



CRSB SUSTAINABLE BEEF PRODUCTION STANDARD  
Version 2.0

Public Consultation (October 4 - December 2, 2022)  
Comments Received and CRSB Responses

**GENERAL FEEDBACK**

Indicator	Feedback	Proposed Solution	Commenter	Company	Response
General	CABV believe that the changes reflect a process of continual improvement in the program. We agree that the proposed changes contribute to a strengthening of the existing program. We would like to thank CSRB for the opportunity to comment on the proposed changes and congratulate CSRB for their commitment to continual improvement		Henry Ceelen	Canadian Association of Bovine Veterinarians	We appreciate CABV's support and are committed to continuing to improve beef sustainability in Canada.
General	BFO believes that the current calf-crop born and raised on an operation pre-CRSB Certification date are managed under the same sustainable practices as if they'd been born post-certification date. Therefore, BFO recommends that CSRB implement an eligibility allowance for the calf-crop immediately preceding the official certification date for all newly CSRB Certified Operations, while maintaining the integrity and credibility of the CSRB claims.		Jaclyn Horenberg	Beef Farmers of Ontario	CRSB is aware of newly certified producers frustration on this issue and are exploring our options for qualifying the calf-crop immediately preceding their official certification date. We will have an update available in early 2023.
General	Agricultural safety and well-being is accepted as important. It is paramount to a successful beef production operation that hazards, and inherent risks be managed eliminated or mitigated. To continue to address agricultural safety as an important factor in sustainability, CASA proposes including additional relevant and practical inclusions that recognize the reality of beef production and elevate the value of the worker in the industry and encourage the developing trend to shift culture that includes enhanced worker care and protection.		Robin Anderson	Canadian Agricultural Safety Association	The People and the Community (PC) Principle addresses the critical role that all human participants play within the beef value chain. The individual comments made regarding workers in relation to indicators in other Principles (NR, AHW) are well reasoned and will be considered for inclusion within the PC indicators and/or the updated Implementation Guide that accompanies the Sustainable Beef Production Standard.
General	To the CSRB Council and members of the Review Committee,  First, congratulations on reaching the five-year milestone for the Framework Certification! Over the last 20+ years WWF has been engaging in these multi-stakeholder platforms and understand how difficult it can be to launch and sustain a voluntary market program such as this. It's important to take time to celebrate the wins, while also remaining focused on the future, and in this case, pursuing a review and update using ISEAL guidelines.  To-date the Framework has served its purpose in helping demonstrate the outcomes of sustainable beef production across Canada and it will continue to do so with the revisions suggested. Several WWF team members have provided suggestions on improvements to specific items in the submitted excel file. The proposed updates are necessary to strengthen the Framework but do not add much additional rigor or credibility to the program without a clear understanding of the ways that the outcomes are demonstrated and evaluated through the audit process.  Findings from WWF's 2022 Plowprint Report indicate nearly 1.8 million acres of grasslands were destroyed across the US and Canadian Great Plains in 2020 alone, contributing to a total of nearly 10 million acres plowed across the region since 2016. The suggested updates to Natural Resources indicator #5 (grasslands) will strengthen the industry's ability to preserve this at-risk ecosystem and would be even stronger if ranchers could demonstrate a commitment to not convert the grassland for 10 years.  The CSRB has played a critical role in demonstrating the sustainability of the beef industry and is a core reason that the 2030 Canadian beef goals are science-based and ambitious. The understanding and application of sustainability in the beef industry has evolved rapidly and is supported with new market instruments and corporate guidance through tools like the Science-Based Targets Initiative-Forest, Land Use and Agriculture (FLAG) guidance for setting climate targets and the GHG Protocol for accounting and reporting progress. CSRB should consider aligning their programs with these tools whenever possible. Doing so will indirectly add rigor and credibility to reporting and claims in the future. Additional resources or even potential updates to the Framework mid-term will likely be needed as guidelines evolve, and it may be prudent to do a mid-term review and update as you to prioritize resources towards making this program a key linkage in tracking and demonstrating credible and transparent progress.  WWF is committed to a vision of creating a world where people and nature thrive, and applauds what CSRB and innovators across the Canadian beef industry do to help achieve that vision and look forward to engaging and supporting the CSRB in these efforts moving forward		Sam Wildman	WWF	Thank you for your comments.

