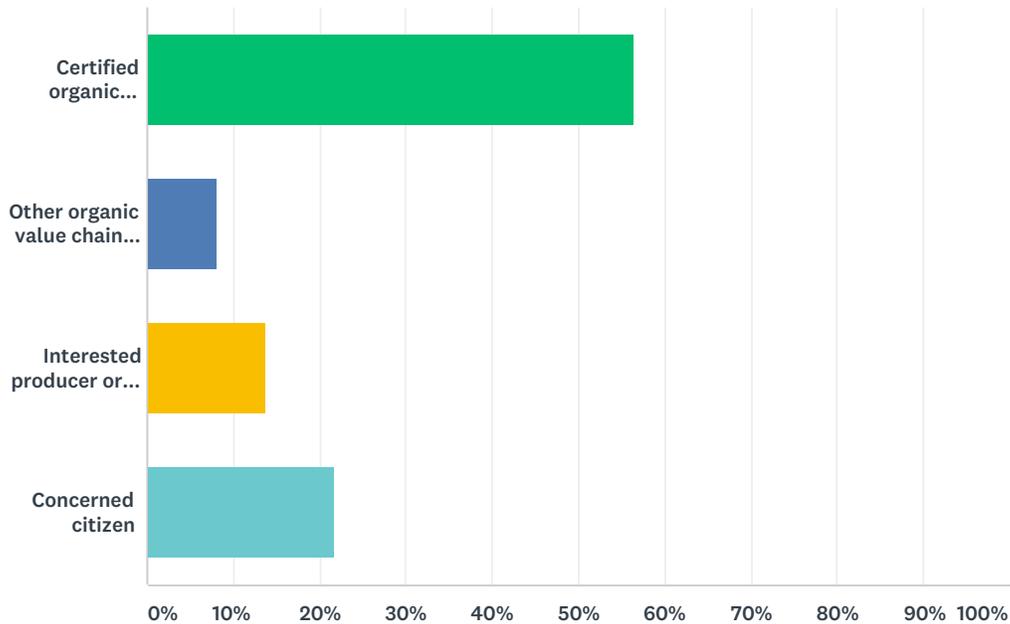


Q1 OCO represents organic businesses on the organic standards review committee but we are also interested in other opinions. Please identify yourself as one of the following:

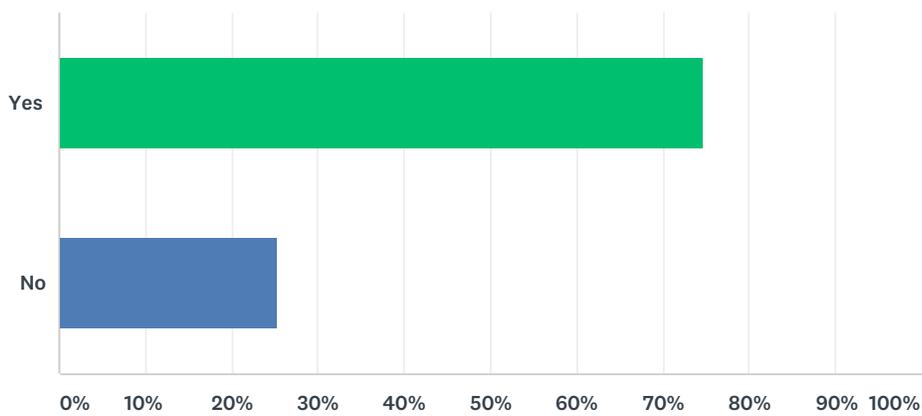
Answered: 124 Skipped: 0



ANSWER CHOICES	RESPONSES	
Certified organic producer or business	56.45%	70
Other organic value chain member (e.g.. distributor, retailer etc)	8.06%	10
Interested producer or business (e.g. in transition or uncertified ecological)	13.71%	17
Concerned citizen	21.77%	27
TOTAL		124

**Q4 10.513-3 Listing organic acreage & aiming for transition Proposal: (1) The organic certificate should specify the area (acreage) being certified organic. (2) Delete the requirement of 5.1.3 that “The enterprise shall aim at a complete transition of its production.” Background: (1) To avoid fraud in split operations. (2) The petitioner believes this “serves no purpose” and cannot be enforced. Decision: Rejected Rationale: (1) Rejected because the request to include certified areas on the certificate was deemed to be a regulatory issue, and not related to organic standards, (i.e. inclusion of the information on the certificate does not indicate compliance with the organic standards). (2) Rejected because removing the requirement (i.e., goal of complete transition) could be perceived as weakening the standard. Do you agree with this decision?**

Answered: 79 Skipped: 45



ANSWER CHOICES	RESPONSES
Yes	74.68% 59
No	25.32% 20
TOTAL	79

#	COMMENTS	DATE
1	'complete' implies all acreage in a property is to be made Org. - that may not be practical in all situations	12/24/2018 3:06 AM
2	I have seen many large conventional farms all of a sudden having land that is ready to be certified and it amazes me how they forgot to put conventional fertilizer and spray on it for the past 3 years to make it applicable	12/22/2018 3:08 PM
3	Encourage people to transition	12/19/2018 1:25 PM
4	fraud can happen even in non-split operations --- allow people to transition a portion of their property at time	12/15/2018 11:26 AM
5	All US certificates have acreage listed and auditors are looking to confirm they are able to supply the quantity I purchased.	12/15/2018 4:11 AM

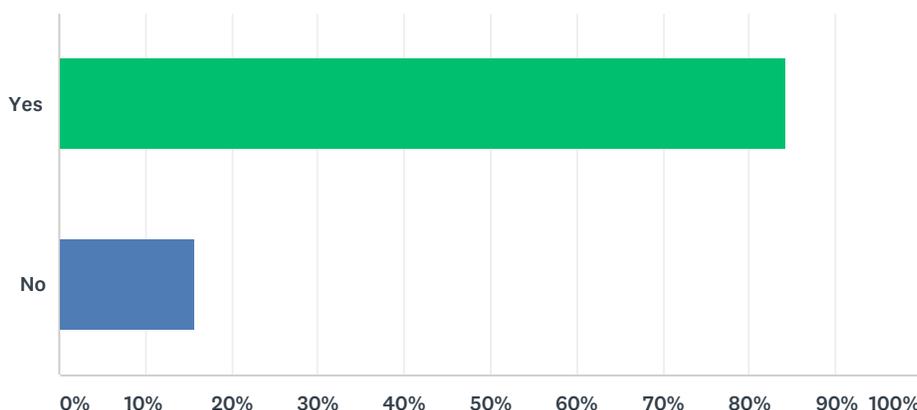
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6	Transparency would eliminate fraudulent claims. The statement that all organic land should be transitioned should remain.	12/15/2018 3:35 AM
7	as per usual you word it in such a way no one can make sense of it	12/15/2018 3:11 AM
8	Important how the area will be defined. Will the acreage be defined as all acreage owned by the farmer/owner operator who may own multiple farms in different locations?	12/14/2018 12:40 PM
9	Frankly, I'm not really sure I understand it	12/14/2018 12:09 PM
10	The individual farm business owner should have the right to choose what products are grown organic and if they choose to grow some produce conventional they should be allowed. The only restrictions would be no cross production of annuals in the organic and conventional system. Ultimately the producer needs to make a living and it should be there choice how they grow their crops on their farms to live.	12/14/2018 11:53 AM
11	We need to go beyond the minimum required by the Standards	12/14/2018 11:04 AM

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**Q5 10.521 Fences used as buffer zones**  
**Proposal:** Allow a fence rather than an 8-m buffer zone for grazing land when there is no obvious sign of spray drift. Add this to 5.2.1.  
**Background:** The 8-m buffer zone may be impractical or expensive for large ranches.  
**Decision:** Rejected  
**Rationale:** A fence is not a buffer zone (as described in 5.2.2) and is inadequate in preventing contamination of organic land by prohibited substances used on neighbouring non-organic land.  
**Do you agree with this decision?**

Answered: 83 Skipped: 41



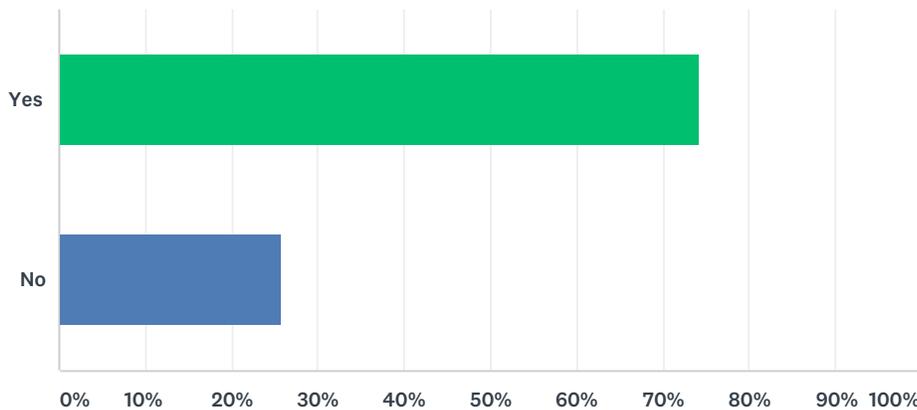
ANSWER CHOICES	RESPONSES
Yes	84.34% 70
No	15.66% 13
TOTAL	83

#	COMMENTS	DATE
1	reluctantly agree.	12/24/2018 3:06 AM
2	a fence is a permanant barrier with this said spray drift will move much more than 8 meters on a little more than a very mild wind	12/22/2018 3:08 PM
3	The person spraying should be staying 8 m away why are they being allowed to spray on our land	12/19/2018 5:36 PM
4	We experienced a RT540 drift this summer and a fence wouldn't have made any difference	12/19/2018 1:25 PM
5	a buffer zone is impractical for pasture fields. certification does not include 'freedom-from' pesticides.	12/18/2018 2:06 PM
6	My opinion is that the polluter should pay. Thus the buffer zone concept should apply to conventional farms not organic ones.	12/18/2018 6:18 AM
7	A fence plus the buffer zone should be allowed as it defines an organic zone.	12/16/2018 10:16 AM
8	however, you are showing a lot of distrust of honesty in landowners -	12/15/2018 11:26 AM
9	Spray drift is a real threat when it comes to applications.	12/15/2018 4:11 AM
10	Use of fields can change without the neighbour's knowledge. Best to assume there will be drift.	12/15/2018 1:05 AM

11	The buffer zone needs to be at least shared with the adjacent farmer. The organic farmer should not be saddled with all of the cost of the buffer that becomes largely unproductive land. In the case of corn, the buffer I recall is 700 ft, and that is way too much unproductive land. How will the buffer be used. Can the buffer be used as if it was organic, but not certified organic?	12/14/2018 12:40 PM
12	Yes, a fence is a fence, a buffer zone is a buffer zone.	12/14/2018 12:09 PM
13	Spray drift is not always "obvious". Neighbour can change management plan and spray later in season. Completely disregards intent of organic separation.	12/14/2018 11:56 AM
14	as per rationale	12/14/2018 11:27 AM
15	3m is sufficient	12/14/2018 11:17 AM
16	Buffer zones are an important aspect of separating conventional from organic	12/14/2018 11:04 AM

