

Dear Rochelle

Organic Tidbits



This edition of Dear Rochelle is a catch-all covering a multitude of small, but in some way semi-related issues rather than one large topic. Hope you enjoy the change. I am also taking this opportunity

to bid adieu as this will probably be the last Dear Rochelle you will be reading for a while, since my position is scheduled to end, although I hope I am proven wrong.

Can I use a product listed on the OMRI Brand Names List?

One of the most challenging tasks in organic certification is determining whether or not a particular commercial input is allowed. The CAN/CGSB 32.311 Permitted Substances List (PSL) only lists generic ingredients that are permitted for use in organic production. But when you go to buy a specific product it is hard to tell if it is acceptable or not. Inputs, amazingly enough (other than food), are not required to list all the ingredients on the label. So you can buy a potting mix that clearly says on the label that it contains peat and perlite. Both of those are allowed, but it could also contain a synthetic fertilizer or a synthetic wetting agent, both of which would not be allowed and are not listed on the label. And even if you ask your supplier or the manufacturer they will often not be willing to disclose everything in the product. It is incredibly frustrating.

What many organic producers do is check the brand name against the Organic Materials Review Institute's (OMRI) brand name list. The OMRI is an American non-profit organization, and this can be problematic for Canadians because the presence of a brand name on that list doesn't mean that it is registered for use in Canada (important for pesticides) or that it is compliant with the Canadian Standards, as the Canadian and US organic generic lists of allowed products are similar, but not exactly the same.

On the Farm Example

Sodium nitrate (sometimes called Chilean nitrate) is allowed under the NOP for a certain percent of a crop's nitrogen needs. Under the Canadian Organic Standards



it cannot be used. Fortunately the presence of sodium nitrate is noted in the OMRI lists – either right next to the brand name (x% sodium nitrate) or upon clicking the name of the product under “restriction,” where it tells you that sodium nitrate is restricted. As a Canadian grower you have to practice this extra level of due diligence.

If OMRI identifies which products contain sodium nitrate and I can buy the product in Canada, everything should be fine, right?

Unfortunately, it is not that simple. Consider GMOs in the US versus in Canada. The prohibition against genetic engineering is worded differently in the two standards. The Canadian Organic Standards (COS) prohibit the use of “... any of the following substances or techniques: all materials and products produced from genetic engineering...” whereas the NOP Standards (US) prohibit organic products from sale that are “produced with excluded methods,” which includes a variety of methods of genetic modification. Even though it is hard to discern the subtle differences at first glance, these

differences can affect ingredients used in processing as well as other inputs – even fertilizers.

Part of the problem is how OMRI interprets the NOP “excluded methods” GMO standard. OMRI accepts seed meals from crops that are genetically engineered for herbicide resistance (for example canola meal, soybean meal), but not those that have been genetically engineered with Bt (for example cotton seed meal, corn meal). Their reasoning is that there is evidence of risk of Bt toxin persistence in soil, but there is no evidence of a risk of GM trait expression for genetically induced herbicide resistance. With the Canada Organic Standard prohibiting the “use” of any genetically engineered product, and the US standard saying “*must not be produced with,*” OMRI looks into whether the trait is expressed. In Canada that seems to be irrelevant – you just can’t use the material.

Now consider plant material based soil amendments in the US versus in Canada. The Canadian PSL has specific requirements for oil seed meals used as a soil amendment – they must be non-GMO (and organic, unless commercially unavailable); ditto for alfalfa meal unless commercially unavailable (this is a headache) and that all plants or parts of plants must be organic,¹ or else composted before use or assessed as commercially unavailable. The NOP doesn’t have the same requirement which means, once again, that OMRI approval for a fertilizer is not an automatic yes.

The bottom line is that certifiers are responsible for reviewing inputs used by their producers for compliance with the Standards. The certifier is supposed to make their own judgement about the input, and not depend on someone else’s list. The certifier must also check for restrictions on how products can be used in the standards. For instance, you can only use a product that contains non-composted manure if you apply it a certain number of days before harvest.

How about a COS brand names list?

I have been told that the Organic Federation of Canada (OFC) is generating a collated list of products accepted by Certification Bodies (CBs) from across the country who willingly volunteered their lists for this purpose. OFC’s list will identify all CB’s who approved a particular input. The list will be accessible online (stay tuned). This would not mean that your certifier would agree with the other certifier, but at least it will give you a place to start. You still have to run the products by your certifier. Unofficially, I have also been told that very few certifiers have volunteered their lists.


What about hand sanitizers used in processing plants?

If hands (or gloves) touch a food as it is being processed you could consider that the hands (or gloves) are a food contact surface, in which case the certifier will want to know whether the sanitizers or soaps used comply with the sanitation section of the PSL. This is not the case in the US where hand cleaners are considered outside the scope of the standard, as well as indirect processing aids (eg blade lubricants). Again, check with your certifier.

One other important US vs. Canada difference: accessory nutrients

“Accessory nutrients” like DHA and ARA² are commonly found in USDA certified products, but are not permitted in certified organic products in Canada. Fortification of any kind except what is required by law is not acceptable under the COS.

Do you need buffers around existing hydro poles & creosote poles?

The relevant portion of the COS is section 5.2.1 stating: *Measures shall be taken to minimize the physical movement of substances prohibited by par. 1.4.1 from neighbouring areas onto organic farmland and crops.* Similarly, measures shall be taken to minimize the contamination of land and crops with such substances. You and your certifier would have to figure out what a reasonable measure would be to minimize the chance of the crop becoming contaminated by the prohibited substances on the hydro-pole or creosote post. The problem is that there may not be much research on this pertinent to your area for either of you to make an informed decision on the measures to take. One paper I read suggests 76 centimetres is sufficient for creosote hydro poles, but again, it would be dependent on soil type and precipitation. 

Notes:

¹ One strange anomaly worthy of comment. The Canadian Standards require organic plant materials for fertilizer yet at the same time allows manure, feather meal, blood meal (sterilized) and bone meal (from non-risk materials) from non-organic sources.

² Docosahexaenoic acid (DHA) is a long chain polyunsaturated fatty acid that is added to various foods stuffs in conjunction with arachidonic acid (ARA) in order to supply the body with structural fats. There is rising concern on the continued use of these synthetic omega 3s as there is a growing body of evidence showing that the synthetic versions are detrimental to the health of children.