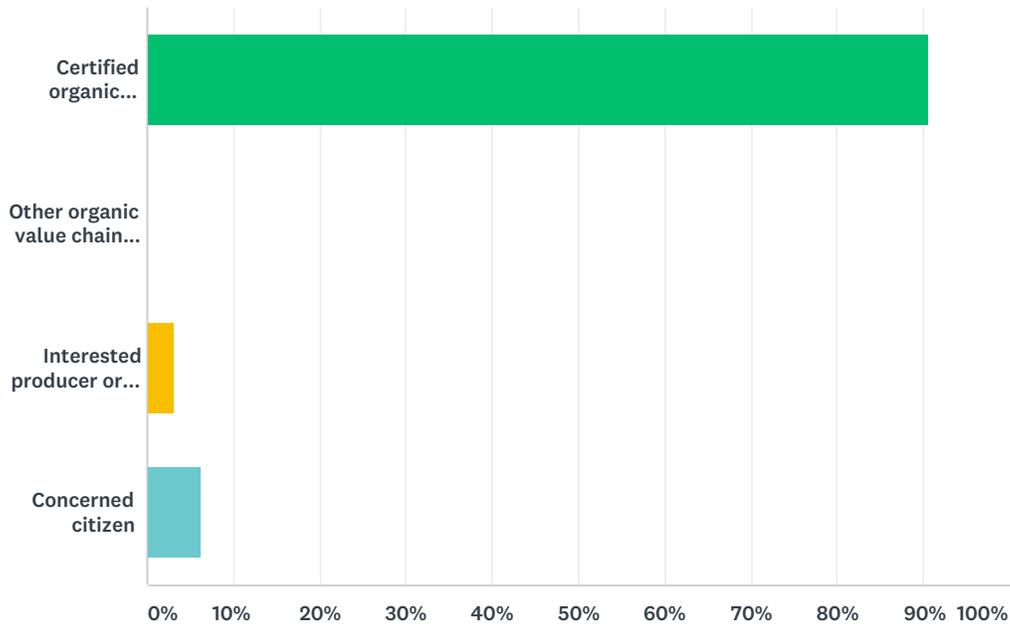


Q1 OCO represents organic businesses on the organic standards review committee but we are also interested in other opinions. Please identify yourself as one of the following:

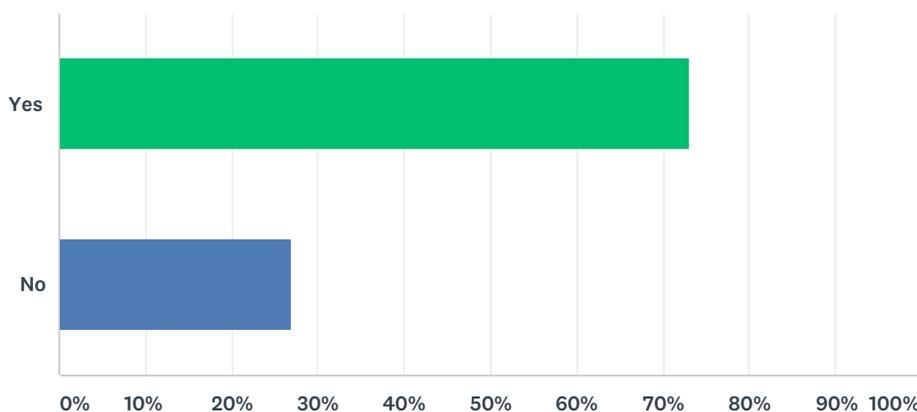
Answered: 32 Skipped: 0



ANSWER CHOICES	RESPONSES	
Certified organic producer or business	90.63%	29
Other organic value chain member (e.g.. distributor, retailer etc)	0.00%	0
Interested producer or business (e.g. in transition or uncertified ecological)	3.13%	1
Concerned citizen	6.25%	2
TOTAL		32

Q4 6 Livestock Production 10.67-6.13 6.7 Outdoor access for poultry
Proposal: Allow ‘in-kind’ measures to the requirement of outdoor access for poultry. Instead of letting birds outdoors, provide an equivalent exercise area that is accessible year-round. This ‘winter-garden’ can provide benefits of outdoor access (e.g., forage, soil/compost for scratching, subdued sunlight, perches and playthings) without the hazards associated with outdoor access. A translucent cover will provide dispersed light without shadows and provide the needed barrier for biosecurity. According to the petitioner, “this new model for organic husbandry addresses the threats, hazards and inconveniences of sporadic outdoor access and creates a much-improved living routine for the well-being of the birds.”
Background: The petition states that “Layers are hard-wired to be aggressive when in bright light” and easily frightened outside. They scratch and destroy pasture rather than graze. There are many threats outside including Avian flu. Even when given outdoor access, most birds do not leave the barn. Instead, a biosecure place with no shadows, predators or diseases could provide an enhanced environment year-round.
Decision: Rejected.
Rationale: It is a basic principle of organic agriculture to allow animals to go out in pasture or a range. The issue is to manage the run well so they can go outside in good weather.
Do you agree with this decision?

