is required but windows are not necessarily the only mean to satisfy the standard.

11-7 Can manure from livestock raised in cages be used, if the farm has a nutritional deficit and no other manure is available within a reasonable distance? Q83

No. There is no provision in the standard under 5.5.1.a for exemption from the prohibition on manure from fully caged systems.

11-8 Does the requirement for water quality in 7.4.2, apply to all uses associated with sprout production? Could water for rinsing be exempt from this description? Q84

The provisions in 7.4.2 apply to all stages of production of sprouts. Water for rinsing is not exempt from this provision.

11-9 What is the space requirement for rearing pullets? Q85

There is no space requirement in the Standard for pullets. The requirements of 6.8.1 and 6.8.11.1 concerning the health and well-being of the animal apply.

11-10 What is the outdoor access requirement for rearing pullets? Q86

Section 6.8.1 requires "...fresh air and natural daylight suitable to the species, its stage of production". Since exposure of pullets to outdoors at a young age predisposes the birds to going outside later on as adults, it is especially suitable.

11-11 Please clarify the meaning of 6.2.2 d. iii. Does it allow that animals could be repeatedly fed conventionally until the last trimester of pregnancy, and still give birth to offspring compliant with the Standard? Q87

Section 6.2.2 d. iii applies only to animals in transition. For animals already under organic management, the feeding of non-organic feed at any time during gestation would render the mother and offspring non-compliant.

11-12 Can substances that are produced using genetically engineered plants (for example, a yeast or enzyme grown on a GE substrate) be used, if it is demonstrated that no trace of the GE material persists in the final product? Q 88

The prohibition on GE materials in 1.4.1 applies to all materials produced from genetic engineering "when producing or handling organic products". This prohibition derives from the use of the GE material, and is not dependent on the presence or absence of GE in the final product. The only exception to this prohibition, is the specific derogation allowed for vaccines grown on GE substrate.

11-13 Is the operator required to obtain pre-approval for use of non-organic feed during a catastrophic event? Q89.1

No, the operator does not need pre-approval. However, the operator should notify their CB and explain the situation when possible before using the non-organic feed. It is the responsibility of the operator to adequately and successfully demonstrate to the CB that 6.4.1 is applicable and that he has complied with the instructions laid out there.

11-14 Can you give some guidelines around the use of the 10 day maximum in 6.4.1? Q89.2

Ten consecutive days is the maximum. If the feeding of non-organic feed was broken up into segments, potentially legitimizing a total period of longer than 10 days, each segment would have to be scrutinized separately for approval under 6.4.1.

11-15 Is the manure from a conventional farrowing operation compliant with the Standard? Q90

Manure from sows in traditional farrowing crates (where they are not able to turn around) is prohibited under 5.5.1., See answer to question answer 83.

11-16 In a facility where both non- organic and organic food is processed, can cleaners not listed in 7.3 or 7.4 be used immediately prior to the processing of the organic product? Q91

Yes. However, the use of cleaners not listed in tables 7.3 or 7.4 PSL is permitted under specific conditions laid out in 8.3.8 and 8.3.10: 1) the cleaning procedure is deemed necessary; 2) that it is done before each organic run; 3) the cleaning materials used are effectively removed from the food contact surfaces and that process documented; 4) the disposal of the cleaning product has minimal environmental impact. Final May 31st 2011

11-17 Is 6.8.3 to be interpreted as a requirement to allow cows housed in tie stalls a period of exercise every day when possible (at least twice a week) or merely a recommendation to do so? Q92

Yes, 6.8.3 is a requirement, not merely a recommendation. The intent of the standard is to require exercise for cows on a regular basis. For an operator to fail to provide regular exercise for the entire winter season would clearly violate the standard. Final May 31st

11-18 If a silage inoculant contains synthetic colouring agents, does that mean that it is prohibited for use in organic livestock feed production? Q 94

See 6.4.4 j. Yes - the use of synthetic colouring agents makes the product non compliant for use in organic feed.

11-19 If the conditions outlined in 6.4.1, which allow for temporary use of non-organic feed are met, would this allowance also extend to the use of non-organic bypass fat? Q 95

No. The allowance to use non- organic feeds is intended to allow the operator to maintain the health of animals in the face of a loss of on-farm feed as a result of catastrophe when organic feed is not available. Bypass fat would not be included, unless it were part of the organic feed inventory on the farm at the time of the catastrophe.

