

# Guide to the Canadian Organic Standards public comment period

On May 30, 2025, the Canadian General Standards Board launched the 60-day public comment period, during which everyone is invited to provide their feedback on the newly revised 2025 draft.

**Where can I find the draft standards to review?** [General Principles and Management Standards](#)

**Where can I find explanations for the proposed changes?** [Rationale on changes to the standard](#)

**How do I record and submit my comments?**

1. Comments must be submitted on the following form: [Comment Form](#)
2. Completed comment forms must be emailed to [astrid.lozano@tpsgc-pwgsc.gc.ca](mailto:astrid.lozano@tpsgc-pwgsc.gc.ca)

**What is the deadline for feedback?** July 29, 2025



## Instructions for completing the form

*Please complete all columns except resolution / Veuillez compléter toutes les colonnes sauf résolution*

Member <sup>1</sup>	Clause	Type of comment <sup>2</sup>	Proposed change	Comment (justification for change)	Secretariat Resolution
Membre <sup>1</sup>	Clause	Type de commentaire <sup>2</sup>	Changement proposé	Commentaires (justification)	Résolution de la secrétaire

**Member:** Your initials

**Clause:** The number and letter, where applicable, that corresponds to the section you are commenting on (e.g., 6.1.1a).

**Types of comment:**

- **general (ge)** - you provide information or your opinion about a proposed modification that might lead to a revision of a proposed modification
- **technical (te)** – you provide technical information that might lead to a revision of a proposed modification

- **editorial (ed)** – you suggest rewording a clause, fixing a typo, or another editorial change that does not change the intent or meaning of the standard

**Proposed change:** Wording you would like to see in the final standard.

**Comment (justification for change):** This is the reason why you feel your proposed change to the standard is necessary.

**Note:** *You do not need to fill in the ‘Secretariat Resolution’ section – please leave this blank.*

## Sample comments on the draft Canadian Organic Standards

The following table includes improvements the BC SPCA would like to see in the organic standards. You can use our content to help develop your own when filling in the [Comment Form for General Principles and Management Standards](#).

**Note:** *The BC SPCA is an animal welfare organization and as such, will be focusing our feedback on the animal-related content in Sections 6 – 8 of the General Principles and Management Standards. However, commenters are encouraged to review both standards in full and submit feedback on any/all sections of interest.*

**Important:** If you choose to use any of the BC SPCA-developed content below, please put it into your own words in the online form.

Clause	Type of comment	Proposed Change	Comment (justification for change)
6.1.2	te	Broiler chickens must be from strains that gain 50g/day or less.	<p>This change would improve broiler chicken health as well as increase range use (as noted in s. 6.13.6).</p> <p>Both Sorensen (2012) and Sophia (2014) recommended the use of slower-growing broiler chickens that gain 40–50 g/day. Ricke et al . (2012) contains more information on suitable genetics for meat chicken production. Source: Karreman, H.J. and Fulwider, W. (2021) Animal Well-being on Organic Farms. In: Improving Animal Welfare-A Practical Approach. (Temple Grandin, ed.) Cambridge MA: CAB International, p. 152.</p>

6.1.3	ge	Define the maximum number of days animals may be confined.	Without a maximum number of days, animals may be confined during the grazing season; it appears that animals may be confined for any number of days if a reason is provided. Set a maximum number of days/reasonable justification for keeping animals inside so that operators and inspectors have clear expectations to mitigate the reasons animals must be kept inside when possible (e.g., not disease or extreme weather related).
6.11.1	ge	Remove exception a) breeding males	<p>Pasture also benefits breeding males' health and welfare, and efforts must be made to allow them to access it safely.</p> <p>A smaller exception, such as during breeding season when breeding is not desired and the male cannot be safely contained away from females, could be considered, but a complete lack of pasture for all males of breeding age is not required for safety.</p>
6.12.1	te	<p>Dairy cows shall have an exercise period at least once a day, for a period of at least 3 hours.</p> <p>OR</p> <p>Dairy cows shall have at least 50 hours a month of outdoor access.</p>	<p>From the NFACC Code of Practice for the Care and Handling of Dairy Cattle: recommended practice: as a guide, provide cows with ~50 hours of outdoor access within any given 4-week period, weather and conditions permitting.</p> <p>Additional information:  Loberg et al. (2004) found 1 h/d of dairy access to an exercise yard to be sufficient for allowing cows to express normal levels of locomotor and other behaviors, whereas 1 h/d of access with lower frequency of access per week leads to compensatory inflations of these behaviors in cows. Longer durations of outdoor access at consistent frequencies, however, is necessary for additional benefits related to performance measures to be seen. For instance, Gustafson (1993) reported that 2-3 h/d of regular outdoor access was required to yield improvements to leg health and reduce the occurrence of calving-related issues. Health benefits, such as those measured by Keil et al. (2006), fall squarely between these two recommendations, indicating 50 h/month of outdoor access to be most effective for decreasing leg injuries prevalence, with shorter durations at more consistent frequencies suggested. Cows that are housed for longer periods of time in tie-stalls exhibited more movement-related behaviours once released into an outdoor exercise yard (Loberg et al., 2004). As little as one day in a tie-stall resulted in more walking and trotting movements once released compared to cows that were never tie-stall housed (Veissier et al., 2008),</p>