Answered: 26 Skipped: 6

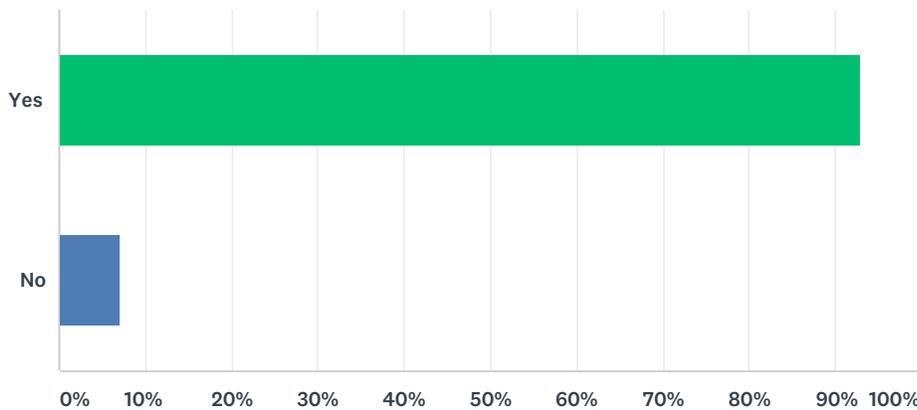


ANSWER CHOICES	RESPONSES	
Yes	73.08%	19
No	26.92%	7
TOTAL		26

#	COMMENTS	DATE
1	Layers are NOT hard-wired to be aggressive and are not easily frightened in a properly managed flock. Our layers love being outside and spend most of the time outdoors. The heritage breeds are not frightened easily if given the chance to free range from birth.	3/8/2019 7:53 AM
2	I understand the concerns about the pasture, disease, and predators, but a winter garden would just be a larger barn with more light and no way to remove manure easily or to ventilate. I would not want to have to spend more money to create another folly.	3/6/2019 8:22 AM
3	This is a management issue for pasture and health.	3/5/2019 5:55 PM
4	I agree with the BACKGROUND: and have seen this too all be true with our farm in all cases.	3/5/2019 12:57 PM
5	It should be the responsibility of the farmer to manage outdoor spaces in a way that encourages use by the birds. If birds would choose to remain in the barn extra steps should be taken to ensure the barn is comfortable as well.	3/5/2019 10:15 AM
6	Outdoor pasture for poultry quickly becomes damaged providing very little forage of any significant value.	3/5/2019 8:41 AM
7	I think indoor winter garden is a good idea	3/4/2019 9:34 PM
8	But there must be still enough space and light indoors during the cold weather season	3/4/2019 8:35 PM
9	This is only an issue for industrial sized operations. Our chickens are perfectly happy and healthy on pasture.	3/4/2019 8:22 PM
10	outdoor 'runs' are "mud-runs". 'access' is a massive deception of the mktplace.	3/3/2019 10:43 AM

Q5 7.4 Sprouts, shoots and microgreens production
Proposal:Item #1: Clarify in 7.4 that Shoots and Microgreens may be grown under 100% artificial light, making it clear the supplemental lighting only criteria in 7.5.6 is not pertinent to SSM.Item #2: Clarify soil container volume applicable to containerized microgreen production.Item #3: Clause 7.4.1 “Sprouts, shoots, and microgreens produced in water” should be strengthened to clarify that inert containers, such as stainless steel or food-grade plastic are allowed, but growing media, whether inert or not, is not permitted for water-based production.Item #4: There seems to be a possible contradiction between 7.4.1.5 (“Substances used for cleaning or sanitation of seed or harvested product shall be limited to substances listed in Table 4.3 of CAN/CGSB-32.311”) and 7.4.3 (“7.4.3 Shoots and microgreens product preparation: Wherever organic product preparation takes place, 8.1 and 8.2 apply.)
Decision and rationale: Revise the section 7.4 as follows (see link)
Do you agree with this decision?

