COR *vs.* NOP Standards

Differences between organic regulations of the Canadian General Standards Board (CGSB) and USDA's National Organic Program (NOP)

CGSB	CGSB Reference	NOP	NOP Reference
Crop production			
Soil amendments and crop nutrients shall not contain substances prohibited by par 1.4.1 of CAN/CGSB-32.310, which includes all materials and products produced from genetic engineering.	PSL 4.2 and CAN/CGSB-32.310 par. 1.4.1	Materials and products produced from genetic engineering may be used as soil amendments and crop nutrients with exceptions. See the OMRI Genetically Modified Organism (GMO) decision tree for more information about how OMRI reviews GMOs used in inputs.	205.105
Certain agricultural materials are required to be organic when used as inputs in crop production unless commercially unavailable in organic form, e.g., alfalfa meal and pellets, molasses, and oil seed meals.	PSL Table 4.2	Agricultural materials used as inputs in crop production are not required to be organic. However, they should not contribute to the contamination of crops, soil or water.	205.105 & 203(c)
Animal manure used for fertility in crop production must either be from an organic farm or the animals must be able to turn in their pens and have access to light. In addition, application of manure has the 90/120-days to harvest rule.	CAN/CGSB-32.310 par. 5.5	Land application of raw manure is subject to the 90/120-days to harvest rule. There are no source restrictions.	205.203(c) (1) & (2)
Processed animal manure is not subject to specific processing parameters; operators must use best known practices to reduce human pathogens. Must meet the same source requirements as raw animal manure.	PSL Table 4.2	Manure must be processed according to specific parameters (12% moisture and heated between 150° and 165° F for one hour) before it may be used without restriction.	NOP Guidance 5006
Aquatic Plant Products may be stabilized using sodium hydroxide or potassium hydroxide, but the manufacturer must prove the need to use sodium hydroxide.	PSL Table 4.2	Aquatic Plant Products may be extracted with sodium hydroxide and potassium hydroxide and the manufacturer does not have to prove the need to use sodium hydroxide.	205.601(j) (1)
Ash from off-farm sources shall not exceed specific limits for acceptable levels of heavy metals. See COR Supplement Review Standards for Lab Analyses for specific thresholds.	PSL Table 4.2	Ash may not contribute to the contamination of crops, soil or water. OMRI has set thresholds where products may receive a "caution" flag or not be listed at all.	205.203(c)
Blood is allowed only if sterilized and **Bone meal** may only be used if guaranteed to be free of specified risk materials.	PSL Table 4.2	Animal products may not contribute to the contamination of crops, soil or water, but do not have source restrictions.	205.203(c)
Animal, animal products, and **animal by-products** used as compost feedstocks must be guaranteed free of specified risk materials.	PSL Table 4.2	Animal products used as compost feedstocks are not subject to source restrictions.	205.105
Compost from off-farm sources shall not exceed specified maximum acceptable levels of trace contaminants and foreign matter for unrestricted use. Compost produced on the farm has management practices/defined processing parameters, and must meet limits for acceptable levels of pathogens for unrestricted use.	PSL Table 4.2	Requirements for compost produced off-site versus on the farm are the same. They include management practices/defined processing parameters. OMRI requires testing of finished compost to demonstrate compliance with compost requirements.	205.203(c) (1) & (2) and NOP Guidance 5021

CGSB—Canadian General Standards Board **COR**—Canada Organic Regime **NOP**—National Organic Program **PSL**—Permitted Substances List
This table is not an exhaustive list of differences between CGSB and NOP regulations. It is meant to provide examples and cover more general, large-scale differences.

