



CRSB

Canadian Roundtable
for Sustainable Beef

**CRSB SUSTAINABILITY INDICATORS FOR BEEF
PRODUCTION: DRAFT 2**

Public Consultation (February 28 – April 1, 2017)

Comments Received and CRSB Responses

The Canadian Roundtable for Sustainable Beef (CRSB) released the second draft of its sustainability indicators for beef operations for a 30-day public consultation; the consultation ran from February 28 to April 1, 2017. Many of the commenters sought clarification or additions to the measures, and recommended additional interpretation questions. Below is a table that contains the CRSB's responses to each of the comments received through the consultation. We would like to thank everyone who submitted comments for their time and constructive feedback.

SECTION	COMMENT	COMMENTER RECOMMENDATION	CRSB RESPONSE
General	Work with all beef breed associations and semen producing businesses to engage in testing of all beef sires for residual feed intake to increase the conversion of feed, enhance competitiveness with the other meat proteins.		Our membership includes the beef breed associations. Certainly feed conversion is an important component for sustainability.
Glossary	Wetlands are listed here under riparian areas. It is important to note that riparian areas only exist by the presence of wetlands not vice versa.	Wetlands should be listed with a distinct definition in the glossary of terms. Wetlands contribute many ecological benefits, including but not limited to the benefits listed as attributed to riparian areas and they are a key component to establishing sustainability.	A separate definition of wetlands has been added.
Glossary	Quality Beef	We commend the broader definition of beef quality you have adopted. Canadian beef quality grades give higher grades to grain feed beef as primarily grass-fed beef does not have the marbling defined as a high grade, despite other potential quality benefits of such beef.	Thank you.

<p>Introduction</p>	<p>The indicator development is guided by the ISEAL Alliance Code of Good Practice. The iSEAL standard is a framework for setting compliance and reporting systems in place. Consider adding the S629 Standard which is a <i>Framework to Evaluate the Sustainability of Agricultural Production Systems</i>. Standard S629 is not a competing standard but rather an overall framework for how all the metrics standards could be used in a continuous improvement process. The US Roundtable for Sustainable Beef will be following this framework.</p>	<p>The S629 Standard - <i>Framework to Evaluate the Sustainability of Agricultural Production Systems</i> should be added as part of the process and part of the building blocks of the CRSB Sustainability program. It should be added to the introduction.</p>	<p>Thank you for bringing the ASABE standard to our attention. We will explore adding it.</p>
	<p>The sections on people and on livestock welfare are comprehensive and good.</p>		<p>Thank you.</p>
	<p>The section on deadstock is very weak – it doesn't address any actual issues.</p> <p>If one of the objectives here is to address issues that influence social license and market access, then the issue of predator and other wildlife conflict management has to be much more robustly addressed. Prevention approaches exist but are not widely adopted – until they are, there will be valid and unhelpful criticism to deal with.</p>		<p>Since this is a topic covered by regulatory bodies, the CRSB Indicator Committee decided to integrate deadstock as referenced in the Beef Code of Practice as part of the Animal Health and Welfare indicators. We have also added further details on predators in the wildlife habitat indicator under Natural Resources.</p>
	<p>Obviously a lot of work has gone into this and it looks very good overall. Thanks.</p>		<p>Thank you very much!</p>

	<p>Does carbon sequestration only apply to atmospheric carbon dioxide? Is that the equivalent you are measuring in root mass or whatever you measure in the soil? Oddly that is pulled from IPCC. CO₂ is the form in the air but it is a different form of C when shoved in the soil is it not?</p>	<p>Adding “equivalents” in there might help. Make it “atmospheric carbon dioxide equivalents.”</p>	<p>A scientific expert from the University of Manitoba was consulted and the definition has been updated to help clarify the process of carbon capture and storage, both on land and in the ocean.</p>
	<p>“Healthy” reads like a health plan, not a state. “Soil health” reads like Healthy soil. Soil health may be degraded to not be able to support plant growth. Again that definition does not sound like a measurable thing, instead it sounds like an aspiration. “Watershed health” suffers from the same aspiration instead of defining a measurement with a gradient.</p>	<p>Straighten out if you are defining an aspirational state. If so, healthy is the right word. If you are defining something to be measured on a gradient then health is the right word. The definition of “Healthy” in the current document does not cut it. That is a definition of health management.</p>	<p>Further clarifications on the expectations in each level of achievement have been added. This more explicitly defines what we are measuring.</p>
	<p>This is a good start. I am curious about the planned sample size for piloting these measures. It will be important to get beyond the leaders and early adapters to see how this will stand up in the field.</p>		<p>The field-testing went very well and offered many lessons learned which we have incorporated. We engaged 21 producers across Canada.</p>

