
	Canadian General Standards Board	Standard title /	Organic Production Systems - General Principles and Management standards and Permitted Substances List	Public Review Closing date / Date limite d'examen public
	L'office des normes générales du Canada	Titre de la norme	Systèmes de production biologique - Principes généraux et normes de gestion et Listes des substances permises	
	Public Review Comment Form	Document No.	CAN/CGSB 32.310 & CAN/CGSB-32.311	September 30, 2019
	Examen public commentaires	Secretary/ Secrétaire	Mark Schuessler	30 septembre 2019

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General Principles & Mgmt	2.3	General	2.3 Canadian Food Inspection Agency (CFIA) Health of Animals Act (1990, c.21, 2019) Health of Animals Regulations (C.R.C., c. 296) Safe Food for Canadians Act (S.C, 2012, c. 24).	This section needs to be updated in order to correspond with new transport regulations in Canada: Regulations published in Canada Gazette, Part II, Volume 153, Number 4 on February 1, 2019 come into force on February 1, 2020. http://www.gazette.gc.ca/rp-pr/p2/2019/2019-02-20/html/sor-dors38-eng.html	
General Principles & Mgmt	2.5	General	Add the <i>Code of Practice for the Care and Handling of Veal Cattle</i> to the list.	The Code of Practice for Veal Cattle is missing from the list of Codes and should be added. Various sections of the organic standard correspond with this Code, and so it should be referenced.	
General Principles & Mgmt	3	General	animal unit one animal unit = one cow or one bull, or two calves, each 102 to 227 kg (225 to 500 lb) or five calves, each less than 102 kg (225 lb), or four ewes and their lambs, or six does and their kids]; compromised in the context of transport, an animal or bird with reduced ability to withstand the stress of transportation due to injury, fatigue, infirmity, poor health, distress, very young or very old age, or impending birth, for example, but where local transport under special provisions will not cause undue suffering. Generally, such animals/birds should only be transported locally under special provisions to receive care, such as to a veterinarian, or transported locally for euthanasia or slaughter. Refer to Canada's <i>Regulations Amending the Health of Animals Regulations</i> for	These terms are used in the Codes of Practice as well as the Canadian Organic Standards. They have specific definitions related to livestock production but are not defined in the organic standard. These terms should be added to Section 3, Terms and Definitions. For the definition of "animal unit", it may be easier to develop a table like the one found at https://articles.extension.org/pages/33665/animal-units to cover the animals that can be raised under the organic standard. For detailed list of examples for animals considered 'compromised' and 'unfit' for transport, operators may	


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			<p>a detailed list of examples of compromised animals and additional guidance on their transport and handling.</p> <p>debudding / disbudding removal or destruction of the horn-producing cells of the horn buds before they have fused (attached) to the animal's skull. Horn bud attachment occurs between 2-3 months of age in cattle.</p> <p>dehorning removal of an animal's horns after the horn buds have fused (attached) to the animal's skull. Once attached to the skull, the horns develop a blood supply and pain-sensing nerves throughout. In cattle, horn bud attachment occurs between 2-3 months of age.</p> <p>unfit for transport in the context of transport, an animal or bird with a reduced ability to withstand transportation. If transported, unfit animals/birds would endure unjustified and unreasonable suffering. This includes any condition associated with pain that will be aggravated by transport, even under special provisions. As a rule, unfit animals should only be transported for veterinary treatment or diagnosis if on the advice of a veterinarian. Refer to Canada's <i>Regulations Amending the Health of Animals Regulations</i> for a detailed list of examples of unfit animals and additional guidance on their transport and handling.</p>	<p>consult the Regulations published in Canada Gazette, Part II, Volume 153, Number 4 on February 1, 2019, which come into force on February 1, 2020:</p> <p>http://www.gazette.gc.ca/rp-pr/p2/2019/2019-02-20/html/sor-dors38-eng.html</p>	
General Principles & Mgmt	3.35	General	3.35 livestock (animaux d'élevage) any domestic or domesticated animal including bovine, ovine, porcine, caprine, equine, lagomorph (rabbits) , poultry and bees raised for food or used in the production of food. The products of hunting or fishing of wild	Reference to rabbits is missing from this definition and should be added since the organic standard covers organic rabbit production.	