CGSB	CGSB Reference	NOP	NOP Reference
For **mulch**, where organic plant residue materials are not readily available, non-organic straw, leaves, grass clippings or hay that are not the products of genetic engineering may be used. Prohibited substances shall not have been used on these materials for at least 60 days before harvest.	PSL Table 4.2	There is no required preference for organic plant residues used as mulch, and residues of plants treated with prohibited substances may be used as mulch provided they are managed in a way that does not contribute to the contamination of crops, soil or water. See the GMO Decision Trees in the *OMRI Standards Manual©*.	205.203(b) & (c)(3)
Plants and **plant by-products**: Wastes from crops that have been treated or produced with prohibited substances are prohibited as soil amendments. Plant by-products not meeting this restriction may be used as composting feedstocks.	PSL Table 4.2 and CAN/CGSB-32.310 par. 1.4.1	Wastes from crops that have been treated or produced with prohibited substances are allowed for use as soil amendments.	205.105
Trace elements must be micronutrients from natural sources that are unchelated or chelated by substances listed as allowed. They are to be used when soil and plant deficiencies are documented by soil and plant testing.	PSL Table 4.2	Nonsynthetic micronutrients are not restricted. Synthetic micronutrients, except those made from nitrates or chlorides are permitted, but may only be used when soil deficiency is documented by testing.	205.105 & 205.601(j)(6)
Worm castings must meet the limits for acceptable levels of human pathogens or the operator must demonstrate that best practices known to eliminate human pathogens during vermicomposting have been used.	PSL Table 4.2	Vermicomposts with manure feedstocks must be made according to specific parameters, including that aerobic conditions be maintained by regular additions of layers of organic matter, turning or employing forced air pipes such that moisture is maintained at 70-90%.	NOP Guidance 5021
Use of **nonsynthetic ethyl alcohol** is limited to use as a solvent to extract botanical pesticides.	PSL Table 4.3	Nonsynthetic alcohol use is not limited, and synthetic ethyl alcohol may be used as an algicide, disinfectant or cleaner, or as an adjuvant or inert ingredient in combination with permitted active pesticidal ingredients.	205.105(a), 205.601(a)(1)
Synthetic citric acid may be used as a chelating agent and pH adjuster.	PSL Table 4.3	Synthetic citric acid may be used to adjust the pH of liquid fish products. It may also be used for equipment cleaning provided there is no crop or soil contact.	205.601(j)(7)
All use of **copper** is cautioned. No visible residue shall be allowed on harvested crops.	PSL Table 4.3	There are specific limits on the use of copper sulfate in aquatic rice systems.	205.601(a)(3)
Dormant oils are allowed as a dormant spray on woody plants only.	PSL Table 4.3	Horticultural oils are not limited to use on woody plants. They must be narrow range oils and may be used as dormant, suffocating and summer oils.	205.601(e)(7) & 205.601(i)(7)
Formulants (inerts) permitted in pesticide formulations are classified by the Canadian Pest Management Regulatory Agency (PMRA) in Regulatory Note REP 2007-4 as List 4A or 4B. Nonsynthetic inerts may also be used.	PSL Table 4.3	Inert ingredients permitted in pesticide formulations are classified by the Environmental Protection Agency (EPA) as 2004 EPA List 4a and 4b.	205.601(m)
Plant extracts, oils and preparations may not be extracted by synthetic solvents except for potassium hydroxide or sodium hydroxide. The amount of solvent is limited to that necessary for extraction, and potassium hydroxide is preferred over sodium hydroxide. The manufacturer shall prove the need to use sodium hydroxide.	PSL Table 4.3	Potassium and sodium hydroxide may be used to extract aquatic plants only, and there is no preference for potassium over sodium hydroxide.	205.601(j)(1)