Economic Viability	As a pillar of sustainability, economic viability is not included in the list of indicators to the degree we feel necessary. While we understand that this is due to privacy concerns, we believe that economic viability should be more overtly included in the indicators and CRSB's verification framework. Overall, we continue to see economic viability as having too small a role in CRSB's assessment and verification of sustainability at the producer level. Economic viability is a pillar of sustainability, along with social responsibility and environmental soundness, and it should be more strongly integrated in CRSB's work.		The CRSB Indicator and Verification Committees discussed this comment and approaches to address it. Economic viability has been added to the five principles of sustainable beef diagram so that this important component is made explicit. We have also added more information related to economic sustainability in the introduction of the indicator document. Lastly, the Indicator Committee agreed that the CRSB will compile resources around succession and transition planning to the online database.
Scoring system	What does the 'Barriers to Entry' Section mean?	Define this section and consider alternative wording. Is each bullet here a grounds for excluding an operation? Or likely reasons that an operation would chose not to participate?	These are further defined for each indicator and a definition is now included in the glossary.
	What would qualify as N/A?	Who or how would it be determined what criteria are not applicable to a particular operation?	This will be included in the auditor materials.
	How will these criteria be evaluated?	Must an operation fulfill all of the bullet points in a level for a given indicator to receive those points?	Details for each level for each indicator have been added for further clarity.

	<p>Need to distinguish between planning and practices.</p>	<p>The bullet points under each level include both planning tasks (e.g., baseline knowledge, protocols established, documented information) as well as practices (e.g., indirect or direct measures, examples of improvement, practices and procedures). While acknowledging that both planning and practices are important, we suggest that these are either separately scored or that practices are given greater weight than plans. An operation that has extensive plans and protocols in place but that fails to implement actual sustainable practices should not receive more points than one who has excellent environmental and sustainable practices, though perhaps has not written these up into formal plans. As the document reads now, it appears that an operation could receive a level 3 via extensive plans, protocols, documentation and monitoring, without actually implementing any of these plans.</p>	<p>The details for each level have been fleshed out further. These provide more clarity on what we are looking for in each level. The implementation of plans has been made explicit as well.</p>
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	<p>Footnote 16: Plans can be documented or not;</p> <p>Footnote 17: specific plans or measures are operation specific</p>	<p>We understand that these footnotes are intended to assure that the indicators can be applicable to the wide variety of beef producing operations in Canada, which vary from small family farms to large industrial operations. We agree with the importance to develop a set of indicators that can encompass the diversity of beef producers across Canada. However, we suggest that you consider different criteria or scoring systems depending on an operation's size. For example, clear and detailed plans and protocols are appropriate for larger operations with many employees; they allow all staff to work towards the same goal and assure that goals are met.</p> <p>Large operations also have the capacity to document practices and create detailed plans.</p> <p>For smaller producers where one or two people do the majority of the work, such detailed planning may be overly burdensome. These smaller producers will require either assistance in developing plans (perhaps the Environmental Farm Plan could play a role here?) or a simplified process of planning and protocols.</p> <p>Additionally, the types of practices appropriate for small versus large operations will likely vary.</p> <p>Differentiating what would be expected from different types or sizes of producers (even a simple above/below a certain head count) would allow the indicators to encompass diverse operations while still specifying relevant and appropriate criteria to meet.</p>	<p>The Verification Committee decided that each operation would be scored in the same manner. Some indicators that are more relevant for the feedlot sector, for example, have been identified more explicitly. The indicators were developed with different operation sizes in mind, and tested with auditors with a range of operations to ensure broad applicability.</p>
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	<p>Assure points given reflect actual outcomes</p>	<p>The way these are currently written, it seems likely that an operation which has many potential negative impacts on sustainability, but implements many plans or procedures to mitigate these could score higher than an operation with very few negative impacts on sustainability. For example, operations with large manure ponds have greater impacts on air quality, local communities and watershed quality; yet there are many activities such operations could do to mitigate these impacts.</p> <p>This would might give them a high score for sustainability using your scoring system. On the other hand, an operation where manure is naturally integrated into grasslands via grazing and pasture management, would have fewer impacts to mitigate and thus may receive a lower score, despite the greater sustainability of this operation. This is a challenge for many sustainability assessments. For example, consumers that own houses can implement many different sustainability practices, yet those who live in small apartments have a smaller total ecological impact. We recommend you consider how to reward those operations that have lower impacts on the environment and community, and thus less need of mitigating measures.</p>	<p>The levels build on one another and a participant cannot attain level 3 without achieving level 1. The documentation and records is an added requirement as a participant progresses through the levels.</p>
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CRSB Sustainability Indicators for Beef Production

	The definition of direct vs. indirect measures is not stated resulting in inconsistencies in the actual examples of indirect vs. direct measures in the specific indicators that follow (i.e. some are repeated in both sections, some should be placed in the opposite categories)	Provide a clear definition of indirect measures vs. direct measures in the pre-ample for Section 2.0; this should provide more clarity/guidance on which examples should be placed where in the subsequent indicator sections.	We have merged the measures into one measure category as they were creating confusion. We have also defined the scoring system for each indicator to allow for greater clarity/guidance.
	Examples of Indirect measures	These are the plans and intentions that are in place within an operation. We need to ensure that the suggested Indirect Measures in each section are truly meaningful or have an impact that can be based on current research/science.	
	Examples of Direct measures	These should have tangible qualifiers or outcomes attached to them. To me, having a plan in place is an Indirect Measure; being able to show that the plan is being executed is the Direct Measure.	