Answered: 14 Skipped: 18



ANSWER CHOICES	RESPONSES	
Yes	92.86%	13
No	7.14%	1
TOTAL		14

#	COMMENTS	DATE
1	More clarity is needed in other areas of the standard. The issue of sulphur smoke bombs for rodent control needs to be addressed because they are allowed under the permitted substances list, anywhere on the farm, except the barns, which is where the rodents make home during the cooler months. It is a contradiction to list it under permitted substances but not identify that it cant be used indoors. Allowing the use of it indoors would significantly reduce rodent populations and there could be a "holding period" that says livestock cannot be in the barn during the time of the treatment, say a week, 2 days, whichever is appropriate, because we know sulfur is not dangerous to livestock in fact it is added to feed and helps with microbial control.	3/8/2019 7:53 AM

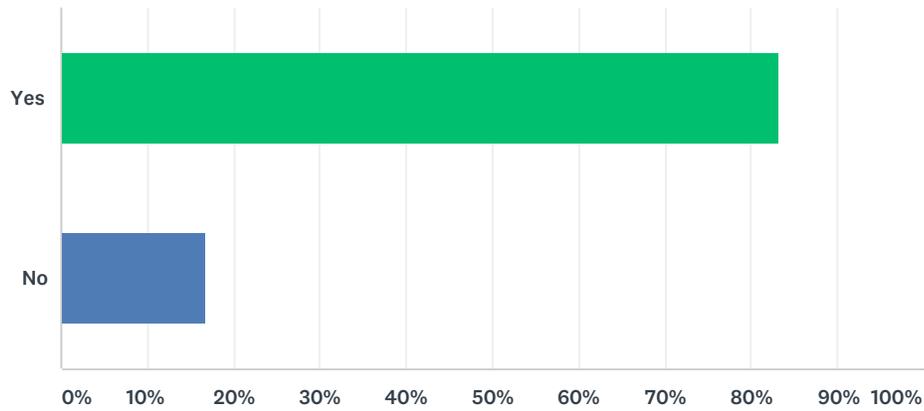
2

n/a to our operation

3/5/2019 12:57 PM

Q6 11.42 Aquatic plants and aquatic plant products
Proposal: Allow sodium benzoate and potassium sorbate as preservatives in aquatic plant products (Table 4.2/4.3).
Background: Seaweed extracts made without synthetic solvents (such as simple water extraction) tend to be less shelf stable. This proposal is to allow two specific synthetic preservatives (sodium benzoate and potassium sorbate) in seaweed extracts. Sodium benzoate is considered safe for human consumption. Potassium sorbate is also considered safe for human consumption and is on PMRA list 4A, and thus currently allowed as a formulant in approved organic crop production aids. Allowing the proposed preservatives will allow manufacturers to produce seaweed extracts without the caustic chemicals that are currently used in most organic-compliant seaweed extracts.
Decision: Revise annotation as described below: [In Table 4.2/4.3] Non-synthetic extracts are permitted. Extraction with synthetic solvents is prohibited except with, May be extracted by using the following substances in order of preference: a) substances in Table 4.2/4.3 Extractants; a) b) potassium hydroxide; b) c) sodium hydroxide; provided the amount of solvent used does not exceed the amount necessary for extraction. The manufacturer shall prove the need to use sodium hydroxide. Sodium benzoate and potassium sorbate may be used as a preservative. Shall not contain synthetic preservatives, such as formaldehyde.
Rationale: The change makes the annotation consistent with the rest of the standards. The proposed synthetic substances are more benign than those currently allowed. Preference should be given to extractants less potent than potassium or sodium hydroxide, even if it means using sodium benzoate or potassium sorbate as preservatives in aquatic plant products. At the same time, there is no will nor need to allow other chemical formulants in these products.
Do you agree with this decision?

Answered: 12 Skipped: 20



ANSWER CHOICES	RESPONSES	
Yes	83.33%	10
No	16.67%	2
TOTAL		12

#	COMMENTS	DATE
1	These substances are synthetic and may cause allergies.	3/5/2019 6:11 PM

Q7 11.42 Calcium Proposal: Modify Calcium annotation in Table 4.2

Background: The revision eliminates confusion caused by the "non-synthetic" term and states examples of sources that can be used. The calcium chloride reference is out of place in Table 4.2 soil amendments and is being moved to Table 4.3 Calcium chloride.

