

Final Questions and Answers – Complying with 2020 Canadian Organic Standards

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6 Livestock

6.1 General

Outdoor pastures and outdoor areas

What is the difference between outdoor pastures and outdoor areas? (458.1) (17 February 2020)

“Outdoor pastures” provide vegetation and nutrition to animals and are required during the grazing season (see 32.310 6.1.3 a) for the purpose of feeding livestock. “Outdoor areas” may or may not contain vegetation. Outdoor areas are used to accommodate livestock health and allow for natural behaviours throughout the year when the animals are not on pasture (see 32.310, 6.7.1 a)).

Poultry peepers/blinders

Are poultry peepers/blinders, with or without attachment pins allowed to prevent cannibalism? (350)

Poultry peepers / blinders are permitted only without pins and only when all other management methods have been tried and have failed. As required per 6.1.6 documentation must be maintained to demonstrate strategies are in place for the reduction of peeper/blinder use.

Calculation of grazed forage

Under 32.310 Clause 6.1.3 a) 1), is the minimum 30% grazed forage of the total forage intake calculated based of an average consumption of grazed forage during the entire grazing period or on the basis of daily consumption of grazed forage? (576) 22 March 2023

The percentage of grazed forage is calculated on a daily basis during the grazing season, and must be a minimum of 30% of the total daily forage intake. Grazed forage intake is expected to exceed 30% during periods of high forage growth (6.1.3 a) 2)).

6.2 Origin of livestock

Breeding stock – Alternating organic and non-organic management

Please clarify the meaning of 6.2.4. Does it allow that animals could be given conventional feed repeatedly until the last trimester of pregnancy, and still give birth to offspring compliant with the Standard (i.e., have offspring that are considered organic)? (87)

No, this practice would not be permitted. 6.2.4 applies only to the transition of whole herds or individual animals used as new breeding stock (whether from within the operation or from another operation). For animals already under organic management, the feeding of non-organic feed at any time during gestation would render the mother and offspring non-compliant (i.e., non-organic). Beef cattle and dairy breeding herds cannot be rotated in and out of organic production. Refer to 6.2.5.

Conventional heifers converted to organic operation

Is it permitted for an organic operation to purchase conventional heifers to convert to organic over the 12-month transition period, and then sell as an organic animal? (555.1)

No. Per 6.2.3.3, the exception to 6.2.3.1 permits for the conversion of conventional herds and individual animals from outside the operation to organic breeding stock for the operation. Per 6.2.4 b), if transitioned breeding stock is transferred outside the operation, they shall be considered non-organic.

Non-organic animals in organic operations

Can non-organic animals that have been incorporated into the organic system become acceptable a) for breeding? b) for slaughter? (48) (529) 6 December 2021

a) Yes. Breeding animals transferred from conventional to organic management may be used as breeding stock in organic production according to the terms specified in the standard (see 6.2.2, 6.2.3, 6.2.3.2, and 6.2.4), but cannot be cloned animals or be the descendants of cloned animals (1.4) and must be managed organically in accordance with the standard including being fed organic feed (6.7.5).

b) No. Meat from a non-organic animal will never be considered organic even if the animal has been integrated into the organic system and permitted to be used as organic breeding stock.

Definition of dairy animal

What is the definition of a “dairy animal” under the standard? (24.2)

A dairy animal is any animal in a herd that produces milk for human consumption.

Sexed semen

Can sexed semen be used in organic production? (40)

Yes, the use of sexed semen does not violate the standard (refer to 6.2.2 a).

Embryo transfer

Is embryo transfer allowed? (Embryo transfer is the collection of eggs from one female and subsequent implantation of the eggs in another animal to complete gestation)? (240)

No. In 6.2.2 b), the standard prohibits embryo transfer techniques in organic livestock.

Can an animal which is the product of an embryo transfer be brought into organic production? (214)

Yes, however the animal cannot be sold for slaughter but may be used for breeding or dairy production, subject to the transition requirements of 6.2.4 and 6.3.

Fertilized eggs

Can birds hatched from eggs treated with antibiotics be certified organic? (271)

No. 6.2.3.2 b) states "no medication other than vaccines shall be used to treat fertilized eggs or day-old poultry".

Health care for poultry

Does Clause 6.2.3.2 mean that day-old birds and/or fertilized eggs can ONLY be given vaccines (i.e., no other medication), while birds that are two day old or older can be given vaccines and/or other medications, if required? (339)

Yes, fertilized eggs and one day-old birds may only be given vaccines, no other medications.

Vaccines and certain other medications can be used on older birds as specified in 6.2, 6.6.10, 6.6.11 and 6.6.12 (32.310).

Raising pullets for layer organic operations

May non-organic operations raise pullets for organic layer operations? (428) - 19 Apr 2019

No. Pullets must be produced by certified organic poultry producers. It is not sufficient for an organic farm to subcontract pullet production to a non-organic operation even if the pullets are raised under conditions that meet the requirements of the standard in all other ways from the second day of life and the sub-contracted operation is inspected annually by the certifier of the organic layer operation.

Transitioning of dairy calves

Can a dairy calf which is part of an organic operation be fed conventional milk, then transitioned back to organic status? (See 6.2.3.3) (259)

No. 6.2.3.2 (6.2.3.3) applies only to the transition of herds and to individual animals used as breeding stock.

Breeding sows – Synchronized estrus

If a producer purchases non-organic non-gestating sows for breeding, brings them into a new operation site, uses hormones to trigger and synchronize estrus, and keeps these females under continuous organic management from the beginning of the last third of their gestation period, would the piglets born from these sows on this site be considered "organic"? (195)

No. The piglets would not be considered organic. Although the standard allows for the introduction of non-organic breeding stock into an organic operation, it requires that from the moment of introduction, the operator complies with all the rules for organic livestock husbandry. The use of hormones to trigger estrus is specifically prohibited in 6.2.2 c), therefore the use of this technique would be a serious non-compliance.