**Q6 10.514-2 Parallel production Proposal:** In 5.1.4, allow parallel production for all crops. **Background:** The current prohibition is leading operators to form separate companies which cannot be audited by the CBs. Also, parallel production is permitted under the NOP. **Decision:** The WG rejected the proposal but the TC could not reach consensus and returned the petition to the WG. The Crops WG is encouraged to provide more details on the pros and cons of parallel production and the stance of other international standards on this issue. Also, the WG can provide ideas on how parallel production might work and under what conditions. **Rationale:** The WG rejected the proposal because it was felt allowing parallel production may erode trust in the standards and create excessive work and other obstacles to the inspection process. Several members of the TC, however, stated that allowing parallel production would give CBs greater insight in the non-organic component of an operation. This would give inspectors better access to verify the entire supply chain on one operation. Other TC members felt this was a weakening of the standards. **Do you agree with this decision?**

Answered: 78 Skipped: 46



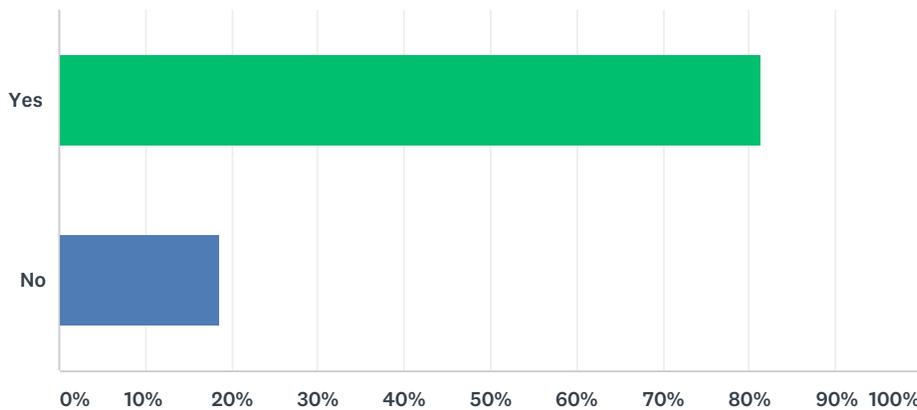
ANSWER CHOICES	RESPONSES
Yes	74.36% 58
No	25.64% 20
TOTAL	78

#	COMMENTS	DATE
1	N/A	12/20/2018 8:28 AM
2	I see both sides and cannot suggest a solution at this time	12/19/2018 9:19 AM
3	Too many acronyms; could not understand proposal. What is parallel production?	12/19/2018 7:02 AM

4	the CB's should be able to audit any associated company with the certified farm or product	12/18/2018 2:06 PM
5	some farms / lands are not fit for organic production (due to soil types, stone pressure etc) and production facilities and handling/storage areas can easily be separated, to allow for both types of production.. not all farms can afford and handle having everything organic all at once or in the near futures.	12/18/2018 8:07 AM
6	I think there are good arguments on both sides. I would be curious how this change would impact growers who are growing on properties where part of their farm is certified organic and the other part is in transition to organic but not yet certified.	12/18/2018 6:18 AM
7	Find a way to make parallel production available for all crops. Better oversight.	12/18/2018 6:18 AM
8	allow parallel production - it's already happening anyway	12/16/2018 5:53 PM
9	Parallel Production erodes my confidence as a consumer and weakens the standards. Therefore makes me less likely to purchase higher priced organic products because I feel less confident that I am purchasing a superior product. I currently avoid higher priced organic products because the uncertainty that I have over the quality does not justify the additional expense in my view.	12/16/2018 2:25 PM
10	I believe parallel production should be conditionally allowed if the farm exhibits adequate separation measures. Some times the farmer has very limited choice of varieties , and production and cost constraints,	12/15/2018 5:03 PM
11	favouring large producers - disadvantage to small producers	12/15/2018 11:26 AM
12	Parallel production should be fine as long as the organic and conventional crops are visually different.	12/15/2018 10:40 AM
13	Leave the standard as it is presently.	12/15/2018 4:18 AM
14	Parallel production would allow CB's to view non-organic operations and judge the organic operations fairly.	12/15/2018 4:11 AM
15	parallel production can be easily done.	12/15/2018 3:11 AM
16	Allowance should be made for parallel production when one crop or land is in transition.	12/15/2018 1:05 AM
17	I dont thing the erosion of trust will happen. I have some parallel production this past year before my final acres of transition. I had 2 inspections, if you are a parallel producer you need to be prepared for more scrutiny.	12/14/2018 2:57 PM
18	dont know	12/14/2018 2:10 PM
19	Every adjacent farm is an example of parallel production. The only real verification is testing for GMO and testing both the soil and the food for glyphosate and other forbidden chemicals	12/14/2018 12:40 PM
20	I'm not sure, I think the end result has to create a situation where farms cannot cheat the system	12/14/2018 12:09 PM
21	To address the concern of separate companies, I would prefer to see the reach of the CBs strengthened so clients must disclose other companies' activities under their management, ownership, using shared equipment, etc.	12/14/2018 11:56 AM
22	In a perennial crop system which takes 5 years to harvest this hampers expansion onto other farmland because we are then in parallel production problems with the crop being harvested on our current certified farms	12/14/2018 11:53 AM
23	Parallel production requires much more rigorous record inspection of yields and sales to verify correct labelling and avoid cheating. Segregation and other related matters would require significant more inspection.	12/14/2018 11:27 AM
24	Let's keep it simple for the inspectors and especially for the consumer. If the number of acres of organic production is not listed on the certificate would look as though the conventional part of the farm is also certified	12/14/2018 11:04 AM

**Q7 10.517-1 Alternating in and out of organic production**  
**Proposal:** The petition is vague but essentially the petitioner proposes that the prohibition on alternating in and out of organic production in 5.1.7 be maintained even if the name of the business changes, or if a landowner rents land to one organic operator, followed by a non-organic farmer, then another organic operator. The petition also suggests that this ban be applied to not only crops but also greenhouses (both in-soil and containerized crops) and maple production. Lastly, the petition recommends records are kept for more than five years. **Background:** The petitioner wants to strengthen the ban on rotating in and out of organic production on a production unit. **Decision:** Rejected. **Rationale:** Certain issues mentioned are regulatory (e.g., specifying how long files need to be kept for CBs) and not part of the standards. Other issues, such as preventing a change in business name, are not legally possible or practical. **Do you agree with this decision?**

Answered: 75 Skipped: 49



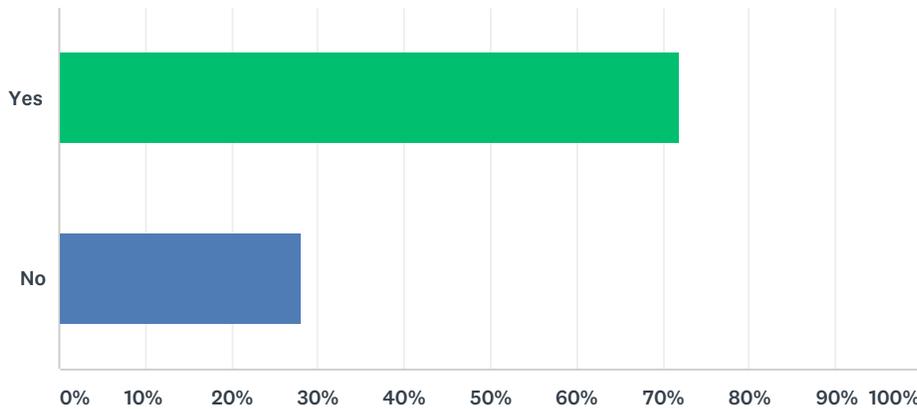
ANSWER CHOICES	RESPONSES
Yes	81.33% 61
No	18.67% 14
TOTAL	75

#	COMMENTS	DATE
1	My personal opinion is if you get out, you are out, many people jump into organic just for the dream of making a large amount of money, they should have to got through the low markets along with the high markets, you should believe in the viability of the organic industry, not just in it for the money. The consumer wants a safe reliable product, we should have producers that believe that what they are producing is a superior product with in reason of price short falls.	12/22/2018 3:08 PM
2	If three years without pesticides are required to be certified organic, shouldn't that prevent alternating in and out of organic production?	12/17/2018 11:55 AM

3	But at least if the land has been certified for organic farming and for how long should be recorded so that it would be a consideration for potential renter or buyers of the land	12/16/2018 6:13 PM
4	again, allowing rotation between organic and non organic production practices erodes my confidence that I am getting a truly organic and uncontaminated product for which I am paying a premium. Allowing rotation without having a defined specific transition period discourages me from purchasing so called certified organic products. This makes the "certification" invalid and meaningless in my view.	12/16/2018 2:25 PM
5	Alternating in and out production does not provide the necessary organic guarantees.	12/15/2018 4:11 AM
6	how can you be organic one year and not the next?	12/15/2018 3:11 AM
7	Is there really many people do this?	12/14/2018 2:57 PM
8	Limit the regulation pertinent to the land, not pertinent to the business name of the owner or the operator	12/14/2018 12:40 PM
9	It's not ok for farms to switch back and forth unless they have gone through the transitional period after conventional growing	12/14/2018 12:09 PM
10	I don't think producers should be able to cheat by trading ownership, etc. I would prefer to give CBs more oversight.	12/14/2018 11:56 AM
11	The question becomes are you certifying the business operation or the land? Its the business being certified.	12/14/2018 11:53 AM
12	as per rationale	12/14/2018 11:27 AM

**Q8 10.551-1 Prohibiting the use of non-organic manure** Proposal: Non-organic sources of manure, blood meal and bone meal should not be allowed under any circumstances in 5.5.1. Background: Residues from GE feedstocks may remain in the manure even after composting. Also, allowing these substances supports the non-organic livestock industry. Lastly, using these products may lead to lack of trust in the organic label. Decision: Rejected. Rationale: There is not enough organic manure currently available. At this time, the proposal would create huge barriers to organic production. Do you agree with this decision? Do you agree with this decision?