Decision: Revise annotation as described below: The following calcium products are permitted: mined calcium carbonate, (calcitic limestone), calcium magnesium carbonate (dolomitic limestone), calcium silicate, and calcium sulphate (gypsum), all from mined sources limestone, dolomite (not slaked) and other non-synthetic sources, including such as shells from aquatic animals (such as for example, oyster shell flour), aragonite, eggshell meal and lime from sugar processing. Non-synthetic calcium chloride is permitted for treatment of nutrient deficiencies and physiological disorders. Slaked limestone (calcium hydroxide), calcium sulphate produced using sulphuric acid, and calcium products that have been used in controlled atmosphere storage are prohibited. Shall not cause salt buildup in soil through repeated application. See Table 4.2 Calcium sulphate (gypsum).

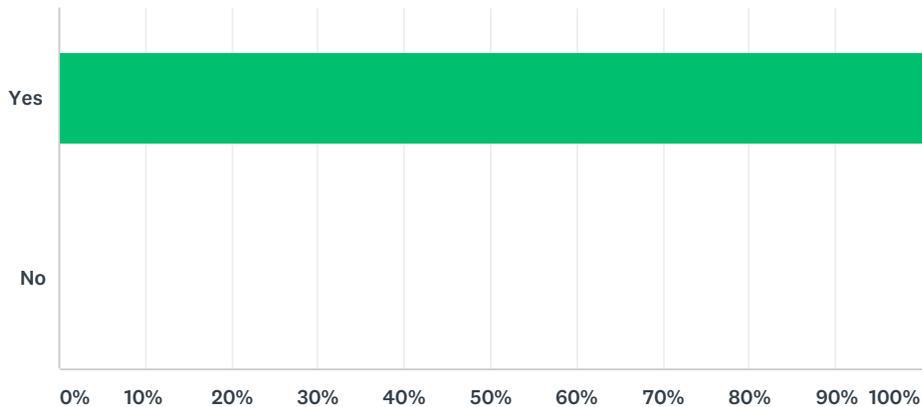
Rationale: The proposal eliminates the agronomic considerations and focuses on allowed and prohibited sources. All mined sources are listed first, followed by other non-synthetic sources of calcium. All prohibited sources are grouped. A separate entry will be made for calcium chloride which is mostly used for physiological disorder (4.3). The following format is used: "Chemical name (common name)."

Final wording – clean version

Calcium carbonate (calcitic limestone), calcium magnesium carbonate (dolomitic limestone), calcium silicate, and calcium sulphate (gypsum), all from mined sources. Other non-synthetic sources, such as shells from aquatic animals (e.g. oyster shell flour), aragonite, eggshell meal and lime from sugar processing. Slaked limestone, calcium sulphate produced using sulphuric acid, and calcium products that have been used in controlled atmosphere storage are prohibited.

Do you agree with this decision?

Answered: 15 Skipped: 17

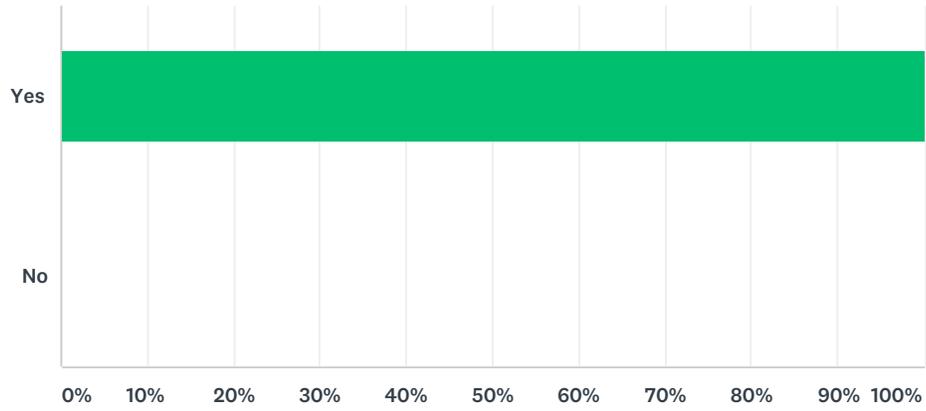


ANSWER CHOICES	RESPONSES	
Yes	100.00%	15
No	0.00%	0
TOTAL		15

#	COMMENTS	DATE
1	Slaked limestone is processed. The way that it is processed has to be studied more thoroughly.	3/5/2019 6:11 PM