11-20 Can mineral oil be used as a dust suppressant in sulphate of potash? Q96

No. Mineral oil is not listed on the PSL. (see table 4.2, PSL "mined minerals" cannot be processed or fortified with synthetic chemicals)

11-21 Please outline the application for the use of sulphuric acid under the COS Q98

Sulphuric acid is specifically prohibited in 32.311 for the manufacturing of substances under 4.2 (fish products, gypsum, iron sulphates, zinc sulphates), under 4.3 (pH buffers), under 5.3 (copper sulphates, magnesium sulphates, calcium sulphates and ferrous sulphates), under 6.3 (calcium sulphates, ferrous sulphates and magnesium sulphates) and under 6.6 (calcium sulphates). As a synthetic manufacturing aid, it is also prohibited, although not specifically mentioned, under 4.2 (phosphate rock, aquatic plants and aquatic plant products, mined minerals). Although not specifically mentioned, it is allowed under 4.2 for Magnesium sulphate for the production of synthetically produced Epsom salts.

11-22 Does 6.3.3 apply to pasture used for poultry? In other words can the raising of pullets be timed to coincide with the transition of land rather than waiting until the pasture is CO to start a new flock? Q99

Yes, 6.3.3 does apply to poultry. Pasture for poultry must be fully compliant, or in the final year of transition, i.e. there must be verification that no prohibited substances have been applied and the operation has been under the supervision of the CB for one year before the marketing of the organic livestock.

The following question has already been posted on COO website and has been revised following the published amendments of the COS or comments received during public consultation period

11-23 Are all the materials used to make compost required to be free from toxins, or can it be determined that some or all toxins present in the compost feedstock will break down and be purified during the composting process? Q68

No. Notation accompanying table 4.2, composting feedstocks indicates that a process of degradation of contaminants should be documented.

11-24 Does the use of x-rays (at customs inspection) constitute irradiation under the standard? Q45

No. X-ray technology used to inspect at border crossings is not irradiation as defined and prohibited by the Standard.

11-25 Is the use of therapeutic hormonal treatment , for example prostinglandins to treat metritis, allowed in dairy animals? If so, what are the restrictions and withdrawal times? Q78.1

For all treatments not listed on the PSL, a minimum withdrawal period of 14 days must be observed - see 6.7.6 d. Therapeutic use of hormones such as prostaglandin which is not listed on the PSL can be used when treatments listed in the PSL are unlikely to be effective, and preventive measures have failed. A 14 day withdrawal period must be observed. If prostaglandin is used in such a manner, as per 6.7.7, the animal is not eligible for use as organic meat, but this event is not counted as one of the “treatments” referred to in 6.7.6 e) iv. That 2 treatment restriction is only pertinent to antibiotics & parasiticides.

11-26 Please clarify the meaning of the standard regarding use of parasiticides in 6.7.9 iv (slaughter) and v (milk) as to the loss of organic status and withdrawal periods. Q78.2

Parasiticides not listed in the PSL may be used on slaughter animals: once preventative measures have failed (6.7.9 b), fecal samples indicate there are parasites (6.7.9 b i), there are written instructions from a veterinarian specifying the product and method of parasite control to be used (6.7.9 ii). Withdrawal times are twice the label requirement or 14 days whichever is longer (6.7.9 b iii) and there can only be one treatment for slaughter animals under a year old and a maximum of two treatments in the life of the animal. (6.7.9 b iv). For dairy animals combined treatments of antibiotics and parasiticides must not exceed two per year. (6.7.6 e iv)

11-27 Are steroid anti-inflammatory drugs allowed during physical alterations? Q78.3

No. 6.7.2, by specifically noting “non-steroid” implies that steroid anti-inflammatory drugs are prohibited for minimizing pain and stress during physical alteration.

11-28 In the case of using a treatment not listed in 32.311, where no withdrawal time is indicated on the label, must organic operators still observe a withdrawal? Q78.4

6.7.6 d. states that when drugs not listed on the PSL are used, a withdrawal period of 14 days or twice the label withdrawal shall be observed. If there is no label withdrawal 14 days must still be observed

11-29 In the case of a medication like ketoprofene, used therapeutically, is there a withdrawal period Q78.5

Yes. See 6.7.6 d. Ketoprofen is not listed in the PSL, therefore a minimum 14 day withdrawal is required.

11-30 Can oxytocin be used to treat postpartum complications? If so what are the withdrawal rules? Q78.6

Yes. But 6.7.7 specifies that the only acceptable use is therapeutic, not preventive. For oxytocin, the animal does not lose status for use as organic meat. (Table 5.3 ; Oxytocin.)

11-31 Is the delivery of pheromones confined to passive dispensers or is spray application allowed? Q93

Yes, the “Origin and Usage” annotation for pheromones limits the delivery to traps or passive dispensers. Spray applications are prohibited.