Answered: 82 Skipped: 42



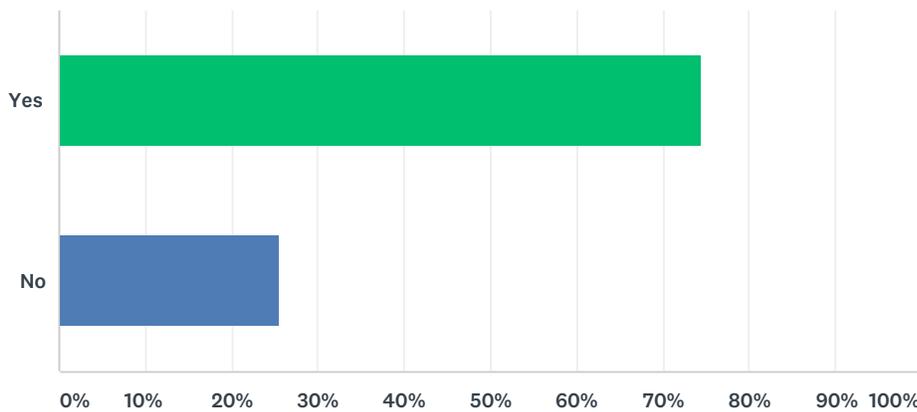
ANSWER CHOICES	RESPONSES
Yes	71.95% 59
No	28.05% 23
TOTAL	82

#	COMMENTS	DATE
1	Manure sourcing is huge issue. i agree with decision.	12/24/2018 3:06 AM
2	I am not sure what to comment here, manure has been around as long as livestock has, or creation, to say manure is bad regardless as to what it is fed leaves no thought to what the creator designed in the animal to digest. I am certainly not a fan of GMO in any respect, but I do not know what happens when it goes through the digestive track the creator designed so can not say if it has any implications.	12/22/2018 3:08 PM
3	N/A	12/20/2018 8:28 AM
4	Yes, but organic farms need to pay much more attention to providing their own manure rather than relying on conventional neighbours. Just like conventional farmers, organic farmers are too often "specialized", rather than mixed farms.	12/18/2018 6:44 AM
5	If there are more organic livestock producers, then there will be more manure amendments available. Make organic livestock production more feasible for producers by improving/changing organic livestock regulations. (For ideas See Salatin, Logsdon). Certified ecological manure (assuming GMO free) should be permitted.	12/18/2018 6:18 AM

6	however working towards a sufficient supply so that only organic manure would qualify is desirable	12/18/2018 4:29 AM
7	This can be became a permanent practice and problem. A conditional consent only with solutions on how to increase organic manure.	12/16/2018 6:13 PM
8	Market forces or availability concerns should have no influence on whether a product can be called organic. What matters is the science. This should not be a decision based on politics or business practices. If a producer cannot find sufficient organic manure or other organic fertilizers for his crops, then they cannot be designated as certified organic. Perhaps an in-between transitional classification of such products could solve the problem. We are not here to undermine strictly organic producers based on science to allow quasi organic producers to access the so called organic market. This dilutes the organic market, and deceives consumers. These consumers will eventually know the truth and the whole notion of honest, scientifically justifiable designation of organic will not have any credibility with the consumer any longer and this market sector will eventually die. Honesty, transparency, and integrity are crucial to maintaining a healthy organic market segment.	12/16/2018 2:25 PM
9	There are alternatives to be used to maintain organic cert.	12/16/2018 10:16 AM
10	organic production should include some livestock for manure purposes	12/15/2018 11:26 AM
11	I need manure from non-organic source for my fertility	12/15/2018 10:16 AM
12	Provided this manure is composted before application	12/15/2018 4:30 AM
13	Hell NO so your saying i can use non organic products in my organic operation?	12/15/2018 3:11 AM
14	Strongly support this decision.	12/15/2018 2:43 AM
15	If this proposal was accepted I would have to stop farming organically.	12/15/2018 1:49 AM
16	It is so important to not have contaminants in the manure	12/15/2018 1:14 AM
17	Animal manure is not essential for growing crops. There is use of 'green manure', cover crops...This is a huge subject area that I have read up on. The organic producers need to take note.	12/14/2018 12:40 PM
18	Only organic inputs should be used	12/14/2018 12:09 PM
19	It would be better to require composting of the manure to at least destroy viability of seeds if any. Wouldn't affect "support" for conventional operations though.	12/14/2018 11:56 AM
20	yes, but. We've had to work hard to produce our own manure so that we know what's in and what's not. Not practical for many.	12/14/2018 11:27 AM
21	Animals are an important part of organic production for the manure and we need to be diligent in rejecting GE substances	12/14/2018 11:04 AM

**Q9 10.551-2 Manure from operations with some fully caged livestock**  
**Proposal:** Amend 5.5.1: (1) Allow manure from non-organic sources even if a minority of the animals in the operation are fully caged. (2) Remove the ban on using manure from livestock kept permanently in the dark.  
**Background:** The petitioner suggests that the current standards are overly restrictive. For example, many non-organic swine operations have group-housed pigs along with sows in crates. The manure from all the animals is mixed and therefore is not allowed on organic farms. This may create a barrier to nearby organic farmers who need external source of manure to maintain soil fertility. No rationale was provided for the ban on manure from animals kept permanently in the dark.  
**Decision:** Rejected.  
**Rationale:** The petition would weaken the standards and possibly erode consumer trust in organic products.  
**Do you agree with this decision?**

Answered: 82 Skipped: 42



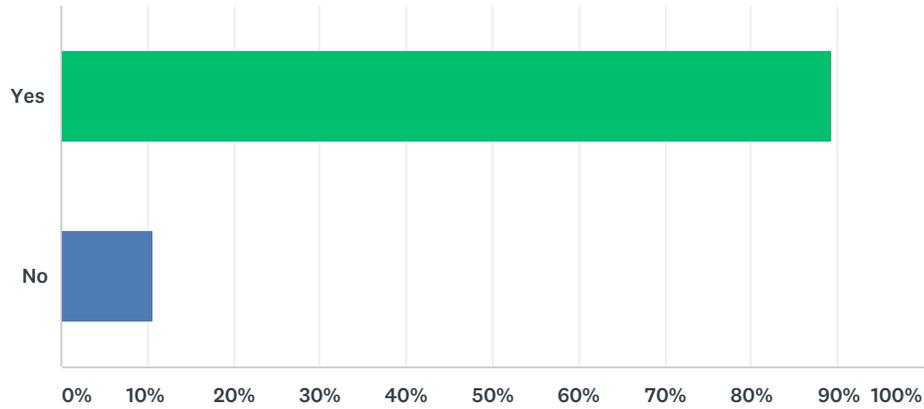
ANSWER CHOICES	RESPONSES	
Yes	74.39%	61
No	25.61%	21
TOTAL		82

#	COMMENTS	DATE
1	some animals are kept premanently in the dark!? wow!	12/24/2018 3:06 AM
2	N/A	12/20/2018 8:28 AM
3	X	12/20/2018 4:20 AM
4	For soil sustainability and balanced soil fertility and produce quality, the use of manure from healthy well treated animals would improve organic operations (especially those without livestock)	12/19/2018 7:07 AM
5	i fail to see how the manure from cages or darkness affect organic; either we allow non-organic or not.	12/18/2018 2:06 PM

6	the living condition of the animal does not effect the manure quality. group pigs and penned pigs produce a good fertilizer, why be so restrictive. they are both feed similarly!	12/18/2018 8:07 AM
7	Should be working towards having enough organic manure so that conventional manure is not allowed. This is just picking some conventional as ok and other not.	12/18/2018 6:44 AM
8	See Salatin and Logsdon for why and how organic livestock production can be improved without the use of caging, etc.	12/18/2018 6:18 AM
9	Producers have to remember that those of us who prefer to buy organic products and even pay a premium for them have particular standards of humane animal husbandry that they demand to see upheld. Furthermore, this will also erode consumer confidence and restrict participation in foreign markets such as the EU where standards are much tighter and adherence is strictly enforced.	12/16/2018 2:25 PM
10	Manure can be composted to remove any contaminates.	12/16/2018 10:16 AM
11	Honestly, I do not know of any livestock operation that keeps its animals in the dark.	12/15/2018 10:40 AM
12	Organic farmers should stay on the side of humane husbandry	12/15/2018 10:16 AM
13	What kind of morons are making these decisions ?	12/15/2018 3:11 AM
14	This is more political than relevant to whether a product is organic	12/14/2018 3:28 PM
15	see my comment about green manures	12/14/2018 12:40 PM
16	Organic inputs for organic farms. period.	12/14/2018 12:09 PM
17	I agree it would weaken the standard.	12/14/2018 11:56 AM

Q10 10.523-1-2-3 Treated fence posts Proposal: In 5.2.3 a): (1) Allow the use of treated posts in case of emergency, such as following a fire. (2) Prohibit the use of treated posts in existing organic production. (3) Replace the "commercially available" clause with a stronger and less ambiguous term. Background: Untreated fenceposts cost more over time because they need to be replaced more often than treated posts. However, treated posts are now allowed in organic production if they already exist (e.g., in vineyards or orchards). The petitioner states that "Some operators change the posts before their conversion to organic, so they are producing under organic certification with treated posts, and therefore are deceiving consumers and having an advantage over other producers." The NOP does not allow treated lumber in contact with organic products/livestock regardless of the commercial availability of alternatives Decision: The text was modified by WG and TC and sent back to the WG for final wording. The main change was to not allow treated wood regardless of the commercial availability of alternatives, as stated below. 5.2.3 Untreated Fence posts or wood treated with substances listed in Table 4.3 of CAN/CGSB-32.311 are permitted. a) For new installations or replacement purposes, fence posts or wood treated with prohibited substances are prohibited unless. Alternatives, such as metal, plastic, concrete, or protective sleeves, shall may be used are not commercially available. Rationale: This modification changes the restriction into a prohibition. The WG concluded there are many alternatives to treated posts, and that no emergency requires the use of treated posts. On the other hand, prohibiting the use of treated posts that were installed before transition would be a significant barrier to transition. Do you agree with this decision?

Answered: 75 Skipped: 49

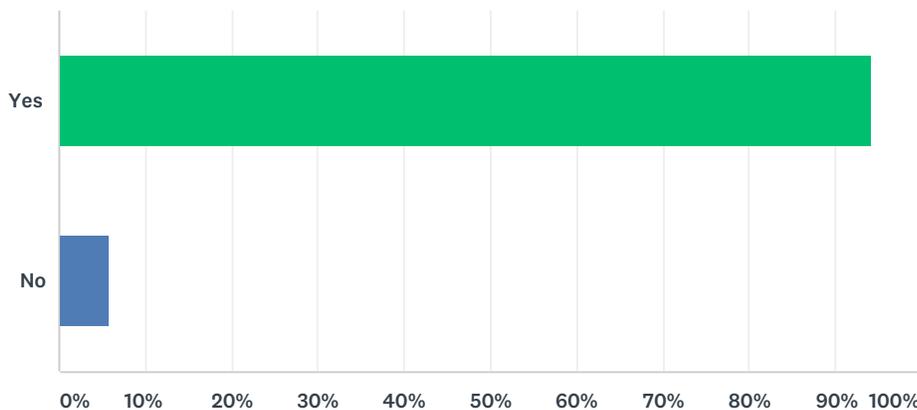


ANSWER CHOICES	RESPONSES	
Yes	89.33%	67
No	10.67%	8
TOTAL		75

#	COMMENTS	DATE
1	I know treated fence posts are probably hard on the soil health, by the same token how farm will the residue go, would it ever get to soil that is being used to feed animals or produce crop. I am not sure about this.	12/22/2018 3:08 PM
2	Yes, with a caveat. Treated posts should definitely be prohibited. However there must be a time limit on the use of treated posts before transition to organic. Treated posts installed only one year prior to transition shall be removed and replaced with untreated posts. The discussion about the allowable length of time treated posts have been in the ground prior to grandfathering shall be permitted needs further discussion.	12/16/2018 2:25 PM
3	Depending the size of the operation and a buffer to the posts can be used.	12/16/2018 10:16 AM
4	There have been treated posts on my farm since my childhood and I have yet to see an animal lick or chew on them.	12/15/2018 10:40 AM
5	The fence is irrelevant wrt crops. Only relevant in the case of livestock that may lick, chew or touch treated posts..	12/14/2018 12:40 PM
6	I think treated fence posts are not something to worry about. Using treated lumber for other applications could be problematic though.	12/14/2018 12:09 PM
7	wholeheartedly. There are alternatives. When existing exceptions are allowed, it is hoped they will be phased out, not added to.	12/14/2018 11:56 AM

**Q11 10.672 Outdoor accessProposal:** Rather than listing the reasons why temporary confinement may be allowed in 6.7.2 (e.g., inclement weather, threats to livestock health or safety, etc.), request documentation on how operators are changing their practices to reduce the need for confinement in the future.  
**Background:** If situations within the control of the operator result in a restriction of outdoor access, steps to correct and improve those situations should be taken (and documented) to avoid restricting access in the future. Change the emphasis to solving the problems that lead to temporary confinement  
**Decision:** The intent is maintained but wording changed.  
**6.7.2 Access to the outdoors and freedom of movement** may be restricted for the following reasons, provided that confinement is temporary:  
 a) inclement weather;  
 b) conditions in which livestock health or safety is jeopardized, given the stage of production; and  
 c) soil, water or plant quality would be compromised.  
 The operator shall document the reasons for and duration of confinement. 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.  
**Rationale:** The WG wants to ensure that operators are proactive regarding outdoor access. The aim is to avoid situations where outdoor access is restricted.  
 Do you agree with this decision?