NATURAL RESOURCES

Indicator	Feedback	Proposed Solution	Commenter	Organization	Response
NR1	Agreed that annual review and updating of the grazing and nutrient management plans is critical to keeping the management system relevant to environmental changes such as water quality.		Sam Wildman	WWF	Thank you for your comment.
NR 1	It is unclear whether the plans are to be implemented, documented, reviewed and updated annually or as needed.	In Excellence, clarify the expectation for annual as a minimum	Sam Wildman	WWF	Excellence level will be amended to, "A grazing management plan that minimizes negative impacts to water quality when cattle are on pasture is implemented, documented, <u>reviewed annually and updated as needed</u> to demonstrate that progress has been made towards maintaining or enhancing watershed health and minimizing degradation of water quality."
NR 1		Nutriments – replace by "fertilizing elements"	Nathalie Côté	Producteurs de bovins du Québec	"Nutrient management" is a broader term than "fertilizing elements" and therefore more appropriate. The interpretation of this indicator includes not just fertilizer products, but also, for example, manure application and BMPs that control soil moisture and/or reduce soil erosion to limit the negative impacts on watersheds health.
NR 1		Excellence 3: demonstrate that progress actions have been completed to maintain or improve. There is a contradiction in demonstrating progress to maintain, yet at the same time there's a moment when probably new progress is impossible. We suggest to replace 'progress' by 'action'	Nathalie Côté	Producteurs de bovins du Québec	Implementing an action today may not result in a demonstration of progress until a later date. Therefore, though we recognize that there may be thresholds where progress is may more appropriately be termed maintenance, the more accurate word for the intention of the Excellence level is "progress" not "action."
NR 2	It is unclear whether the plans are to be implemented, documented, reviewed and updated annually or as needed.	In Excellence, clarify the expectation for annual as a minimum	Sam Wildman	WWF	Excellence level will be amended to, "A grazing management plan that includes soil health considerations when cattle are on pasture is implemented, documented, <u>reviewed annually and updated as needed</u> to demonstrate that progress has been made towards maintaining or enhancing soil health."
NR 2	Score #2: which includes provisions related to the health of the soil: not very clear what is aimed to be evaluated.		Nathalie Côté	Producteurs de bovins du Québec	The CRSB Sustainable Beef Production Standard Interpretative Guide provides more detailed information on how soil health will be evaluated during an audit (e.g., observation of the health of grasslands, crops and hayland; appropriate litter levels; lack of erosion and/or compaction; monitoring programs and/or management plans; 4R nutrient stewardship; fertilizer application; use of cover-crops and/or no-till practices; manure testing; etc.). This document is currently being updated as well.

NR 2	Score #3: demonstrate that progress actions have been completed in order to preserve	Score #3: demonstrate that 'actions' have been completed in order to preserve	Nathalie Côté	Producteurs de bovins du Québec	Implementing an action today may not result in a demonstration of progress until a later date. Therefore, though we recognize that there may be thresholds where progress is may more appropriately be termed maintenance, the more accurate word for the intention of the Excellence level is "progress" not "action."
NR 3	Unclear what "minimize emissions" means in this context	Elaborate the intent, or provide an example	Sam Wildman	WWF	"Minimize emissions" is clarified the CRSB Sustainable Beef Production Standard Interpretative Guide. Current identified practices include keeping grassland healthy and investing in production and feed efficiencies, but more practices could be identified and added as the Guide is updated.
NR 3	What does it mean to assess the success of practices that support carbon sequestration?	Clarify the expectation for how assessing success is to be managed	Sam Wildman	WWF	Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide. Excellence level is generally intended for operations that can show documented progress and/or are exceeding other level requirements. Given the emerging nature of carbon related practices and challenges with on-farm measurement, scoring Excellence level for this indicator doesn't currently hinge on successfully reducing emissions, rather on if the ability to assess exists. E.g., Operation implements practices and can demonstrate evidence of change, operation monitors and documents cattle performance, energy efficient options are adopted on an ongoing basis, etc.
NR 3	How are they to identify areas of operation that affect sequestration & impact potential emissions (in other words, how would this be assessed)? Attend a class/training on awareness? Complete some sort of tool/hypothetical assessment, even if don't have to take any action on it?	Include tools or resources that producer can use in order to become "able to identify the areas of the operation..."	Sam Wildman	WWF	Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide. Examples include being able to demonstrate knowledge of impactful practices, having animal productivity goals, awareness of energy inputs, etc. Potential practices include: Grazing plan (swath grazing, bale grazing, banked forage grazing), efficiencies in genetics, efficiencies in animal health (use of production enhancing products/protocols e.g. implants, feed additives); efficiencies in energy use (energy assessment completed, use of solar/wind/other), etc.