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			animals are not included in this definition.		
General Principles & Mgmt	All	General	Update the organic standard to reflect new Code requirements and recommendations for rabbits. Add references to rabbits throughout the standard, when it is applicable to rabbits.	Throughout the organic standard it appears as though very little consideration was given to rabbits. The organic standards for rabbits are very dated. Reference to rabbits is missing in many places where it should be, and rabbit content is lacking in detail in general. A new Code of Practice for the Care and Handling of Rabbits was written and published for the first time in 2018: https://www.nfacc.ca/codes-of-practice/rabbits . This Code is important since it is the first of its kind in Canada. It should be used to inform the many necessary updates required to Canada's organic standards as they apply to rabbits.	
General Principles & Mgmt	6.1.3 a	General	6.1.3 a) Herbivores, including rabbits , shall have access to pasture during the grazing season and access to the open air at other times whenever weather conditions permit:	The standard does not explicitly state whether rabbits must have pasture access during the grazing season. Rabbits are herbivores, so 6.1.3 a) should apply. However, 6.1.3 a) 1) – 3) only refer to ruminants. Mentioning rabbits specifically would clarify what is expected of farmers.	
General Principles & Mgmt	6.1.3 a3	General	6.1.3 a) 3) a minimum of 0.13 ha (0.33 ac.)/animal unit shall be devoted to grazing. One animal unit = one cow or one bull, or two calves, each 102 to 227 kg (225 to 500 lb) or five calves, each less than 102 kg (225	The definition of "animal unit" is far more complex than this. For example, it's unclear how many lambs and kids this would apply to, when (what age or weight?) a	


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			lb), or four ewes and their lambs, or six does and their kids];	lamb becomes a sheep and a kid becomes a goat. It may be better to remove the definition from this section and add it to the Terms and Definitions section instead so that it can be more fully and comprehensively defined.	
General Principles & Mgmt	6.4.3 c, e, f, note	General	<p>6.4.3</p> <p>c) calves shall be given fresh, whole, organic milk or reconstituted organic milk that maintains health and vigour, promotes satiety, and is free of medication, at least twice daily until the age of three months. Weaning must occur gradually over at least five days;</p> <p>e) lambs and kids shall be given fresh, whole, organic milk or reconstituted organic milk that maintains health and vigour and promotes satiety, at least twice daily, until the age of two months or a weight of 18 kg (39.7 lb). Weaning must occur gradually over at least five days;</p> <p>f) if they are not nursing, young animals shall be fed to meet their nutritional requirements and to achieve optimal growth and health, using artificial teats to satisfy their motivation to suck. Personnel must assist newly arrived calves, lambs and kids not accustomed to milk feeding with artificial teats;</p> <p>NOTE Refer to the applicable Code of Practice for the Care and Handling of Dairy Cattle for requirements and recommendations on colostrum feeding, the quantity of milk to be fed, and the prevention of iron deficiency anemia.</p>	<p>Weaning is a very stressful time for dams and their young. Ideally, weaning would occur gradually over a period of several days, as would happen naturally.</p> <p>Human intervention is essential to ensure young animals learn to drink milk on their own from a bottle or bucket to ensure they remain healthy and fed.</p> <p>Minimum care requirements for weaning of dairy calves are outlined in the Code of Practice for the Care and Handling of Veal Cattle (2017). As it appears now, the organic standard does not meet this Code, especially as it relates to Sections 4.2 "Milk Feeding", 4.2.1 "Iron Deficiency Anemia" and 4.2.2 "Weaning" of the Code.</p> <p>The public views organic production as an improvement over standard production practices, which are outlined in Canada's Codes of Practice. Further, in some provinces certain Codes have been adopted into provincial animal cruelty legislation, meaning minimum Code requirements are enforceable by law. Therefore, it is advisable that the organic</p>	


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				standard at least meet minimum Code requirements, and exceed them where possible in order to hold up to consumer expectations.	
General Principles & Mgmt	6.4.3 g	General	g) dairy calves, lambs, kids and piglets shall have access to solid food at all times;	Why does this not apply to other young animals, such as beef calves, goats, lambs and piglets? They should be added here, as access to solid food helps ease the transition from a milk-only diet to a solid-food diet during weaning.	
General Principles & Mgmt	6.4.3 m	General	6.4.3 m) rabbits shall be given forage, such as grass and hay, and have continuous access to safe material that keeps teeth healthy, such as gnawing blocks, root vegetables and tree branches. Substances in gnawing blocks shall be listed in Table 5.2 of CAN/CGSB-32.311.	The term "access" is open to interpretation (once daily?, once a month?, etc.). Also, not all gnawing blocks and tree branches are safe for rabbits. The Code of Practice for the Care and Handling of Rabbits (2018) states: "Soft wood objects may splinter and contain noxious volatile oils; some hard woods may contain toxicants (e.g., the bark of apple wood contains cyanide)." Requiring access to be continuous and materials to be safe would help strengthen the standard. Examples of unsafe materials, such as the ones mentioned here, could be provided in a note as guidance to producers.	
General Principles & Mgmt	6.5.5	General	6.5.5 The duration of transportation shall be as short as possible. If animals are in transit for more than 5 h, recommendations regarding Maximum transit times and minimum feed, water and rest times, as outlined in the Code of Practice for the Care and Handling of Farm	Some of the requirements in the Transport Code of Practice have been superseded by new Transport Regulations found at http://www.gazette.gc.ca/rp-pr/p2/2019/2019-02-20/html/sor-dors38-eng.html .	