Answered: 69 Skipped: 55



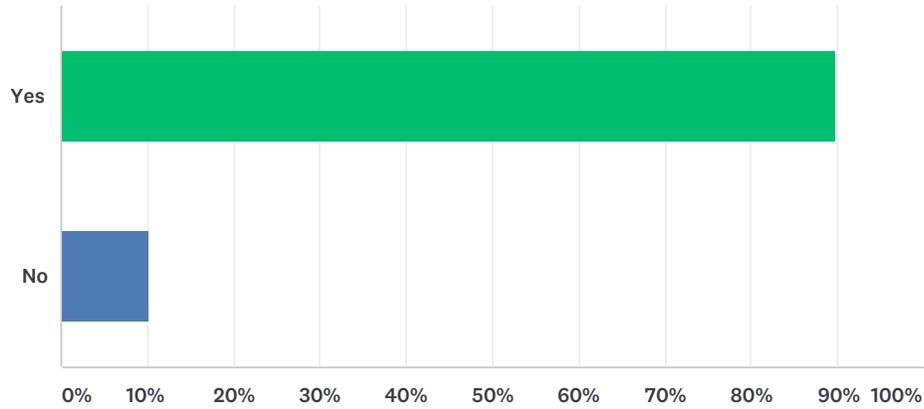
ANSWER CHOICES	RESPONSES	
Yes	94.20%	65
No	5.80%	4
TOTAL		69

#	COMMENTS	DATE
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1	using the above, allowable reasons for confinement, my flock only sees the outdoors for 50-60 days per year. maybe we need to consider alternatives	12/18/2018 2:47 PM
2	Continuous access to outdoor-like shelters should be permitted and preferred over periodic access to outdoors.	12/17/2018 10:05 AM
3	Yes, with a caveat. Operators should be encouraged to raise species that are hardy enough to thrive in outdoor access for the climatic conditions specific to their locations. Animals that are not hardy enough for outdoor access in existing climatic conditions should be discouraged from being raised.	12/16/2018 2:50 PM
4	too overbearing	12/15/2018 11:35 AM
5	Organic standards put too much emphasis on outdoor access. When the weather is marginal very few of my animals have the will to go outside. They are far more comfortable in the barn.	12/15/2018 11:10 AM
6	OMG thats 2 in a row i can agree on !	12/15/2018 3:18 AM
7	How long is temporary?	12/14/2018 4:51 PM
8	should be specifying the minimum sq metres of area per animal species that operator must comply with.	12/14/2018 12:51 PM
9	Too many livestock are still indoors.	12/14/2018 12:02 PM

**Q12 10.613 Codes of Practice Proposal:** In 2.5, add references to Codes of Practice for poultry, sheep, goats and rabbits. **Background:** The Codes of Practice are useful references for basic living conditions, such as number of nests, feeders or waterers, which are not specifically outlined in the COS. Section 6 refers to ‘best management practices’ (6.13.3 and 6.13.7), for which the relevant Codes of Practice can be used as a minimum when needed. Adding these codes as part of the Normative References would make it easier for CBs to refer applicants to these and for operators to find the resources they need. **Decision:** Accepted and the WG added the Codes for Transportation and Bison. The WG proposed adding “Note: In case of differences between any Codes of practice and the Organic Standards, the operators shall comply with the Organic Standards.” The TC supports the intent but has requested the WG add the content of the note into Section 6, rather than in 2.5.2.5 National Farm Animal Care Council (NFACC) Code of Practice for the Care and Handling of Dairy Cattle Code of Practice for the Care and Handling of Beef Cattle Code of Practice for the Care and Handling of Pigs Code of Practice for the Care and Handling of Hatching Eggs, Breeders, Chickens and Turkeys Code of Practice for the Care and Handling of Poultry - Layers Code of Practice for the Care and Handling of Sheep Code of Practice for the Care and Handling of Goats Code of Practice for the Care and Handling of Rabbits Code of Practice for the Care and Handling of Bison Code of Practice for the Care and Handling of Farm Animals: Transportation **Rationale:** The Codes are in the Standards as a reference and fill an educational purpose. As there are differences between the Codes and the Organic Standards, it is important to mention in Section 6 that the Standards are mandatory as the Codes are not. Do you agree with this decision?

Answered: 59 Skipped: 65

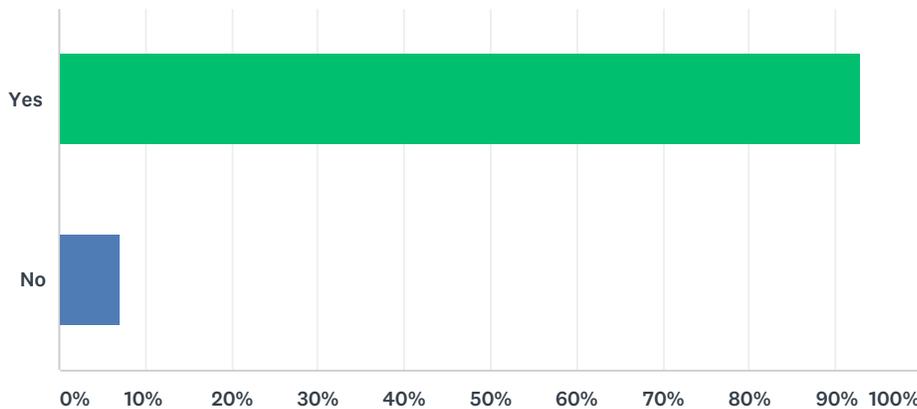


ANSWER CHOICES	RESPONSES	
Yes	89.83%	53
No	10.17%	6
TOTAL		59

#	COMMENTS	DATE
1	If this was a panel of farmers or animal husbandry persons, fine, but if the decision rests with people that have not raised any animals I disagree totally with the standard, this is the same as someone being a child psychologist and never having raised a kid.	12/22/2018 3:14 PM
2	Uncertain - there have been times in which I have found "customary best practices" - I assume this to be similar to "codes" to be different from the standard.	12/18/2018 6:35 AM
3	Would add modified wording to state producers should comply with codes of practice or COS whichever is higher.	12/15/2018 2:03 AM
4	but in case codes are more restrictive then the standard, one should not be operating contrary to code.	12/14/2018 12:51 PM
5	As a layer producer our facility has to comply with the Ontario Egg Farmers HACCP and Code of Practice Guidelines. We find it very frustrating when the Organic standards contradict with EFO standards. All standards should have food safety and animal health first and fore most! Ever organic egg producer should be able to score 100% on the EFO Code of Practice and HACCP audits. If complying with the Organic Standards put us offside with the HACCP or the Code of Practice then the two different bodies should get together so we can all agree that what we are doing is best for food safety and animal welfare. Please address this issue, this is a very serious problem that needs to be addressed	12/14/2018 11:57 AM

**Q13 10.63 Transition of poultry** Proposal: (1) Change the title of 6.3 so to clarify that the transition of poultry is covered in 6.13.1.c.1, not 6.3. OR (2) Add 6.13.1.c.1 as a new clause in 6.3. Background: The transition of poultry is covered in 6.13.1.c.1, not 6.3 (the general section on livestock transition). It's important to clarify that organic poultry for meat cannot be raised on transitional pastures; outdoor areas must be free of prohibited substances for 36 months prior to use (6.13.1.c.1). In the case of pullets, land can be in transition when pullets are started, but the 36-month mark must have been reached and the land certified by the time birds are ready to go out to pasture. Decision: Change title: 6.3 Transition of livestock production units to organic production, except poultry covered by 6.13.1.c.1 Rationale: Clarifies the issue. Do you agree with this decision?

Answered: 56 Skipped: 68

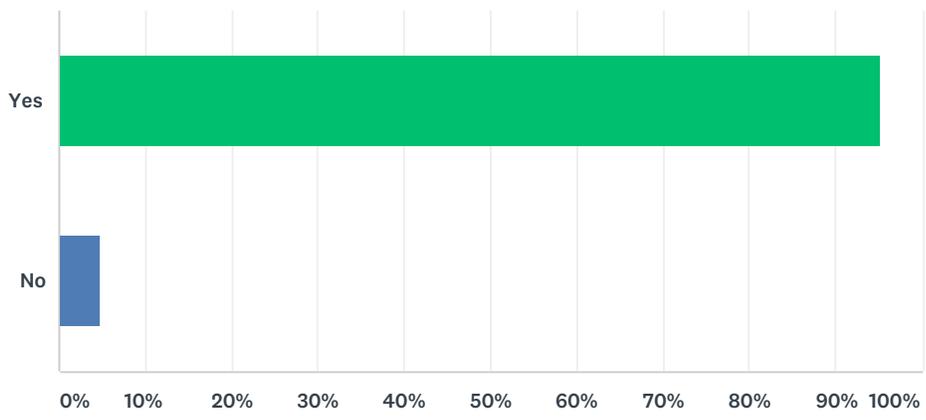


ANSWER CHOICES	RESPONSES
Yes	92.86% 52
No	7.14% 4
TOTAL	56

#	COMMENTS	DATE
1	N/A	12/20/2018 8:34 AM
2	3 years can be reduced to one if the soil microbiology is active to reduce any contaminate.	12/16/2018 10:30 AM

**Q14 10.671j Management of outdoor runs**  
**Proposal:** In Livestock living conditions (6.7.1), add “j) management of outdoor runs and pasture so that soil degradation, long-term damage to vegetation and the contamination of water are avoided.”  
**Background:** There are cases in which the design and construction of outdoor runs does not allow for or encourage use by the livestock year-round, such as cattle exercise areas that consistently become covered with ice in the winter due to poor drainage or poultry runs that provide all the requirements of the standard but do not make the birds feel safe. Design of outdoor areas should allow and encourage the livestock to use them as much as possible while also preventing damage to soil, water, and vegetation. Avoiding soil degradation or water contamination should not be a reason to restrict access to the outdoors, rather, outdoor access should be designed in a way that allows it to be used and avoid degradation.  
**Decision:** Accept but reword: “j) Construction and management of outdoor exercise areas runs and pastures to encourage appropriate year-round uses by livestock and to avoid so that soil degradation, long-term damage to vegetation and the contamination of water are avoided.”  
**Rationale:** The change puts the emphasis on the design and good use of outdoor exercise areas and pastures.  
**Do you agree with this decision?**