Q8 11.42 Magnesium Proposal: In Table 4.2 Magnesium, Background: Addresses confusing elements. For example, magnesium chloride is not a form of magnesium rock but is derived from brine, and none of the sources should be used if there isn't a documented magnesium deficiency. Also, langbeinite was added (see Table 4.2 Potassium listing). Decision: Revise annotation as described below: From non-synthetic substances, without the addition of chemically synthesized substances or chemical treatment. The following sources of magnesium are permitted: a) mined magnesium rock; b) magnesium carbonate, magnesium chloride derived from natural brines and not purified; c) mined calcium magnesium carbonate (dolomitic limestone) (that has not been slaked); d) potassium magnesium sulphate (langbeinite); e) magnesium sulphate ($MgSO_4$), kieserite or synthetic, Epsom salts) may be used when soil and plant deficiencies are documented by visual symptoms or by testing of soil or plant tissue, or when the need for a preventative application is documented. are permitted if used to correct a documented magnesium deficiency Rationale: The new wording clearly identifies the allowed sources and requirements. The use of magnesium sulphate needs to be restricted because it is a synthetic form (no commercial mined sources exist) and because it is highly soluble. Other sources of Mg are less soluble and need no restrictions. Final wording – clean version Magnesium The following sources are permitted: a) mined magnesium rock; b) magnesium chloride derived from seawater and not purified; c) mined calcium magnesium carbonate (dolomitic limestone) that has not been slaked; d) langbeinite (potassium magnesium sulphate); e) magnesium sulphate (kieserite, Epsom salts) is to be used when soil and plant deficiencies are documented by visual symptoms or by testing of soil or plant tissue, or when the need for a preventative application is documented. Do you agree with this decision?

Answered: 16 Skipped: 16

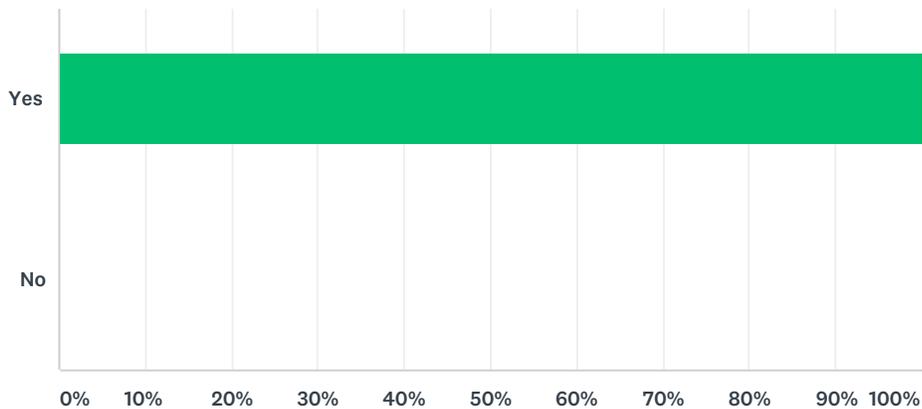


ANSWER CHOICES	RESPONSES	
Yes	100.00%	16
No	0.00%	0
TOTAL		16

#	COMMENTS	DATE
1	Natural fertilizers are in keeping with high microbial populations	3/5/2019 6:11 PM

Q9 11.42 Micronutrients Proposal: Allow all oxide and sulfate forms of micronutrients in Table 4.2, plus all forms that are chelated with allowed substances (see Chelates). To clarify that citrate and tartrate forms are allowed, the listing “chelates” should also be updated to specifically list citric and tartaric acids. Background: The current listing for Micronutrients is not always consistent with the individual listings for each nutrient and is unclear. Decision: Revise annotation as described below: Plant micronutrients are Iron, Manganese, Zinc, Copper, Molybdenum, Boron, Chlorine and Silicon. To Micronutrients fertilizers may only be used when soil and plant deficiencies are documented by visual symptoms or by testing of soil or plant tissue, or when the need for a preventative application is documented. Chelation with substances listed under “Chelates” is permitted allowed. EDTA, DTPA, EDDHA, nitrate and ammonium forms of micronutrients are prohibited. See specific annotations for Boron, Silicon and Chlorine in Table 4.2. Nitrate and ammonium forms of micronutrients are prohibited. See Table 4.2 Boron; Copper; Iron; Manganese; Molybdenum; and Zinc. Rationale: The proposal is aimed at making this annotation clearer. First, it states what is considered a micronutrient. This allows to clearly distinguish them from macronutrients (N, P, K) and secondary nutrients (Ca, Mg and S). In the second sentence, the words “micronutrient fertilizers shall only” were added to clarify that we are dealing with concentrated sources of micronutrients, as opposed to less concentrated sources such as seaweed extracts, rock dust, manure or compost. Finally, most separate entries dealing with micronutrients will simply refer back to “Micronutrients”. Exceptions will be for boron, silicon and chlorine. In the case of boron, it will be to help the users. For silicone and chlorine (entries to be created), it will be to restrict certain usages. Final wording – clean version Plant micronutrients are Iron, Manganese, Zinc, Copper, Molybdenum, Boron, Chlorine and Silicon. Micronutrients fertilizers shall only be used when soil and plant deficiencies are documented by visual symptoms or by testing of soil or plant tissue, or when the need for a preventative application is documented. Chelation with substances listed under “Chelates” is allowed. EDTA, DTPA, EDDHA, nitrate and ammonium forms of micronutrients are prohibited. See specific annotations for Boron, Silicon and Chlorine. Do you agree with this decision?