NATURAL RESOURCES

General	I would like to stress that wetlands provide a multitude of ecological good and services that support nearly all of the desired outcomes of the Natural Resource section of this framework. The presence and retention of wetlands can be used as a simple and valuable indicator for sustainability.		Thank you, the CRSB's Indicator Committee has reviewed this comment and incorporated wetland, per the commenter's recommendation.
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<p>2.1 Natural Resources</p>	<p>All but one of the key performance indicators in the Natural Resources criteria section is already covered by provincially and federally recognized Environmental Farm Plans (EFP) or by the Plan d'accompagnement agroenvironnemental in Quebec (PAA). In fact, the EFP is very extensive as a risk-assessment tool and an effective corrective action plan. The EFP and PAA do not directly address Carbon sequestration or GHG mitigation, but do address some of the indirect measures listed for that practice (e.g. manure and nutrient management, reduced tillage, grassland / pasture management).</p> <p>The EFP or PAA covers much more than the CRSB indicators for Natural Resources.</p> <p><i>The Environmental Farm Plan was developed as an environmental risk management tool to enable environmental concerns to be enumerated at the farm scale and provides a framework for farmers to use as they plan to reduce the impact of any identified concerns through the use of best management practices. The EFP program provides a platform that allows farmers to demonstrate their environmental ethics and assists them in making investments that mitigate environmental risks associated with production practices. (Ontario EFP 4th Edition)</i></p> <p>The EFP is also used by provincial and federal governments as commitment in areas of program design and development and funding support.</p>	<p>Accept at par each of the Natural Resource's key performance indicators once a producer demonstrated that he/she completed a provincially recognized Environmental Farm Plan (PAA in Quebec) of his/her farm.</p>	<p>The CRSB is developing an equivalency benchmarking process. This would need to undergo an assessment to ensure the EFP's cover all of the indicators in the Natural Resources principle.</p>
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Indicator 1: Riparian areas, surface and ground water sources and nutrient runoff are responsibly managed to help maintain or enhance watershed health.			
	Water quality testing and a riparian health assessment are good examples of Direct Measures		Thank you.
	Operations that not only maintain but also restore riparian forests, forest fragments and wetlands should be rewarded for such efforts	See for example, suggested practices for habitat restoration in the following guides: http://stewardshipcentrebc.ca/resources/	The resource provided will be added to our online resources database. Thank you.
Riparian areas, surface and ground water sources and nutrient runoff are responsibly managed to help maintain or enhance watershed health. (page 11)	Wetlands should be included in the title of this section in order to position wetlands as core to achieving the stated water quality and quantity outcomes (watershed health). The inherent beneficial processes of wetlands for watershed health include; water filtration, flood mitigation, ground water recharge etc.	An important management option for proof of sustainability on farm should be wetland conservation and restoration. This should be considered a key indicator in this section. Examples of indirect measure: Wetland conservation or restoration plans are in place. Sample questions to support interpretation: Are existing wetlands being maintained? Does the operation plan to restore previously drained wetlands? Has restoration of wetlands been undertaken?	Wetlands were added to the watershed health indicator.
	Watershed health includes the uplands as well as waterbodies and riparian areas.	Include upland management in the goal of watershed health. This can include appropriate land-use decisions for the specific site (eg soils-at-risk should not be cultivated). An example of direct measure are range/pasture health assessments. Avoiding or undoing wetland drainage is also an important component of watershed health.	Healthy wetlands and riparian areas, riparian health assessments and a grazing management plan have been added as measures to this indicator.

	Does BC have a riparian area assessment criteria; my fear is that their solution will be to fence every watercourse which is almost impossible and I don't necessarily think is the best for wildlife movement, etc.		Fencing is not a requirement in our framework. We focus on outcomes rather than prescriptive ways to achieve those outcomes.
	Also, just want to point out that ecological goods can be the maintenance and use of dams on rangeland and the producers' regulation of that water to maintain the hydrology of an area.		Thank you.
Indicator 2: Soil health is maintained or enhanced. (page 12)			
	Wetlands provide soil health benefits including; mitigating overland flooding, soil erosion and transport of nutrients.	Examples of indirect measures: Include maintenance or restoration of wetlands as an indicator. Sample question to support interpretation: Are measures taken to slow moving water or capture and hold greater quantities of water on farm to prevent the loss of top soil or nutrients downstream? (eg. Wetland restoration).	The measure and sample question recommended have been included.
Indicator 3: Practices that support carbon sequestration and minimize emissions are employed.			
	Methane is not explicitly mentioned in this indicator, despite being the most important GHG emission from beef production.	We suggest that you explicitly mention reducing methane emissions as a goal in this indicator. Recognizing the challenges to managing methane, its impact warrants greater effort. Using biodigestors is one way to at least turn the methane produced into useful energy and create compost for sale. Other methods to reduce methane should be explored as well. This is an area you could include in the innovation section as well.	Methane at the farm level is challenging to measure. The CRSB has benchmarked the greenhouse gas footprint in the National Beef Sustainability Assessment. Visit our website to learn more www.crsb.ca . Reducing the greenhouse footprint of the Canadian beef industry per unit of product produced is one goal in the CRSB's Sustainability Strategy.