Answered: 62 Skipped: 62



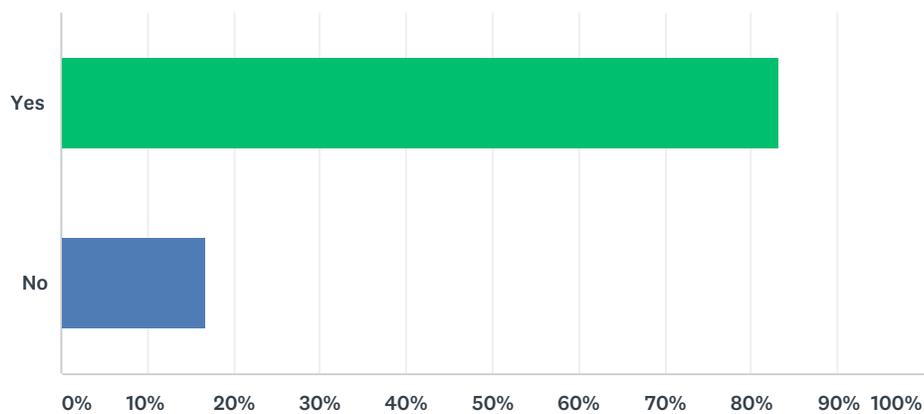
ANSWER CHOICES	RESPONSES
Yes	95.16% 59
No	4.84% 3
TOTAL	62

#	COMMENTS	DATE
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1	we need to understand that in autumn, cattle punch up any accessed area, creating mud with all the negative aspects, even when there is good drainage. Lay hens, on the other hand, by their very nature completely destroy the grazing area by their scratching & digging. The issue has to do with group numbers. Fewer than 10 cattle or 400 hens in a barn results in much better management capabilities. But this is not a commercial size. We better find ways to accomodate commercial scale, while at the same time honouring the intent of best practices & codes & standards.	12/18/2018 2:47 PM
2	Absolutely, heading in the right direction. Great eg, Salatin's head per acre / amount if time per acre / amount of weeks before cattle reintroduced to previously grazed acre.	12/18/2018 6:35 AM
3	But there should be an alternate pasture-like space with fresh microgreens that can be used on inclement days.	12/17/2018 10:05 AM
4	I fail to see the practicality when the cattle receive their requirements for fresh air exercise and even sunshine in the safety of their winter shelter.	12/15/2018 11:10 AM
5	open to differing opinions by inspectors and land owners.	12/14/2018 1:00 PM
6	Sometimes producers use their poor design as an excuse.	12/14/2018 12:02 PM
7	We have beautiful outdoor pastures, but our emphasis was also building a very beautiful indoor area. Our barn has way more space then required in the organic standard, but we felt the birds would enjoy the extra space and do better with it so that's what we built. Our bird have the required access to go to the outdoor pasture, but only a few go out. It is my professional opinion that all animals, if they have free choice, will choose to go where they want. So, if the birds would rather be inside because they want to be inside let them choose where they want to go. Animals are no different that humans they will find an area that they feel most comfortable. I agree they need to have access to the outdoors and lots of it, but if they chose not to go please let the animals decide!	12/14/2018 11:57 AM

**Q15 10.643 Giving calves milk from cows that have received antibiotics**  
**Proposal:** Allow the use of the milk of a cow which received treatment with antibiotics for feeding organic calves (after a 15-day withdrawal period), without the calves losing their organic status as slaughter animals.  
**Background:** It is disappointing to see such a large amount of milk thrown away by organic producers during the withdrawal period after antibiotic use.  
**Decision:** Accepted as follows: 6.4.3 c) ... Calves can be fed milk from an organic cow that received treatment with antibiotics if a withholding period twice the label requirement, or 14 days, whichever is longer, is applied;  
**Rationale:** This recommendation is consistent with the rest of the Standards and will reduce the waste of milk. Do you agree with this decision?

Answered: 66 Skipped: 58

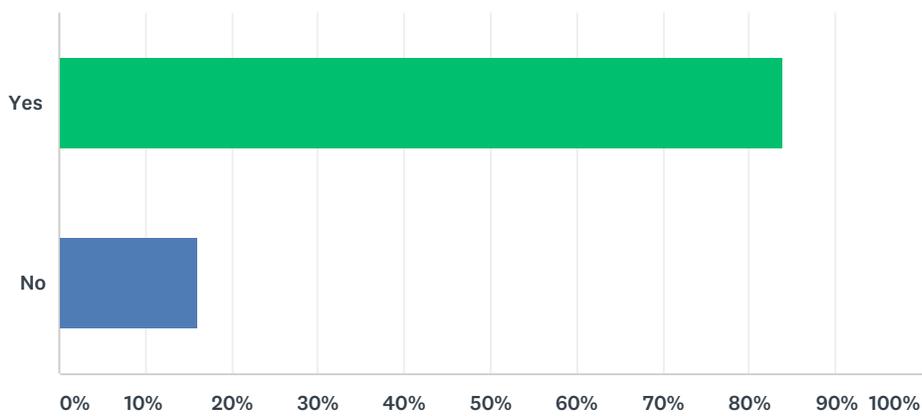


ANSWER CHOICES	RESPONSES	
Yes	83.33%	55
No	16.67%	11
TOTAL		66

#	COMMENTS	DATE
1	Use of antibiotics in dairy cattle should be for emergencies only. Allowing the milk to be fed to calves encourages more use of antibiotics on dairy farms.	12/19/2018 9:24 AM
2	Create provisions for diverting said milk to non organic (this may be inconsistent with previous questions I have answered).	12/18/2018 6:35 AM
3	Organicallly raised animals should not be fed antibiotics	12/18/2018 2:48 AM
4	with reservation	12/16/2018 6:22 PM
5	No antibiotics should be used ,milk should be dumped	12/15/2018 3:53 AM
6	I think no antibiotics should mean no antibiotics.	12/14/2018 12:02 PM

**Q16 10.643 Giving calves milk from cows that have received antibiotics**  
**Proposal:** Allow the use of the milk of a cow which received treatment with antibiotics for feeding organic calves (after a 15-day withdrawal period), without the calves losing their organic status as slaughter animals.  
**Background:** It is disappointing to see such a large amount of milk thrown away by organic producers during the withdrawal period after antibiotic use.  
**Decision:** Accepted as follows: 6.4.3 c) ... Calves can be fed milk from an organic cow that received treatment with antibiotics if a withholding period twice the label requirement, or 14 days, whichever is longer, is applied;  
**Rationale:** This recommendation is consistent with the rest of the Standards and will reduce the waste of milk. Do you agree with this decision?

Answered: 56 Skipped: 68

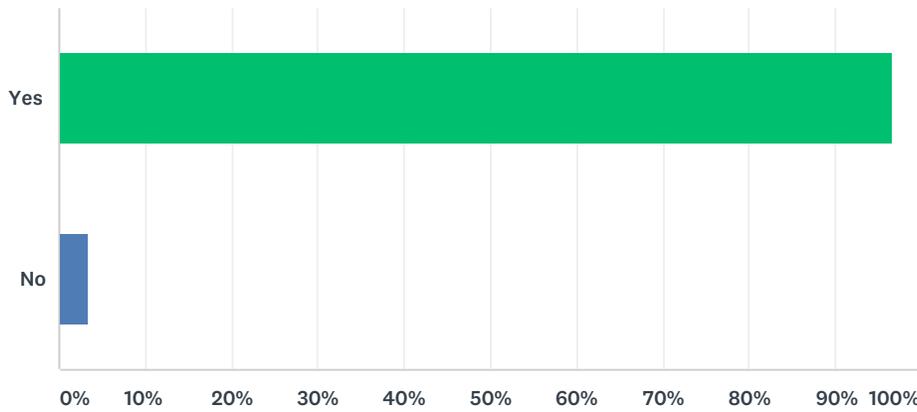


ANSWER CHOICES	RESPONSES	
Yes	83.93%	47
No	16.07%	9
TOTAL		56

#	COMMENTS	DATE
1	Waste of milk should not be an issue of consideration.	12/19/2018 9:24 AM
2	same as above	12/19/2018 7:14 AM
3	repeat of 15?	12/18/2018 2:47 PM
4	Use of colloidal silver can be done but not pharma antibiotic	12/18/2018 2:48 AM
5	with reservation	12/16/2018 6:22 PM
6	Why is this listed twice? number 15 and number 16	12/16/2018 2:50 PM
7	I think it is repeated	12/15/2018 5:18 PM

**Q17 10.6231 Replacing the word “chicks” with “birds”** Proposal: Change the word "chicks" for "birds" in 6.2.3.1b. Background: The expression "day-old chicks" is restrictive; the term should include poults, ducklings and other types of birds. Decision: Accepted as follows: 6.2.3.1 b) neither day-old poultry chicks nor the fertilized eggs they hatched from shall be given medication other than vaccines.; Rationale: It is more consistent with the rest of the Standards to use "poultry" instead of "birds." Do you agree with this decision?

Answered: 60 Skipped: 64

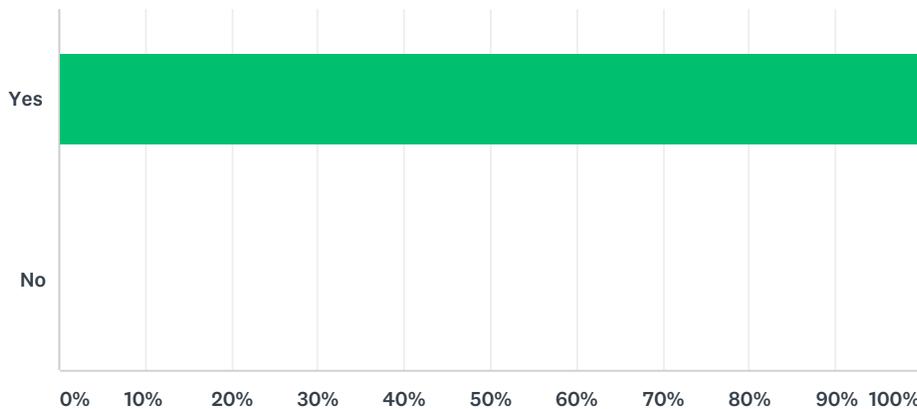


ANSWER CHOICES	RESPONSES
Yes	96.67% 58
No	3.33% 2
TOTAL	60

#	COMMENTS	DATE
1	Not certain what I am being asked here...	12/18/2018 6:35 AM
2	The standard should clearly cover all birds. Poultry means guineas, geese, chickens, pigeons and turkeys. It does not mean ducks, quail, emu, ostrich or other birds that have been raised as domestic	12/14/2018 11:14 AM

**Q18 10.671g Non-agricultural bedding** Proposal: Allow non-agricultural types of bedding in 6.7.1.g. provided they are not from GE plants and have not been treated with (or contain) prohibited substances. Background: Following the recommendation #318, the SIC committee recommends clarifying article 6.7.1.g as it does not mention the non-agricultural source of bedding. Decision: Accepted as follows: 6.7.1.g) appropriate resting and bedded areas that meet the needs of the animal. Indoor areas shall be large enough, solidly built, comfortable, clean and dry. Resting areas shall be covered with a thick layer of dry bedding that absorbs excrement. If organic bedding is commercially unavailable, bedding material from non-genetically engineered crops bedding material that is free of prohibited substances for at least 60 days prior to harvest may be used; non-agricultural absorbent bedding sources (minerals, cellulose, sawdust, paper products, etc.) can be used for livestock bedding as long as they are not GE products (1.4 a), and do not contain and/or have not been treated with prohibited substances (1.4 l). Rationale: There are no reasons to restrict those materials, as long as the reference is consistent with the restrictions on prohibited substances and GE plants. Do you agree with this decision?