Cloning

Is the use of cloned animals allowed? (148)

No. All of the conditions listed in 1.4 are forbidden. The origin or lineage of animals needs to be known to ensure that no cloned animals are used nor the descendants of cloned animals (1.4 d).

6.3 Transition of livestock production units to organic production

Pasture – Poultry

Does 6.3.3 apply to pasture used for poultry? In other words, can the raising of pullets be timed to coincide with the transition of land rather than waiting until the pasture is CO to start a new flock? In this case, if pullets hatched when the range was only partway through the transition, when these birds become layers, are they allowed to forage on the land for the last twelve months of transition? (99)

No. 6.3.3 applies to pasture used by a herd or a flock of sheep and not to pasture used for poultry. Pasture for poultry is considered an organic crop (5.1.1) and must be free of prohibited substances for 36-months prior to use (6.13.1 b). In other words, land can be in transition still when pullets are started, but the land must have completed the necessary transition period and been granted organic status by the time birds are ready to go out to pasture.

Transition - Outdoor runs

Does the requirement for a 36-month transition of land for crop production apply to the outdoor runs required to permit poultry access to the outdoors? (225)

Yes. Poultry eat when they go outside, including ingesting small amounts of soil. Since organic feed is required (6.4), all outdoor runs/pasture must have completed the necessary 36-month transition period and been granted organic status before being accessed by organic poultry.

Offspring born under transition

Can livestock offspring be considered organic for meat, if they were born on a production unit in transition, prior to the end of the final 12 months of transition, as long as the dam has been under organic management for the last third of gestation (6.2.3.3 b), including eating pasture and feed produced within the operation, which is considered organic when consumed by the transitioning herd or flock on the same production unit in T3 , as per 6.3.3? (409) 14 June, 2021

No. With reference to Clauses 6.2.3.3 and 6.3.3, livestock offspring born on land in transition would not be considered organic for meat. 6.3.3 allows for the final third of gestation to occur during the final months of transition. Offspring can be considered organic for meat if they were born on or after the day that the land has completed the necessary transition period and been granted organic status. Furthermore, the offspring has to be fed organic milk (6.4.3 d) & f); the milk whether from a dairy cow or a beef cow or ewe can only be considered organic once the land has organic status.

Transitional feed

When a beef cow herd is being transitioned to organic, does 6.3.3 give permission to use transitional feed that is produced on the farm to feed gestating animals whose offspring will be eligible for sale as organic? (179)

Yes. However the offspring will only be considered organic if they are born after the 36-month transition period for the land has ended.

Can the use of feed from transitional land allowed in 6.3.3 be allowed after the transition of the livestock is complete? (257)

No. Feed produced on land in the final year of transition (commonly referred to as T-3 feed) is considered organic within the farm unit while the herd or flock of sheep is in transition. The T-3 feed produced and harvested before herd transition is complete may continue to be used as organic within the farm after herd transition is complete. T-3 feed harvested after herd transition is complete has no organic status even within the farm.

Non-organic feed when transitioning entire dairy herds

Is GE feed permitted in the 20% non-organic feed allowance for first time transitioning entire dairy herds (6.3.1 a)? (407)

Yes. GE feed may be used in the 20% non-organic feed allowance when initially transitioning an entire dairy herd, and this information should be documented in the operation's organic plan.

Offspring of breeding stock treated with antibiotics

Is it permitted to give antibiotics to breeding stock (excluding poultry) such as sows, to treat a medical problem without affecting the organic status of the offspring? (565) 19 December 2022

Yes. If the breeding stock is treated with antibiotics before the last third of gestation, the organic status of the offspring shall not be impacted per 6.2.3.3 (b). If given antibiotics during the last third of gestation, the offspring shall lose organic status. Treatment cannot be withheld from any breeding stock with a medical problem to preserve the organic status of the offspring (6.6.6).

Parallel production in livestock production

Is parallel production in livestock prohibited? If not, under what circumstances might it be allowed? (283)

Within the same production unit (3.62), parallel livestock production is prohibited. See the parallel production definition (Clause 3.52) which includes livestock. See also 6.7.5, which stipulates all animals in a production unit must be managed organically whether or not all the animals have organic status and that the non-organic animals must be clearly identified.

An exception exists when there is more than one production unit in an operation and complete separation is ensured. This would require separate records, barns, separate feed and input storage areas, separate runs, and separate pasture, etc.

6.4 Livestock feed

Testing of water source for livestock

When initially testing the main water source for livestock, such as beef cattle, what exactly are the potential livestock toxins to be included in the water test prescribed in 6.4.5 of 32.310? (517) 6 December, 2021

As of COS 2020 revision, testing of water shall be to guidelines outlined by the relevant Code of Practice and industry associations quality assurance programs 32.310 (2020) 6.4.5 in this case "[Code of Practice for the Care and Handling of Beef Cattle](#)", Section 2.2.

Buffers – Livestock feed

Can livestock feed harvested from the buffer zones around organic cropland be fed to livestock in transition to organic? (149)

No. As per 5.2.2 c), feed harvested from the buffer zones is non-organic. Feeding buffer zone feed would be the same as feeding conventional feed and is not permitted.

Treatment of stored feed

Can stored livestock feed (6.4.4) be treated with substances listed in PSL Table 4.2 (Column 2) or Table 5.2? (330)

Substances listed in Table 5.2 can be applied to, or combined with, stored livestock feed (6.4.4). Substances listed in Tables 8.2 and 8.3 may be used if their substance listing annotation does not prohibit direct contact with organic products. Substances in Table 4.2 (Column 2) can only be used during crop production - not post-harvest.

Feed storage – Commingling

An organic grain producer is using all his organic livestock feed to feed to non-organic livestock. During storage, the organic feed may have been mixed or commingled with non-organic feed purchased from off the farm. Is there any risk that this would compromise the producer's ability to certify future crops from the same fields? (97.1)

No. At the point in time where the separation between organic and non-organic feed is compromised, the feed in question loses its organic status. This has no effect on the organic integrity of the field and the capability to produce organic feed in subsequent years.