Practices that support carbon sequestration and minimize emissions are employed. (page 13)	Note that wetlands are proven to sequester significant amounts of carbon and that draining wetlands results in substantial emissions.	Examples of indirect measures: Wetland acres conserved and restored. Sample questions to support interpretation: Are there wetlands on your operation? Are you retaining your wetlands as part of your carbon sequestration and emission reduction strategies?	The measure and sample question recommended have been included.
	Low stress weaning is an indirect indicator of carbon sequestration and carbon emissions?	Take that out of that chart. It is a stretch too far.	You are correct - this has been removed. Thank you for the comment.
Indicator 4. Air quality for people and animals is responsibly managed.			
	Air quality for people and animals is responsibly managed.	Air quality for people and animals is responsibly managed.	Thank you, this revision has been made.
	<p>Examples of Indirect Measures:</p> <p>The primary emphasis should be the completion and implementation of an odour management plan.</p> <p>This is a comprehensive tool that was completed via a multi-stakeholder process with the participation of Alberta Beef Producers, Alberta Cattle Feeders' Association, Alberta Milk, Intensive Livestock Working Group, Alberta Agriculture, Food and Rural Development, non-government organizations, among several other stakeholders.</p> <p>Although it emphasizes "odour", the technologies and practices listed will also have effects on reducing other air emissions of concern, e.g., ammonia, etc.</p> <p>The plan also addresses most, if not all the other examples listed.</p>	<p>Examples of Indirect Measures:</p> <p>Completion and implementation of an odour management plan</p>	Thank you. This indicator was revised to include odour and dust. The tool will be added to our online resources database.

	<p>Examples of Direct Measures:</p> <p>The measurement (regular or occasional) of ambient or indoor air quality at the farm level is not viable or feasible. The measurement or monitoring of air emissions from cattle production systems is a very complicated, intricate, exorbitant issue, even for the scientific and research community.</p> <p>Subsequently, I recommend that CRSB focus efforts and promote beneficial management practices (BMPs) that can generate the most co-benefits with the least trade-offs. Co-benefits are not limited to managing air emissions of concern from cattle farming operations, but also consider other environmental factors (e.g. climate change, water, etc.), social factors (e.g. animal welfare, etc.) and economic factors (e.g., improved productivity, reduced input costs, etc.).</p> <p>The “odour management plan” is a BMP tool that was developed giving consideration to these three drivers, in order to achieve a successful sustainability (economic, social and environmental) outcome.</p>	<p>Examples of Direct Measures:</p> <ul style="list-style-type: none"> *Ambient air quality measures and concentrations - delete *Regular monitoring of air quality - delete *Masks available for workers - move to “2.2 People and the Community” *Complete and implement one or more options listed in an odour management plan - add 	<p>The recommended measures were deleted. The development and implementation of an odour and dust management plan was added to level 3.</p>
	<p>Spelling error</p>	<p>Change “responsible managed” to “responsibly managed”.</p>	<p>Thank you, this revision has been made.</p>
	<p>The text appears to overlook manure spreading on pastures.</p> <p>Are there additional measure that need to be identified to address air quality in this scenario?</p>		<p>The levels have been further defined for this indicator and the focus is on odour following subject matter expert review and recommendation.</p>

Indicator 5: Grasslands, tame pastures and native ecosystems are maintained or enhanced.			
	No definition of native ecosystem in Glossary of Terms. Ensure that wetlands are considered a native ecosystem.	Examples of indirect measure: Wetland conservation or restoration plans are in place. Sample questions to support interpretation: Are existing wetlands being maintained? Does the operation plan to restore previously drained wetlands? Has restoration of wetlands been undertaken?	A definition that includes wetlands has been added, as have the questions recommended by the commenter.
	Grazing practices can enhance habitat for some prairie endangered species, it isn't necessarily damaging.	Change to: "Is the operation aware of any species at risk on the operation? Does it implement practices to minimize negative impacts <i>or optimize positive impacts</i> on these species?"	This recommendation has been included.
	What type of measures are considered to ecosystems are protected from "land conversion"?	Ranchers were uncertain whether this was addressing conversion of land in production to urban development; or whether it was targeting the conversion of native grasslands to crops. They were also uncertain what type of protection was being referenced. Were you meaning Conservation covenants or the Agricultural Land Reserve.	The objective of this indicator has been modified to clarify the intent.

Indicator 6: Habitat for wildlife is maintained or enhanced.			
Habitat for wildlife is maintained or enhanced.	This is the only section that addresses predators and problem wildlife. If the idea is to address consumer concerns, the standard needs to be more specific than just “habitat”	<p>Add a new section or modify this one along the lines of what I suggest in the next line.</p> <p>7. Wildlife conflict prevention</p> <p><u>Concrete measures</u> could include: Quantified losses of livestock and/or forage; Number of predators or problem wildlife killed or physically removed from property. <u>Sample questions to address the indicator</u> could include: are feed storage areas enclosed by wildlife exclusion fencing? What deterrent technologies are in place (eg: active herding, use of livestock guard animals, electric fencing, etc.)? Are deadstock removed from the ecosystem in a timely way?</p>	Wildlife conflict prevention has been added to this indicator. The measures and sample questions have been incorporated.
Habitat for wildlife is maintained or enhanced. (page 16)	Good inclusion of wetlands here but again important to recognize wetlands as more than just provision of habitat.		Thank you. We have incorporated it in indicator 1 more explicitly.

