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**CRSB SUSTAINABILITY INDICATORS FOR BEEF PROCESSING: DRAFT 1**

**Public Consultation (June 29 – August 29, 2017)**

*Comments Received and CRSB Responses*

The Canadian Roundtable for Sustainable Beef (CRSB) released the first draft of its sustainability indicators for beef processing for a 60-day public consultation; the consultation ran from June 29 to August 29, 2017. The majority of the commenters sought further clarification on the metrics within the levels and alignment with regulations. 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	COMMENTS RECOMMENDATION	CRSB RESPONSE
<b>2. Air emissions (e.g. greenhouse gases, air quality) are responsibly managed.</b>	Page 12; Air Emissions: In the Level 2 category “Results from air quality tests are documented,” this could be misconstrued that air quality tests are required.	Suggestion: re-wording “When air quality tests are necessary, results are documented.”	Thank you, the Indicator Committee revisited this requirement and since it is a regulatory requirement, it has been removed.
<b>3. Compromised and sick animals are managed appropriately.</b>	Page 22; Compromised sick animals: In the Level 2 category “Veterinary Service is sought and cattle are provided with alternate care when needed” this does not make sense in the processor section.	Suggestion is to delete this component of Level 2.	This has been deleted.
	In reviewing the requirements in each section, a processor meeting Level 1 status would be meeting the minimum necessary requirements that would be legally required to operate in Canada. If the minimum requirement to be considered for the program is Level 1, would this state that all processors would be considered Verified Sustainable?		There are provincially inspected and federally inspected and licensed facilities in Canada. The indicators have been developed to be accessible to both.
	There does not seem to be a challenge or commitment to sustainability if a processor can qualify and remain as qualified at Level 1.		The Verification Committee is developing the scoring system for the indicators. To encourage uptake of the new program, a level 1 is required in all indicators that are scored and no improvement requirements have been added in this iteration of the program.
	If processors are required to meet requirements beyond Level 1 to be Verified Sustainable, this does not seem to be identified in the scoring.		

	<p>Is there a way to recognize an organization's commitment beyond a level, or for achieving the highest level (such as LEED design – gold/platinum rating)?</p>		<p>Level 3 is currently the highest level of achievement in the indicators.</p>
	<p>Many of the Level 3 measures do not list criteria in which the facility could be audited, they only state 'where feasible', 'where appropriate'. These circumstances need to be defined and confirmed who will be able to make this determination.</p>		<p>Level 3 requirements have been reviewed with the Indicator Committee and the qualifying statements have been removed to allow for clearer interpretation.</p>
	<p>Level 3 does not look to have defined goals or metrics, or a goal of continuous improvement.</p>		<p>Level 3 requirements have been reviewed with the Indicator Committee and the qualifying statements have been removed to allow for clearer interpretation. Some of the metrics in Level 3 have also been fleshed out further to facilitate interpretation. Levels 1 through to 3 represent the continuous improvement spectrum, they build on one another. For some of the indicators, tracking metrics over time is the goal. The content and metrics within the levels will be reviewed every 3-5 years for relevance.</p>
	<p>Many categories have very little distinction between Level 2 and 3, and could be open to too much interpretation for an auditor.</p>		<p>The metrics were reviewed and have been more clearly defined in cases where there is overlap.</p>

	One requirement for a Verified Sustainable beef processor that should be included is to ensure they have a way they can verify the upstream supply chain, and segregate this product within their facility. The processor will need to have measures in place to ensure the Verified Sustainable guarantee /chain of custody is maintained.		Primary processors can receive certification to the CRSB indicators without passing on a product claim. The chain of custody guidelines currently being developed by the Verification Committee address the verification of upstream product and handling/reconciliation of volumes of product.
	Overall, the indicators are not specific enough to be audited against. Without being able to audit the indicators, the credibility of the system is weakened.		The indicators have been revised to allow for greater auditability while maintaining an outcome-based approach. We welcome any further comments on the revised draft to ensure the indicators are robust and defensible.
<b>Glossary</b>	Would be helpful to add the following terms to the glossary in case people are reading it as a standalone document: sustainability, outcome based, verification framework, and indicator.	Define: sustainability, outcome based, verification framework, and indicator.	A definition for sustainability, outcome based and indicator have been defined. Verification framework encompasses the entire CRSB program. This will be defined in other communications pieces.
<b>Water resources are responsibly managed, page 11</b>	Suggested wording modification to Objective.	Incoming and outgoing water is managed reasonably and appropriately in both its quantity and quality. Water is used responsibly and recycled where possible.	The objective has been revised according to the recommendation.