Emergency feed

Can the allowance of non-organic feed in catastrophic circumstances (6.4.7 a)) be expanded to include commercial or logistical challenges outside the operator's control? (e.g., a shipment is held up by border inspection) (156)

No. The examples of farm-scale catastrophic events cited in 6.4.7 a) (fire, flood, extreme climatic conditions) do not extend to commercial or logistical problems.

Is the operator required to obtain pre-approval for use of non-organic feed during a catastrophic event? (89.1)

No, the operator does not need preapproval. However, the operator should notify their CB and explain the situation as soon as possible. It is the responsibility of the operator to adequately and successfully demonstrate to the CB that 6.4.7 a) is applicable and the operator has met the instructions laid out in 6.4.7 a) (See note to 6.4.7.)

Can you give some guidelines around the use of the 10-day maximum in 6.4.7 a)? (89.2)

Ten consecutive days from any catastrophic event is the maximum permitted to provide a *** diet made up completely of* non-organic feed given the intent of 6.4.7 a) which was to allow the operator time to source organic feed.

In 2020, however, a change was made to allow “up to 30% non-organic feed for up to 30 days.” This helps farmers who can find organic sources for some, but not all, of the necessary feedstuffs within ten days of the catastrophic event.

6.4.7 b) allows for the feeding of non-organic forage to breeding herds in the case of a regional forage shortage. If a producer anticipates running out of organic forage: (157.1)

a) Can they prepare by sourcing the non-organic feed before they run out?

Yes. The operator may source the non-organic forage ahead of time, but before feeding, the regional feed shortage must be confirmed by the CB. Also all other conditions of 6.4.7 b) must be addressed including: maintenance of detailed records to track feed and animals fed, to confirm non-GE status of the feed. Animal must be segregated and effort should be taken to use transition feed or at least forage grown without prohibited substances.

b) Which animals can be fed the non-organic feed and what are the implications for the status of meat and milk?

With the agreement of the CB, the non-organic forage may be fed to:

- 1) non-lactating dairy animals - without affecting their status in future lactation.
- 2) beef cows or ewes that are not nursing offspring, during the first 2 trimesters, without affecting the status of future offspring in utero.

6.4.7 b) allows for the feeding of non-organic forage to breeding herds in the case of a regional forage shortage. Which animals can be fed the non-organic feed and what are the implications for the status of meat and milk? (157.2)

As per 6.4.7 b) and c), in the case of a forage shortage, the operator shall first feed non-organic forage to breeding stock but only if the CB agrees and if the operator has a plan to avoid future shortages. The breeding stock will then lose their organic status and must be re-transitioned. Normally switching back and forth from organic to non-organic production is not permitted. However, this exception allows for breeding stock under these specific circumstances to be fed non-organic feed and then re-transitioned. If non-organic forage is fed to animals during the last trimester of gestation, the offspring will not be organic. Similarly, if lactating females are fed non-organic forage, the nursing young will lose their organic status.

If organic forage is in such short supply that the shortage continues even after the breeding stock is fed with non-organic forage, the remaining animals in the ruminant herd can be fed non-organic forage but (i) it can make up no more than 25% of their forage intake, (ii) the operator must have a plan to avoid future shortages, and (iii) all other requirements of 6.4.7 c) are met (including the order

of preference of sources). The animals fed with 25% non-organic forage will then remain organic (milk and meat).

Note, the 25% non-organic forage allowance differs from the limit of 20% non-organic feed permitted under specific transition requirements for dairy cows in 6.3.1.

Use of non-organic feed

Under what circumstances can a dairy operation use non-organic feed? (260)

1. Catastrophic event: Following a catastrophic event that directly affects the operation, a dairy herd may be provided non-organic feed for a maximum of ten consecutive days (or up to 30% non-organic feed for up to 30 days), as specified in 6.4.7 a. In this case, there is no interruption of the production of organic milk and all animals retain organic status for sale as meat.
2. During a regional organic shortage: refer to QA 157 above.
3. Dairy herds in transition to organic production may be provided non-organic feed, in accordance with the rules in 6.3.1 a and b, which allow cows to be fed for 9 months with a minimum of 80% organic feed ration, followed by 3 months of 100% organic feed. A farm that is transitioning its whole dairy herd to organic production may use T3 feed grown on that same farm (i.e., feed from fields in the last year of transition) (32.310-6.3.3).

Note, the 20% non-organic feed refers to the specific transition requirements of 80% organic feed for dairy cows in 6.3.1; this differs from the limit of 25% non-organic forage as permitted under specific circumstances in forage shortages as outlined in 6.4.7 c.

Bypass fat

If the conditions outlined in 6.4.7 which allow for temporary use of non-organic feed are met, would this allowance also extend to the use of non-organic bypass fat? (95)

No, this is not permitted because the feed energy could be sufficiently provided by non-organic grains, silage or haylage after the catastrophic event. The allowance to use non-organic feeds is intended to allow the operator to maintain the health of animals following a farm catastrophe.

Milk for replacement kids

Can non-organic reconstituted milk be given to the replacement kids in an organic goat dairy herd if the 12-month transition for the kids is respected? (394)

No. The exception for 6.2.3 only applies to herds and animals in transition to organic production. 6.4.3 d) provides specific requirements for lambs and kids which only permit organic milk (fresh whole or reconstituted). 6.4.7 only permits non-organic feed in the case of a catastrophic event or a regional shortage. 6.4.7 b) also specifies that 6.2.3 applies to offspring.

Feed – Transitional

When a beef cow herd is being transitioned to organic, does 6.3.3 give permission to use transitional feed that is produced on the farm to feed gestating animals whose offspring will be eligible for sale as organic? (179)

Yes. However the offspring will only be considered organic if they are born after the 36-month transition period for the land has ended.