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			Animals: Transportation and applicable legislation , shall apply.	Therefore, this requirement should be updated to reflect the new transport regulations.	
General Principles & Mgmt	6.5.6	General	6.5.6 Fitness for transport shall be assessed before loading. Compromised or unfit animals shall not be transported, for example, those that are injured, lame, emaciated, in late gestation or heavily lactating, or too young .	"Compromised" and "unfit" are both terms that are used in the Codes and have distinctly different definitions. These terms should also be added to Section 3, Terms and Definitions.	
General Principles & Mgmt	6.6.4 a3	General	6.6.4 a) 3) branding, ear tagging and ear tattooing ; and	It is not uncommon for piglets, rabbits, goats and sheep to be given ear tattoos for identification purposes.	
General Principles & Mgmt	6.6.4 b1	General	6.6.4 b) If they are the only remaining option, the following physical alterations are permitted; restrictions in 6.6.4 c) apply: 1) minimal beak trimming or treatment to remove sharp hook. Beak trimming must only be performed on birds under 10 days of age and so that no more than one-third of the top beak is removed, as measured from the tip to the entrance of the nostrils ; Or, this text could be added to section 6.6.4 c) 4) instead.	Beak trimming can be painful if done incorrectly, and may result in lasting pain for the bird. In some sectors of the poultry industry (e.g. broiler chicken production), beak trimming is unnecessary altogether and should be prohibited. In other sectors it may become necessary to control problematic pecking. Minimum care requirements for the beak trimming of egg-laying hens are outlined in the Code of Practice for the Care and Handling of Pullets and Laying Hens (2017). As it appears now, the requirement in the organic standard is open to interpretation and therefore, does not meet this Code. Specific detail on beak trimming of laying hens and in particular, requirements for age limits and proportion of beak removed, would ensure the minimum Code requirements are met.	


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				The public views organic production as an improvement over standard production practices, which are outlined in Canada's Codes of Practice. Further, in some provinces certain Codes have been adopted into provincial animal cruelty legislation, meaning minimum Code requirements are enforceable by law. Therefore, it is advisable that the organic standard at least meet minimum Code requirements, and exceed them where possible in order to hold up to consumer expectations.	
General Principles & Mgmt	6.6.4 c3	General	6.6.4 c) Restrictions on physical alterations: 3) For all physical alteration procedures, operators shall consult the applicable Code of Practice (see 2.5) and follow the requirements for age restrictions, methods and the use of pain control medications;	For any of the physical alterations listed in 6.6.4, operators should be required, at minimum, to follow best practices required in the Codes of Practice. They can choose to go over and above the Code requirements if they choose, but not below them. This includes beak trimming, tail docking and teeth trimming as listed in 6.6.4 c) 4). Currently it seems as though producers can trim beaks, tails and teeth on older animals since there is no reference to the age limits in the Codes in this bullet point. If this wording is added to 6.6.4 c) 1), the duplicate wording can then be removed from 6.6.4 c) 3). If this wording is NOT added to 6.6.4 c) 1), it should be added to 6.6.4 c) 4) to ensure producers are not	


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				trimming beak, teeth and tails on animals that have exceeded the age limits listed in the Codes.	
General Principles & Mgmt	6.6.4 c3	General	6.6.4 c) Restrictions on physical alterations: 3) for castration, tail docking, dehorning, debudding/disbudding, and branding, ear tagging and ear tattooing , operators shall consult the applicable Code of Practice (see 2.5) and follow the requirements for age restrictions and methods and the use of pain control medications;	The Code of Practice for the Care and Handling of Rabbits (2018) requires that analgesia be used when tagging and tattooing rabbits' ears. The public views organic production as an improvement over standard production practices, which are outlined in Canada's Codes of Practice. Further, in some provinces certain Codes have been adopted into provincial animal cruelty legislation, meaning minimum Code requirements are enforceable by law. Therefore, it is advisable that the organic standard at least meet minimum Code requirements, and exceed them where possible in order to hold up to consumer expectations.	
General Principles & Mgmt	6.6.4 c3 & c6	Editorial	6.6.4 c) Restrictions on physical alterations: 3) for castration, tail docking, dehorning, debudding/ disbudding and branding, operators shall consult the applicable Code of Practice (see 2.5) and follow the requirements for age restrictions and methods and the use of pain control medications. Castration of piglets shall take place in the first two weeks of life. Castration of cull boars is prohibited; 6) castration of piglets shall take place in the first two weeks of life. Castration of cull boars is prohibited;	6.6.4 c) 3 & 6 appear to conflict regarding castration of pigs. Point 3 says to follow the Code of Practice for age restrictions while point 6 further prescribes age restrictions for boars. If these two points were combined it would be more clear that the organic standard is more specific for piglet castration. Add point 6 to the end of point 3 for clarity.	