	<p>Should conservation covenants or host agreements (i.e., SARPAL) be listed in the direct measures.</p> <p>Recommend having more balance in the questions.</p> <p>Recommend including a question about crop/pasture depredation.</p>	<p>[...] delivers the SARPAL program for cattle producers provincially and issues Host Agreements with a term of 5yrs. We recognize that the circumstances in BC are different because a protection order is not in place.</p> <p>Our committee of ranchers recommended that the indicator recognize the other side of wildlife management; the cost to provide habitat. The questions do not address the cost side of the enhancing/maintaining wildlife habitat.</p> <p>Since there is a question about predation (livestock) we recommend including a question to assess wildlife damage on crops/pastures.</p>	<p>More questions were added to balance the discussion on this issue. Thank you!</p>
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PEOPLE AND THE COMMUNITY

General	I wondered if it would be of value to include an indicator in here that speaks to succession planning and/or strategic/business planning. Though this has been talked about within our industry for a long time, we are seeing that many out there don't have a plan for their ranch or a vision of what they want their future to look like (whether it's transfer or the business to someone in family or not). At the end of the day the economic impacts of this to our overall industry is huge (hence, the lack of herd expansion in Canada relative to the US).		The CRSB's Indicator Committee discussed this recommendation and decided to add resources for producers on the online database for those who are interested in learning more.
Page 18	There is a WHIMIS instead of WHMIS on page 18, The 1. Safe and Healthy Work Environment is ensured.	Make it WHMIS.	Thank you, this revision has been made.
Indicator 1: A safe and healthy work environment is ensured.			
	Missing word	In the penultimate bullet, should read "Do workers understand <u>the</u> safety procedures?"	Thank you, this revision has been made.
	Add Direct Measure	<p>In BC, the AgSafe organization works with ranchers to offer regular/weekly safety talks in a practical setting. We call them "tailgate talks" where the foreman/farm boss/manager will review safety items, training etc. Recommend adding safety meetings or tailgate talks in the list of direct measures.</p> <p>In the questions section, could ask if the ranch works with AgSafe BC (formerly FARSHA) to minimize workplace hazards and incidents.</p>	<p>The recommended measures have been added.</p> <p>The recommended question has been added, but expanded to include subject matter experts broadly.</p>

		Add 'Posted safety policies and/or visitors log book present.' as a measure	These measures have been added.
Indicator 2: All workers are treated with equity and respect.			
	On page 19 it should not say "Minimum wage paid to workers" it should say "wage paid to workers. It reads like it is encouraging Minimum wage payment. It does so again in the Sample Questions.	Take out "Minimum."	Minimum has been removed.
		Add 'Racism/sexual mistreatment training initiatives or sign postage present.' as a measure	A broad measure on mistreatment training initiatives or signage has been added.
	Add a phrase	Recommend changing "Are workers paid minimum wage?" to Are workers paid <u>at least</u> minimum wage?	This question has been removed. "Minimum wage" has been revised to read just "Wage".
Indicator 3: operation is involved in its community			
Operation supports its community.	On page 20 "coach any sports teams" should be "help out with sports teams or leagues or activities" to allow for managers and other volunteer roles such as commissioner or teacher of activities that are not sports.	Broaden the language to include other volunteer roles.	The examples that followed the question were moved to the measures and broadened.

	Additional questions	<p>The [...] committee identified the following additional items for determining community involvement:</p> <p>Are you a 4-H leader or club volunteer?</p> <p>Are you a volunteer within your community?</p> <p>Do you serve on cattle industry boards or committees?</p> <p>Are you involved in the local/regional stock association?</p> <p>The committee recommended wording these questions so that it is clear that you do not have to be doing all of the listed items to qualify.</p>	The questions that were recommended have been added to the measures section. This indicator is for information collection purposes only and therefore it is not scored.
	Recommend adding extension/outreach in the examples of direct measures.	<p>Questions to include:</p> <p>Do you host farm tours (i.e., schools, service groups, etc.)?</p> <p>Have you participated in an industry field day/outreach?</p> <p>Are you active in agricultural education/outreach in your community?</p>	The questions that were recommended have been added to the measures section.