Silage inoculant additives – Colour

If a silage inoculant contains synthetic colouring agents, does that mean that it is prohibited for use in organic livestock feed production? (94)

Yes. Only colouring agents from biological sources, such as dehydrated beets, can be used in livestock feed or forage as described in Table 5.2 of the PSL.

Summer ration – Long-fibre forage

When calculating compliance with 6.4.3 i) & j) of a summer ration for ruminants, can pasture be considered “long-fibre forage”? (194)

No. 6.4.3 i) & j) address feed rations when animals are not on pasture. During the grazing season 6.1.3 a) applies, and requires that sexually mature ruminants obtain a minimum of 30% of their total forage intake from grazing calculated on dry matter basis.

40% grain ration in early lactation

6.4.3 i allows for increased grain feeding during uncommonly cold conditions or when forage quality is compromised to ensure that nutritional requirements of ruminants are met. Can dairy cows be fed more than 40% grain in early lactation when their energy requirements are highest? (295)

No, dairy cows cannot be fed more than 40% grain to meet their nutritional needs in early lactation. The allowance for feeding more grain in 6.4.3 i) is only for exceptional circumstances beyond the control of the operator.

Percentage of organic ingredients for feed

May livestock be fed organic food waste containing 95% or more organic ingredients? What about food waste stemming from products only containing 70-95% organic ingredients? (372) - 19 Apr 2019

In 2020, “Food waste” was added to Table 5.2 and the annotation specifies that it is allowed to use “organic food for human consumption or by-products from organic food production”. This means that livestock may be fed organic food waste ($\geq 95\%$ organic content) certified in accordance with 32.310 - subclause 9.2.1. Food products containing 70-95% organic ingredients and compliant with 32.310 - subclause 9.2.2 can only be fed to livestock according to the derogation in 6.4.7.

Vegetable matter

Regarding the 'vegetable matter' element in the requirements for poultry and pork (6.4.3 I) (340) - 1 November 2021

a) is organic vegetable matter required?

Yes. Organic vegetable matter is required.

b) would non-cereal grains (soybean, flax, corn) count as vegetable matter?

No. Vegetable matter is referring to fruit (apples, pears, etc.), vegetables (lettuce, potatoes, squash, etc.) and the associated crop waste and forage (straw, hay).

c) would straw and seed cleanings count?

Yes - for straw. No - for grain-based seed cleanings.

d) would a grassed access area count?

Yes. Organic pasture would qualify as vegetable matter.

e) would alfalfa meal or pellets count?

Yes. Alfalfa in any format satisfies the current requirements.

f) would pea hulls count?

Yes.

Note - The vegetable matter fraction can be supplemented to the feed ration or be included in the feed ration.

6.5 Transport and handling

References for animal transportation

Clause 6.5 refers to the Code of Practice for Care and Handling of Farm Animals: Transportation. Also, the note in 6.5 refers to the Health of Animals Regulations under the Health of Animal Act (CFIA). If these two sets of rules contradict one another, which one is to be referred to in evaluating compliance? (315.1)

These two references are not in contradiction. Table 4 of the Code of Practice for Care and Handling cites the Health of Animal Regulations. This table shows the maximum times for travel. When these maximums are reached, it requires that the animals be unloaded and given feed, water and 5 hours of rest time.

I have a choice between two slaughterhouses - one is 2 hours away and another 6 hours. Am I at liberty to use the facility 6 hours away? (315.2)

No. 6.5.5 is explicit - "The duration of transportation shall be as short as possible." The recommendations from the *Code of Practice for Care and Handling of Farm Animals: Transportation* become applicable when the closest facility is more than 5 hours away.

Feed – livestock transportation

Is organic feed required during transport and handling of livestock when the duration of transit exceeds 5 hours (6.5.5)? (512) 24 March 2021

Yes. The reference to Code of Practice for the Care and Handling of Farm Animals: Transportation relates to the humane treatment of the livestock and does not supersede 6.4.1 indicating feed ration shall be organic. Specific circumstances around a catastrophic event (6.4.7) may be invoked as determined by the operator's Certification Body.

6.6 Livestock health care

Hormone treatments

Is the use of therapeutic hormonal treatment, for example prostaglandins to treat metritis, allowed in dairy animals? If so, what are the restrictions and withdrawal times? (78.1)

Therapeutic use of hormones such as prostaglandin which is not listed on the PSL is permitted when treatments listed in the PSL are unlikely to be effective, and preventive measures have failed. A 14-day withdrawal period must be observed. If the prostaglandin is used in such a manner, as per 6.6.3, the animal is not eligible for use as organic meat, but this event is not counted as one of the dairy animal "treatments" referred to in 6.6.10 c) or 6.6.10 e, or 6.6.10 f). That "two-treatment" restriction only applies to treatments of antibiotics and parasiticides (as clarified in the 2020 COS).

For all treatments not listed on the PSL, a minimum withdrawal period of 14 days must be observed - see 6.6.10 d).

Can oxytocin be used to treat postpartum complications? If so what are the withdrawal rules? (78.2)

Yes. 6.6.3 specifies that hormones are acceptable when the use is therapeutic, not preventive. For oxytocin, the animal does not lose status as organic meat. The withdrawal time is double what is stated on the label or 14 days, whichever is longer. See PSL Table 5.3 Oxytocin and 6.6.10 d) - 32.310.

Medical treatments – Dairy animals

Do two separate incidents of treatment with antibiotics and parasiticides administered in combination count as one treatment, two treatments, or four? (135)

6.6.10 e 5) and 6.6.11 h) mean that the maximum allowable is a total of two treatments per year including each incident of a combined treatment. For example, when a combination of two drugs is supplied at the same time, it counts as two treatments. Therefore two separate incidents of a combination dose would count as a total of four treatments.

However, 6.6.10 e) states that an animal treated for the same disease for three consecutive years must be removed from the herd (within 9 months of the last treatment). So, if an antibiotic was used one year and parasiticides in two subsequent years, the animal could stay within the herd, but not if, for example, a dairy cow received antibiotics for mastitis three years in a row.