Answered: 66 Skipped: 58

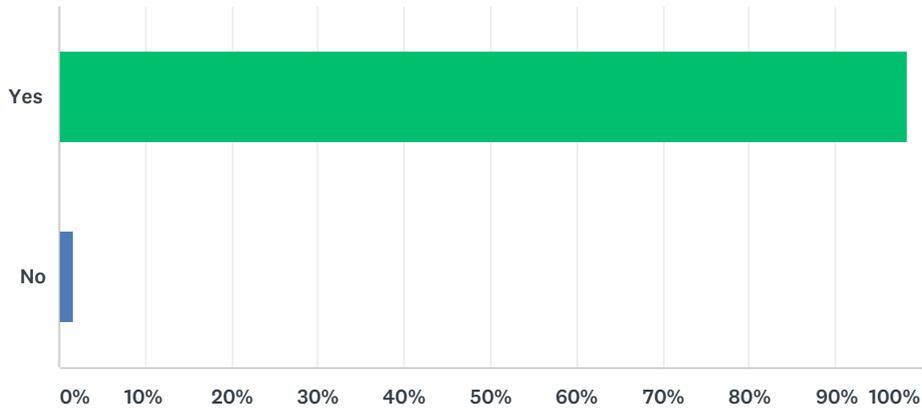


ANSWER CHOICES	RESPONSES	
Yes	100.00%	66
No	0.00%	0
TOTAL		66

#	COMMENTS	DATE
	There are no responses.	

**Q19 10.671g Non-agricultural bedding** Proposal: Allow non-agricultural types of bedding in 6.7.1.g. provided they are not from GE plants and have not been treated with (or contain) prohibited substances. Background: Following the recommendation #318, the SIC committee recommends clarifying article 6.7.1.g as it does not mention the non-agricultural source of bedding. Do you agree with this decision?

Answered: 58 Skipped: 66

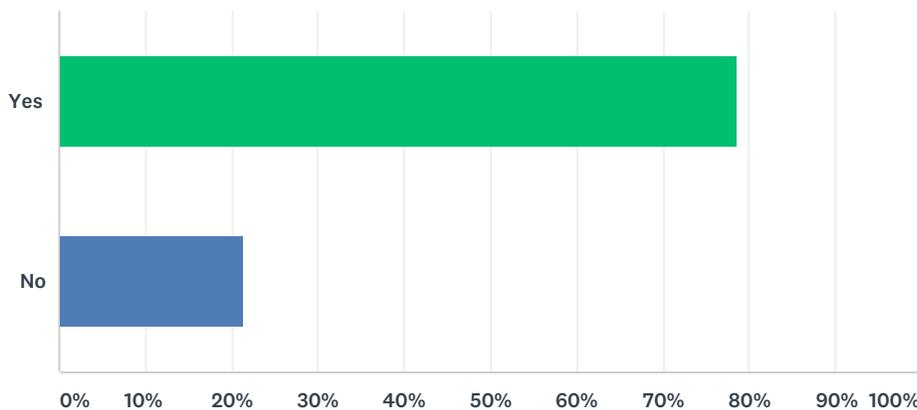


ANSWER CHOICES	RESPONSES
Yes	98.28% 57
No	1.72% 1
TOTAL	58

#	COMMENTS	DATE
1	If safe and free of heavy metals and other contaminants or toxic material	12/18/2018 2:48 AM

**Q20 10.72101-1 & 10.72101-2 Number of taps** Proposal: Allow a tap to be added on trees 12" in diameter if the spout is 5/16" and not disposable. Also, take into account whether a vacuum system is present and update Table 7 in 7.2.10.1 to specify diameter classes. Table 7 should include the sap potential that can be extracted given the number of taps. Background: 1) Forestry practices now use diameter classes instead of fixed diameters. The table should be updated. 2) Tapping practices have evolved. Taps are not as deep, causing less damage to trees. However, the new disposable spouts can increase the production of some taps by nearly 50%. This new practice damages trees and is harmful to the environment. The standard should take into account the type of spout used and the presence or absence of a vacuum system so that producers are on an even footing. Decision: Rejected. Rationale: Forestry plans are made by measuring the diameter using a forestry caliper. Estimates of diameter can vary depending on the angle of the tool. This technique is not convenient for producers and inspectors because it is cumbersome to handle a timber caliper. Do you agree with this decision?

Answered: 28 Skipped: 96

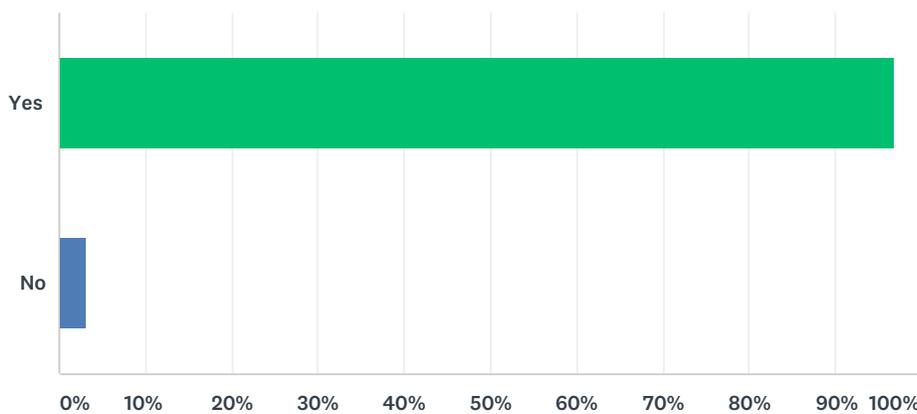


ANSWER CHOICES	RESPONSES
Yes	78.57% 22
No	21.43% 6
TOTAL	28

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM
2	It was rejected because of false information!	12/15/2018 3:34 AM

**Q21 10.72102 & 10.72101-1 Depth and diameter of taps**  
**Proposal:** Decrease the maximum diameter of the taps to 7.9 mm (5/16") from the current 11 mm (0.4375 in.) in 7.2.10.2.  
**Background:** The diameter of taps has decreased over the years to promote healing. The section should reflect advancements in practices and equipment. The spouts available on the market are 5/16" or 1/4". These smaller spouts reduce tree compartmentalization and promote healing and growth.  
**Decision:** Accepted as follows: 7.2.10.2: Depth of tap holes shall be no more than 4 cm (1.6 in.), not counting the bark, or 6 cm (2.4 in.) if the measurement is made from the surface of the bark. Diameters shall not be greater than 11 mm (0.4375 in.) 7.93 mm (5/16 in.).  
**Rationale:** This change will help maintain the health of trees.  
 Do you agree with this decision?

Answered: 31 Skipped: 93

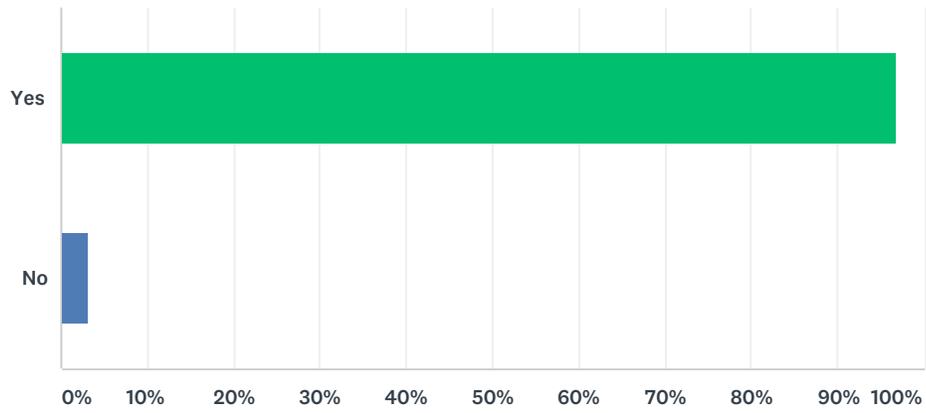


ANSWER CHOICES	RESPONSES	
Yes	96.77%	30
No	3.23%	1
TOTAL		31

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM
2	again false info	12/15/2018 3:34 AM

Q22 10.72104 Over-tapping Proposal: Remove the word “Over-tapping” in the title of 7.2.10.4. Simplify the wording about double tapping, prohibit retapping, and do not define the production season. Background: (1) The title of the section must be amended to eliminate the term and concept of “over-tapping,” which is not an advisable practice in a sugar bush operation. (2) Retapping, even if the diameter is not changed, is not a common practice and is detrimental to the integrity of the vacuum system. (3) Autumn syrup should continue to be banned, but depending on the region, the “maple syrup season” may extend over a very long period. With climate change, the season may also shift in time depending on the year and region. Decision: Accept modification of the title, simplify the wording and prohibit double tapping. Change as follows: 7.2.10.4 Over-tapping, Renewing the tap and removal of spouts. Maple trees shall only be tapped once a year. The practice of retapping a previously tapped tree during the same season or double tapping is prohibited. Renewing the same hole is allowed if the diameter is not changed. To allow trees to heal, spouts shall be removed no later than 60 days after the final, seasonal sap flow. Maple trees shall only be tapped during the sugar bush operation period (maple syrup season). It is prohibited to tap the trees in the fall. Rationale: Restricting tapping to one tapping per year systematically prohibits fall syrup. This prohibition is repeated in last sentence for better clarity. Retapping is already prohibited. We can keep mentioning the maple syrup season because it helps inspectors verify that tapping is done at the right time of the year. We don't want to mention specific months because seasons are rapidly changing. Do you agree with this decision?