EPA—Environmental Protection Agency

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CGSB	CGSB Reference	NOP	NOP Reference
Livestock feed and healthcare			
Use of **anesthetics, sedatives and non-steroid anti-inflammatory analgesics** (e.g. ketoprofen) are allowed for minimizing pain, stress and suffering due to permitted physical alterations.	CAN/CGSB-32.310-2006 Paragraph 6.7.2	Use of medications, including anesthetics, sedatives, and non-steroid anti-inflamatory analgesics are only allowed if the active ingredient(s) are nonsynthetic or appear on 205.603 for the specified use.	205.238(b)
The use of **synthetic medications** that do not appear on the Permitted Substances List is allowed under certain circumstances and with certain restrictions.	CAN/CGSB-32.310-2006 Paragraph 6.7.6.c	Synthetic medications may only be used if they appear on 205.603, e.g., vaccines.	205.238(b)
Use of **veterinary drugs** not on the Permitted Substances List requires a withholding period that is double the label requirements before the products from the treated animal can be considered organic.	CAN/CGSB-32.310-2006 Paragraph 6.7.6.d	Use of synthetic veterinary drugs that are not permitted at 205.603 disqualify the products of the treated animal from being sold, labeled, or represented as organically produced.	205.238(c)(1) & 205.238(c)(7)
Antibiotic treatment of dairy animals is permitted in emergencies under certain conditions.	CAN/CGSB-32.310-2006 Paragraph 6.7.6.e	Animals or animal products derived from an animal treated with antibiotics may not be sold, labeled or represented as organic.	205.238(c)(1) & 205.238(c)(7)
Hormonal treatment shall only be used for therapeutic reasons and under veterinary supervision. The meat from animals so treated shall not be organic meat unless the treatment is permitted by CAN/CGSB-32.311, Organic Production Systems - Permitted Substances List.	CAN/CGSB-32.310-2006 Paragraph 6.7.7	Hormonal treatments are not permitted.	205.238(c)(3)
Parasiticides not listed in the Permitted Substances List may be used under certain circumstances and with certain restrictions.	CAN/CGSB-32.310-2006 Paragraph 6.7.9.b	Only nonsynthetic parasiticides or synthetic parasiticides on 205.603 may be used.	205.238(b)
Animal-derived enzymes shall be guaranteed free of specified risk materials including the skull, brain, trigeminal ganglia (nerves attached to the brain), eyes, tonsils, spinal cord and dorsal root ganglia (nerves attached to the spinal cord) of ruminants aged 30 months or older; and the distal ileum (portion of the small intestine) of ruminants of all ages. Shall be from an organic source unless not commercially available.	PSL Table 5.2	There is no specification for nonsynthetic, animal-derived enzymes.	
Use of **synthetic vitamins** and **synthetic nutrient minerals** is restricted to when nonsynthetic sources are not commercially available.	PSL Table 5.2	Preferential use of nonsynthetic vitamins and minerals over synthetic forms is not required. Under NOP, any mineral - synthetic or nonsynthetic, must be an FDA approved form or listed in AAFCO publication for feed.	205.603(d)(2)
Organisms from **genetic engineering** or their products (e.g., recombinant gene technology) used as vaccines are prohibited.	PSL Table 5.3	Vaccines made with genetically engineered ingredients are prohibited. Use of GMO vaccines is under consideration by the NOSB.	205.105(e)

AAFCO—American Association of Feed Control Officials **NOSB**—National Organic Standards Board