NR 3	<p>NR3 addresses a review of practices employed to both sequester carbon and lower emissions on a certified cattle operation.</p> <p>For a goal, we would revise the goal to move away from awareness (there are better places for education) and move the goal to actual change.</p>	<ul style="list-style-type: none"> <li>• Achievement (Score 1) <ul style="list-style-type: none"> <li>o The operation shall be able to identify and calculate a footprint for annual sequestration achieved and annual emissions achieved.</li> </ul> </li> <li>• Innovation (Score 2) <ul style="list-style-type: none"> <li>o The operation has implemented a change in management practices and operations that are measurable.</li> </ul> </li> <li>• Excellence (Score 3) <ul style="list-style-type: none"> <li>o The operation shall show and report an annual change in the net emission footprint.</li> </ul> </li> </ul>	Graham Gilchrist	Biological Carbon Canada	<p>Measurement of some of the complex natural processes on-farm is often not scientifically or technologically possible, or economically feasible for individual producers. The requirements for this principle are designed for the assessment of individual operations and reflect what is within the control of the operators, although it is recognized that an operation is both part of and connected to other systems. There is currently no practical tool available for individual producers to measure on-farm carbon balance.</p> <p>Indicators such as carbon balance are more scientifically and economically feasible to estimate at a national level. The National Beef Sustainability Assessment (NBSA) examines these factors at a national level and is currently being updated for 2023 publication. CRSB continues to advocate for recognition of national carbon balance data for use in corporate science-based target setting and reporting.</p>
NR 3	<p>NR 3 - Practices that support carbon sequestration and minimize emissions are understood and/or employed.</p> <p>While the requirements noted under the "Achievement" level have been updated to ensure that producers are more cognizant of site-specific operational impacts on carbon, rather than general management practices that may or may not apply to their operations, we feel that this indicator does not go far enough.</p> <p>Comparatively, we note much more stringent and prescriptive language, such as "manage", "monitor", "maintain", "adopt", "implement", "undertake", "demonstrate", etc. in use at the Achievement level for the majority of the other indicators within the Framework. In our opinion, NR 3 contains the weakest language and requirements of any of the 25 indicators, and yet to our stakeholders, it is by far the most important "sustainability" aspect, and on which major progress is needed.</p> <p>We would have very much expected a greater evolution in ambition over the course of a five-year iteration review window, than the drafted update from the current awareness to the ability to identify operational carbon sources/sinks. Given the ever-increasing stakeholder pressures on both our business, and the Canadian beef industry, with regards to beef's perceived</p>	<p>Strengthen 'Achievement' level language to at least be on par with that of the other indicators within the Framework, so that it is clear that actual work and progress is expected to be made in this space, rather than merely requiring that a producer be 'able to identify' potential carbon sources/sinks.</p> <p>Use of two distinct indicators one for carbon sequestration, with a focus on regenerative agricultural practices, and one for GHG emissions mitigation/reduction so that producers are clear on the distinction in the operational goals to be achieved.</p>	Chris Christie	McDonald's Canada	<p>Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.</p> <p>Measurement of some of the complex natural processes on-farm is often not scientifically or technologically possible, or economically feasible for individual producers. The requirements for this principle are designed for the assessment of individual operations and reflect what is within the control of the operators, although it is recognized that an operation is both part of and connected to other systems. There is currently no practical tool available for individual producers to measure on-farm carbon balance.</p> <p>Indicators such as carbon balance are more scientifically and economically feasible to estimate at a national level. The National Beef Sustainability Assessment (NBSA) examines these factors at a national level and is currently being updated for 2023 publication. CRSB continues to advocate for</p>

	climatic impacts, waiting another five-years to address this indicator's ambition gap will pose significant risks to the public's perceived credibility of what constitutes "sustainable beef".				recognition of national carbon balance data for use in corporate science-based target setting and reporting.
NR 3	We have potential concern around the vague language used in the Innovation description. Removing the word "some" now implies that all practices that support carbon sequestration and/or minimize emissions are adopted. There is new research and products coming to the market that are not economically feasible for the industry yet, and we believe that needs to be acknowledged.	Provide more clarification on what practices are expected of producers to achieve an Innovation level, and keep the existing language "when economically feasible."	Jaclyn Horenberg	Beef Farmers of Ontario	<p>Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide. Innovation level includes implementation of impactful practices and products, improved production/productivity, energy efficient options, etc. Examples of potential practices include grazing plan (swath grazing, bale grazing, banked forage grazing), efficiencies in genetics, efficiencies in animal health (use of production enhancing products/protocols e.g. implants, feed additives); efficiencies in energy use (energy assessment completed, use of solar/wind/other).</p> <p>The Standard assumes that economic viability influences behaviour, decision making and the potential for adoption of production practices across each of the five principles of sustainability. Removing, "when economically feasible" from the Innovation level improves consistency across all indicators, while maintaining that economic feasibility underlies decision making at all score levels.</p>
NR 5	Documentation and implementation should go together in Innovation and that Excellence is used to monitor and adjust plans accordingly	Move documentation into Innovation category	Sam Wildman	WWF	"Documentation" appears in either the Innovation and Excellence levels throughout the Standard. At this time, "documentation" will not be moved from the Excellence to the Innovation levels for this indicator.
NR 5	Need to include water quality in the list of grazing management plan details in the Excellence category	Add water quality to the list in Excellence category	Sam Wildman	WWF	Water quality components of the grazing management plan are a focus of indicator NR-1 "Riparian areas, wetlands, surface and ground water sources and nutrient runoff are responsibly managed...". To avoid direct duplication, the components of a grazing plan meeting this indicator focus on the terrestrial elements, though CRSB acknowledges there is overlap in how management plans contribute to the outcome of multiple indicators.