Answered: 31 Skipped: 93

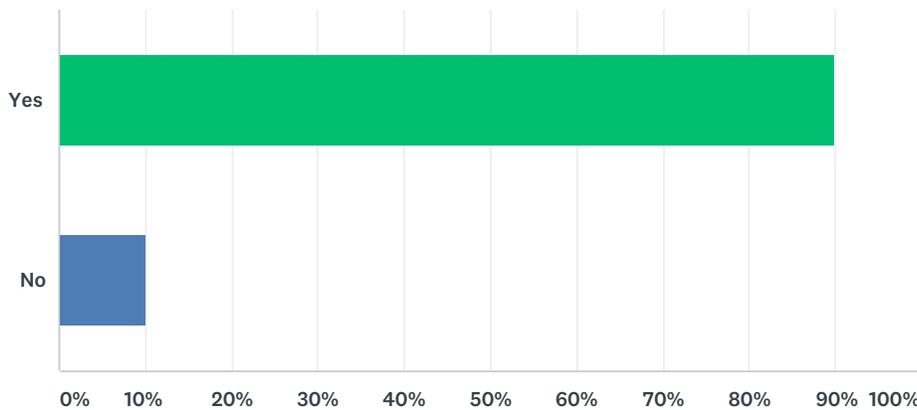


ANSWER CHOICES	RESPONSES	
Yes	96.77%	30
No	3.23%	1
TOTAL		31

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM
2	finally !!! for all the right reasons	12/15/2018 3:34 AM

**Q23 10.72111 Spouts Proposal: Prohibit disposable spouts in 7.2.11.1. Background: Plastic spouts produce a lot of waste, which goes against the principles of organic agriculture. Decision: Rejected but a note is added to 7.2.11.2. Vacuum collection system. "All parts of the collection system that may come in contact with sap shall be made of materials suitable for use in the manufacture of food products. Pumps shall be well-maintained and used oil shall be collected and disposed of so as to not contaminate the environment. Note: it is recommended to recycle all materials of the components of the collection system." Rationale: The use of disposable spouts may present important and significant advantages. It is recommended to target recycling of material instead of imposing specific prohibitions. For example, using polycarbonate spouts (recyclable) instead of nylon spouts (non-recyclable). The inspector can hardly verify the multi-year use of spouts; that proposal is rejected. Do you agree with this decision?**

Answered: 30 Skipped: 94

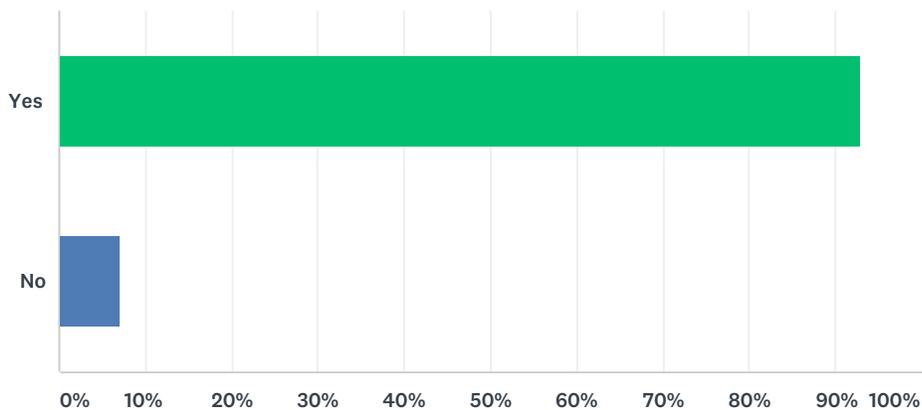


ANSWER CHOICES	RESPONSES	
Yes	90.00%	27
No	10.00%	3
TOTAL		30

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM
2	very good !	12/15/2018 3:34 AM
3	These are organic standards not semi-organic standards. Very little plastic is recycled in some northern communities. We have false assumptions regarding recycling.	12/14/2018 11:22 AM

Q24 10.7.2.10.2-2 Depth and diameter of tap holes Proposal: Add numbering and define 'regular tapping standards' in "7.2.10.2 Depth and diameter of tap holes." Background: The explanations in the paragraph are difficult to understand. A numbering system with letters (proposed here) or numbers could make it easier to understand and reduce the risk of confusion. Similarly, the reference to "regular tapping standards" without an accompanying definition may also cause confusion. "Regular tapping standards" should be defined. Decision: Accepted in part as follows: 7.2.10.2 Depth and diameter of tap holes Depth of tap holes shall be no more than 4 cm (1.6 in.), 5 cm (1.9in) not counting from the surface of the bark for trees with a diameter smaller than 25 cm (9.8in), or 6 cm (2.4 in.) from the surface of the bark for trees with a diameter higher than 25 cm (9.8in), if the measurement is made from the surface of the bark. Diameters shall not be greater than 11 mm (0.4375 in.). If a tree is diseased, infested with pests, and/or has decaying or tap holes that are not healing properly, stricter standards shall be implemented: the number of taps per tree shall be reduced to 2 where 7.2.10.1 allows 3, and 1 where 2 are allowed. When the diameter at breast height is less than 25 cm (~9 7/8 in.), tapping is prohibited. If a majority of trees are affected, tapping shall comply with table 7 of 7.2.10.1 regular tapping standards apply. However, spouts with a smaller diameter shall be used on trees, in the affected area, shall not be tapped Rationale: It is too difficult to measure the depth of the tap inside (without the bark) because the diameter of the tap complicates the process. The current proposal considers that the growth of the bark is proportional to the diameter of the tree. The maximal depth will take into account the different type of measurement. That should not create practical changes, and will facilitate inspection and measurement. For reducing confusion about regular tapping standards, there is a reference to table 7.2.10.1, which describes the number of taps per diameter. Do you agree with this decision?

Answered: 28 Skipped: 96

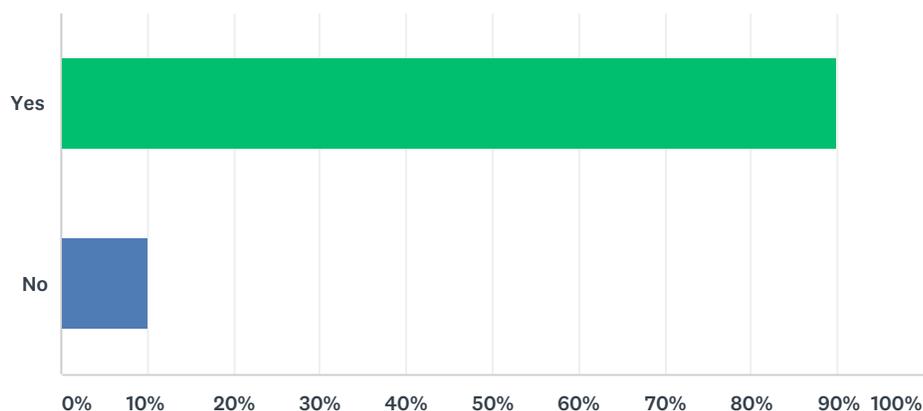


ANSWER CHOICES	RESPONSES	
Yes	92.86%	26
No	7.14%	2
TOTAL		28

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM
2	Don't forget to change the 11 mm diameter to be consistent with earlier suggestions	12/19/2018 7:17 AM
3	again who is making this shit up ??	12/15/2018 3:34 AM

Q25 10.72123 Allow the use of potassium metabisulfite Proposal: Add potassium metabisulfite, a similar chemical compound, as an alternative to sodium metabisulfite, which is already permitted under the standard in 7.2.12.3. Background: Sodium metabisulfite (SMBS) and/or potassium metabisulfite (PMBS) may be added to the filtrate to prevent mould growth. If SMBS or PMBS is used, the membrane shall be rinsed before next use with a volume of water equal to the hourly capacity of the membrane [for example, 2728 L (600 gal.) of water for a 2728 L/h (600 gal./h) membrane]. Off-site storage of the membrane (for example, by the membrane supplier) shall be documented. Decision: Accepted as follows in 7.2.12.3. Sap may be concentrated via reverse osmosis. Only reverse osmosis and nano-filtration (ultra-osmosis) membranes are allowed. In the off-season, osmosis membranes shall be stored, in filtrate, in a hermetically sealed container and kept in a frost-free location. Sodium metabisulfite (SMBS) or potassium metabisulfite (PMBS) may be added to the filtrate to prevent mould growth. If SMBS or PMBS is used, the membrane shall be rinsed before next use with a volume of water equal to the hourly capacity of the membrane (for example, 2271 2728 L (600 gal.) of water for a 2271 2728 L/h (600 gal./h) membrane). Off-site storage of the membrane (for example, by the membrane supplier) shall be documented. Rationale: There is an allergenic risk but this product (potassium metabisulfite) is authorized for use in the food industry provided the operator has to rinse well after use. It is a cleaning product, so there should not be residues in the final product. The current procedure eliminates traces of cleaners. Do you agree with this decision?

Answered: 30 Skipped: 94

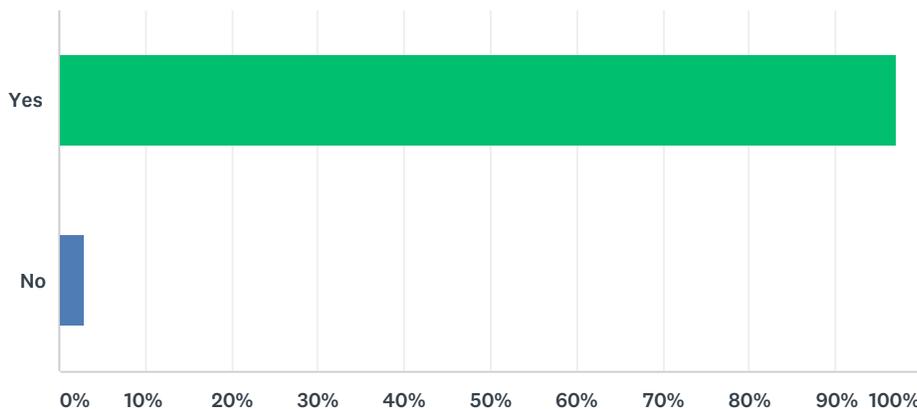


ANSWER CHOICES	RESPONSES	
Yes	90.00%	27
No	10.00%	3
TOTAL		30

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM

**Q26 10.72124 Adding more sources of fuel**  
**Proposal:** In 7.2.12.4 Evaporator, list additional sources of fuel: Permitted Fuels such as include wood, and heating oil, electricity, propane, natural gas, etc. that do not affect the integrity of the syrup are allowed.  
**Background:** Regarding a decision by the organic standard interpretation committee on the use of natural gas to heat evaporator pans (#346), it would be advisable to clarify the intent of the standard. The standard currently reads as if fuels are restricted to wood and heating oil, which is not the intent. The interpretation committee consulted a Quebec expert in maple syrup production, who said that wood and heating oil were the two most common fuel types when the standard was written and that is why they were included as examples. The intent was not to exclude other types of fuel, as long as the integrity of the syrup is maintained.\*\* Another proposal suggested that the standards do not mention the fuels to avoid the risk of leaving some out.  
**Decision:** Cut the reference to fuel: Permitted fuels include wood and heating oil. Used oils may be used as a primary or supplementary fuel. NOTE In Canada, additional provincial requirements may apply to the use of used oils.  
**Rationale:** Remove the mention of fuels as it is redundant; all types of fuels allowed by law are allowed. But we have to ensure that producers are aware of the regulations governing used oils; so the WG recommends keeping the note.  
**Do you agree with this decision?**

Answered: 33 Skipped: 91



ANSWER CHOICES	RESPONSES	
Yes	96.97%	32
No	3.03%	1

TOTAL	33
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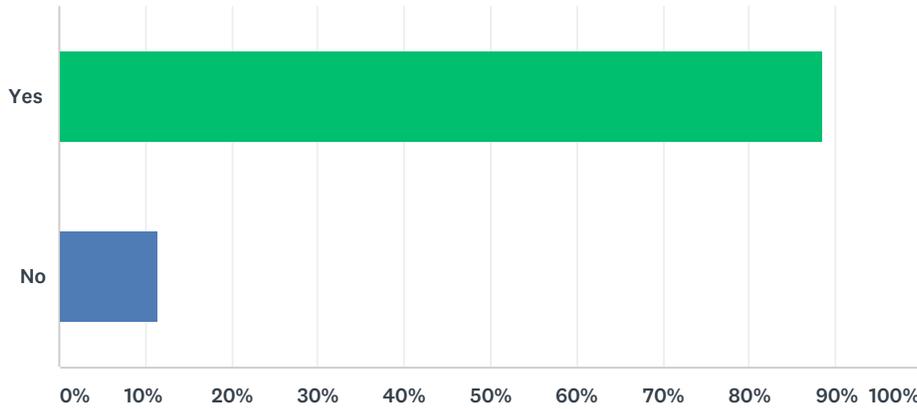
#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM

Q27 10.72132-1 & 10.72132-2 Changes to PWP tests Proposal: (1) In 7.2.13.2a1, change the cleaning limit from 85% to 90% in “If a Pure Water Permeability (PWP) test indicates that controlled efficiency is less than 85 90% of the controlled efficiency recorded at the beginning of the season, a caustic soda-based soap (NaOH) recommended by the manufacturer for membrane cleaning is permitted. (2) In 7.2.13.2a4, specify that rinse water must be neutralized. Background: (1) “Compliance with this standard reduces the efficiency of the membranes since when you start a new production day with membranes that are 85 or 86% efficient—particularly at the beginning of the season when the sap is difficult to filter—you quickly end up with membranes that are 75% efficient, so that in the middle of the day you have to stop concentrating to rinse, wash with NaOH, and rinse again, which wastes several hours and can cause the membranes to be considerably less efficient for the rest of the season. In addition, letting the efficiency drop below 85% increases the demand for soap during cleaning.” (2) Rinse water disposal after cleaning with NaOH (sodium hydroxide) should also be regulated because of its negative impact on the environment. Wastewater could be neutralized with citric acid, peracetic acid, or acetic acid, products already permitted for use in cleaning at the end of the season. Decision: Both proposals are rejected.