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General Principles & Mgmt	6.6.4 a4, b4, c3	Editorial	Add a description to differentiate between debudding/disbudding and dehorning in the text of this section and/or in the section of the standard containing the terms and definitions.	Not everyone (even farmers) know the difference between debudding and disbudding, or between these two terms and dehorning. There are subtleties in how they differ between animal types as well (e.g. differs between lambs and calves. Also differs between breeds, such as between Holstein dairy calves and angus beef calves). Therefore, it is important to define these terms and outline how a producer will be able to tell when it will no longer be considered disbudding, but dehorning instead. Definitions may be better suited to Section 3 than section 6.6.4.	
General Principles & Mgmt	6.6.9	General	6.6.9 Products from sick animals or those undergoing treatment with restricted substances shall not be organic or fed to organic livestock. However, organic dairy calves may receive milk from a cow that has received treatment with antibiotics per the requirements listed in 6.4.3 d).	Section 6.6.9 conflicts with section 6.4.3 d) RE: feeding dairy calves milk from cows that have received antibiotics. This exemption should be clarified here. Also, why does 6.4.3 d) not also apply to other young animals, like kids, lambs and piglets?	
General Principles & Mgmt	6.6.10 f, 6.6.11 6.7.7	Editorial	The text and bullet points are all indented incorrectly.	Fix to correspond with other sections of the standard.	
General Principles & Mgmt	6.7.1 c	General	6.7.1 c) sufficient space and freedom to lie down in full lateral recumbence, stand up, stretch limbs and turn freely, and to express normal patterns of behaviour;	Do all producers know what "lateral recumbence" means? If not, it should be added to the list of Terms and Definitions in Section 3, or different wording	


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				should be used here instead. For example – "...stretch out when lying down...", as is written for calves in 6.12.5 a).	
General Principles & Mgmt	6.7.1 f	General	6.7.1 f) good air quality. Humidity, dust particles and ammonia levels shall not impair the well-being of animals. Ammonia levels shall not exceed 25 ppm, or 20 ppm for rabbits . If these levels are exceeded, remedial action shall be taken;	<p>According to the Code of Practice for the Care and Handling of Rabbits (2018), "ammonia concentrations of 20 ppm or higher impair rabbit respiratory immunity and are strongly correlated with respiratory disease". The Code therefore requires that ammonia concentrations not exceed 20 ppm.</p> <p>The Code of Practice for the Care and Handling of Veal Cattle (2017) recommends that farmers take corrective action when ammonia levels exceed 17 ppm.</p> <p>The public views organic production as an improvement over standard production practices, which are outlined in Canada's Codes of Practice. Further, in some provinces certain Codes have been adopted into provincial animal cruelty legislation, meaning minimum Code requirements are enforceable by law. Therefore, it is advisable that the organic standard at least meet minimum Code requirements, and exceed them where possible in order to hold up to consumer expectations.</p>	
General Principles	6.7.1 g	Editorial	g) appropriate resting and bedded areas that meet the needs of the animal... If organic bedding is commercially unavailable, bedding	This sentence doesn't make sense as edited. It should read: " ...non-genetically engineered bedding material	


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& Mgmt			material from non-genetically engineered bedding material that is free of prohibited substances for at least 60 days prior to harvest may be used...	that is free of ..."	
General Principles & Mgmt	6.8.1	General	6.8.1 Manure management practices used to maintain areas in which livestock is housed, penned or pastured shall be implemented in a manner that minimizes soil and water degradation and promotes animal health.	Manure gas levels in barns, such as ammonia and hydrogen sulfide, are directly impacted by manure management practices. Therefore, manure management has an impact on animal health and welfare. It is not just an environmental issue. Organic standard requirements relating to manure management practices should reflect considerations for animal health. The proposed change reflects this thinking.	
General Principles & Mgmt	6.10 & 8.3.1	General	Prohibit the use of glue traps/boards, drowning, electrocution, live freezing/hypothermia and any traps or snares that cause death over a prolonged period of time from animal-related pest control methods. The focus should be on exclusion practices and, when absolutely necessary, only quick-kill methods of pest control should be used (e.g. animal-triggered snap traps for rodents).	Methods of pest control that prolong pain or cause unnecessary discomfort, stress or suffering of an animal, either due to the pest control method itself or because the method is ineffective, should be prohibited, as should those that endanger other animals. For example, traps, snares and glue boards that imprison the pest lead to a slow death due to one or more of several factors such as starvation, exposure to adverse climate, dehydration, energy deprivation, predation, self-mutilation and over-exertion. Some traps and snares also endanger other non-pest animals. Live freezing causes prolonged suffering and stress to an animal. Drowning also causes unnecessary stress and suffering. For these reasons, the methods listed here are incredibly	


