

March 2, 2020



### Review of the Canadian Organic Standards

#### Poultry welfare at the heart of the discussions

Do you care what's behind the organic logo on your meat, milk and eggs? If so, you're not alone. Apparently, many people want to have a say in the organic standards for livestock production. Half of the 706 comments received during the public review of the proposed 2020 Canadian Organic Standard (COS) were related to livestock. The comments addressed subjects such as feed supplements, weaning practices, transportation conditions, space requirements in barns and dehorning.

Some statements supported the changes while others complained the requirements are either too difficult to meet or not rigorous enough. Numerous comments simply requested clarification in the wording.

Many comments suggested changes to the COS that were not related to the proposed revision that went out for public comment in 2019. These issues will need to wait until the 2025 review process. For example, about a dozen comments addressed the lack of detail in rabbit production. While they raised valid points, it is too late for the Livestock Working Group (WG) to address the issues.

The following issues received many comments. These were considered by the Livestock Working Group, which will submit recommendations to the CGSB Committee on Organic Agriculture (Technical Committee), which meets March 12th. This will be the last Technical Committee meeting before the ballot is launched.

## Regional forage shortages

The 2020 draft allowed, by derogation, non-organic forage “in the event of regional shortages as defined by a competent authority.” There were many questions about how to define “a competent authority” and a “regional shortage,” and whether this procedure would be practical, particularly in remote areas. To address these issues, the WG proposes that non-organic forage be permitted in the event of “regional shortages documented by the operator and confirmed by a competent authority if possible” without specifying the distance required to define a “regional” shortage.

## Tie stalls

Many comments were related to animal welfare.



For example, “the use of tie stalls is seen by the public as a form of confinement and is not in line with the ideals of the public on the treatment of animals. Tie stalls restrict movement and, hence, should be prohibited at a much earlier date than 2030.”

The year 2030 was chosen as the final year that organic tie stalls would be allowed so that farmers would not have to renovate or rebuild barns (a costly procedure) every five years. The comment did not provide new evidence for the WG to consider changing their recommendation.

## Permitted substances lists (PSL)

The WG recommends adding non-organic fish meal and phytase to the PSL. Phytase is an enzyme which can improve the digestibility of phosphorus. The result is less phosphorus in manure and less P that can enter the environment.

The WG proposes to allow an exception for genetically engineered vaccines and certain GE feed amendments (i.e., phytase, vitamins, lysine, methionine). The annotations vary but generally GE forms are allowed for these four substances when non-GE forms are not commercially available or are ineffective.

## Poultry

Nearly half the comments were about poultry. Comments were deeply divided from “Some of these changes may make it no longer financially feasible to be in organic egg production” to “This is a minimum threshold and no downward modification would be acceptable. [The standard] should focus on consumer expectations of animal welfare rather than industry pressure for lower animal welfare standards.”

## Covered outdoor areas

The COS requires that all livestock have access to shade. With the goal of trying to encourage poultry (layer and broilers) to go outside, the Livestock WG provided detailed requirements for overhead cover. The proposed change triggered many comments and questions. In response, the WG recommends clarifying that:

- Shade cloth and camouflage netting can count as overhead cover, but a winter garden cannot.
- Roof overhangs can be considered overhead cover but only when they are over pasture. They can account for up to half of the required overhead cover. This point was achieved after much debate.

## Outdoor access for broilers



There were many objections to the proposed requirement that 25% of barn-raised meat birds need to be on the range by 2025. Some felt this was impractical, inhumane (by exposing birds to the elements), or would lead to chicken being too expensive to produce or buy.

Certain WG members were concerned that the COS was “changing the goalposts every five years” with each review. They worried that specifying 25% might scare off potential new operators and cause some current operators to drop out of organics. Others, however, felt that mentioning the goal of 25% helps farmers prepare for the future. After much debate, the WG recommends deleting the reference to 25% and to require operators to document the use of the range, develop a plan to increase use, and “continue to strive to increase the number of birds on the range in future years.”

## Winter garden = enriched verandah for layers

The new requirement of a winter garden for layers raised many questions and comments. It appears the term “winter garden” is misleading. For example, in very cold areas, winter gardens are only used in early spring and late fall. Also, winter gardens can be used in the summer in wet conditions or when there is a threat of Avian Influenza.

The Livestock WG now recommends replacing “winter garden” with “enriched verandah.” Also, details about the enriched verandah (formerly in 3. *Definitions*) have been incorporated into the poultry section.

“An enriched verandah is a covered, uninsulated, unheated extension to a poultry barn. It has an outdoor climate but offers protection from inclement weather (e.g., wind, rain), rodents, predators and disease threats. Birds have access to the enriched verandah during daylight hours, at least from spring through fall.



1) The enriched verandah shall have:

- a) natural lighting but can be supplemented with artificial lighting.
- b) a sand or dirt floor; or a solid floor covered with bedding, such as straw or wood shavings, for comfort and warmth and to encourage foraging, scratching and dust bathing behaviours.
- c) enrichments (examples include perches, trays of greens, hay bales, pecking objects) to encourage natural behaviours.”



## Apiculture

The use of sugar to feed bees during dormancy will be discussed at the TC meeting. The list of arguments was presented in [InfoBio in February](#).

To learn more about the issues being discussed by the TC and the review process, see past issues of InfoBio on the [OFC website section](#) dedicated to the review.

The Organic Federation of Canada thanks the sponsors of the review!

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Please contact Nicole Boudreau – [nicole.boudreau@organicfederation.ca](mailto:nicole.boudreau@organicfederation.ca)  
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