<p><b>Air emissions (e.g. greenhouse gases, air quality) are responsibly managed, page 12</b></p>	<p>There are multiple standards for greenhouse gas (GHG) reporting – Greenhouse Gas Protocol from World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD), etc.</p>	<p>Maybe a list of them needs to be added to CRSB’s resources that suggest there are some standardized ways of calculating GHGs. If they are not a regulated facility the scope will change as will the way their footprint is calculated.</p> <p>Greenhouse Gas Protocol:  <a href="http://ghgprotocol.org/calculation-tools">ghgprotocol.org/calculation-tools</a>  Environment and Climate Change Canada's (ECCC) Greenhouse Gas Emissions Reporting Program (GHGRP):  <a href="https://www.ec.gc.ca/ges-ghg/default.asp?lang=En&amp;n=0A6D96FB-1">https://www.ec.gc.ca/ges-ghg/default.asp?lang=En&amp;n=0A6D96FB-1</a>  Alberta Specified Gas Emitters Regulation – Information for Industry:  <a href="http://aep.alberta.ca/climate-change/guidelines-legislation/specified-gas-emitters-regulation/information-for-industry.aspx">http://aep.alberta.ca/climate-change/guidelines-legislation/specified-gas-emitters-regulation/information-for-industry.aspx</a></p>	<p>The recommended resources will be added to our online database.</p>
<p><b>Land resources and ecosystem health are maintained or enhanced, page 13</b></p>	<p>It would be helpful to add “and documented” to the Level 3 sentence. The documentation would be recorded when reviewed and any actions that need to be taken.</p>	<p>“The plan is reviewed at least annually and documented”.</p>	<p>The recommendation has been incorporated.</p>
<p><b>A safe and healthy work environment is ensured, Level 1,</b></p>	<p>Are employees/workers identifying and bringing any items to supervision. What is supervision doing with the concerns? How are</p>	<p>I believe that supervision needs to take on accountability and responsibility of the safety and health of their workers. I also believe that</p>	<p>Thank you for these questions. They have been handed over to the Verification Committee as potential questions in the audit of the indicator.</p>

<p><b>page 14</b></p>	<p>they addressed, how soon are they addressed, what is the feedback from the workers about the supervisors attitude on safety?</p> <p>Does supervision lead by example and promote safety, even when deadlines are tight?</p> <p>Do the supervisors understand and know what safety is and what is required from them, both legally and in identification of what a hazard is?</p>	<p>the employees (workers) share the responsibility in following rules, and having the courage to ask questions when they are unsure.</p>	
<p><b>All workers are treated with equity and respect, page 15</b></p>	<p>Same as above, it would be helpful to add “and documented” to the Level 3 sentence. The documentation would be recorded when reviewed and any actions that need to be taken.</p>	<p>“...policy that is reviewed at least annually and documented”.</p>	<p>The recommendation has been incorporated.</p>
<p><b>Career development opportunities are provided, page 17</b></p>	<p>Could add orientation to Level 1.</p> <p>Could add human resource strategy and, training and development to Level 2 or 3.</p>	<p>Level 1 – Orientation – measure could be they have an orientation plan and timeline developed.</p> <p>Level 2 or 3- could add something related to the human resource strategy related to sustaining employees and identify key training and development that will assist the employee to do their job- measure could be training and development plan created or identified coaching and mentoring required to begin the new job or complete the job.</p>	<p>Orientation, human resource strategy and development were added as measures.</p> <p>The resource provided will be added to the online database.</p>