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				inhumane and should not be permitted for use in organic production.													
General Principles & Mgmt	6.11.3	Editorial	There sheep and goat space requirements table in this section is listed as Table 2, but should be table 3 (table 2 already exists for cattle space requirements in section 6.11.2). All the tables following this one are also incorrectly numbered. The incorrect table number is cited in the text of Section 6.15.9 for this reason as well.	Correctly number tables in the standard to avoid confusion.													
General Principles & Mgmt	6.11.3	Editorial / Technical	<p>The sheep and goat space allowance table:</p> <table border="1" data-bbox="612 880 1561 1291"> <thead> <tr> <th></th> <th>Indoor space</th> <th>Outdoor runs and pens</th> </tr> </thead> <tbody> <tr> <td>Ewes/does and nursing lamb/kid</td> <td>1.2 m² (21.5 ft²)/head plus 0.35 m² (3.8 ft²)/head for each additional lamb/kid</td> <td>3 m² (32.3 ft²)/head plus 0.5 m² (5.4 ft²)/head for each additional lamb/kid</td> </tr> <tr> <td>Weaned/bottle-fed lambs/kids</td> <td>0.5 m² (5.4 ft²)/head increasing to 1.5 m² (16 ft²)/ head for year-old lambs and kids</td> <td>0.75 m² (8.1 ft²)/head increasing to 2.25 m² (24 ft²)/ head for year-old lambs and kids</td> </tr> <tr> <td>Rams/bucks</td> <td>3 m² (32.3 ft²)/head</td> <td>4.5 m² (48.5 ft²)/head</td> </tr> </tbody> </table>		Indoor space	Outdoor runs and pens	Ewes/does and nursing lamb/kid	1.2 m ² (21.5 ft ²)/head plus 0.35 m ² (3.8 ft ²)/head for each additional lamb/kid	3 m ² (32.3 ft ²)/head plus 0.5 m ² (5.4 ft ²)/head for each additional lamb/kid	Weaned/bottle-fed lambs/kids	0.5 m ² (5.4 ft ²)/head increasing to 1.5 m ² (16 ft ²)/ head for year-old lambs and kids	0.75 m ² (8.1 ft ²)/head increasing to 2.25 m ² (24 ft ²)/ head for year-old lambs and kids	Rams/bucks	3 m ² (32.3 ft ²)/head	4.5 m ² (48.5 ft ²)/head	<p>The way it is written, it sounds like the 1.2 m²/head includes the dam and one baby and you only have to add more space for each additional lamb or kid after the first one. Was this the intention?</p> <p>Or is it meant to read as 1.2 m² for the dam and 0.35 m² for each baby, including the first one?</p> <p>Also, there seems to be a typo or a math error here. 1.2 m² is lower than that recommended in the Sheep Code of Practice (1.5 m²) and it is not equal to 21.5 ft² as indicated in the brackets. 2 m² = 21.5 ft².</p> <p>The space for weaned lambs (feeder lambs) also starts out lower (0.5 m²) than the Code of Practice (0.6 m²).</p> <p>At what age do they go from being considered weaned lambs/kids to rams/bucks? This is not clear in the</p>	
	Indoor space	Outdoor runs and pens															
Ewes/does and nursing lamb/kid	1.2 m ² (21.5 ft ²)/head plus 0.35 m ² (3.8 ft ²)/head for each additional lamb/kid	3 m ² (32.3 ft ²)/head plus 0.5 m ² (5.4 ft ²)/head for each additional lamb/kid															
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				standard.	
General Principles & Mgmt	6.12.5 a,e & 6.12.6	General	<p>6.12.5 Calves may be housed in individual pens and hutches, up to eight weeks of age, provided that the following conditions are met:</p> <ul style="list-style-type: none"> a) they are not tethered and have enough room to turn around without assistance, lie down, stretch out on their side when lying down, get up, rest and groom themselves; b) individual pens are designed and located so that each calf can see, smell and hear other calves; c) Individual housing has an area of at least 2.5 m² (27 ft²) and a minimum width of 1.5 m (4.9 ft); d) outdoor hutches shall have access to an enclosed yard or run; e) calves in hutches and outdoor enclosures must be able to stand fully upright without touching the top of the enclosure. <p>6.12.6 Calves shall be group-housed after weaning and by no later than eight weeks of age, whichever occurs first. Preferably, calves would be housed in pairs or small groups of 2-5 from arrival.</p>	<p>Cattle are social animals who normally live in groups/herds. They may become stressed when isolated, especially if over long periods or if in a hutch/crate that is too small for the animal. The organic standard should show preference for a larger housing environment that allows animals to be housed together with at least one member of their herd.</p> <p>Minimum care requirements for housing dairy calves are outlined in the Code of Practice for the Care and Handling of Veal Cattle (2017). In Section 3.2 "Young Animal Housing" of the Code, it states that calves must be group housed as young as possible, and no later than 8 weeks of age, yet the organic standard allows calves to be housed in isolation for 3 months of age. This is in direct conflict with a Code requirement.</p> <p>Further, the organic standard doesn't have any</p>	