NR 5	Who is responsible for maintaining perennial cover?	Add "Operation" in front of the existing sentence for Excellence	Sam Wildman	WWF	Certification to the CRSB Standards occurs at the operation level, so meeting the outcomes of the indicators is the responsibility of the operation. There are numerous examples where "operation" could be added throughout the document, so for consistency the change will not be made for this one indicator.
NR 5	What does a "balanced approach to managing ecosystems" mean?	Clarify what this means	Sam Wildman	WWF	CRSB defines a "balanced approach" as giving equitable consideration to the environmental, social and economic components of the resource and/or system. CRSB definitions will be available in a published Glossary of Terms accompanying the Standard.
NR 5	North American grasslands are under immense pressure and threat to land conversion for other ag purposes such as crop production. Maintaining perennial cover is a good starting point, but could be strengthened by inclusion of demonstrated commitment to not convert grasslands.	Add language to the excellence criteria that establishes an expectation for ranchers to keep grassland in grass and keep cows on the land.	Sam Wildman	WWF	At this time, the CRSB will not set the precedent of prohibiting specific practices as part of its outcome-based Standards. The Canadian beef sector has set a 2030 goal to maintain the 35 million acres of native grassland in the care of beef producers by focusing on economic viability of producers and by supporting programs that incentivize conservation in collaboration with Canadian crop groups (e.g. Canadian Roundtable for Sustainable Crops). Strategies to achieve this goal have been identified, and can be found on the CRSB's website.
NR 5	Is the distinction between tame and exotic grasses clear somewhere? Thinking crested wheatgrass or smooth brome as examples	Provide guidance	Sam Wildman	WWF	As an outcome-based Standard the document does not go into such specific details as tame or exotic grass species. Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.
NR 5	Innovation 2: It is unclear the intent of the GMP to grassland management here.	Innovation 2: Suggest adding additional language to what the GMP should include for this Goal similar to what was done for NR1 and NR2	Sam Wildman	WWF	Innovation level has been amended to, "A grazing management plan <u>that minimizes negative impacts to grasslands and ecosystems when cattle are on pasture</u> is implemented."
NR 5	Elaborate potential Resources available to assist in meeting indicators		Sam Wildman	WWF	Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.

NR 5	Define or describe what "monitored and managed" means if not a grazing management plan?	More clearly describe what "monitored and managed" needs to consist of	Sam Wildman	WWF	A producer may not recognize or have documented a comprehensive grazing management plan. However, they should be managing their operation for exotic and invasive plant species, problem areas of soils, soil erosion and compaction, and land/water quality degradation, etc., regardless of if they identify these actions as a comprehensive "grazing management plan" or not. Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.
NR 5	the original Standard (v1) says that the requirements are outcome-based to account for woody encroachment on native grasslands and similar situations. How this is outcome-based?	Revise the recommendation to achieve an outcome based measure	Sam Wildman	WWF	This is not currently part of this indicator. The original intent of the indicator was to protect grasslands no matter the technique required, including deforestation if appropriate. Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.
NR 5	Consideration to working alone or in isolation when monitoring grass and rangelands is important for worker health and safety. It is suggested that best practices should include provision for, and recognition of action that address this reality. It is essential that when work is done on range or grasslands it needs to include an understanding of the risks and skills required to safely perform the task. This should, in our opinion, be considered for inclusion.	<u>Entry</u> : There is no provision for worker safety, no plan for working alone or in isolation, no competency determination or training <u>Achievement</u> : There is a work alone or in isolation plan <u>Innovation</u> : There is a work alone or in isolation and a missing or overdue response plan. Range workers are deemed competent in the use of horse or operation of quad <u>Excellence</u> : There is a work alone or in isolation plan and a missing or overdue response plan. Range workers are deemed competent in the use of horse or operation of quad and survival skills.	Robin Anderson	Canadian Agricultural Safety Association	The People and the Community (PC) Principle of the Framework addresses the critical role that all human participants play within the beef value chain. The language for this indicator will not be changed in response to this feedback, but the points made will be considered for inclusion/expansion in the relevant PC sections of the CRSB Sustainable Beef Production Standard Interpretative Guide.
NR 5	Score #1: "managed"? check difference with scoring #2		Nathalie Côté	Producteurs de bovins du Québec	A producer may not recognize or have documented a comprehensive grazing management plan. However, they should be managing their operation for exotic and invasive plant species, problem areas of soils, soil erosion and compaction, and land/water quality degradation, etc., regardless of if they identify these actions as a comprehensive "grazing management plan" or not. Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.
NR 5	Score #3: maintain perennial cover (grassland and/or cultivated)		Nathalie Côté	Producteurs de bovins du Québec	Excellence language will remain as, "Maintain perennial cover (native and tame grasslands) to positively impact ecosystems."