Add the need for measuring PWP after rinsing with warm filtrate as follows in 7.2.13.2a1. “If after rinsing with warm filtrate (in an open or closed circuit), a Pure Water Permeability (PWP) test indicates that controlled efficiency is less than 85% of the controlled efficiency recorded at the beginning of the season, a caustic soda-based soap (NaOH) recommended by the manufacturer for membrane cleaning is permitted.” Rationale: The industry would like daily cleaning with soap. The standard favours a minimal use of soap, including NaOH. In theory, the PWP test should be done after rinsing with water or warm filtrate for more than 30 minutes at greater than 40°C. If that procedure is not followed, the PWP results will be lower than 85 and we will have to clean (using soap). It is not the role of the inspector or of the standard to provide technical advice. There is consensus that the operators shall accurately calculate the PWP. Mentioning that the rinsing with warm filtrate shall be done before the PWP is measured will allow inspectors to correct and educate operators who do not calculate PWP accurately and who, consequently, product more soap waste than necessary. Mentioning

the open or closed circuit will allow the use of different rinsing methods. Regarding rinsing water, there are currently no verified methods allowing an efficient neutralization. More research needs to be done before making a decision. Do you agree with this decision?

Answered: 26 Skipped: 98

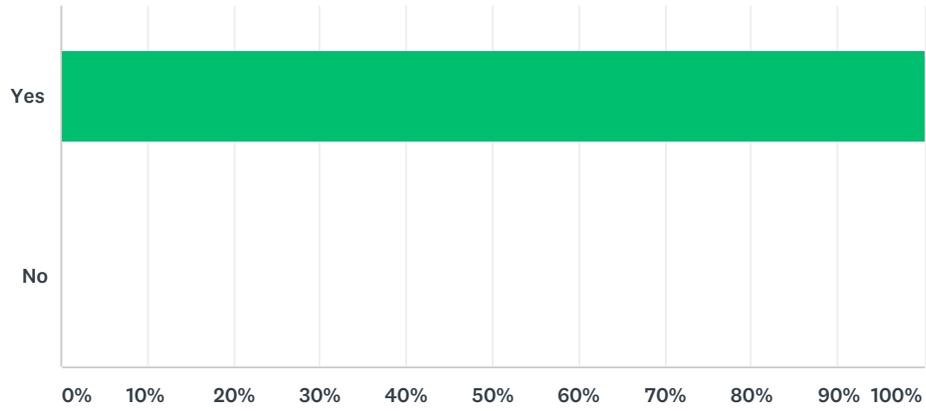


ANSWER CHOICES	RESPONSES
Yes	88.46% 23
No	11.54% 3
TOTAL	26

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM
2	We need to raise the bar of the standards in certain areas	12/14/2018 11:22 AM

Q28 10.72133-1 Acetic acid for rinsing Proposal: Replace the word “vinegar” in the in 7.2.13.3 with “acetic acid” to permit its use in-season and specify rinsing procedures for rinsing evaporators with glacial acetic acid (e.g., double rinsing is mandatory and the second rinsing shall be done under hot conditions). Background: (1) The standard generally refers to acetic acid under its scientific name “acetic acid” rather than one of its more common forms, “vinegar.” For end-of-season cleaning, glacial acetic acid (99%) is permitted while acetic acid solution (56%) is not. Replacing the word “vinegar” in the section with “acetic acid” would clarify things. (2) Due to a lack of sufficient data on the use of vinegar in-season and its impact on the product, it has always been prohibited. The Acer Centre’s findings demonstrate the efficacy of acetic acid (Ali et al., 2017). The physical, chemical, and sensory properties are not significantly altered if proper washing and rinsing procedures are followed. Evaporators should be permitted to be cleaned with acetic acid in-season, and rinsing procedures should be specified Decision: Accepted and modified by the WG and TC as follows: “7.2.13.2 Evaporators may be cleaned with potable water, or filtrate at any time or acetic acid at any time Vinegar or with fermented sap may be used at the end of the season. If acetic acid is used, double rinsing is mandatory and the second rinsing shall be done with hot water, filtrate or sap.” Rationale: The word “vinegar” is obsolete, as acetic acid at highest concentrations is now used. There is a debate about the mid-term risk of contamination of the syrup by residues on the stones or if rinsing procedures are not well applied. The proposal is accepted as it reduces the risk of fraud (use of phosphoric acid as an example) and risk of contamination is low. It is probable that some producers will decide to use two sets of pans to allow them to clean one pan while using the other in order to avoid slowing down production. Do you agree with this decision?

Answered: 31 Skipped: 93

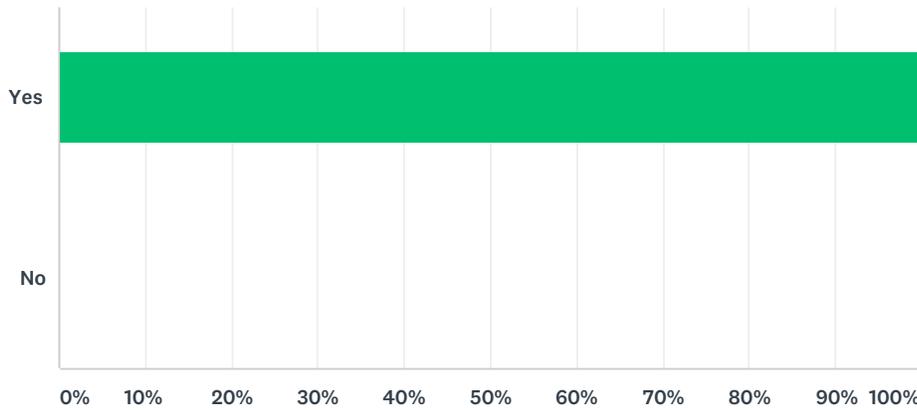


ANSWER CHOICES	RESPONSES	
Yes	100.00%	31
No	0.00%	0
TOTAL		31

#	COMMENTS	DATE
1	N/A	12/20/2018 8:38 AM

**Q29 Combining Tables 4.2 and 4.3.**Background: There is considerable overlap in the content of Table 4.2 (Soil amendments and crop nutrition) and Table 4.3 (Crop production aids and materials). Many substances are listed in both tables and some substances are listed only in one table but may be used for both crop nutrition and plant protection.Decision: Accepted.Rationale: The WG acknowledges that there will be challenges in combining the tables particularly due to the differences in the annotations for formulants. However, this is outweighed by the potential benefits. A single table for crop inputs will be less confusing for farmers and may simplify the WG’s work in the future. Do you agree with this decision?

Answered: 58 Skipped: 66



ANSWER CHOICES	RESPONSES
Yes	100.00% 58
No	0.00% 0
TOTAL	58

#	COMMENTS	DATE
1	increase clarity	12/14/2018 12:05 PM

## Q30 Do you have any further feedback or comments you wish to make on the organic standards review process?

Answered: 11 Skipped: 113

#	RESPONSES	DATE
1	Making any standard clearer to understand for the farmer is always a good thing	12/19/2018 1:30 PM
2	A review and reprint of this standard every five years is getting exhausting.... we just finish renovating to meet the "newest standard requirements" and then you are changing it again! when will our standard be enough... continuing to make structural changes is very costly and almost putting me out of business after 13 yrs and we are not getting compensated for these changes.. i would like to see that existing organic operations be grandfathered into the "new standard requirements" especially when structural changes are needed to meet the "new standard" requirements.	12/18/2018 8:26 AM
3	Thanks for your efforts.	12/18/2018 6:47 AM
4	As a concerned citizen and a consumer of organic products, my take away from this survey is that all of the emphasis seems to be on the convenience of the producer and what benefits him/her. There seems to be little concern if any for providing a quality product for the consumer. There is no attempt to define even in broad terms what an organic product is. There are also plenty of areas where standards are so eroded by exceptions that honesty, transparency and integrity for the consumer in favour of the producer are so lacking that I have lost all confidence in ever knowing what it is that I am actually getting for the premium that I pay for organic products. There seems to be no consistency. After completing this survey I have no confidence whatever left in organic products that are available in stores. I have therefore decided that given the uncertainty of what I am actually getting when I purchase a so called "organic" product, I am not getting my money's worth and will greatly curtail my purchases of these products in the market place in the future. I will probably still purchase these products on occasion directly from specific producer whom I know personally and whom I feel that I can trust. Other than that, I have come to feel that the label "certified organic" of "organic" is a meaningless sham and a deception foisted upon the average consumer. If Ontario producers want to increase their participation in the market place and perhaps even extend to foreign markets, they had better pull up their socks and "straighten up and fly right" I am very disappointed. My father, while he was alive, grew organic apples, mainly to protect his own health, but he never joined an organic organization to help market his apples. He once said they were all "crooks". When he said that, I thought he was being paranoid. Now, after his death, I feel that he was right.	12/16/2018 3:58 PM
5	They should be talking to the farmers more often on decision making of standards and not to people who haven't farm a day in there life	12/15/2018 5:13 AM
6	I would like to know who was the 'expert' used for the Maple Decisions	12/15/2018 3:36 AM
7	I was accepted as part of a working group for dairy, but have not received any correspondence This is related to inputs for dairy udder hygiene, which are very ambiguous in the standard. Please advise, Thanks, Bill van Nes	12/14/2018 1:07 PM
8	Keep the standards simple	12/14/2018 1:06 PM
9	No	12/14/2018 12:51 PM
10	none	12/14/2018 11:33 AM
11	Please review the Demeter International Standards for ideas to raise the bar so that the Organic Standards are accepted and trusted. You will find the DI Standards at <a href="http://www.demetercanada.ca">www.demetercanada.ca</a>	12/14/2018 11:24 AM