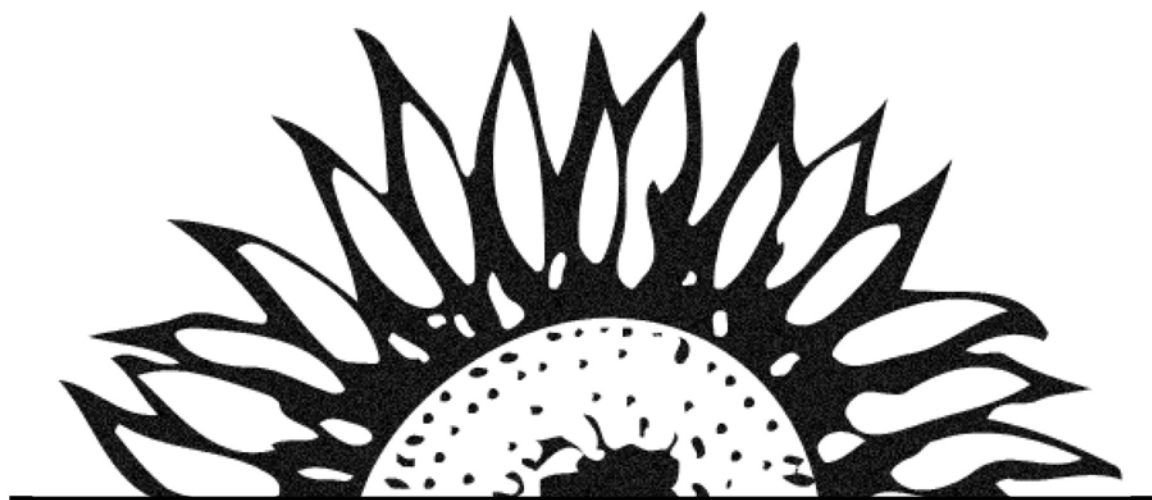


CCOF
Certification Services, LLC.

www.ccof.org



CCOF COR COMPLIANCE MANUAL

A Guide for Compliance to the
Canadian Organic Regime (COR) for
Operations Located in Canada

Edition: September 2011

Introduction

CCOF's Canadian Organic Regime (COR) Compliance certification program is for operations located within Canada. These regulations differ from the United States Department of Agriculture National Organic Program (NOP) standards and are required for any operations or facilities in Canada as of June 30, 2009.

The manual contains:

1. **Frequently Asked Questions**
2. **COR Standards Guide**
3. **Certification Process Guide**

1. FREQUENTLY ASKED QUESTIONS

Q: Do I need to be certified to the CCOF COR Compliance program?

A: If any part of your organic operation is handling or processing organic products within Canada, you must be certified to the COR Compliance program. Operations that produce or handle non-food items such as: personal care products, textiles, pet food and retail establishments, are outside the scope of CFIA's COR authority and do not require COR certification (NOP certification alone will suffice). **Q: How much does CCOF COR Compliance certification cost?**

A: For operations located in Canada, CCOF will charge \$1,500 minimum annual certification fee, plus all other applicable fees (such as inspection fees, late fees, etc) as defined by CCOF Manual One: A Guide to CCOF Certification Services. Where organic production value exceeds this fee category, existing fees as described in Manual One will apply.

For operations with locations both inside and outside of Canada, CCOF will charge \$1,500 annual certification fee per COR certified facility, plus all other applicable fees (such as inspection fees, late fees, etc) as defined by CCOF Manual One: A Guide to CCOF NOP Certification Services.

Q: How do I obtain COR Compliance Certification from CCOF?

A: There are three simple steps for attaining COR certification.

Step 1: Complete the COR application & Organic System Plan (OSP), and submit it directly to CCOF CS. Operations with production in the United States and Canada must maintain a separate COR OSP and certification.

Step 2: Pay the required fees. CCOF CS will invoice you when we receive your COR Compliance application and again each year at the continuation of certification.