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				<p>requirements around height of the enclosure in relation to calf size. This means a calf could be housed in a pen with a low ceiling.</p> <p>The Veal Code recommends housing calves in pairs or in small groups of 2-5 from arrival (Section 3.2).</p> <p>The public views organic production as an improvement over standard production practices, which are outlined in Canada's Codes of Practice. Further, in some provinces certain Codes have been adopted into provincial animal cruelty legislation, meaning minimum Code requirements are enforceable by law. Therefore, it is advisable that the organic standard at least meet minimum Code requirements, and exceed them where possible in order to hold up to consumer expectations.</p>	
General Principles & Mgmt	6.13.1 i	General	<p>6.13.1 i) Meat chickens that will be raised outdoors in shelters without indoor access shall have access to pasture on a daily basis by four weeks of age, unless weather conditions endanger the health or safety of the birds. Turkeys shall have outdoors access by eight weeks of age.</p> <p>Barn-raised meat chickens shall have outdoor access on a daily basis by at least 25 days of age, at which time the operator shall provide evidence of use of the pastures or exercise areas by demonstrating that a minimum of 15% of birds (increasing to 25% in 2025) are on range when there are no weather constraints.</p>	<p>Organic chicken meat should be marketed as indoor grown.</p> <p>Broiler chickens only live for 5-7 weeks before they are killed. Yet farmers do not have to let them outside until they are 4 weeks old. So there is really only 1-3 weeks of a chicken's life where it might get the chance to go outside.</p> <p>However, farmers do not have to let them out if the weather is bad, so they can be kept indoors if it is too</p>	


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			When an operator is unable to achieve the above outdoor access requirements, action(s) shall be taken over an annual production cycle to increase the probability of birds using outdoor areas during their lifetime.	<p>hot or cold, too wet, windy, snowy, rainy, etc. The layer chicken industry describes ideal temperatures (not too hot or cold) as between 15°C and 30°C (59°F to 86°F) – this is undefined by the broiler industry.</p> <p>In the provinces of Quebec and Ontario where most broiler chickens are raised, weather may be “ideal” for about 22 weeks (end of April til early October in really good years). In that time, about 3 cycles of chickens might have the chance to go outside for 1-3 weeks before they are killed. That totals only 3-9 weeks of the year where chickens might get to go outside, and that’s only if the weather isn’t stormy in that time and if they are brave enough to venture out. For the other 43-49 weeks of the year these chickens stay indoors.</p> <p>Organic chicken meat is marketed as free range, implying they have plenty of outdoor time. However, 3-9 weeks out of 52 in the year is barely significant. That’s only 5-17% of the year! Consumers who place importance on outdoor access falsely believe organic chickens go outside more than that. This is why organic chicken meat should be marketed as indoor-grown.</p>	
General Principles & Mgmt	6.13.3	General	6.13.3 Layers shall have access to an adequate number of nests, as recommended by best management practices.	This is open to interpretation. Either set a number of birds allowed per nest, an amount of nest space required per bird, or reference the document containing the recommended best management	


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				practices you are referring to (i.e. the Code of Practice for Poultry – Layers).	
General Principles & Mgmt	6.13.13	Editorial	6.13.13 If major renovation of barns on existing operations is required in order to comply with 6.13.1 b), 6.13.5 and 6.13.8, operators are granted an extended period until the end of November 2018 to come into compliance, provided that a plan for the new construction or renovation is in place by November 2016.	This section is out of date and should be removed from the standard.	
General Principles & Mgmt	6.14	General	<p>6.14 Additional requirements for rabbits</p> <p>(NEW – add to the top of this section)</p> <p>The operator shall establish and maintain rabbit living conditions that accommodate the health and natural behaviour of rabbits as follows:</p> <p>a) Rabbits shall have access to pasture, open-air runs, and other exercise areas, subject to weather and ground conditions. Outdoor areas shall:</p> <p>1) be free of prohibited substances for 36 months prior to their use; 2) be covered with vegetation, seeded if necessary, and periodically left empty to allow vegetation to re-grow and to prevent disease build-up; 3) provide protection from predators and be managed in a way that encourages use by the rabbits; 4) show signs of use as appropriate for the season.</p> <p>b) In an emergency situation, when outdoor access results in an imminent threat to the health and welfare of rabbits, access may be</p>	<p>The organic standard lacks the detail for rabbits that is afforded to the other livestock types. Given certain similarities between rabbits and poultry, some of what is required for organic poultry production could be added to the requirements for organic rabbit production. This would strengthen the organic standard.</p> <p>The first Code of Practice for the Care and Handling of Rabbits was published in 2018. This Code provides a lot of detail on the minimum care requirements expected of producers raising rabbits, and should be consulted during the revision of the Canadian Organic Standards in order to ensure the required best practices are followed.</p> <p>The public views organic production as an improvement over standard production practices, which are outlined in Canada's Codes of Practice. Additionally, in some provinces certain Codes have</p>	