NR 6	Does species only apply to fauna in this criteria? Where would other ecological biodiversity be implicated in the standard?	Suggest including plant biodiversity in Excellence list for NR 5, and/or explaining that NR 6 is only for fauna if that is the case.	Sam Wildman	WWF	This indicator is specific to wildlife (fauna).  Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide. The Guide will be updated to more clearly reflect the intent for plant (NR-5) and animal (NR-6) biodiversity.
NR 6	Achievement (known, monitored, and managed) reads as more advanced than the Innovation (record species).	Consider swapping them or clarifying the rigor needed to credibly achieve innovation	Sam Wildman	WWF	The score levels within the Framework are additive. In this indicator, Innovation level is being able to provide a document record (written, photographic, etc.) of the knowledge and management practices identified at the Achievement level.
NR 6	Interpretive Update very specific - perhaps refer to expanded list of resources?	Elaborate/expand or refer to multiple potential Resources available to assist in meeting indicators	Sam Wildman	WWF	Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide. The Guide is currently being updated as well.
NR 6	While hopefully not the case, these all read like killing predators could address the predator problem	Add "non-lethal management practices as a first resort"	Sam Wildman	WWF	This indicator will be revised to:
NR 6	"address predators" is vague	Define/describe how to know if predators have been "addressed" in a way that meets the standard (and communicates to the rest of us what is okay/not okay)	Sam Wildman	WWF	<b>ACHIEVEMENT:</b> The predators and wildlife that are present on the operation shall be known, monitored and management practices to help maintain wildlife and address <del>predators</del> <u>predation</u> shall be adopted:
NR 6	Concerns with the term 'negation' used under NR6. Rationale: livestock producers use various mitigation practices to reduce the risk of negative livestock-wildlife interactions, such as predation. However, in provinces such as Manitoba producers do have the right to manage problem predators in defense of property, including livestock. Specifically, The Wildlife Act states, Despite any other provision of this Act, but subject to sections 10, 11, 12 and 24, the owner or occupier of private land or leased agricultural Crown land, or a person authorized by the owner or occupier, may kill or take any wildlife on the land other than a moose, caribou, deer, antelope, cougar, elk or game bird for the purpose of defending or preserving their property. MBP cautions that it is very difficult to predict when certain wildlife may be present on a farm or ranch, such as predators.	MBP suggests changing the word 'negation' to 'mitigation' for the purposes of clarification.	Carson Callum	Manitoba Beef Producers	<b>INNOVATION:</b> A record of wildlife, including species at risk, and <del>predators</del> <u>an assessment of predation risk or <del>problem</del> human/wildlife conflicts</u> , is documented.  <b>EXCELLENCE:</b> Habitat improvements, or wildlife conflict <del>negation efforts</del> <u>reduction and predation risk mitigation practices</u> , have been implemented.  Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.

NR 6	Wildlife or predator encounters can be dangerous, directly, or indirectly for a worker attending to the cause of NR 6. A predator or wildlife can cause a horse to react creating potential for injury to an unsuspecting worker. Predator attacks, while rare, are often able to be avoided by a worker who is aware of signs of proximity or activity.	<p><u>Entry:</u> Awareness of predators and predator type in area <u>Achievement:</u> Worker is aware of the types of wildlife and predators that may be encountered <u>Innovation:</u> Worker is aware of the types of wildlife and predators that may be encountered Worker has been trained in how to determine predator type and activity in area. Has some ability to determine if predators are active, passing through, or may be present in area. <u>Excellence:</u> Worker is aware of the types of wildlife and predators that may be encountered Worker has been trained in how to determine predator type and activity in area. Has some ability to determine if predators are active, passing through, or may be present in area. Worker is aware of how to react in an encounter with wildlife or predators.</p>	Robin Anderson	Canadian Agricultural Safety Association	The People and the Community (PC) Principle of the Framework addresses the critical role that all human participants play within the beef value chain. The language for this indicator will not be changed in response to this feedback, but the points made will be considered for inclusion/expansion in the relevant PC sections of the CRSB Sustainable Beef Production Standard Interpretative Guide.
NR 6	a record is required in score 2: The service must be available to help the producer, as he is not the specialist in species at risk and he is not always able to identify everything.		Nathalie Côté	Producteurs de bovins du Québec	The proposed change from "inventory" to "record" is intended to address the fact that most producers are not wildlife specialists. Whereas a "wildlife inventory" implied more formal protocols and documentation requirements, a "record" is interpreted more loosely as documentation, which could be written, photographic, etc. and within an individual producers' capability without significant support. Guidance to achieving the indicator and information on how the indicator will be audited is provided in the CRSB Sustainable Beef Production Standard Interpretative Guide.
NR 6	Score #3: Is the requirement in addition to the registry		Nathalie Côté	Producteurs de bovins du Québec	The score levels within the Framework are additive. In this indicator, Innovation level is being able to provide a document record (written, photographic, etc.) of wildlife, which should then be used to identify and implement BMPs to meeting the Excellence level criteria.