Step 3: Complete an inspection. After the inspection, CCOF CS will review the inspection and determine compliance.

Q: What/ who is the Canadian Organic Regime (COR)?

A: COR is overseen by the Canadian Food Inspection Agency (CFIA) and is composed of several constituent parts. Each part plays a role in defining how operators demonstrate compliance and the roles of certifiers, standards setting bodies, and enforcement arms.

- **Regulation establishing COR, released in its final version June 24, 2009.**
- **Organic Production Systems General Principles and Management Standards (CAN/CBSB-32.310-2006).** These are the National Standard of Canada which establishes the production practices that must be followed by operators.
- **Organic Production Systems Permitted Substances Lists (PSL).** This list identifies materials that may be used in the production of organic products under COR.
- **Canada Organic Regime Quality Management System Manual (QMS).** Published by the CFIA, this manual identifies the manual for entities involved in administering the COR. These include requirements and procedures for certifiers, accreditors, and the CFIA itself. The QMS includes numerous requirements that affect certifiers accreditation and will result in certification processes or requirements that affect operations seeking certification under COR.

- **Q: What is the difference between certification to the Canadian Organic Regime (COR) and Canadian Organic Equivalency?**

2. CCOF COR STANDARDS GUIDE

CCOF's COR Compliance program is approved by the International Organic Accreditation Service (IOAS) for providing certification services to those who demonstrate full compliance with the Canadian National Organic Standards (CAN/CBSB-32.310-2006). The full text of the Canadian National Organic Standards may be accessed at any time via www.ccof.org/canada.php, or by contacting the CCOF office to request a paper copy. Operations seeking certification as COR compliant are responsible for reviewing the full text of the Canadian National Organic Standards. CCOF CS will notify producers of the changes to the CCOF COR Compliance program and will provide clients with six months notice prior to enforcement of any standard change when possible. Operations in CCOF's COR Compliance program will be given 12 months from the implementation date to demonstrate full compliance with new standards and/or requirements established through amendments to CAN/CGSB 32.310 and/or 32.311.

The scopes of certification offered by CCOF's COR Compliance program; includes crop production, wild crops, livestock production and the preparation and handling of organic products. CCOF does not currently offer certification for grower groups or Apiculture to the Canadian National Organic Standards.

COR-03-00-01 CCOF COR Compliance Program Manual V1, R1, 10/01/11

2.1 Complaint Log¹

All COR Compliance program clients must keep a record of all complaints received that relate to a product's compliance with CCOF COR Compliance program standards. A record of all complaints must be made available to CCOF CS when requested. The record must show that appropriate action is taken with respect to each received complaint

3. CERTIFICATION PROCESS GUIDE

The CCOF COR compliance program is based upon the CCOF Guide to Certification, Manual One. Specific references are provided in Manual One that describe the certification process, including application, review, inspection, decision, appeals, complaints, etc. This manual also makes notations of additional and/or different aspects of the CCOF COR Compliance program.

3.1 Application²

To request certification to COR Compliance, an operation must complete the CCOF COR Compliance certification program Application. Applications are described per Manual One: A Guide to CCOF Certification and can be downloaded at www.ccof.org.

All applicants with dual or multiple certifications with the same certification scope must obtain written consent from the applicant to receive from the certifier or certifiers the following upon application:

- Current certification decisions,
- Any major non-compliances,
- Evidence of corrective actions(s),
- Copies of transactions certificates or information regarding sales, and/or
- Any denials or suspension/revocations.

3.2 Application Review³

The Application Review is described per Manual One: A Guide to CCOF Certification, Section 2.2 Application Review and Cost Estimate. The findings of this review will be communicated to the client per Section 3.7 Certification Sanctions.

3.3 On-Site Inspection⁴

The on-site inspection is described per Manual One: A Guide to CCOF Certification, Section 2.3 On-Site Inspection.