In the case of antibiotic use in dairy cows, if the operator provides test results to show that there is no residue in the milk, can the compulsory 30 day withdrawal period be shortened? (125)

No. 6.6.10 f) states that the minimum withdrawal period is 30 days after the use of any antibiotics, even topical applications in milking cows. No exceptions are specified.

However, as specified in 6.4.3 e, organic calves can be given the milk after a withholding period of twice the label requirement or 14 days, whichever is longer.

Raising requirements for organic calves

Due to disease, such as coccidiosis, or other animal health or welfare issues, can calves born on an organic dairy farm be raised under conventional conditions (e.g., using conventional milk replacer and/or medicated starter) and then transitioned to organic to join the milking herd? (575) 19 December 2022

No. Livestock used for organic livestock products must be managed organically throughout their lifetime (6.2.3.1). According to 6.7.5, "All livestock in a production unit shall be managed organically". Clauses 6.4.3b, 6.6.2, 6.6.4, 6.6.5, 6.6.10, 6.6.11 detail standards for disease management in organic dairy operations, including care of calves and the use of veterinary substances. As per 6.4.3 c) and 6.6.10 f), the use of treatments not listed in 32.311 Table 5.3, including medicated feed, to prevent or control the spread of contagious disease would require written instructions from a veterinarian, including an action plan for prevention and eradication. Treatment cannot be withheld to preserve the organic status of an animal (6.6.6).

Medical treatments (parasiticides) – Slaughter animals

Please clarify the meaning of the standard regarding the use of parasiticides and the loss of organic status or withdrawal periods for meat and milk. (78.2, 24.1)

Parasiticides not listed in the PSL may be used on slaughter animals only if:

- preventative measures have failed (6.6.11);
- fecal or tissue samples confirm the correct diagnosis (6.6.11 a);
- the operator provides a written action plan, with a timeline, describing how they will amend their parasite control plan to avoid similar situations in the future (6.6.11 b);
- the group of animals or entire production unit has not been treated two years in a row for the same problem (6.6.11 c),
- the operator has obtained written instructions from a veterinarian that specify the product and method of parasite control and the operator has developed a plan to avoid the development of parasite resistance to the parasiticides (6.6.11 d);
- the required withdrawal times is twice the label requirement or 14 days whichever is longer (6.6.11 d);
- there can only be one treatment for slaughter animals under a year old and a maximum of two treatments in the life of the animal (6.6.11 g);
- for dairy animals, no more than a total of two treatments a year of antibiotics and parasiticides in any combination are permitted (6.6.11 h). (refer to QA 35 for further insight on treatment counting. However, dairy cull animals that receive more than two treatments of parasiticides in their lifespan 2020 or any antibiotics in their lifespan cannot be considered organic in terms of meat.

Note that gestating animals may be given parasiticides during gestation (6.6.11 f).

Parasiticide treatment after 12 months

How many parasiticide treatments may be given to meat animals older than 12 months? (406) - 19 Apr 2019

A meat animal can receive one parasiticide treatment within its first year. A total of two parasiticide treatments are permitted within a meat animal's lifespan (see 32.310 6.6.11 d) (CLAUSE 6.6.11 g).

Veterinary treatment – Withdrawal period

In the case of using a treatment not listed in 32.311, where no withdrawal time is indicated on the label, must organic operators still observe a withdrawal? (78.4)

Clause 6.6.11 d) states that when veterinary drugs not listed in CAN/CGSB-32.311 are used, a withdrawal period of 14 days or twice the label withdrawal shall be observed. If there is no withdrawal time listed on the label of a pharmaceutical veterinary drug, the 14 day withdrawal period must still be observed. See QA 449.

Off-label veterinarian prescription

What is the withdrawal period of a livestock health care product if prescribed by a veterinarian for a condition not indicated on the label or prescribed 'off-label'? (520) 6 December, 2021

That will depend. If the substance in the health care product is not listed in Table 5.3, the prescription becomes the de facto label and the withholding period specified on the prescription is therefore

doubled or extended to 14 days, whichever is longer (6.6.10 d). If the substance is listed in Table 5.3, such as anti-inflammatories, there is no withholding period unless specified in the annotation or the veterinarian prescription.

Spray bandage

Is a spray bandage (which is sprayed on wounds, replacing traditional bandages) allowed? (292)

A spray bandage, containing ingredients not listed in 32.311, would fall into the category of "prescribed veterinary drugs" (6.6.10 c). It could be used if the products permitted by the Standard "are ineffective in combatting illness or injury". The withdrawal period specified in 6.6.10 d) applies, as well as the special provision for poultry and breeding stock in 6.6.12.

Physical alterations – Anti-inflammatories

Are steroid anti-inflammatory drugs allowed during physical alterations? (78.3)

No – 6.6.4 c 2), by specifically noting “non-steroid” are permitted, implies that steroid anti-inflammatory drugs are prohibited for minimizing pain and stress during physical alteration.

Physical alterations – Beak trimming

What justification must be given in order for beak trimming of day-old chicks to be permitted (i.e., compliant with the Standard)? (275)

Since beak trimming is only effective if done before problematic behaviour starts, the operator can point to previous experience or to the shared experience of operators to reasonably predict that problems would emerge to justify day-old beak trimming. The procedure for trimming must be minimal and conducted in a way that minimizes pain, stress and suffering (6.6.4 c1, c2, c4). The operator must document the other measures taken to reduce or eliminate behavioural problems in flocks.

Can beak trimming be carried out as a preventive measure or is the allowance for this practice under 6.6.4 c) 4) only relevant after a problem arises? (101)

Yes, the practice of beak trimming is acceptable as a preventive measure to ensure the welfare of poultry if only a very small amount of the beak, the sharp hook, is trimmed or treated (6.6.4 b) 1). In order to remain compliant with the standard, the operator must also document the other measures taken to prevent or control problematic behaviours. Since the standard implies that this is an extraordinary event, it should not become the norm. Operators who employ this technique must review annually with the CB their plans to eliminate the need for beak trimming or treatment.