Answered: 17 Skipped: 15



ANSWER CHOICES	RESPONSES	
Yes	100.00%	17
No	0.00%	0
TOTAL		17

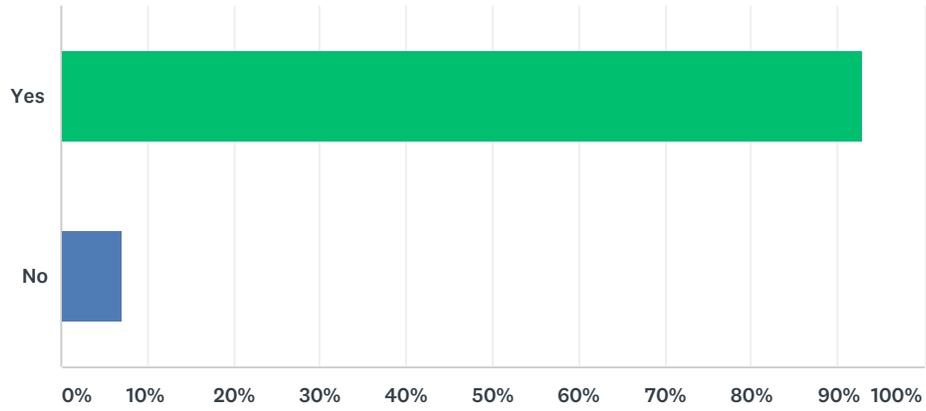
#	COMMENTS	DATE
1	micronutrients must be clearly defined.	3/5/2019 6:11 PM

Q10 10.8.2 & 11.74: Tables of cleaners, disinfectants and sanitizers Proposal: (1) Change 8.2 to focus on non-rinse sanitizers or cleaners in direct contact with food (i.e., listed in Table 7.3) (2) Delete Table 7.4 – Cleaners, disinfectants and sanitizers permitted on organic product contact surfaces for which a removal event is mandatory. Background: Table 7.4 is unnecessary because removal events are mandatory. The table and associated information in 8.2.2 is confusing. Decision: The WG rejected the proposal but decided to modify the text as follows. In 8.2.2, delete the condition "If substances in Table 7.3 are ineffective," and in 8.2.3 add Table 7.3 to the condition (i.e., if substances in Tables 7.3 and 7.4 are ineffective." Rationale: As both 7.3 and 7.4 are lists of permitted substances (7.3 without a removal event and 7.4 substances with a removal event), having to prove that 7.3 substances are ineffective before being able to use a 7.4 listed substance is redundant and adds an unnecessary burden on stakeholders. The ineffective criteria for 7.3 was moved out of 8.2.2 into 8.2.3. Final wording approved – clean version

8.2.2 If substances in Table 7.3 are ineffective, cleaners, disinfectants and/or sanitizers listed in Table 7.4 of CAN/CGSB-32.311 may be used on organic product contact surfaces, provided that documentation demonstrates: a) they are used as annotated; and b) removal event(s) have eliminated the substance(s) from organic product contact surfaces prior to organic production.

8.2.3 If substances in Tables 7.3 & 7.4 are ineffective, other cleaners, disinfectants and/or sanitizers may be used on organic product contact surfaces, provided that documentation demonstrates: a) the efficacy of the alternative substance(s); and b) removal event(s) have eliminated the alternative substance(s) from organic product contact surfaces prior to organic production; and c) that effluent discharge was neutralized to minimize negative impact on the environment. Do you agree with this decision?

Answered: 14 Skipped: 18



ANSWER CHOICES	RESPONSES	
Yes	92.86%	13
No	7.14%	1
TOTAL		14

#	COMMENTS	DATE
1	Define "other" substances?	3/5/2019 6:26 PM

Q11 11.74 Surfactants and detergents & definition of biodegradable

Proposal: (1) Revise the definition of biodegradable as it relates to biodegradable mulches. (2) Update the definition to include target threshold to which carbon will need to be consumed and timelines referencing EcoLogol UL code (Canadian) and ISO 17088.

