

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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AGENDA ITEM NO. 4

CX/FL 02/04-ADD.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTIETH SESSION
HALIFAX, CANADA, 6 - 10 MAY 2002**

**GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND
MARKETING OF ORGANICALLY PRODUCED FOODS:
PROPOSED DRAFT REVISED SECTIONS: SECTION 5 – CRITERIA
AND ANNEX 2 – PERMITTED SUBSTANCES
(CL 2001/48-FL)**

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

CANADA

GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS: PROPOSED DRAFT REVISED SECTIONS: SECTION 5 – CRITERIA AND ANNEX 2 – PERMITTED SUBSTANCES (CL 2001/48-FL)

GOVERNMENT COMMENTS AT STEP 3

CANADA:

Canada looks forward to participating in the Working Group review of the provisions of Section 5 and Annex 2 of the *Guidelines* to ensure they remain current and in keeping with technological advances in the organic food industry.

General Background Comments

- The Canadian National Standard for Organic Agriculture (CAN/CGSB-32.310-99) was ratified by the Standards Council of Canada (SCC) in April, 1999 and was published at the end of June, 1999. Even though the standard is voluntary, food products in Canada labelled as “organic” are expected to comply with its provisions. The Standard outlines the general principles for organic agriculture and the minimum criteria which must be met in order for food products to make an organic claim. An independent certification body may be asked to inspect all stages of production and verify that the standard has been met. The SCC is the national competent authority to accredit certifying bodies to ISO-65 guidelines. In addition, Québec and British Columbia have provincial requirements which address organic agriculture.
- Agriculture and Agri-Food Canada is currently funding a revision to the National Standard for Organic Agriculture. In particular, Section 11 (Requirements for Inclusion of Substances on the List of Acceptable Inputs (Permitted Substances List)) and the four appendices which make up the permitted substance list are under review. This initiative is being undertaken in order to help establish equivalence between Canada’s approach and that of major trading partners such as the European Union, United States and Japan. A committee was established to represent as broad a range of stakeholders as possible and its first meeting to revise the standard was held March 11-12, 2002.

Specific Comments

Section 5. Requirements for Inclusion of Substances in Annex 2 and Criteria for the Development of Lists of Substances by Countries

- A. Canada notes that there is recognition in this section that substances used in organic agriculture should take into account all regulatory provisions and that new substances need to meet the general organic principles. Canada believes that only substances permitted for use by the national authority(s) should be allowed. If a substance is permitted for only a specific use, that restriction must still apply. There would be no objection to the use of substances which do not trigger regulatory oversight. From this broad list the subset of substances which meet the general principles and criteria of the

organic guidelines should be permitted. We would recommend changing the text in subsection 5.1 to reflect this.

Proposed revision:

- 5.1. At least the ...in Section 4. In using this criteria to evaluate new substances for use in organic production, countries must take into account all applicable statutory and regulatory provisions. Any new substances should meet the following general criteria: ...
- B. Canada would like to see clarification to the text in Sections 5.2 and 5.3 as to who should be notified when a country wishes to amend their national permitted substances lists with substances not included in Annex 2.

Annex 2. Permitted Substances for the Production of Organic Foods - Precautions

- A. Following recommendation A in the above section Canada would propose changing the “should” to “must” in the first paragraph.

Proposed revision:

1. Any substances used ... storage of the food product must comply with the relevant national regulations.

Annex 2. Permitted Substances for the Production of Organic Foods - Tables

- A. It would be easier to find a specific substance if the substances in each table were listed in alphabetical order.

Table 1.

- A. Clarification is sought regarding the second entry in Table 1 “slurry or urine”. Why are these two listed together?
- B. The use of processed animal products from slaughterhouses and fish industries and the use of human excrement as soil fertilizers causes some concern. Standards should be applied to the processing of these waste products to assure consumers that there is no risk of disease transmission.
- C. Items such as “by-products of food and textile industries” are too open ended. More details should be provided as the type of by-product(s) under consideration.

Table 2

- A. Criteria for the use of metaldehyde (V. Traps) should be provided given its toxicity to non-target animals in particular, dogs.

Table 3

- A. Is the substance listed in the table for livestock and bee products as “traganth gum” supposed to be “tragacanth gum”
- Substances listed in Table 3 should be consistent with the provisions of the Codex General Standard on Food Additives, including the use of the Codex Food Categorization System.