Anesthetics containing hormones

If an animal is administered a local anesthetic that contains a hormone, is it considered as a ‘hormonal treatment’ per 6.6.3 of CLAUSE? (521) 6 December 2021

No. If a local anesthetic contains a non-steroidal hormone (i.e. epinephrine) as an ingredient, the use of this local anesthetic is not considered a hormonal treatment. Meat from the treated animal would not lose organic status as a result of this use.

Physical alterations – Dehorning paste

Is de-horning paste allowed? (29)

Yes, all types of dehorning paste are acceptable under 6.6.4 a 4), but operators must abide by applicable industry Codes of Practices and restrictions outlined in 6.6.4 c).

Immunological castration - Pigs

Can immunological castration of pigs during the finishing phase be used to replace castration of young pigs? (218)

No. The substances used would have to be listed on 5.3 of the Permitted Substances Lists in order to be acceptable.

Livestock, vaccines – GE contamination

What would happen if organic livestock are unintentionally contaminated with a GM rabies vaccine? (52)

The note after 8.3.5 addresses the issue of emergency pest or disease treatment. The evaluation of compliance or non-compliance following this theoretical scenario would depend on: the degree of contamination; the precise nature of the contaminant; and the ability of the operator to identify and exclude affected animals. How and why the contamination occurred is not relevant to evaluating compliance. Operators need to inform their certification body when such incidences occur.

GE vaccines for poultry

Can GE vaccines or vaccines grown on GE substrate be used in poultry if the conditions for the use of veterinary drugs (6.6.10) are met? (298)

Vaccines are categorized in the standard as 'veterinary biologics' not 'veterinary drugs'. As described in Table 5.3, GE vaccines or vaccines grown on GE substrate can be used if non-GE vaccines are not commercially available. Genetic engineering (GE) is defined in Clause 3.31 of 32.310. However, day-old birds and fertilized eggs can be given any type of vaccine (6.2.3.1 b).

GE vaccines for pigs

To prevent livestock losses to deadly diseases (e.g., CircoVirus in pigs), can a genetically engineered vaccine be used, if we consider that it is 'necessary to prevent or treat livestock

health problems when other treatments permitted by this standard are not available", as stated in 32.310, 10.3 Criteria for Examination of Particular Substances, Table 9, under Livestock health care? (436) - 19 Apr 2019

A GE vaccine can be used but only if non-GE vaccines are not commercially available or are not efficient (i.e., all vaccines for that particular disease in the marketplace are the product of genetic engineering).

Vaccines with preservatives

Are livestock vaccines containing bacteriostatic or fungistatic preservatives permitted? (402) 1 November 2021

Yes. These ingredients are considered formulants as listed in Table 5.3 PSL.

6.7 Livestock living conditions

Poultry housing – Sunlight

Does housing for broilers require windows for sunlight to enter while the birds are confined? (82)

Yes. As per 6.7.1 a) and 6.13.12, natural light inside the barn is required but windows are not the only mean to satisfy the standard. For example, light permeable fabric is another option.

Level of natural light in poultry barns

Can we have some guidance on how to evaluate the level of natural light in poultry barns? 6.13.12 requires the ability to read a newspaper but this reference is subjective and variable depending on the person's eyesight and the level of light outside. (316)

The enforceable norm for windows in poultry barns is stated in 6.13.12: "The total window area shall be no less than 1% of the total ground-floor area..." If this condition is met, there is no need to evaluate light levels. However, if a poultry barn does not meet that minimum, 6.13.12 also offers alternative means of demonstrating effective natural lighting: "unless it can be demonstrated that natural light levels are sufficient to read a document such as a newspaper anywhere in the barn." In other words, a newspaper that can be read outdoors using natural light must also be legible inside the barn.

Test for detecting ammonia levels

Can an operator use the “smell test” if they feel confident that they can detect high ammonia levels, or is testing required to verify that livestock housing ammonia levels do not exceed 25 ppm (32.310 - 6.7.1 f)? (592) October 13, 2023

No. A “smell test” is not acceptable. Use of reliable testing tools is required (e.g., meter, test strips).

Bedding for poultry

Is an operator obligated to provide bedding for poultry (as in 6.7.1g), or is it enough to allow litter to “build up” from poultry waste without adding anything? (426) - 19 Apr 2019

As stated in 6.7.1 g), bedding must be provided from the onset of a cycle to "establish and maintain animal living conditions that accommodate the health and natural behaviour of animals". The amount of bedding should be sufficient to keep the birds clean, dry and comfortable. It should also permit the birds to express their behaviour, including scratching and dust bathing. See also 6.13.10 for details on bedding for poultry.

Outdoor access – Turkeys

If an operator arbitrarily confines turkeys inside for one week prior to slaughter, does this constitute non-compliance with the standard? (39)

The standard sets out a number of legitimate reasons for denying outdoor access. Turkeys or other livestock cannot be denied outdoor access for any reason other than those outlined in 6.7.2. Note that “measures taken to reduce the need to restrict outdoor access in the future shall also be documented when circumstances are within the operator's control.”

Outdoor access – Pigs

Can the organic operator choose to keep pigs confined, not allowing outdoor access, when there is no risk to the animal caused by weather or stage of production? (196)

No. Complete confinement of pigs is non-compliant with 6.7.1 a). A key requirement of organic animal husbandry is access to outdoors. 6.7.2 states the specific exceptions to the rule which apply to all livestock. 6.15.2 outlines the outdoor exercise requirement for pigs.