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CGSB	CGSB Reference	NOP	NOP Reference
Processing			
Numerous **food additives** such as gums and agar may only be extracted by water, bases or acids consistent with the Permitted Substances List.	PSL Table 6.3	Extractants are not specified so long as the final extract is a substance listed at 205.605, and does not contain any residual extractant not listed at 205.605.	
Numerous **food additives** and **processing aids** such as potassium tartrate and sodium bicarbonate may be used in the synthetic form if the nonsynthetic form is commercially unavailable.	PSL Table 6.3 and Table 6.6	Synthetic substances are allowed in food processing if they appear on 205.605(b) regardless of whether or not they are commercially available in nonsynthetic form.	
Gelatine and **enzymes** made from animal sources must be free of specified risk materials. Shall be organic unless not commercially available.	PSL Table 6.3	There are no specifications on animal sources for gelatine but it must be organic unless commercially unavailable.	205.606(j)
Glycerides must be produced from organic sources unless commercially unavailable and are for use in drum drying only.	PSL Table 6.3	Glyceride is considered nonagricultural and allowed as a synthetic substance in processed food labeled as organic.	205.605(b)
Bleached lecithin is allowed if processed in accordance with Canadian Organic Standards.	PSL Table 6.6	Lecithin used in or on processed products labeled as "organic" must be organic, except that de-oiled lecithin in nonorganic form may be used when an organic form is not commercially available. De-oiled lecithin may be unbleached or bleached. Fluid lecithin must be organic and may be unbleached, or bleached with hydrogen peroxide in accordance with 205.605(b).	205.606(p)
Argon, Casein, Isinglass, Talc, and Tannic acid are permitted processing aids.	PSL Table 6.6	Because Argon, Casein, Isinglass, Talc, and Tannic acid do not appear on the National List of Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))" at 205.605, these substances are not permitted in the processing of organic food.	205.105(a) and (b)
Vegetable oil used as a processing aid is not required to be organic.	PSL Table 6.6	Vegetable oil is considered agricultural and must be organic when used in the processing of organic food.	205.105(d)
Cholecalciferol (vitamin D3) is not allowed in organic food processing and food storage facilities.	PSL Table 6.7	Cholecalciferol (vitamin D3) may be used as a rodenticide in an organic facility if the practices provided for in 205.271(a) and (b) are not effective to prevent or control pests.	205.271(c) and 205.601(g)(2)
Diatomaceous earth and **Neem oil** are allowed as pest control substances in organic processing facilities if practices provided in 8.4.1 of 32.310 are met.	PSL Table 6.7; 32.310 8.4.2	Diatomaceous earth and Neem oil may only be used as pest control in an organic processing facility if the practices provided for in 205.271(a) and (b) are not effective to prevent or control pests.	205.271(c)
Pyrethrins used as pest control in organic processing facilities must not directly contact organic food.	PSL Table 6.7	Pyrethrins may only be used as pest control in an organic processing facility if the practices provided for in 205.271(a) and (b) are not effective to prevent or control pests.	205.271(c)
Nonsynthetic or synthetic acetic acid may be used on equipment as a food-grade cleaner, disinfectant and sanitizer without a mandatory removal event. Nonsynthetic sources only may be used on food and plants.	PSL Table 7.3	Acetic acid may be used as a sanitizer or cleaner provided measures are taken to prevent contact of the organically produced products or ingredients with the acetic acid.	205.105(c)

CGSB	CGSB Reference	NOP	NOP Reference
Ethyl alcohol and **isopropyl alcohol** may be used on equipment as food-grade cleaners, disinfectants and sanitizers without a mandatory removal event.	PSL Table 7.3	May be used as sanitizers, disinfectants or cleaners, provided measures are taken to prevent contact of the organically produced products or ingredients with the substance used.	205.105(c)
Only nonsynthetic sources of **Ascorbic acid** may be used on equipment.	PSL Table 7.3	Synthetic ascorbic acid is permitted for use as an ingredient in or on processed products labeled "organic."	205.605(b)
Synthetic Citric acid may be used on equipment as a food-grade cleaner, disinfectant and sanitizer without a mandatory removal event.	PSL Table 7.3	Synthetic citric acid be used as a sanitizer, disinfectant or cleaner provided measures are taken to prevent contact of the organically produced products or ingredients with the substance used.	205.105(c)
Bleach may be used as a cleaner, disinfectant and sanitizer on food contact surfaces including equipment at a concentration not to exceed 10% solution by volume. Substance must be removed from food contact surfaces in an organic facility prior to organic production.	PSL Table 7.4	For food handling facilities and equipment, chlorine materials including bleach may be used up to maximum-labeled rates for disinfecting and sanitizing food contact surfaces. Rinsing is not required unless mandated by the label use directions.	205.605(b)
Iodine, Potassium permanganate, and **soaps** used as food-grade cleaners, disinfectants and sanitizers all have source or use restrictions in addition to the requirement for mandatory removal from food contact surfaces prior to organic production.	PSL Table 7.4	Iodine, Potassium permanganate and soaps do not have source or use restrictions beyond the requirement that measures are taken to prevent contact of the organically produced products or ingredients with the substance used.	205.105(c)

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