Background: The current definition of biodegradable (which is used in reference to mulches, detergents and surfactants) is vague. Also, there is confusion over the difference of soaps, detergents and surfactants.

Decision: Definition of biodegradable is not modified. However, the following terms in 7.4 were clarified as follows:

7.4 'Detergents' - Detergents shall be readily, ultimately or inherently biodegradable per the OECD definitions, or are readily eliminated during wastewater treatment such that any potential harm to the environment is minimized. (see Biodegradable definition in clause 3 of CAN/CGSB-32.310).

7.4 'Surfactants' - See Table 7.4 Detergents; Soaps. Surfactants built-in to detergents, or stand-alone, shall be readily, ultimately or inherently biodegradable per the OECD definitions, or are readily eliminated during wastewater treatment such that any potential harm to the environment is minimized.

7.4 'Wetting agents' - Non-synthetic wetting agents, including saponins and microbial wetting agents. See Table 7.4 Detergents; Soaps.

7.4 'Sodium silicate' - See Table 7.4 Detergents

[OECD: Organisation for Economic Co-operation and Development]

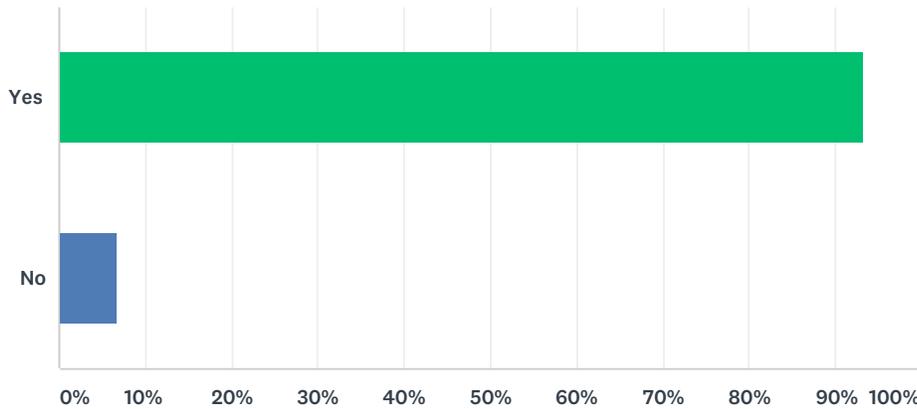
Rationale: The WG agreed that the definition in Clause 3 was not the issue; the references to "Table 7.4 Detergents; Soaps" in the listings for surfactants, sodium silicate and wetting agents annotations created confusion. These substances are commonly 'built' into detergents but it is only the biodegradability of the entire detergent product that needs to be determined – not that of the individual components. Also, referencing the detergent annotation was creating circular logic. Furthermore, soaps are examples of surfactants and, by their nature, biodegradable; therefore, referring to other substances to the soap listing added to the confusion. The annotation for detergents (and surfactants) needed improvement regarding biodegradability. Final wording approved – clean version

7.4 'Detergents' - Detergents shall be readily, ultimately or inherently biodegradable per the OECD definitions, or are readily eliminated during wastewater treatment such that any potential harm to the environment is minimized.

7.4 'Surfactants' – Surfactants built-in to detergents, or stand-alone, shall be readily,

ultimately or inherently biodegradable per the OECD definitions, or are readily eliminated during wastewater treatment such that any potential harm to the environment is minimized. 7.4 'Wetting agents' - Non-synthetic wetting agents, including saponins and microbial wetting agents. 7.4 'Sodium silicate' Do you agree with this decision?