		<p>[...] worked with Explore Local in 2016/2017 to develop some HR Essential materials and a workshop targeted at small entrepreneurs (companies). The resource templates are easy to use. It may be a good resource to have listed on CRSB's resource webpage.</p> <p><a href="http://www1.agric.gov.ab.ca/\$Department/dptdocs.nsf/all/explore16036/\$FILE/HR%20Essentials%20Participant%20Materials.pdf">www1.agric.gov.ab.ca/\$Department/dptdocs.nsf/all/explore16036/\$FILE/HR%20Essentials%20Participant%20Materials.pdf</a></p>	
	<p>Over the years [...] has partnered with industry and different value chains in the livestock sector to develop resources and tools to assist with different data collections, how to measure and record for tracking purposes and decision making. [...] can be a resource to assist producers or processors with using existing resources or has the potential to partner on lessons learned for new projects.</p>		<p>Thank you, please provide us with any additional resources to add to our website.</p>
	<p>In regards to the indicator on page 24, "Information is shared up and down the supply chain – [...] has developed a Fresh Food Strategic Innovation CD ROM to assist fresh food suppliers and [...] staff to develop and execute innovation practices within firms. There are modules for Innovation capability audit, customer</p>		<p>Thank you, please share any resources we can add to our online database.</p>



	partnership management, innovation opportunity assessment, new product development and retail category planning. This may be of some use for this indicator. If future need identifies that this resource could be useful as an on-line tool then maybe we could apply for a new project.		
	In regards to the indicator on page 25, the Meeting Customer Requirements Tool can be used with any clients working through customer requirements and planning. <a href="http://www1.agric.gov.ab.ca/\$Department/deptdocs.nsf/All/cbd16357">http://www1.agric.gov.ab.ca/\$Department/deptdocs.nsf/All/cbd16357</a>		This resource will be added to our online database.
<b>Transport</b>	Haven't seen much about animal care during transport and unloading		This is covered under Animal Health and Welfare, Indicator 2. Operation takes actions to minimize animal pain and distress.
	This is a very extensive framework. Great job		Thank you!
<b>2. Operation takes actions to minimize animal pain and distress</b>	Please note that animal welfare is a regulatory requirement in the abattoirs  Slaughter must always be conducted in a humane manner.		Thank you, the regulatory requirements are the reference point for these indicators.

<p><b>3. Compromised and sick....</b></p>	<p>How does a worker know if an animal is not fit for consumption?</p> <p>What about Kosher or Halal no-stun slaughter?</p> <p>How to know when and how bruising occurs? What are the criteria for evaluating bruises?</p>	<p>Perhaps not fit for slaughter? In abattoirs it is the inspector (MHO) that will make these determinations during the ante mortem inspection</p> <p>Not all cattle are stunned – need to have language included that will cover this.</p>	<p>‘Consumption’ has been changed to ‘slaughter’.</p> <p>The CRSB’s reference point on this are the provincial and federal regulations. The important outcome for the CRSB is minimizing pain and distress.</p> <p>These questions will be included in the audit manual.</p>
	<p>In general, the proposed sustainability indicators (natural resources, people and the community, animal health and welfare, food, and efficiency and innovation are reasonable to assess beef processors.</p>		<p>Thank you.</p>
	<p>Provincially regulated abattoirs are often run by families with limited spare time and small margins who are already feeling overwhelmed by various programs. It is important to assist these smaller plants to understand the concept of sustainability and the role they have in producing sustainable beef.</p>	<p>Add in more background information so that smaller plant operators understand the justification for this initiative warranted.</p>	<p>The CRSB Communications and Marketing Committee is developing marketing tools to provide rationale for participation as well as assist those who do participate in making claims.</p>
	<p>Coordinate with other organizations such as <i>Farm and Food Care Canada</i> to discuss synergies within each other’s mandate and explore various approaches for sustainability / education (e.g. “do the right thing” type training).</p>	<p>Investigate</p>	<p>Thank you, we have been working with Food and Farm Care Canada in different capacities. For example, their consumer trust research has informed our framework development.</p>