CCOF reserves the right to make all inspection assignments. CCOF clients may not influence the choice of inspector or contact inspectors directly to solicit inspection assignments. Operators have the right to be informed about the identity of the inspector before the inspection visit, and may raise objections based on conflicts of interest or other reasons. The certification body shall rule whether the grounds on which the inspector was refused is accepted.⁵

CCOF CS may provide foreign accreditation agencies and/or import authorities with copies of inspection reports when required exclusively for the purpose of gaining import licenses for CCOF clients or their customers. When inspection reports etc. are provided CCOF will notify the client of this occurrence.

3.3.1 Additional On-Site Provisions

In addition to other on-site provisions, inspections for COR Compliance certification program clients will take into account the intensity of the production system, production types, company size, previous inspection/review results, complaints, and parallel production.

CCOF will also include identification and investigation of areas of risk, review of records and accounts, productions/sales reconciliation on farms, and input/output reconciliation and trace back audits in processing and handling, and verification that changes have taken place per any changes in COR standards.⁶

Inspections for clients seeking COR compliance may also include the full inspection of all conventional crops and applicable storage areas, including, but not limited to, conventional input, seed storage facilities. This is applicable where there are organic and non-organic fields/farms operated by the same clients in the same area.⁷

Clients must be able to demonstrate during onsite inspections functioning audit trail/record keeping systems that include traceability.

3.3.2 Additional (Announced & Unannounced) On-site Inspections⁸

CCOF CS reserves the right to conduct additional on-site inspections of both applicants for certification and certified operations to determine compliance with the applicable international organic production and handling regulations. The documentation of additional inspections will be deemed necessary by CCOF CS based on risk analysis, taking into account factors such as the type of production, the operator's record of compliance and complexity of production.

The International Organic Accreditation Services (IOAS) may require that additional inspections be performed by CCOF CS for the purpose of determining compliance or equivalence with applicable international organic production and handling regulations. Additional inspections may be announced or unannounced at the discretion of the CCOF CS or as required by IOAS.

In addition to the regular inspections, CCOF CS will conduct unannounced inspections of at least 3% of COR primary producers, and 5% of other COR clientele. CCOF CS will assign the inspection based on the following criteria:

¹ ISO Guide 65 §15, CAN QMS 8.1.2.e

² ISO/IEC Guide 65 4.1.4, 4.5.3.1-4.5.3.1.2, 4.6.1, 4.6.2.a

³ ISO/IEC Guide 65 8.1.1, 8.1.3-8.1.4, 8.2.1.a-b, 8.2.2.a-b, 8.1.2.a-h, 9.0-9.3

⁴ ISO/ICE Guide 65 9.2, 9.4, 10

⁵ CAN QMS 4.5.3.IF

⁶ COR QMS 4.5.3.I

⁷ COR QMS 9.2.2.b

⁸ COR QMS 13.01.a

- Identification of a possible non-compliance activity;
- Potential for drift;
- Achievement of geographic crop and seasonal diversity;
- Other logical reason(s), including random selection.

3.4 Granting of Certification⁹

Granting certification is described per Manual One: A Guide to CCOF Certification, and Section 2.4 Granting Certification. The certificate for those operations who are found to be in compliance with COR requirements shall receive the CCOF Canadian Organic Regime Certificate of Compliance. CCOF will inform clients, in writing, when they are affected by a change, modification (such as reduction, expansion, or extension), or withdrawal of certification in whole or in part¹⁰.

3.5 Continuation of Certification¹¹

Continuation of Certification is per Manual One: A Guide to CCOF Certification, Section 2.5 Continuation of Certification.

3.6 Modification of Certification¹²

Modification of Certification is per Manual One: A Guide to CCOF Certification, Section 2.6 Modification of Certification.

3.7 Certification Sanctions¹³

Certification Sanctions are per Manual One: A Guide to CCOF Certification, Section 2.7 Certification Sanctions.