ANIMAL HEALTH AND WELFARE

<p>General</p>	<p>Each of the key performance indicators in the Animal Health and Welfare criteria section is already covered by National Farm Animal Care Council (NFACC) Codes of Practices. The beef sector (including cattle feeders) and the dairy sector each has developed and put in motion approved Animal Assessment Programs using the NFACC Animal Assessment Framework with either second or third party evaluation auditors.</p> <p>While the NFACC approved Animal Assessment Programs cover all of the CRSB Animal Health and Welfare criteria, the CRSB criteria are not as comprehensive as the NFACC programs.</p>	<p>Accept at par each of the Animal Health and Welfare’s key performance indicators once a producer demonstrated that he/she completed and passed a registered NFACC animal assessment program for beef, cattle feeders or dairy.</p>	<p>Thank you, we will explore this opportunity with NFACC. As part of our Verification Framework, we are developing a benchmarking and equivalency assessment process.</p> <p>We will flag this as one area to investigate further.</p>
<p>Indicator 1: Nutritional needs of cattle are met to promote proper animal health</p>			
	<p>“Cattle are in optimum health and body condition score”. There are many reasons that this might happen for a short time. So long as actions are being taken to correct will the operation still score a 3?</p>		<p>That is correct, there must be an improvement plan. Further details have been added to the indicator to clarify.</p>
	<p>Recommend including fire/wildfire</p>	<p>Does the operation have a back-up feed plan for flood, drought or <u>wildfire</u>?</p>	<p>The recommendation has been added.</p>
	<p>Page 25 “parasecticide” maybe parasiticide?</p>	<p>Parasiticide does not pass spell check either.</p>	<p>Thank you, we have confirmed that this is the correct spelling, ‘parasiticide’.</p>

	Indirect and Direct measure examples are inconsistent	BCS is positioned in both indirect and direct categories – place in Direct Measure category only. “Nutritionist/Veterinarian business relationship” should be 2 separate parameters (not an “or” statement) therefore remove the “veterinarian” from this statement – 1) nutritionist business relationship; 2) valid veterinarian/client/patient relationship with licensed practitioner. Clearly define “Training records” – training of whom or what?	The measures have been merged and scoring system fleshed out for each indicator (for BCS and training). The two relationships have been separated out.
	Separate nutritionist and veterinarian in Sample Questions to Support Interpretation	Does the operation have an established working relationship with a nutritionist? Does the operation have an established working relationship with a veterinarian?	The recommended questions have been included.

Indicator 2: Cattle have sufficient quantity and quality of water to meet their physical needs.

	Quantity vs. Quality	<p>The [...] would like to be consistent in our view that clean/safe drinking water should be available but that this water does not need to be potable. We wanted to be sure that the verification protocols would not be requiring potable water. We do not feel it is achievable to test all livestock water sources.</p> <p>Quality of water is listed in the indicator yet none of the questions address water quality sampling/testing. It is the [...] view the cattle will drink from the nearest water source rather than the best water source. We support providing safe/clean water but do not support the need to conduct water testing (particularly when cattle are on Crown range/Community Pasture).</p>	The Beef Code of Practice is the reference point for this indicator. The Code indicates palatable water. This comment and recommendation will be passed to the Verification Committee. Water testing is not a requirement.
	Indirect and Direct measure examples are inconsistent	<p>Consider moving these “Direct measures” to “Indirect measures”: Watering program; water management plan; observation of watering areas (access to quality and quantity)</p> <p>- Within Direct measures, consider the following: monitoring log of water quality, accessibility and/or cleaning schedule; multiple watering sources or back up water sources <i>appropriate to animal density and accessibility</i></p>	Thank you, the recommended measures have been added.

Indicator 3: Animal health and welfare is monitored and maintained as per the relevant National Farm Animal Care Council Code of Practice; sick and injured animals are treated appropriately.			
	Provide more clarity around the Direct measures	<p>What specifically are we looking at in “visual assessment of cattle”? Consider evaluating BCS, lameness, mentation, hair coat.</p> <p>Consider an updated wording of: “documented actions executed in relation to the herd health plan or program; Written health records and treatments.</p>	The recommendations have been included.
Indicator 4: Animal health products are responsibly used and disposed of, according to label or veterinary prescription.			
	Record Keeping Access to Veterinarians	<p>There isn't a question about record keeping for illness, injury, treatment, dose, prognosis/outcome, withdrawal period.</p> <p>We encourage producers to have a relationship with their veterinarian, however, we recognize that there are many areas in British Columbia where veterinary services are not available. The restricted access to animal health products will make proper animal care in underserved areas extremely difficult.</p>	This has been added and have added a definition of the vet-client-patient relationship, with the understanding that remote locations have limited access to in-person veterinary services.
	Indirect and Direct measure examples are inconsistent	<p>Move the following to “Indirect Measures”: Product labels followed; parasiticide and treatment protocols; disposal plan.</p> <p>Change Indirect Measure diction to “Vaccination <i>protocol</i>”</p>	Thank you, we have incorporated your revisions. Note that the measures have been integrated.
		Add 'review of the vaccine records and storage. Review for outdated medicines.' as measures	These measures have been added.

