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**DELIVERED VIA EMAIL**

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Canadian General Standards Board  
Place du Portage III, 6B1  
11 Laurier Street  
Gatineau, Quebec K1A 1G6

Dear Members of the Canadian General Standards Board,

**RE: 2025 Review of the Canadian Organic Standards – Strengthening Animal Welfare Provisions**

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Please accept this submission on behalf of Animal Environmental Legal Advocacy (“AEL Advocacy”) as part of the 2025 review of the Canadian Organic Standards.<sup>1</sup> Our comments focus on urgently needed improvements to animal welfare provisions to ensure the Standards reflect both public expectations and the foundational principles of organic agriculture.

The Canadian Organic Standards are among the few legally enforceable and independently verified frameworks for farmed animal welfare in Canada. Unlike conventional farming, which relies primarily on voluntary, industry-created codes of practice, the Canadian Organic Standards impose mandatory requirements on certified organic producers. This unique position places additional responsibility on the Board to ensure that the Standards not only reflect best practices but also evolve in step with current science and societal values.

Despite this higher bar, significant gaps persist. The continued allowance of practices such as the use of fast-growing broiler chicken breeds, prolonged tethering of dairy cows in tie stalls, and the use of glue traps for pest control causes avoidable animal suffering. These practices undermine both public trust in organic certification and the overall integrity of organic agriculture as a system that promotes environmental stewardship, animal well-being, and ethical farming practices.

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<sup>1</sup> <https://organicfederation.ca/2025-review-of-the-canadian-organic-standards/>

## A. About AEL Advocacy

Animal Environmental Legal Advocacy (“AEL Advocacy”) is a public interest law practice and not-for-profit organization based in Ontario. Our lawyers understand the important interconnection between humans, animals, and the environment. We leverage our legal and political expertise to support individuals, communities, and organizations working to protect animals and the environments where they live.

## B. AEL Advocacy’s Comments and Recommendations

### 1. Require Higher Welfare Breeds for Broiler Chickens (Section 6.1.2)

The use of fast-growing broiler chicken breeds is a well-documented animal welfare concern. These birds are genetically selected to reach slaughter weight in just 38 days—four times faster than in the 1950s.<sup>2</sup> This unnaturally accelerated growth causes:

- Lameness and bone deformities;
- Heart failure and sudden death syndrome;
- Painful muscle and skin conditions such as footpad dermatitis and breast blisters;
- Severe mobility issues, limiting natural behaviours such as walking and dust bathing.<sup>3</sup>

These outcomes are incompatible with both the intent and spirit of organic agriculture, which is meant to prioritize animal well-being alongside environmental and human health.

**Recommendation:** Amend Section 6.1.2 to require the use of slower-growing, higher-welfare chicken breeds as outlined in the Better Chicken Commitment.<sup>4</sup> These breeds are less prone to the serious health issues associated with conventional fast-growing strains and demonstrate improved welfare outcomes in areas such as mobility, skeletal health, and mortality rates.

### 2. Mandate Daily Exercise for Tie-Stall Dairy Cows (Section 6.12.1)

Current organic standards allow dairy cows kept in tie stalls to be let out for exercise only twice a week for one hour—an allowance that is both outdated and insufficient.<sup>5</sup> Scientific research and welfare assessments confirm that prolonged tethering in tie stalls:

- Increases the risk of joint deterioration and lameness;
- Contributes to mastitis, skin lesions, and hoof problems;

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<sup>2</sup> <https://animaljustice.ca/blog/canada-is-updating-organic-standards-take-action-now>

<sup>3</sup> <https://animaljustice.ca/blog/canada-is-updating-organic-standards-take-action-now>

<sup>4</sup> <https://betterchickencommitment.com/ca/policy/en/>

<sup>5</sup> <https://animaljustice.ca/blog/canada-is-updating-organic-standards-take-action-now>

- Restricts natural behaviours, causing frustration and abnormal stress-related behaviours such as tongue rolling and bar biting.<sup>6</sup>

Daily outdoor access is necessary to reduce these welfare risks. Moreover, several jurisdictions have already moved toward phasing out tie-stall systems altogether in recognition of their inherent welfare limitations.

**Recommendation:** Amend Section 6.12.1 to require daily outdoor exercise for all cows kept in tie stalls. AEL Advocacy further recommends establishing a clear timeline for phasing out tie stalls entirely within the Canadian Organic Standards, aligning with emerging international best practices in organic dairy farming.

### 3. Prohibit Glue Traps for Pest Control (Section 8.3.2)

Glue traps are inhumane by design, causing rodents and other small animals to suffer slow, painful deaths from dehydration, starvation, exhaustion, or injury.<sup>7</sup> Their use also creates unintended harm to non-target species, including:

- Wild birds, squirrels, and chipmunks;
- Insects critical to ecosystem health;
- Companion animals such as cats and dogs.<sup>8</sup>

Given that organic farming emphasizes ecological balance and humane practices, the continued allowance of glue traps is inconsistent with the values underpinning the Canadian Organic Standards.

**Recommendation:** Amend Section 8.3.2 to prohibit the use of glue traps for pest control on organic farms. The Standards should explicitly require the use of humane, integrated pest management (“IPM”) alternatives, including exclusion techniques, live traps, and ecological control methods that align with organic agriculture principles.

## C. Conclusion

Strengthening the Canadian Organic Standards to address these identified gaps is critical to ensuring that organic certification is consistent with both its ethical foundations and public expectations. Animal welfare is not only a core value of organic agriculture—it is essential to maintaining public trust in the organic label.

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<sup>6</sup> <https://animaljustice.ca/blog/canada-is-updating-organic-standards-take-action-now>

<sup>7</sup> <https://animaljustice.ca/blog/canada-is-updating-organic-standards-take-action-now>

<sup>8</sup> <https://animaljustice.ca/blog/canada-is-updating-organic-standards-take-action-now>

We urge the Canadian General Standards Board to adopt these recommended changes as part of the 2025 review. Doing so will make a meaningful and measurable difference for farmed animals across Canada while reinforcing the integrity of the organic certification system.

We thank you for your consideration of our comments and welcome further engagement with the Board on this important matter.

Sincerely,

**ANIMAL ENVIRONMENTAL LEGAL ADVOCACY**



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Kira Berkeley  
Co-Director & Counsel