PEOPLE AND THE COMMUNITY

Indicator	Feedback	Proposed Solution	Commenter	Organization	Response
PC 1	<p>Question--A Healthy and Safe work environment is provided.</p> <p>The current Achievement level states that workers shall have the knowledge and equipment to safely complete their assigned duties. What this component is missing is that workers have been made aware of the hazards and the controls for the job. Workers have 3 rights and the first is Right to Know what the hazards and controls are for the job they are doing. Using the term knowledge is very broad and vague and leaves farms assuming common sense will cover them off and open to liability for not completing basic requirements.</p>	<p>Achievement Level --Workers shall be made aware of the hazards and controls for the tasks that they do. Equipment shall be maintained for operator safety.</p> <p>Documentation for this level would be a Hazard Assessment completed for tasks on the farm.</p>	Jody Wacowich	AgSafe Alberta	<p>Achievement level will be amended to, "Workers are informed of the (potential) hazards and controls and have the equipment to safely complete their assigned duties. Equipment shall be maintained for operator safety."</p>
PC 2	<p>Workplaces that value their workers, and do not abide bullying or harassment have workers remain much longer at that site. Longevity in positions builds confidence, capability, and contentment, creating a safer workplace. Addressing worker rights in this section can provide guidance to increase wellness and mental health.</p>	<p>Entry: Nothing is done to assist in, or ensure a respectful workplace</p> <p>Achievement: The worker is aware of their right to be treated fairly</p> <p>Innovation: The worker is aware of their right to be treated fairly and knows how to report untoward acts of disrespect, bullying or harassment. Excellence: The worker is aware of their right to be treated fairly and knows how to report untoward acts of disrespect, bullying or harassment.</p>	Robin Anderson	Canadian Agricultural Safety Association	<p>CRSB indicators are built on the assumption that participants are complying with all applicable laws and regulations; they are not intended to verify legal compliance or to endorse any activity as meeting any legal requirement that may apply to an individual operation. The interpretation on which this indicator is audited is that workers know their rights, and the operation (employer) is responsible for providing fair and impartial processes for workers to express any concerns they have about their treatment given those rights. Disrespect, bullying and harassment are examples of practices that would not achieve the indicator's outcome of treating workers with equity and respect, so in keeping with the outcome-based language of the Standards we will not add additional language here but will consider updating the relevant sections in the CRSB Sustainable Beef Production Interpretative Guide.</p>

PC 3	<p>PC3 Career Development opportunities are provided.</p> <p>Achievement Level--Workers shall be trained and competent to complete their assigned tasks.</p> <p>My concern with this is twofold, first in PC1 training is an innovation score and here it is an achievement score which seems confusing. The second concern is around competency. As a health and safety association we have seen OHS demand this information from farms, so we ask that clear information and even training around doing this properly be provided to farms and ranches. We are concerned that if OHS were to see that a farm is CRSB certified and has claimed competency has been evaluated according to this question that it could be used against them in the case of a serious incident or fatality.</p> <p>Excellence Level--I would add some emphasis around training for supervisors. We are aware that once you become a supervisor that there is some responsibility under legislation for incidents that happen.</p>	<p>Achievement Level--I would suggest perhaps an on demand webinar for training on competency and supporting competency sample forms if this wording remains. A supervisor or owner who signs off on competency training/evaluation would have responsibilities under the legislation.</p>	Jody Wacowich	AgSafe Alberta	<p>CRSB indicators are built on the assumption that participants are complying with all applicable laws and regulations; they are not intended to verify legal compliance or to endorse any activity as meeting any legal requirement that may apply to an individual operation.</p> <p>PC-1 "Healthy and safe work environment," Innovation level specifies that safety training is provided in respective work areas. The Achievement level for this indicator will be amended to, "Workers shall be trained for competency to complete their assigned tasks." The audit interpretation will focus on general/professional skills develop that aren't necessarily safety related, which is the focus on PC-1.</p>
PC 3	<p>It's important that training be continuous and recorded.</p>	<p>Entry: N/A Achievement: Employers will have a risk assessment, safe work practice and capacity to determine and record training and competency Innovation: Mentorship is built into training and ongoing development of the worker. Workers are told how to perform a task, it is demonstrated to them and then observed to be properly completed Excellence: Employer has embraced the need for and established training periods and sessions. Actively seeks out and engages trainers, clinicians, courses, online programs, that develop and train the worker. Utilizes tailgate and toolbox meetings to constantly develop the skills of the worker. Ensures supervisors supervise.</p>	Robin Anderson	Canadian Agricultural Safety Association	<p>As an outcome-based Standard the language for this indicator will not be changed in response to this feedback, which if prescriptive in its suggested requirements. However, the points made will be considered for inclusion/expansion in the relevant PC sections of the CRSB Sustainable Beef Production Standard Interpretative Guide.</p>
PC 3(4)	<p>how is Achievement indicator different from Achievement level of "Health &amp; Safety" (PC 1 in original standard)</p>		Sam Wildman	WWF	<p>PC-1 "Healthy and safe work environment," Achievement level will be amended to, "Workers are informed of the (potential) hazards and controls and have the equipment to safely complete their assigned duties. Equipment shall be maintained for operator safety." The Achievement level for this indicator will be amended to, "Workers shall be trained for competency to complete their assigned tasks." The audit interpretation for this indicator focuses on general/professional skills develop that aren't necessarily safety related, which is the focus of PC-1.</p>
PC 3(4)	<p>For focus on career development, annual reviews should include discussion of career development opportunities.</p>		Sam Wildman	WWF	<p>The point made will be considered for inclusion/expansion in the CRSB Sustainable Beef Production Standard Interpretative Guide for this indicator.</p>