Indicator 5: Steps are taken to minimize animal pain and distress

	<p>Recommend asking about the age of cattle when these painful procedures are done.</p> <p>Recommend including branding in the list of painful procedures.</p>	<p>Recommend changing the second bullet to read: “How old is the animal when castrated and dehorned?”</p> <p>In British Columbia, ranchers who utilize Crown range are required to have a visual identifier (i.e., brand) on the animal before turn out. At this time, ranchers are still legally required to brand animals in BC. It may be necessary to identify what steps are taken to minimize pain/distress when branding the animals</p> <p>The Association would recommend the industry support research into pain mitigation for branding procedures in addition to castration and dehorning.</p>	<p>The recommended revision to the question has been made. Branding is identified in the list of painful procedures in the document.</p>
	<p>What about earmarking or waddles? Although the beef code says to discontinue, but in our case, especially on our cows, I feel like we could consider this a best practice as we can identify cows better from distances when they have an earmark.</p>		<p>This is not currently covered in our framework.</p>
	<p>Indirect and Direct measure examples are inconsistent</p>	<p>Move the following to “Indirect Measures”: pain medications available</p> <p>Move the following to “Direct Measures”: <i>Documentation of implementation of requirements in Code of Practice regarding animal pain; pain medication used (is this redundant to the previous point?)</i></p> <p>Regarding “Observation of procedures” in direct measures, what exactly are we observing? This may also be redundant if they are implementing the requirements in the Code of Practice.</p>	<p>The revisions to the measures have been incorporated. Documentation is required to achieve level 3, so this was added as an additional measures. Observation of procedures is an opportunity for the auditor to see first-hand the practices in action and support their assessment of the indicator and its objective.</p>

Indicator 6” Decision points for euthanasia are clear and methods of euthanasia are acceptable.			
	Indirect and Direct measure examples are inconsistent	<p>Move the following to “Indirect Measures”: Documented euthanasia protocol; appropriate equipment for euthanasia; cleaning equipment for guns.</p> <p>Move the following to “Direct Measures”: <i>Documented</i> implementation of requirements in the Code of Practice regarding euthanasia.</p> <p>Regarding “Observation of euthanasia” in direct measures, what exactly are we observing? This may also be redundant if they are implementing the requirements in the Code of Practice.</p>	
Indicator 7: Feeding area and pastures allow cattle to express normal behaviours including resting postures.			
	Indirect measures can be simplified	<p>Consider the following since number of head per acre or pen space per animal is specified in Direct Measures:</p> <p>Indirect measures – Observation of cattle in feeding areas, resting areas and pastures (<i>should we specify what exactly we are observing here?</i>)</p> <p>Direct measures – Implementation of the space requirements as outlined in the Code of Practice as it relates to number of head per acre or pen space per animal</p>	

Indicator #8: Unnecessary animal distress if minimized.

	<p>Indirect and Direct measure examples are inconsistent</p>	<p>Move the following to “Indirect Measures”: Extreme weather management plan; pre-transport decision tree.</p> <p>Move the following to “Direct Measures”: <i>Documented</i> implementation of requirements in the appropriate Code of Practice;</p> <p>“Observation of loading/unloading cattle” is in the Indirect Measures and “Observation of cattle handling and transport” is in the Direct Measures – we need consistency of where we will place “Observations” and provide more specific details on what exactly we are observing.</p> <p>Add the following to Direct Measures: Training records for cattle handling for producers and employees.</p> <p>How will “Low stress cattle handling facilities” be defined? This may be too general of a direct measure to have any meaningful impact. Consider moving this to “indirect measures” and use the terms “Appropriate cattle handling facilities that minimize stress and injury to the animal and handler.”</p>	
	<p>Add additional example of direct measure for flood/wildfire evacuation</p>	<p>Add flood/wildfire evacuation plan as a direct measure</p>	<p>This recommended measure has been added.</p>

FOOD

<p>General</p>	<p>Each of the key performance indicators in the Food criteria section is already covered by Canadian Food Inspection Agency (CFIA) Food Safety Recognition Program. Both proAction[®] Food Safety and the Verified Beef Production Plus programs are recognized and approved by the CFIA as rigorous HACCP based food safety programs.</p> <p>To meet the CFIA requirements, programs must meet the technical definition of technical soundness in that it promotes the production of safe food at the farm and adheres to Hazard Analysis Critical Control Point (HACCP) principles as defined by Codex Alimentarius - and supports the effective implementation, administration, delivery and maintenance of a technically sound food safety program.</p> <p>While CFIA on-farm food safety rigorous programs more than cover the CRSB Food criteria, the CRSB criteria are not as comprehensive as the CFIA programs.</p>	<p>Accept at par each of the Canadian Food Inspection Agency's key performance indicators once a producer demonstrated that he/she completed and passed a CFIA approved on-farm food safety program, either the proAction[®]: Food Safety program or the Verified Beef Production Plus program.</p>	<p>Thank you. As part of the Verification Framework, the CRSB is developing a process to benchmark and assess equivalency with other programs. We will flag this as one area to investigate further.</p>
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Indicator 1: On-farm food safety procedures are followed and contributions to the production of safe, quality beef are made.

	<p>I think I lost the comment form and will voice my comment here. In the examples of direct measures - food safety, documents or records showing withdrawal times met or managed.</p>	<p>My suggestion is to add "or identified on pre-shipment records" to this comment.</p>	<p>Thank you, this measure has been added.</p>
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		Only portions of this section apply to cow/calf producers. The [...] committee was uncertain about the CFIA feed inspection results and when a medicated feed inspection would be required.	The CRSB is not including these regulatory requirements in the framework. The inspection results can be used by a producer to demonstrate achievement in an indicator during the audit but we will not be asking for it.
Indicator 2: Verification-relevant information is shared up and down the value chain to allow for to aggregate reporting.			
	Change Do to Does	In the third bullet, recommend changing do to does.	This indicator has been modified.
		Add 'On farm filing system for CCIA, VBP, grade sheets, beef production programs for verification-relevant information sharing or retention.' as measures	This indicator has been modified.