3.7.1 Noncompliance Procedure

Noncompliance Procedure is per Manual One: A Guide to CCOF Certification, Section 2.7.1 Noncompliance Procedure.

3.7.2 Denial of Certification (Applicants)¹⁴

Denial of Certification is per Manual One: A Guide to CCOF Certification, Section 2.7.2 Denial of Certification.

3.7.3 Proposed Suspension or Revocation¹⁵

Proposed Suspension or Revocation is per Manual One: A Guide to CCOF Certification, Section 2.7.3 Proposed Suspension or Revocation.

3.7.4 Suspension or Revocation¹⁶

Suspension or Revocation is per Manual One: A Guide to CCOF Certification, Section 2.7.4 Suspension or Revocation.

3.7.5 Discontinuance of Certification¹⁷

Discontinuance of Certification is per Manual One: A Guide to CCOF Certification, Section 2.7.5 Discontinuance of Certification. Clients must also cease all claims of the CCOF logo and name, destroy or return all certificates, labeling and marketing materials containing reference to CCOF, and are liable for the costs of services provided up to the point of withdrawal.

3.7.7 Reinstatement

Reinstatement is per Manual One: A Guide to CCOF Certification, Section 2.7.7 Reinstatement.

3.8 Appeals¹⁸

An applicant for certification may appeal a CCOF CS notice of denial of certification, and a certified operation may appeal a CCOF CS notification of proposed suspension or revocation of certification or other adverse action or decision. CCOF CS will carry out the appeal pursuant to the following:

- All written communications between parties involved in appeal proceedings must be sent to the recipient's place of business by a delivery service, which provides dated return receipts.
- An appeal of a noncompliance decision must be filed as required in the notification or within 30 days from receipt of the notification, whichever occurs later. All appeals must include a copy of the adverse decision and a statement of the appellant's reasons for believing that the decision was not proper or made in accordance with COR regulations.
- The appeal will be considered "filed" on the date received by CCOF CS. All appeals shall be reviewed in a timely manner, heard and decided by persons not involved with the decision being appealed. The CCOF CS Ad Hoc Appeals Committee shall render a final and non-appealable decision to sustain, deny, suspend or revoke certification. Alternatively, they may sustain or deny an appeal regarding an adverse action.

3.9 Complaints¹⁹

CCOF CS reserves the right to investigate complaints of noncompliance with applicable to COR Compliance program organic production and handling regulations, and/or complaints against the performance of CCOF CS as a certification body. CCOF CS is committed to investigating complaints that are submitted in writing and that provide evidence that supports the allegation(s). CCOF CS conducts investigations in a timely manner, confidentially and based only on documented evidence. If a certified party or applicant refuses to cooperate in an investigation, CCOF CS may deem this sufficient cause for denial or suspension and/or revocation of certification. A certified party must also maintain records of such complaints per Section 2.1 Complaint Log Standard.

⁹ ISO/IEC Guide 65 4.2.b, 4.6, 11.b, 12-12.4

¹⁰ COR QMS 14.1.3

¹¹ ISO/IEC Guide Section 13

¹² ISO/IEC Guide 65 4.6-4.6.2.c, 12.1, 12.4, 13-13.3

¹³ ISO/IEC Guide §4.6.1,4.6.2-4.6.2.c, 4.8.1, & 12.4

¹⁴ ISO/IEC Guide Section 4.2.b

¹⁵ ISO/IEC Guide 65 4.6

¹⁶ ISO/IEC Guide 65 4.6-4.6.2.a

¹⁷ ISO/IEC Guide 65 4.6.2.a

¹⁸ ISO/IEC Guide 65 7, COR QMS 2.i

¹⁹ ISO/IEC Guide 65 7-7.1, 7.2.b-c,15, COR QMS

COR-03-00-01 CCOF COR Compliance Program Manual V1, R1, 10/01/11