Answered: 15 Skipped: 17

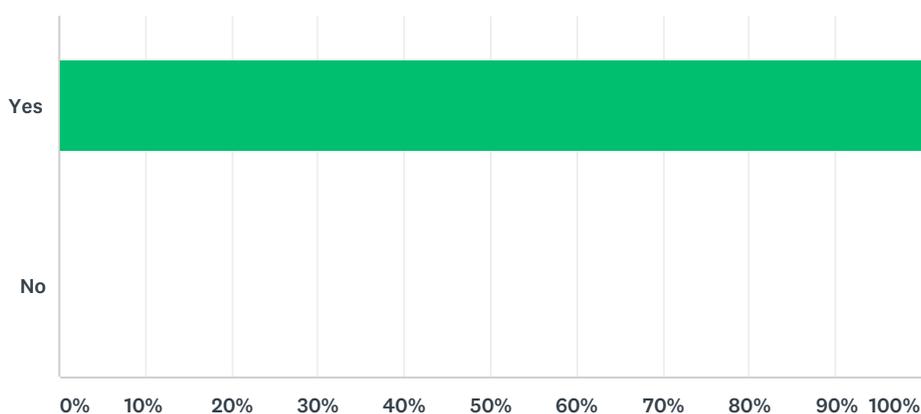


ANSWER CHOICES	RESPONSES
Yes	93.33% 14
No	6.67% 1
TOTAL	15

#	COMMENTS	DATE
1	sodium silicate is very dangerous & health hazardous	3/5/2019 6:26 PM

Q12 11.6.3-extract “Extraction solvents, carriers, precipitation aids” Proposal: Create a separate listing for carriers. Clarify the remaining annotation and address the issue in annotations for colouring agents (6.3) and flavours (6.4). **Background:** (1) “Extraction solvents, carriers, precipitation aids” (ES/C/P) doesn’t work as a group listing as each has a different function. Carriers are added to help with the delivery of ingredients, while extraction solvents and precipitation aids are used in the making of an ingredient or product. Another confusing factor is the current ES/C/P listing only lists examples of extraction solvents. (2) The annotation is too restrictive for current circumstances and not precise. The list does not clearly allow the use of materials commonly used as carriers in flavours and colours, specifically dextrans, which are often used as carriers in powdered natural flavours. Solvents and precipitation aids are unlikely to be listed on specification sheets for gums, agar, carrageenan, and other ingredients because as processing aids, they are not likely to be present in the finished product or require listing in the ingredient statement. This means that additional affidavits will be needed. (3) Table 6.3, 6.4. and 6.5: Must be looking at harmonization with the NOP. The focus should be on specific restrictions on Extraction solvents, carriers and precipitation aids. **Decision:** Accepted with minor modifications (see link) **Do you agree with this decision?**

Answered: 9 Skipped: 23



ANSWER CHOICES	RESPONSES	
Yes	100.00%	9
No	0.00%	0
TOTAL		9

#	COMMENTS	DATE
1	endangered species is of utmost importance for biodiversity and conservation	3/5/2019 6:26 PM

Q13 Do you have any further feedback or comments you wish to make on the organic standards review process?

Answered: 7 Skipped: 25

#	RESPONSES	DATE
1	No, thank you. Keep up the great work.	3/5/2019 6:27 PM
2	As an Organic Poultry Farmer, We are ALWAYS doing everything we can to keep our hens healthy and happy. They will not be fruitful if we cannot do this. Even with current organic standards it is impossible to keep our hens safe from disease and from harming each other. We work with our girls(hens) every day and i feel like our experience and skill with the girls should be taken into much more consideration. The more risk and stress we put on our girls the more likely they cannot stay healthy. I feel very strongly that we should not be putting them in harms way just for the end consumer. this also leads to more likely hood that if they do get sick we would be forced to use some form of medication to keep them alive, where if they are kept in a safe environment we very certainly should never need to see sick hens, which has been the case thus far. We have never use any hormone or medications and want to keep it this way.	3/5/2019 1:12 PM
3	I am not sure if the discussion of hydroponic or aeroponics additions to the standards has been part of this review process but i do not agree that these forms of production should be allowed withing the Canadian Organic Standard.	3/5/2019 11:02 AM
4	Animal welfare is my primary concern. In reading the organic standards I was disheartened by the allowance of so many exceptions. Going forward I hope to see less tolerance for tethering and/or separating social animals, less physical alterations, and better pain relief for animals undergoing physical alterations. I understand the allowance of some outdated practices in older barns but I would like to see a set year where they will no longer be tolerated (to avoid farmers "renovating" old barns and not updating their practices). One of the biggest contradictions of organic livestock (in my opinion) is the slaughter. Such care is taken to ensure animals lead healthy, fulfilling lives and then they are packed and shipped to a terrible end. In the future I hope there can be a way around this. A federally regulated "travelling" slaughterhouse would eliminate the final trip and provide a much more humane way to slaughter animals on-site.	3/5/2019 10:15 AM
5	Are there any changes coming to parallel production? Parallel production rules make it almost impossible to bring new land into production	3/4/2019 9:39 PM
6	We are egg producers and I find it extremely frustrating when we loss marks in HACCP or EQA audits because we follow the organic standard. All organic standard recommendations should also be able to obtain 100% in an HACCP or EQA audits. Food safety, and animal welfare should all ways come first.	3/4/2019 7:33 PM
7	The process of trying to reach consensus within a group of very differing interests, in a short time, not getting physically together, is expecting too much. I hope the TC can keep an eye on the vision and minimize the conflict between stakeholders. some standards need to evolve with time.	3/3/2019 8:14 PM