Outdoor access – veterinarian recommendations

Under CLAUSE Section 6.7.2, can operators limit access to the outdoors to their entire herd / flock (such as goats, sheep, cattle, poultry) for the entire winter if the operator provides a letter from their veterinarian stating that access to the outdoors is detrimental to the health of the particular species of livestock? (354) 1 November 2021

No. The standards already provide sufficient flexibility to address the health and welfare of organic

livestock with specific guidance and exceptions with regard to outdoor exercise and access to pasture (6.1.3, 6.11.1 & 6.13.1).

6.11 Additional requirements for cattle, sheep and goats

Outdoor access – Finishing phase

When herbivores are being confined in the final finishing phase (see 6.11.1)), and are not subject to pasture requirements, must the confinement facility be located on an organic enterprise? (116)

Yes. The areas used for finishing, including all buildings, facilities and outdoor access areas which are used by the organic livestock, must comply with the standard and be verified by the CB. The remainder of the farm is not required to be organic.

Note that even during the finishing phase, the animals “they shall have access to the open air or an outdoor exercise area, weather permitting” as specified in 6.11.1 of the 2020 Standards.

Access to exercise yards

Must young herbivores be given access to exercise yards outside of the pasture grazing season (6.11.1)? (325)

Yes. Outside of the pasture grazing season, young herbivores must have access to exercise yards unless the operator can demonstrate that doing so would jeopardize their health and/or welfare (6.11.1 b). Dairy calves must have access to pasture by 9 months of age (6.12.7).

6.12 Additional requirements for dairy cattle housing

Indoor pens for dairy calves

Can dairy calves be raised in indoor pens until such time as they are weaned? (317)

Yes. Note that calves must be given milk until the age of 3 months (6.4.3 d) and that dairy heifers aged 9 months and older must have access to pasture in season (6.12.7).

Electric trainers

Are electric trainers allowed to manage animals in tie stalls? (206)

Electric trainers are prohibited as of November 2020.

Tie stalls

Are tie stalls prohibited? (92.1)

Tie stalls are being phased out of organic production and will be prohibited by November 2030. Until then, tie stalls are prohibited in new construction and major renovations. Existing tie stalls may continue to be used for lactating cows and for one month for heifer training before they join the milking herd, as long as the dairy cows are exercised preferably daily, or at least twice a week.

Is 6.12.1 to be interpreted as a requirement to allow cows housed in tie stalls a period of exercise every day when possible (at least twice a week) or merely a recommendation to do so? (92.2)

Yes, 6.12.1 is a requirement, not merely a recommendation to exercise animals at least twice a week. 6.12.1 recommends, however, that animals have daily exercise periods. The intent of the standard is to require that cows have regular exercise during the winter months. If an operator fails to provide regular exercise, this would clearly violate the requirement and be considered non-compliance.

What if it is not possible to exercise dairy animals daily or at least twice a week? (92.3)

To remain compliant with the standard, the operator must find a way to exercise animals kept in tie stalls at least twice a week or to provide loose housing. There was a 5-year grace period from November 2015 standard but that *finished* in December 2020.

Ratio of cows to stalls

Do the requirements under CLAUSE section 6.12.2 (ratio of cows to stalls shall not exceed 1:1) apply in a situation where dairy cows have access to the outdoors and an outdoor bedding pack year-round? (452) - 26 Sep 2019

Yes, where a group of animals is housed in a free stall system, the 1:1 animal to stall ratio is required, regardless of outdoor access. This ensures that during periods of weather-induced confinement, each animal can ruminate and rest.

6.13 Additional requirements for poultry

Length of immunization program

Is it permissible to

- a) extend the vaccination schedule of a flock of pullets to 18 weeks even if the program does not need to be extended for any medical reason, simply to avoid the need to let the birds outdoors?**
- b) eliminate the need for an outdoor run by extending the immunization program to 18 weeks in cases where the program can be shorter than 18 weeks? (412)**

The answer is no to both questions. "6.13: Additional requirements for poultry" apply, particularly 6.13.2.

Note that the standard recommends that the pullet rearing facilities closely match the conditions of the layer barn.

Space requirements – Poultry

Please clarify the outdoor space requirements for poultry. Can a flock be split so that use of the outdoor area is rotated between groups? If so, does the total area required diminish (i.e, is less space required outside)? (37)

While the standard allows for exceptions to the outdoor access requirements (temporary confinement), the total area available for birds outdoors must allow for the entire flock to be outside at the same time without exceeding the densities set out in 6.13.13, Table 5, for all poultry.

Does the outdoor space requirement for poultry described in 6.13.13 refer to the total pasture area available for the year, or to the total area available at any given time? In other words, if an operator is rotating poultry between pastures, is each pasture required to meet the space requirements, or is it calculated from the total pasture that will be available throughout the year? (425) - 19 Apr 2019

6.13.13 Table 5 refers to the total area available at any given time and does not include the pasture the flock cannot access. Read 6.13.15 for further insight.

Are the poultry densities in Table 5 of 32.310 per flock? Or averaged over a year? (415) - 19 Apr 2019

32.310 6.13.13 Table 5 specifies maximum densities at any given time.

Protection of birds on outdoor areas

Under 32.310 Section 6.13.1, is there a requirement that the outdoor areas for poultry be fenced? (547) 3 May 2022

There is no specific requirement that outdoor areas or pasture need to be fenced. However, the operator must be able to demonstrate that the flock is managed according to the COS at all times including 3.62 and 6.13.1 b)1 & d), by way of fencing or other effective barrier.

Floor space in multi-aviary systems

Does a raised floor above the nests in a multi-level aviary count in the overall square footage, as well as for the perch length? (360)

Yes, as described in 6.13.14, the calculation of total floor footage includes all useful floor levels including perches. See details on perches in 6.13.5.

For multi-level aviary systems for layers (6.13.14):

If winter gardens are accessible all year round, are they counted as indoor space, or part of the outdoor run/space? (410.1)

A winter garden or enriched verandah does not count towards the indoor or outdoor space allowance. See 6.13.3 b) 6 and note exceptions in 6.13.3 e) 2.

Does space on ramps or ladders count towards useable floor space? (410.2)

No. Ramps and ladders are not floor space.