	<p>Provide more information on auditing structure/process that is anticipated to be developed. For instance, will a third party accredited company with certified auditors be used or is CRSB planning to hire auditors?</p> <p>How often are audits required?</p>	<p>Define auditing structure</p>	<p>The audit cycle and requirements are currently being developed by the CRSB Verification Committee.</p> <p>The auditing body will be organizations that meet the CRSB Assurance Protocol requirements as assessed by our Oversight Body (third part organization) and will be subject to annual oversight.</p>
	<p>Industry optics – although voluntary, some operators could be view this initiative as another burdensome auditing program.</p> <p>There may be minimal upside for small plants given the effort and there may be a perception of adding red tape/another level for industry to comply to.</p>	<p>Define advantage for industry to participate.</p>	<p>The CRSB Communications and Marketing Committee is developing marketing tools to provide additional rationale for participation as well as assist those who do participate in making claims.</p>
	<p>What benefits do smaller processors obtain by participating in this verification initiative?</p> <p>How can this be marketed? A deciding factor for a company to participate on this could depend on how rigorous of a promotional plan CRSB has.</p>	<p>Define marketing plan.</p>	<p>The CRSB’s Communications and Marketing committee is developing the claims associated with participation. This will be unveiled at the launch in December.</p>

	<p>There is a concern that only larger operations will have the resources to participate; and smaller operations will be viewed as non-participatory, non-interested in sustainable initiatives.</p>	<p>Concern</p>	<p>The goal of the CRSB's Verification Framework, in part, is to be practical and realistic but also meets market expectations. Therefore, the CRSB's committees and Council have sought to balance these needs in the indicator development. Note that a Level 1 in each indicator that is scored is required to enter the program.</p>
	<p>Concern that participating smaller companies may over extend themselves and underestimate the labour/time/effort to develop and maintain sustainability programs. There will be a need to ensure that the audit assesses what is done everyday and identifies opportunities for enhancements.</p>	<p>Concern</p>	<p>The audit will ensure the verification of the indicators on the operation in efficient a manner as possible.</p>
	<p>Is there a funding mechanism in place to provide funding support to companies to enhance sustainability initiatives? How will these programs keep funding comparable/equitable across jurisdictions?</p>	<p>Clarify</p>	<p>No, the CRSB does not intend to provide funding for the implementation of sustainability projects on individual operations. The CRSB is developing the national framework for stakeholders to demonstrate sustainability on their operations and end users to source and make consumer-facing claims. The CRSB has a projects pillar that will be fleshed out further post-launch as well as a sustainability strategy that it will work with its members, partners and collaborators to achieve.</p>

<b>Term: Food loss and waste</b>	“Food, or any substance intended for human consumption, and/or associated parts removed from the food supply chain that is avoidable.” Inedible product is not necessarily waste so it is important to clarify this.	Clarify	The definition has been revised to include where inedible product fits in: “and/or associated parts (e.g. inedible product) removed...”
<b>Term: Safe</b>	“Reasonable steps are taken to reduce the risk of injury. “  Risk of injury to whom? cattle and/or humans”?	Clarify	‘Workers’ has been added to the definition and objective to clarify the subject in this sentence.
<b>The following comments pertain to each of the sustainability indicators.</b>			
<b>Natural Resources</b>	We appreciate the requirements defined to meet a particular level, but more defined examples would be beneficial.  No clear definition of how to meet the requirements; could be very subjective. An operator may believe that he/she is in compliance (i.e. enhance air quality), but find out through an audit that they are not. For smaller facilities, it will be difficult to validate that change is making a difference.	More examples of compliance or develop a Guideline reference.	We are developing a stand-alone document to support interpretation that is complementary to the indicator document.

