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THE ORGANIC FEDERATION OF CANADA NEWSLETTER

September 16, 2020

Countdown to the publication of the 2020 Canadian Organic Standards
The weekly preview

Feed for livestock

Pandemic and drought on the agenda of the review of the Canadian Organic Standards

As drought hits many areas of Canada this year, livestock farmers face difficult decisions. And for organic farmers and ranchers, the decisions are particularly complex and challenging. Add a pandemic to the mix and organic operators are dealing with unprecedented problems.



Organic livestock eat organic feed and forage. But what happens when, due to drought, there is no organic silage available? Or, what happens after the nightmare scenario when a barn burns down and the winter's worth of feed and hay is lost in the flames? And, in a more timely example, what happens when a pandemic interrupts international trade leaving farmers and feed suppliers unsure of when the next imports will arrive?

When developing the Canadian Organic Standard (COS), there is both a need for compassion for the farmers facing disastrous conditions, and a need to maintain organic integrity.

The 2015 COS contained a certain level of flexibility in terms of the use of non-organic feed and forage for exceptional circumstances. Non-organic feed could be used for a maximum of 10 days after a catastrophe (e.g., fire or flood) that destroys or makes the feed supply unavailable, according to 6.4.7 a).

This enables a farmer to use whatever non-GE feed is available in a short-term emergency situation to maintain the health of animals without losing organic status.

Generally, a commercial or logistical challenge, such as feed shipments being held up at the border, would not be considered a catastrophe because these can be avoided with better advance planning. A pandemic, however, is a different story and raises new questions.



In the spring of 2020, the global distribution system was severely disrupted by COVID-19; organic farmers and inspectors questioned whether this was considered a catastrophe under 6.4.7 a). The use of non-organic feed in the 2015 COS was restricted to 10 days because that was considered enough time to find a replacement supply of organic feed. While 10 days may be appropriate after a barn fire, it doesn't apply after a major disruption in the global supply chain.

Given that so many products were unavailable in the spring of 2020, some farmers found that it took more than 10 days to find everything they needed for balanced organic feed rations. On top of that, the whole supply chain was unstable and some farmers were afraid of recurring shortages of feed.

In response to requests from farmers, the 2020 COS now allows up to 30% non-organic feed for up to 30 consecutive days after a catastrophe in case farmers can't obtain all the feedstuffs needed for a complete feed ration within 10 days. For 6.4.7 a), the operator does not need to get specific permission from the certifier (but should notify the certifier about the change in the Organic Plan as soon as possible).

This was only one of several changes to Clause 6.4.7.

When the COS review began, many farmers and inspectors questioned 6.4.7, which allows permitted non-organic forage to be fed to breeding stock (i.e., not organic animals destined for slaughter) during a regional forage shortage.

The clause 6.4.7 b) raised more questions. How large an area needs to be facing a shortage for it to be called a regional shortage? What authority needs to define a regional forage shortage? What happens to organic meat animals during a drought: do they all need to lose their organic status if there is no organic hay in the region?

After many long, thought-provoking discussions, the Livestock Working Group and CGSB Technical Committee (TC) on Organic Agriculture proposed several changes to 6.4.7 b) and added 6.4.7 c) and d).



In terms of regional forage shortages, the requirements were both clarified and relaxed. The 2020 COS allows for non-organic forage to make up to 25% of the forage for the entire ruminant herd, including animals destined for slaughter if the operator meets certain the conditions (see 6.4.7 c) and d)). The operator must document the forage shortage. Ideally, the farmer should seek out a second opinion from a competent authority to confirm the shortage. The appropriate authority can include a crop insurance organization, a provincial forage specialist, or a conservation authority. Unlike the catastrophic situation in 6.4.7 a), for the forage shortages in 6.4.7 b), the operator must get permission from the certifier before feeding non-organic forage. The order of preference of forage sources is outlined in 6.4.7 c).

Drought, flooding and other weather irregularities are becoming more common due to global climate change. To avoid having farmers and operators using non-organic forage year after year, operators must develop a plan as to how they will try to avoid forage shortages in the future. Examples of options are outlined in 6.4.7 d).

☞ The revised clause ☞

6.4.7 By exception, non-organic feed is permitted under the following circumstances:

- a) If organic feed is unobtainable as the result of a catastrophic event with a direct impact on the production unit (for example, fire, flood, or extraordinary weather conditions), non-organic feed may be used for a maximum of ten consecutive days (or up to 30% non-organic feed for up to 30 days), to ensure a balanced livestock ration. Non-organic feed from land in transition to organic production and free of prohibited substances shall be used in preference to non-organic feed;
- b) Breeding herds may be given non-organic forage in the event of a regional forage shortage documented by the operator and confirmed by a regional authority, when possible, provided that the animals are segregated, visually distinguishable (for example, have ear tags and age verification records) and record keeping is maintained. For breeding herds, forage from land in transition to organic production and free of prohibited substances shall be used in preference to non-organic forage. Use of genetically engineered forage crops is prohibited at all times. In all other respects, breeding herds whose offspring is intended for organic products shall be under organic management at all times. The breeding herd shall be re-transitioned when an organic forage supply becomes available. Subclause 6.2.3 applies to any offspring. The organic status of other livestock on the operation is not affected.
- c) In the event of a forage shortage documented by the operator and confirmed by a regional authority, when possible, and if the quantities of feeds allowed in 6.4.7 b)

are insufficient, non-organic forage may comprise up to 25% of the forage ration for the entire ruminant herd with the following in order of priority preference:

- 1) non-organic forage from land in transition;
 - 2) non-organic forage grown without the use of prohibited substances;
 - 3) non-organic forage grown without the use of prohibited substances for at least 60 days prior to harvest;
 - 4) non-organic forage provided it is not a genetically engineered crop.
- d) The operator shall design a contingency plan to address future forage shortages which may include strategies such as growing more climate-adapted varieties; improving grazing practices; stockpiling a supply of forage; identifying alternative supply chains; varying herd size; and improving the resilience on-farm forage production.

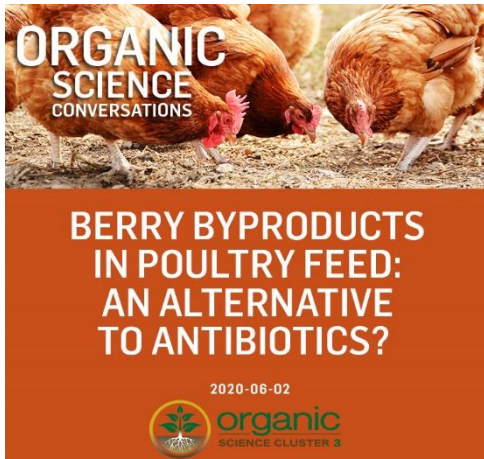
Note: For the exception in 6.4.7 a), the certification body should be notified as soon as possible after non-organic feed or forage is used. For the exception in 6.4.7 b) and c), the certification body should be notified before non-organic feed or forage is used.

Organic production systems: general principles and management standards. 32.310.

Draft approved August 4th, 2020 by the CGSB Technical Committee on Organic Agriculture.



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