

BC SPCA Suggested Comments on the draft Canadian Organic Standards

Content for 90-day public comment period held:

July 2 through September 30, 2019

The Canadian General Standards Board is looking for public feedback on the two new DRAFTS of the Canadian Organic Standards:

- [CAN/CGSB-32.310 Organic Production Systems: General Principles and Management Standards](#)
- [CAN/CGSB-32.311 Organic Production Systems: Permitted Substances Lists \(PSL\)](#)

These two standards are used to certify all farms growing certified organic foods, whether plants or animals.

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

Public review notice

- All comments must be submitted one at a time using the approved online form: [public review notice – feedback form](#). Otherwise, they will not be taken into account.
 - Full link to the online form - <https://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/programme-program/normes-standards/frep-prff-eng.html>
- Any comments received after the deadline of September 30, 2019 will be considered for use in future editions. The technical committee has the right to include or exclude comments based on technical discussion at the committee in the final edition.
- The standard is expected to be published by November 2020.

Instructions for filling in the online form

- You will be required to enter your name, organization and email address. You can type in “self” as your organization when adding your comments in your own words. Please do not use “BC SPCA”.
- Standard: Choose either the “general principles” or “permitted substances” standard from the list
 - [CAN/CGSB-32.310 Organic Production Systems: General Principles and Management Standards](#)
 - [CAN/CGSB-32.311 Organic Production Systems: Permitted Substances Lists](#)
- Clause:
 - The number and letter, where applicable, that corresponds to the section you are commenting on (e.g. 6.6.11a)
- Type of comment:
 - General – regarding the nature of the standard. Should it be strengthened? Is it too strict? Why?
 - Technical – correction is required for specific facts or figures in the standard
 - Editorial – The text is changed to clarify the wording (e.g. correction of grammar or spelling).
- Comment (justification for change):
 - This is the reason why you feel your proposed change to the standard is necessary



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The following table includes a list of animal welfare concerns submitted by the BC SPCA as they relate to organically raised farm animals (excluding bees). You can use our content to help develop your own when filling in the online [“Public review notice – feedback form”](#) developed by the Canadian General Standards Board. However, feel free to review both standards (“general principles” and “permitted substances”) in their entirety and submit feedback on any/all sections of importance to you.

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.

Standard	Clause	Type of comment	Proposed change	Comment (justification for change)
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>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</p>

			NOTE Refer to the applicable Code of Practice <i>for the Care and Handling of Dairy Cattle</i> for requirements and recommendations on colostrum feeding, the quantity of milk to be fed, and the prevention of iron deficiency anemia.	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 b1	General	<p>6.6.4 b) If they are the only remaining option, the following physical alterations are permitted; restrictions in 6.6.4 c) apply:</p> <p>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;</p> <p>Or, this text could be added to section 6.6.4 c) 4) instead.</p>	<p>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.</p> <p>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.</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	6.6.4 c3	General	<p>6.6.4 c) Restrictions on physical alterations:</p> <p>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;</p>	<p>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.</p> <p>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.</p> <p>If this wording is added to 6.6.4 c) 1), the duplicate wording can then be removed from 6.6.4 c) 3).</p> <p>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 trimming beak, teeth and tails on animals that have exceeded the age limits listed in the Codes.</p>
General Principles & Mgmt	6.10 & 8.3.1	General	<p>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.</p> <p>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).</p>	<p>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 inhumane and should not be permitted for use in organic production.</p>

<p>General Principles & Mgmt</p>	<p>6.12.5 a,e & 6.12.6</p>	<p>General</p>	<p>6.12.5 Calves may be housed in individual pens and hutches, up to three months 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 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>
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<p>General Principles & Mgmt</p>	<p>6.13.1 i</p>	<p>General</p>	<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>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>	<p>Do organic chickens raised for meat get enough time outside?</p> <p>They 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>Also, farmers do not have to let the chickens out if the weather is bad, so they can be kept indoors if it is too hot or cold, too wet, windy, snowy, rainy, etc. The egg industry describes ideal temperatures (not too hot or cold) as between 15°C and 30°C (59°F to 86°F). In the provinces of Quebec and Ontario where most chickens are raised, weather is ideal for about 22 weeks (end of April til early October in really good years).</p> <p>In that time, about 3 groups 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 remember, that's only if the weather isn't stormy. For the other 43-49 weeks of the year the chickens stay indoors.</p> <p>Do you think that is enough time?</p> <p>Organic chicken meat is marketed as free range, which means they have outdoor access. Now that you know what that means to the chicken, do you think it's a fair statement to say that organic chickens are free range? Or should organic chicken be marketed as indoor-grown?</p> <p>For turkeys, it's a very similar story.</p>
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General Principles & Mgmt	6.14	General	<p>6.14 Additional requirements for rabbits</p> <p>(NEW – add to 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> <ol style="list-style-type: none"> 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>b) In an emergency situation, when outdoor access results in an imminent threat to the health and welfare of rabbits, access may be 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>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 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>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>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>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	6.14.7	General	<p>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.</p>	<p>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.</p>
General Principles & Mgmt	6.15.3 b	General	<p>6.15.3 Sows and gilts shall be kept in groups, with the following exceptions:</p> <p>b) sows may be individually housed in a pen ([7.5 m² (81 ft²)/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;</p>	<p>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.</p>
General Principles & Mgmt	6.15.4	General	<p>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.</p>	<p>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</p>