PC 3(4)	not possible in the context of a family enterprise which has no worker unless N/A can be indicated during the audit		Nathalie Côté	Producteurs de bovins du Québec	<p>Family members can still participate in career development relating to knowledge and skill growth regardless of their position/title within a family enterprise (recognizing potential for some overlap with EI-5 continuous learning). Potential examples include: mentorships outside of the family enterprise, some succession planning activities, skills development courses, etc. Potential audit questions will be included in the CRSB Sustainable Beef Production Standard Interpretative Guide.</p>
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ANIMAL HEALTH AND WELFARE

Indicator	Feedback	Proposed Solution	Commenter	Organization	Response
AHW 4	<p>Entry threshold includes Vet-Client-Patient-Relationship while Achievement also includes Vet-Client-Patient-Relationship. Unsure if this is intentional. Change achievement to Vet-Client-Patient-Relationship. This change would align the standard with the NFACC Code of Practice for the Care and Handling of Beef Cattle Section 3.1 which requires operations to establish an ongoing working relationship (VCPR) with a licensed practicing veterinarian and develop a strategy for disease prevention and herd health.</p> <p>The sustainable production standard cannot have less rigorous standards than the NFACC Code of Practice for the Care and Handling of Beef Cattle. Code requirements are defined by NFACC as a regulatory requirement, or an industry-imposed expectation outlining acceptable and unacceptable practices and are fundamental obligations relating to the care of animals. Requirements represent a consensus position that these measures, at minimum, are to be implemented by all persons responsible for farm animal care.</p>	Change achievement to Vet-Client-Patient-Relationship	Melissa Speirs	BC SPCA	<p>This was a typo. Entry Threshold should read "No valid Vet-Client-Patient Relationship" and Achievement level should read "Valid Vet-Client-Patient Relationship." Current Animal Health and Welfare (AHW) indicators use NFACC Code requirements at Achievement level and recommend practices at Innovation/Excellence levels. In anticipation of updates to the NFACC Code of Practice for the Care and Handling of Beef Cattle, the CRSB has not made significant changes to the indicators in the AHW principle, but will revisit the entire section once the updated NFACC Code is available.</p>
AHW 4	<p>The CVMA holds that for animal welfare considerations, it is strongly advised to remove horn buds (disbudding) before eight weeks of age, rather than dehorning when older. For animal welfare reasons, disbudding is strongly preferred to dehorning. Every effort should be made to ensure disbudding occurs before the age of eight weeks. Cattle that are disbudded or dehorned should receive a local anesthetic and peri-operative analgesia. Source: <a href="https://www.canadianveterinarians.net/policy-and-outreach/position-statements/statements/horn-management-of-cattle/">https://www.canadianveterinarians.net/policy-and-outreach/position-statements/statements/horn-management-of-cattle/</a></p> <p>The Canadian Veterinary Medical Association (CVMA) recommends that when castration of cattle, sheep, or goats is required, an appropriate technique with anesthesia and analgesia is used and that it is undertaken at a young age. All methods of castration cause acute and chronic pain. This can be mitigated by the use of local anesthesia and an appropriate non-steroidal anti-inflammatory drug. Source: <a href="https://www.canadianveterinarians.net/policy-and-outreach/position-statements/statements/castration-of-cattle-sheep-and-goats/">https://www.canadianveterinarians.net/policy-and-outreach/position-statements/statements/castration-of-cattle-sheep-and-goats/</a>.</p>	Amend 'achievement' to require multimodal pain control for painful practices, including disbudding, dehorning, branding, and castration at any age.	Melissa Speirs	BC SPCA	<p>The current Animal Health and Welfare (AHW) indicator 5 "Steps are taken to mitigate animal pain and distress," incorporates NFACC Beef Code requirements from sections 4.4 "Disbudding and Dehorning" and 4.5 "Castration" at the Achievement level, which include seeking veterinarian guidance on pain control and on the optimal timing for disbudding and castration. In anticipation of updates to the NFACC Code of Practice for the Care and Handling of Beef Cattle, the CRSB has not made significant changes to the indicators in the AHW principle, but will revisit the entire section once the updated NFACC Code is available.</p>