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			<p>restricted. Outdoor access shall resume when the imminent threat ends. Producers shall document periods of confinement.</p> <p>c) Operators shall have an organic plan that describes outdoor access and how they will protect rabbits from disease and predators.</p>	<p>been adopted into provincial animal cruelty legislation, meaning minimum Code requirements are enforceable by law. Therefore, it is advisable that the organic standard at least meet minimum Code requirements, and exceed them where possible in order to hold up to consumer expectations.</p>	
General Principles & Mgmt	6.14.1 a,b	General	<p>6.14.1 If required for comfort and security, rabbits may be temporarily confined, for example, overnight, in cages or hutches. When confined, rabbits shall have enough room to turn around, lie down, stretch out when lying down, get up and groom themselves.</p> <p>a) The operator shall document the reasons for and duration of confinement. Continuous confinement is prohibited. Measures taken to reduce the need to confine rabbits in the future shall also be documented when circumstances are within the operator's control.</p> <p>b) The floors where rabbits are temporarily confined shall not be entirely of slatted, wire or grid construction.</p>	<p>The organic standard does not permit any other livestock types to be kept in cages and, where animals are allowed to be temporarily confined, the operator must document it, as well as plan for how to avoid confinement in the future. The suggested changes would place similar parameters on rabbit confinement.</p> <p>Many rabbit cages and hutches have all-wire floors. Providing relief from a wire surface is important for rabbit comfort and foot health. For example, the Code of Practice for the Care and Handling of Rabbits (2018) will require all breeding does and bucks to have a resting mat in their cage by 2021.</p>	
General Principles & Mgmt	6.14.2	General	<p>6.14.2 The use of mobile pasture pens is permitted, provided that pens do not restrict natural behaviour and they are moved at least once every three days, taking into consideration the impact on the rabbits and on the land. Mobile pens shall comply with the minimum space requirements in Table 5.</p>	<p>This wording is used in the poultry section and would place similar parameters on mobile shelters for rabbits if used here. It would also ensure consistency throughout the organic standard.</p>	
General Principles	6.14 Table 5	Technical	<p>Table 5 – Minimum indoor and outdoor space requirements for rabbits</p>	<p>The standard does not meet the Code of Practice for the Care and Handling of Rabbits (2018) for indoor</p>	


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& Mgmt			<table border="1"> <tr> <td>Rabbits</td> <td>Indoor space</td> <td>Outdoor – runs and concrete exercise areas</td> <td>Outdoor – pasture</td> <td>Mobile pens</td> </tr> <tr> <td>Bucks</td> <td>0.46 m² (4.95 ft²)/ head</td> <td>2 m² (22 ft²)/ head</td> <td>5 m² (54 ft²)/ head</td> <td>0.4 m² (4.3 ft²)/ head</td> </tr> </table>	Rabbits	Indoor space	Outdoor – runs and concrete exercise areas	Outdoor – pasture	Mobile pens	Bucks	0.46 m ² (4.95 ft ²)/ head	2 m ² (22 ft ²)/ head	5 m ² (54 ft ²)/ head	0.4 m ² (4.3 ft ²)/ head	space for bucks. According to the Code, there must be 0.36 m ² /buck (current Code requirement) or 0.46 m ² /buck (Code requirement effective January 1, 2038). Ideally, Table 5 should meet this future Code requirement. The public views organic production as an improvement over standard production practices, which are outlined in Canada's Codes of Practice. Further, in some provinces certain Codes have been adopted into provincial animal cruelty legislation, meaning minimum Code requirements are enforceable by law. Therefore, it is advisable that the organic standard at least meet minimum Code requirements, and exceed them where possible in order to hold up to consumer expectations.	
Rabbits	Indoor space	Outdoor – runs and concrete exercise areas	Outdoor – pasture	Mobile pens											
Bucks	0.46 m ² (4.95 ft ²)/ head	2 m ² (22 ft ²)/ head	5 m ² (54 ft ²)/ head	0.4 m ² (4.3 ft ²)/ head											
General Principles & Mgmt	6.14.7	General	6.14.7 Weaning before the kits are 30 days of age is prohibited. However, if the welfare of the doe or kits is compromised, earlier weaning is permitted, provided the weaning age and justification for early weaning are documented in detail by the operator.					Proper documentation should be required so that rabbit farmers must justify why earlier weaning was necessary. This would also allow for easier auditing by the certification body.							
General Principles & Mgmt	6.15.3 b	General	6.15.3 Sows and gilts shall be kept in groups, with the following exceptions: b) sows may be individually housed in a pen ([7.5 m ² (81 ft ²)/sow with litter]) provided the pen's width still allows her the ability to turn around, lie down, stretch out when lying down and get up unassisted, for up to five days prior to farrowing and during the suckling period;					The suggested wording ensures the sow still has freedom of movement. Long, narrow pens may meet the space requirement but still restrict movement, so further clarification should be added here.							