			suggesting that cows react to the reduced ability to perform movement-related activities immediately upon increased confinement. Source: <a href="https://www.sciencedirect.com/science/article/abs/pii/S0168159120301143">https://www.sciencedirect.com/science/article/abs/pii/S0168159120301143</a>
6.12.5	ge	Individual pens and hutches are designed and located so that each calf has physical contact with other calves unless they are sick with a contagious disease, or upon the recommendation of a veterinarian.	Sick calves that are not contagious do not need to be isolated unless recommended by a veterinarian.
6.5.4	ge	Keep clause: If possible, animals shall be transported directly from the operation to their final destination.	While not enforceable, this speaks to the spirit of organic. By minimizing transit times and stops, animal health and welfare are protected.
6.5.5	ge	The duration of transportation shall be as short as possible.	While not enforceable, this speaks to the spirit of organic. By minimizing transit times and stops, animal health and welfare are protected. Add maximum transport times of 8 hours.
7.7.2.3	ge	Add a requirement for a farm-specific organic plan with standards to be followed or species-specific standards.	It is unclear how operators or inspectors will follow this clause, as it is not specific.
7.7.3.1	ge	Add a requirement for a farm-specific organic plan that has standards to be followed or species-specific standards	It is unclear how operators or inspectors will follow this clause, as it is not specific.
7.7.3.4	ge	Add a requirement for a farm-specific organic plan that has standards to be followed or species-specific standards	It is unclear how operators or inspectors will follow this clause, as it is not specific. There are many killing methods that can cause suffering, and it is unrealistic to expect all inspectors and operators to be able to assess suffering in insects, especially without a list of signs of suffering.
7.7.4.1	ge	Add a requirement for a farm-specific organic plan that has standards to be followed or species-specific standards	It is unclear how operators or inspectors will follow this clause, as it is not specific.

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8.3.2	te	Glue boards for rodents to mitigate infestations are prohibited	<p>Glue traps are not designed to kill, which means animals caught in glue traps often suffer a slow and painful death. Trapped animals are often unable to move and suffer for days until they die from dehydration, starvation or exhaustion, or may attempt to free themselves by chewing off the stuck limb.</p> <p>In some cases, in their frantic attempt to free themselves from the glue, their noses and faces become stuck, and they die from suffocation.</p> <p>Even though glue traps are marketed exclusively for rodents, non-target species such as small mammals, birds, reptiles, amphibians and even companion animals have been found stuck on them.</p> <p>Non-target animals who also have access to these areas can find themselves stuck or with the glue trap attached to their fur, feathers, or limbs. When wings, snouts or bodies are stuck on a glue trap, the chances of survival are slim.</p> <p>Even if a larger animal can move away, a glue trap stuck to fur, skin or feathers will often result in injury or prevent normal activity like foraging for food.</p>

## Permitted substances

The Canadian Organic Standard also has a list of permitted substances. You may also wish to review and comment on this revised document. The revised document can be found here:

- [Permitted Substances Lists](#)
- [Rationale on changes](#)

Comments on the permitted substances list must be submitted using this form:

- [Comment Form for Permitted Substances Lists](#)