<p><b>Natural Resources</b></p>	<p>Indicator Two “Air emissions (e.g. greenhouse gases, air quality) are responsibly managed”</p> <p>Levels two and three may be not economically feasible for smaller companies because of financial cost to test.</p>	<p>Concern</p>	<p>Note that Level 1 is required to enter the program. The additional levels are included to encourage continuous improvement but are not required. Air quality tests have also been removed as a metric.</p>
<p><b>People and the Community</b></p>	<p>Indicator One: “A safe and healthy work environment is ensured”</p> <p>This may be confusing in regards to Occupational Health and Safety requirements. What are the expectations beyond this?</p>	<p>Clarify</p>	<p>These have been fleshed out more clearly. Please review the revised indicators and let us know if the level in the indicator is clearer.</p>
<p><b>People and the Community</b></p>	<p>Indicator Three: “Operation involved in community”</p> <p>This is difficult to assess; there may be limited opportunities in rural areas or there could be a situation whereby a small business is in a large community and they cannot economically do this to create a meaningful impact. In addition, some companies would not be able to provide mentorship opportunities within a community because of food safety or biosecurity reasons.</p>	<p>Concern</p>	<p>This is voluntary indicator that is not scored in the audit. It is for collection purposes only for reasons noted in your comment.</p>

<p><b>People and Community</b></p>	<p>Indicator Four: “Career development opportunities are provided”</p> <p>Many small operators will not be able to advance pass Level one due to resource constraints (limited time to conduct performance reviews). In some cases, owners work side-by-side the employees and provide informal on-the-job training or in other cases may not have employees.</p>	<p>Concern</p>	<p>In facilities with no employees, this would not be applicable. We have included informal or formal reviews in Level 2, and in Level 1 the training does not have to be documented or formal, however employees do need to be competent to do their assigned tasks and therefore some form of training/instruction needs to be provided.</p>
<p><b>People and Community</b></p>	<p>Indicator Five: “Operation maintains a provincial or federal licence to operate in good standing”</p> <p>It is possible that a company could be licensed, yet have numerous non-conformances while the regulator and operator work on amenable solutions. In this situation, is the operation in “good standing”?</p>	<p>Clarify</p>	<p>‘in good standing’ was removed from the indicator to allow for more clarity in the expectation and to account for situations like those mentioned in the comment .</p>
<p><b>People and Community</b></p>	<p>As a prerequisite, the auditor should be trained (and certified?) in animal transportation and welfare.</p>	<p>Suggested</p>	<p>We will pass this recommendation on to our Verification Committee who is developing the assurance protocols for auditors.</p>
<p><b>Animal Health and Welfare</b></p>	<p>Humane slaughter is practiced. Does this include halal slaughter?</p>	<p>Clarify</p>	<p>Yes, as the CRSB’s reference point on this are the provincial and federal regulations.</p>

<p><b>Animal Health and Welfare</b></p>	<p>Indicator Two: Operations takes action to minimize pain and distress Level three facilities are “revised” when necessary</p> <p>Meaning upgraded, maintained?</p>	<p>Clarify</p>	<p>Yes, this indicator was modified for clarity: “Protocol is reviewed at least annually and changes made when necessary.”</p>
<p><b>Food</b></p>	<p>Indicator One: “A food safety program is followed” Different provinces have different requirements for their respective industry when it comes to food safety programs whether being documented or not.</p>	<p>Forewarning</p>	<p>The Indicator Committee discussed this comment, and there was consensus that that a documented food safety program would be the minimum requirement for the CRSB program.</p>
<p><b>Food</b></p>	<p>Indicator Two: “Information is shared up and down the supply chain.”</p> <p>How meaningfully will this be measured?</p> <p>The company could have shared confidential information regarding sustainability but the auditor will not be privy to.</p>	<p>Clarify</p>	<p>This is a placeholder for our chain of custody requirements and will be fleshed out further following the second consultation.</p>
<p><b>Food</b></p>	<p>Indicator: 4. “Efforts are made to reduce food waste.” How would this situation be scored? An organization generates “waste” in one process, yet that waste is an ingredient in another process (e.g. meat scraps used for pet food).</p>	<p>Clarify</p>	<p>The intent is to encourage food waste and loss that is avoidable. The example provided could be one way of showing achievement in the indicator. The definition of food waste and loss has been updated to include inedible product as an example of an ‘associated part’.</p>



<b>Food or Efficiency and Innovation</b>	Proper disposal of specified risk materials should be identified as a requirement for Level 1 assessment.	Addition	Since this is covered in federal regulations, the Indicator Committee decided to exclude specified risk material from the indicators.
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