EFFICIENCY AND INNOVATION

<p>General</p>	<p>Each of the key performance indicators in the Energy and Innovation criteria section is already covered by provincially and federally recognized Environmental Farm Plans (EFP) or by the Plan d'accompagnement agroenvironnemental in Quebec (PAA) . In fact, the EFP / PAA is very extensive as a risk-assessment tool and an effective corrective action plan.</p> <p>The EFP / PAA covers much more than the CRSB indicators for efficient use of energy and resources.</p> <p><i>The Environmental Farm Plan was developed as an environmental risk management tool to enable environmental concerns to be enumerated at the farm scale and provides a framework for farmers to use as they plan to reduce the impact of any identified concerns through the use of best management practices. The EFP program provides a platform that allows farmers to demonstrate their environmental ethics and assists them in making investments that mitigate environmental risks associated with production practices.</i></p> <p>The EFP is also used by provincial and federal governments as commitment in areas of program design and development and funding support.</p>	<p>Accept at par each of the Energy and Innovation's key performance indicators once a producer demonstrated that he/she completed a provincially recognized Environmental Farm Plan (PAA in Quebec) of his/her farm.</p>	<p>Thank you. As part of the Verification Framework, the CRSB is developing a process to benchmark and assess equivalency with other programs. We will flag this as one area to investigate further.</p>
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Indicator 1: Operation reduces, reuses and recycles, as feasible facilities, services and technologies exist or become available.			
	Limited access to agricultural recycling	The Association supports the recycling of agricultural plastics. In British Columbia, a few small regional pilot projects were completed. Unfortunately, this initiative has not gained enough momentum or support to become available province-wide. The existing Stewardship BC program doesn't accept agricultural plastics.	The CRSB understands that recycling programs do not exist in all areas, therefore the indicator has been written to incorporate this potential lack of availability.
Indicator 2: Energy and resources are responsibly used.			
	Incentive programs are needed to encourage adoption of efficient technology	Upgrading equipment and technology can be expensive. The [...] would like to see programs to assist producers in adopting new technology.	Thank you for this feedback. We will flag this as a potential project opportunity.
Indicator 3: Innovation and Technology are used to improve responsible production			
		<p>Add breeding selection goals, objectives and program as measures</p> <p>Potential questions could be:</p> <ul style="list-style-type: none"> • What are or are there any factors used for selection of breeding goals and objectives? • Is there any data from a processor used in an evaluation system for assessment of goals and objective results? 	Thank you - this recommendation has been incorporated.
Indicator 4: Crops inputs are safely and responsibly used and disposed.			
	Add a word	<p>Indirect measures: We recommend adding the word "of" to read "disposed <u>of</u> as per ..."</p> <p>Direct measures: "Crop <u>input</u> products..."</p>	Thank you - this recommendation has been incorporated.
	Additional direct measure	Include GPS system and proper calibration of sprayers	Thank you - this recommendation has been incorporated.

Indicator 5: Deadstock is responsibly managed			
		Add questions: What measures are used to prevent pollution (air, water, etc.) and predation from deadstock disposal?	Thank you - this recommendation has been incorporated.
	The objective statement is very weak. Meeting a government standard is not the same as demonstrating exemplary practice to consumers.	Change to: Dead stock is removed from the environment in a timely and efficient manner that minimizes risk to wildlife and health.	Thank you. The objective has been updated.
		Add the following potential questions: Are all deaths listed and assessed? Does the farm vet review the list for any issues?	The focus of this indicator for this iteration of the framework is whether or not the producer meets the provincial requirements. We will note this for future iterations.
Indicator 6: Continuous learning regarding sustainability in beef production is pursued.			
	Add informal industry learning opportunities	The Association recommends allowing informal learning opportunities through: 1) involvement on industry committees/boards and 2) reading industry trade publications	This recommended learning opportunities have been added.
CONCLUSION			
Challenges to implementation		The [...] felt that the list of challenges were very accurate and reflected the barriers for producer participation.	Thank you.

APPENDICES

<p>Appendix A: Resource Database – Natural Resource Indicators: References, programs and tools. (page 42)</p>		<p>Ducks Unlimited Canada: http://www.ducks.ca/ Should be listed as a national resource.</p>	<p>Thank you, we will add this resource to the Resources Database, which is being transferred to our website rather than being contained in this document.</p>
		<p>All of the Sask Ministry of Agriculture links are outdated.</p>	<p>Thank you, we double check all the links in the Resources Database, which is being transferred to our website rather than being contained in this document.</p>
		<p>Foragebeef.ca is an excellent resource</p>	<p>Thank you, we will add it to the Resources Database, which is being transferred to our website rather than being contained in this document.</p>