AHW 8	Sections of HAR (Health of Animals Regulations) apply to those arranging transport and loading/unloading animals, and operations transporting their own animals	<p>Change "operation shall be aware of the Recommended Code of Practice for the Care and Handling of Farm Animals: Transportation" to "operation shall IMPLEMENT the Recommended Code of Practice for the Care and Handling of Farm Animals: Transportation."</p> <p>Add requirement to follow the Health of Animals Regulations: Part XII: Transport of Animals to achievement score.</p>	Melissa Speirs	BC SPCA	<p>Certification of cattle transport is currently out of scope for the Achievement level of the Framework. Indicator AHW 8 "Unnecessary animal stress is minimized," incorporates NFACC Beef Code requirements from section 5.3 "Loading and Receiving Cattle," at the Innovation and Excellence levels for decisions that happen on a certified production operation. In anticipation of updates to transport legislation and to the NFACC Code of Practice for the Care and Handling of Beef Cattle, the CRSB has not made significant changes to the indicators in the AHW principle, but will revisit the entire section once the updated NFACC Code is available.</p>
AHW 8	Concern that the suggested revision reverses progress by moving from 2 to 1 and 3 to 2 practices. Including "Regular evaluation" of cattle handling techniques is a great idea and goes hand-in-hand with employee training, and should be a part of the employee training process.	Keep original standard	Sam Wildman	WWF	<p>The proposed change for the Innovation level is from "two of the recommend practices" to "at least one recommend practice per Code section." With three Code sections listed for this indicator, the update is stronger because it requires a minimum of three of the recommend practices total, spread across all identified sections of the Code. Similarly, the proposed change for the Excellence level is from "three or more of the recommend practices" to "at least two recommended practices per Code section." With three Code sections listed for this indicator, the update is stronger because it requires a minimum of six of the recommend practices total, spread across all identified sections of the Code.</p>
AHW 8	These proposed changes should help to drive progress while still be attainable for producers. However, it should be acknowledged that as the Beef Codes of Practice is updated, these requirements and recommendations will change.	A proposed solution would be to reference the impending update to the Beef Codes of Practice.	Jaclyn Horenberg	Beef Farmers of Ontario	<p>Yes, the entire AHW Principle will again be reviewed and updated once the anticipated updated NFACC Code of Practice for the Care and Handling of Beef Cattle is available. While not referenced in the Standard document itself, this intent will be communicated to all stakeholders.</p>

<p>AHW 8</p>	<p>AHW 8 is very complete and has many solid suggestions and requirements for a work site as it relates to the care and handling of both the stock and the worker.</p>	<p><u>Entry</u>: The workers fail to understand the value of communication. What one worker considers to be low stress cattle handling etc. may not be the training or experience of another. It is essential for team efficiency, flow of cattle and worker safety that communication is understood to be valuable. The creation and necessity of a plan for all handling activities creates a more effective, efficient, and cohesive workplace.</p> <p><u>Achievement</u>: Competency of the handler must be determined and supervised once established. This needs to be recorded. Facilities should be inspected prior to use and the inspection recorded. Facilities should be of a design that facilitates good flow of the cattle, eliminates wherever possible the need for workers to be in the path or space occupied by the cattle. <u>Innovation</u>: Review of the handling facilities, incorporation of devices and revision of pens, chutes and facilities that do not promote ease of flow for the cattle. Workers should be consulted and have input in revisions or design changes. Consult a specialist to assist with design challenges that prohibit ease of flow or present a challenge or danger to the workers. <u>Excellence</u>: Review of the handling facilities, incorporation of devices and revision of pens, chutes and facilities that do not promote ease of flow for the cattle. Workers should be consulted and have input in revisions or design changes. Consult a specialist to assist with design challenges that prohibit ease of flow or present a challenge or danger to the workers.</p>	<p>Robin Anderson</p>	<p>Canadian Agricultural Safety Association</p>	<p>The People and the Community (PC) Principle of the Framework addresses the critical role that all human participants play within the beef value chain. The language for this indicator will not be changed in response to this feedback, but the points made will be considered for inclusion/expansion in the relevant PC sections of the CRSB Sustainable Beef Production Standard Interpretative Guide.</p>
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EFFICIENCY AND INNOVATION

Indicator	Feedback	Proposed Solution	Commenter	Organization	Response
EI 1	Energy resources are used responsibly	Les ressources énergétiques sont utilisées de manière <del>responsable</del> -responsable	Nathalie Côté	Producteurs de bovins du Québec	The translated French documents will be copy edited before publication.
EI 2	Innovation criteria matches the stated goal of the indicator. Suggest revising.	Energy efficient options are implemented	Sam Wildman	WWF	Innovation level will be amended to, "Energy efficient options are implemented when feasible."
EI 2	Remove duplication with what was suggested for Innovation criteria	Remove the original text, keep the suggested text in red.	Sam Wildman	WWF	
EI 2	In regards to the proposed language in the Achievement score, the change is now asking for monitoring of energy inputs. Does this mean that producers need to be documenting their energy inputs in order to monitor them, or what is required of the producer to show that they are meeting this achievement level?	Suggested updated wording for Achievement: "Operation shall identify their energy inputs, and be aware of their usage."	Jaelyn Horenberg	Beef Farmers of Ontario	Yes, some form of documentation of energy inputs will be required. At the Achievement level this could be things like fuel receipts or electric or natural gas invoices, inventory or consumption documents, planning documents or budgets, etc. The documentation should support what a producer identifies as their high/average/low energy use areas and their understanding of the challenges and opportunities on their operation.
EI 3	GOAL: a word is missing at the end of the sentence.		Nathalie Côté	Producteurs de bovins du Québec	The translated French documents will be copy edited before publication.
EI 5	The proposed change in wording helps to drive progress by asking producers not only to engage in learning activities, but to demonstrate an application of that learning. We are supportive of this change, and feel the 5 year time frame is reasonable for the operation to demonstrate the application of learning.		Jaelyn Horenberg	Beef Farmers of Ontario	Thank you for the comment. CRSB appreciates your support for the strengthening of the requirements of this indicator.