Do terraces under which manure collects and is not removed count towards useable floor space? (410.3)

No. As manure collection should take place in all spaces used by animals, areas (such as under terraces) where manure collects and is not cleaned out does not count as useable space.

Parallel livestock production

Can organic meat birds be raised on the ground floor with access to the outdoors and non-organic birds raised on the 2nd and 3rd floors of the same barn? (393)

Using the same barn for organic and non-organic poultry production would be very difficult to achieve. For the ground floor of a barn to be considered a "separate production unit," complete separation would need to be ensured and documented. This would include having completely separate watering systems, air flows, pest control, biosecurity, effective equipment systems for dust control, feed and input delivery, storage, and preparation activities. Clear identification and separation of flocks would be required by breed and/or by stage of production.

Organic layers confined indoors

Is there a temperature difference between the inside of a poultry barn and the outside environment (for example, a 2-degree C differential) that will allow operators to keep poultry confined indoors? (368)

No. A slight temperature difference in and of itself is not sufficient justification to keep poultry confined indoors, because other factors, such as relative humidity, rainfall, wind velocity, presence of predators, etc., must also be considered (6.1.3, 6.7.2, and 6.13.1).

Is it permitted to raise organic layers confined indoors up to peak production based on 32.310 6.13.2 a) & b)? (427) - 19 Apr 2019

Yes. This is permitted if the operator can demonstrate that the layers are accessing the outdoors by the time of peak production. However, the rearing facility should closely match the conditions in the layer barn, including having access to an outdoor run (6.13.2 b). It is important to understand it is only permitted to keep the pullets indoors as an exception (i.e., when necessary for the immunization program and to ensure birds are confident in their laying sites).

Confinement - Laying period

Can hens be confined for part of each day during the laying period? (226)

Restricting outdoor access of laying hens, during day time hours, may only occur during onset of lay as per 6.13.2 a) or for reasons outlined in 6.7.2. Further restriction of outdoor access is not permitted.

Urgent confinement of organic poultry

Can a regional authority make the decision that organic poultry must be confined (kept indoors) based on an imminent threat to the health of the birds, and would this be sufficient to establish the requirements needed for emergency confinement of all organic poultry in a given region, as per 6.13.1 c)? (440) - 21 June 2019

No. Ultimately each operator must make the decision that an imminent threat to health and welfare exists and document the reasons and the length of the confinement. A documented 'High Risk' alert from a regional poultry authority may be used as one of the documented reasons for emergency confinement, but the decision to confine must be made by each operation individually.

Encouraging birds to go outdoors

How can operators encourage layers to use the range? Would management practices such as running electric wire in front of the openings to the outdoors (to prevent crowding along walls and in corners) or raising openings to the outdoors to above the eye level of hens standing on the floor (to prevent pests entering the barn) be compliant? (413) - 19 Apr 2019

Management practices or structural impediments such as those cited in the question would hinder movement of the birds and thus are prohibited. There are many ways to encourage the birds to use the open range; here are some practices to consider:

- Provide cover on the range in the form of trees, shrubs or constructed shade to protect the birds from avian predators, as described in 6.13.1 c).
- Provide outdoor access or a covered porch or verandah to get the pullets outside and make them comfortable with the range they will have access to as adults.
- Provide separation in barns and runs to create multiple segregated flocks (i.e., two flocks of 5,000 rather than one flock of 10,000).
- Provide enriched verandahs as described in 6.13.3 for pullets and layers. These create a transitional space between the barn and the outside environment, which can help the birds feel more comfortable going outside.

Popholes are mandatory

When organic layers are pasture-raised throughout the grazing season can the flock be housed during the non-grazing season in barns without popholes or other means of accessing the outdoors? (478) - 1 November 2021

No. 6.13.7 states "Poultry barns shall have sufficient exits (popholes) to ensure that all birds have ready access to the outdoors." As per 6.13.1 d), access to outdoors may only be restricted when outdoor access results in an imminent threat to the health and welfare of poultry. The exit requirements for poultry are outlined in 6.13.8 and 6.13.9. 6.13.9 does not eliminate the need for exits, but explains the minimal conditions that must be met if for some reason 6.13.8 cannot be met (maybe in cases when barn renovation required from evolving organic standards cannot be done).

Laying hens sold for organic meat

In order for spent organic laying hens to be sold at the end of their laying-life for organic meat or organic processing, are they required to meet the requirements in 6.13.6 b) that barn-raised meat chickens have daily outdoor access by 25 days of age? (411) - 19 Apr 2019

Pullets with access to outdoors (6.13.6 a) would easily meet the requirements for organic meat birds. The practice of confining pullets does not meet the intent of the requirements and therefore they cannot be sold as organic meat at the end of their laying lives (6.13.6 b). Another approach is a comparison of life cycles. As 25 days represents approximately 2/3 of the life of a meat bird raised to an average of 40 days, this means that for approximately 1/3 of its life (15 days), this bird must be able to get outside. Based on that logic, a spent hen slaughtered at 18 months of age (548 days), would have needed to spend 183 days outside to qualify as organic meat, unless weather conditions endanger the health or safety of the birds.

6.14 Additional requirements for rabbits

Space requirements for rabbits

Why are the space requirements for rabbits the same for all ages when other livestock in the standard has different space requirements for different ages? (458.2) - 17 February 2020

Due to the short period from kit to slaughter of rabbits, it seems impractical to have an interim stocking rate requirement during this period. When the standard was first written, the only reference standard that had different requirements for different ages was assessed to be a lesser (weaker) standard and so these were not adopted.

6.15 Additional requirements for pigs and farm-raised wild boar

Transition of swine outdoor areas

Does the 36 months transition requirement of vegetated land (5.1) apply to outdoor swine exercise areas? (546) 3 May 2022

Yes. Any outdoor exercise area other than concrete (6.15.2 a) must comply with requirement of 36 months free of prohibited substances (6.3.2).