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General Principles & Mgmt	6.15.3 c, d	Technical	<p>6.15.3 Sows and gilts shall be kept in groups, with the following exceptions:</p> <p>c) if needed for piglet protection during the suckling period, sow restraint using _____ is permitted for a maximum of three days. Sows may be restrained using _____ for a shorter period to protect the operator during piglet processing or pen cleaning;</p> <p>d) the use of farrowing crates as a means of restraint is prohibited.</p>	If farrowing crates as a means of restraint are prohibited in 6.15.3 d) and tethering is prohibited in section 6.7.3, then what are the methods of restraint that would be allowed for up to three days under 6.15.3 c)? What methods are allowed for shorter periods? It may be helpful to suggest which methods of restraint are acceptable in 6.15.3 c), and if there aren't any, remove or revise that wording.	
General Principles & Mgmt	6.15.4	General	6.15.4 Piglets shall not be weaned before four weeks of age. However, if the welfare of the sow and piglets is compromised, earlier weaning is permitted provided the weaning age and justification for early weaning are documented in detail by the operator.	Proper documentation should be required so that the farmer must justify why earlier weaning was necessary. This would also allow for easier auditing by the certification body	
General Principles & Mgmt	6.15.9	Editorial	<p>Table 6 should actually be table 7 (since there are two versions of table 2).</p> <p>In this table, change the word "flock" to "herd", as pigs live in herds, not flocks.</p> <p>^a Under exceptional circumstances the maximum stocking density may be exceeded for individual herds. These circumstances shall be documented and if they recur, actions to prevent future herds from surpassing maximum stocking densities shall be taken.</p>	The footnote of this table for pig space allowances refers to flocks. Pigs live in herds.	

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Your Name/ votre nom	Melissa Speirs
Organization	British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA), Farm Animal Welfare Department
Email Address/ courriel	

Public Review Notice

Public review of the draft standard is from 2019-July 2 to 2019-September 30

All comments received must be submitted with the approved comments form. Please include rationale for the change. Comments received in an edited version of the standard will not be accepted.

Please include your name, organization and email address on the comment form.

All personal information will be kept private with CGSB and not disclosed to the public. All comments received will be reviewed by the technical committee, specific technical working group or working group convenors. Final comments with disposition will be made available upon request. CSGB will not send individual comment responses.

Any comments received after September 30, 2019 will be considered for use in future editions. The technical committee reserves the rights to include or not include comments, based on technical discussion at the committee in the final edition. The standard is expected to be published in 2020.

Avis d'examen public

La période d'examen public du projet de norme aura lieu du 2 juillet 2019 au 30 septembre 2019.

Tous les commentaires doivent être soumis à l'aide du formulaire approuvé à cette fin. Veuillez fournir une justification pour les changements proposés. Les commentaires apportés directement dans la norme, sous forme de suivi des modifications, ne seront pas acceptés.

Veuillez indiquer votre nom, le nom de votre organisation et votre adresse de courriel sur le formulaire de commentaires.

Tous les renseignements personnels recueillis demeureront confidentiels et ne seront pas rendus publics. Les commentaires reçus seront examinés par les membres du Comité technique, un des groupes de travail technique ou les responsables des groupes de travail. Les commentaires définitifs seront fournis sur demande. L'ONGC ne répondra pas à chacun des commentaires.

Tout commentaire reçu après le 30 septembre 2019 sera examiné dans le cadre d'éditions ultérieures. Le Comité technique se réserve le droit d'inclure ou non, dans la version définitive de la norme, les commentaires reçus d'après les conclusions des discussions tenues entre les membres du Comité. La norme devrait être publiée en 2020.

² Type of comment: **ge** = general **te** = technical **ed** = editorial / Type de commentaire: **ge** = général **te** = technique **ed**: éditorial