



CCOF
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GLOBAL MARKET ACCESS

Program Manual

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INTRODUCTION

The market for organic products continues to grow worldwide. CCOF has developed the Global Market Access (GMA) program, described in this manual, to provide CCOF clients with compliance review to export arrangements between the USDA National Organic Program (NOP) or Canada Organic Regime (COR) and various foreign governmental bodies. Our GMA program currently offers NOP certified operations equivalence verification for export to Canada, the EU, the UK, Switzerland, Japan, Korea, and Taiwan, and COR certified operations equivalence verification for export to the US, the EU, the UK, Switzerland, Japan, and Taiwan.

While the equivalence agreements dramatically simplify the organic standards for producers of exported products certified to NOP or COR standards, there are some critical variances and labeling requirements in the agreements that entail certifier review and approval. This program is designed to allow CCOF clients to receive the service and support they need to ensure seamless export of their products.

This manual contains information on exporting from the US to Canada, the EU, the UK, Switzerland, Japan, Korea, and Taiwan, and from Canada to the US, the EU, the UK, Switzerland, Japan, and Taiwan including additional production and labeling requirements. Please review this manual carefully for each export market that applies to your operation. If you are exporting your products to other markets, or from origins outside the US or Canada, please contact CCOF to discuss what your operation needs to do.

As foreign countries develop new mandatory national standards and export requirements change, CCOF will continue to modify and expand our GMA program to ensure foreign market access.

SECTION ONE: FREQUENTLY ASKED QUESTIONS

Q1: HOW MUCH DOES THE CCOF GMA PROGRAM COST?

A1: To be the most cost efficient for operations that are shipping to limited export markets, CCOF only charges operations that are exporting products directly, or that grow products to be exported that need additional verification to meet the critical variance of that market. Exporters are only charged for those markets for which they require verification.

- Canada, EU & UK, Switzerland, Japan, Korea, Taiwan, US (from Canada): \$250 annually each.
- EU & UK wine, Switzerland wine: \$750 annually each

The annual fees are due at the time of initial enrollment and due January 1 every year after.

There is an additional \$75 fee for each Export certificate issued under this program, per the CCOF Certification Services Program Manual.

Q2: IS MY OPERATION ELIGIBLE FOR THE CCOF GMA PROGRAM?

A2: All operations currently certified by or applying for NOP or COR certification with CCOF are eligible for the CCOF GMA program, with the following exceptions:

- If your operation is located in Mexico and shipping directly to the EU or Switzerland, you need to enroll in the CCOF International Standard program.
- If your operation is located in Mexico, or you are shipping directly to Mexico, you need to enroll in the Mexico Compliance program.
- Additional restrictions for each equivalence are outlined in the equivalence-specific sections in Section Two of this manual.

Q3: WHO NEEDS TO BE ENROLLED IN THE CCOF GMA PROGRAM?

A3: You should enroll in the CCOF GMA program if you do any of the following:

- Export CCOF certified organic products to the EU, the UK, Switzerland, Japan, Korea or Taiwan from the US.
- Export CCOF certified organic products to Canada from any location.
- Export CCOF certified organic products to the US, the EU, the UK, Switzerland, Japan, or Taiwan from Canada.

- Design labels for products that will be sold in Canada, the EU, the UK, Switzerland, Japan, Korea, or Taiwan.
- Produce wine that may be exported to the EU, the UK or Switzerland from the US.
- Sell CCOF certified organic products to any buyer who requires international verification of certification.

Q4: DOES MY OPERATION HAVE TO BE NOP OR COR CERTIFIED IF I ONLY WANT TO EXPORT PRODUCTS ABROAD?

A4: Yes. All operations must first be certified according to the NOP or COR Standards before the CCOF GMA program can apply.

Q5: HOW DO I OBTAIN EXPORT CERTIFICATES FROM CCOF?

A5: CCOF will provide export certificates only to clients enrolled in the GMA program for the corresponding market and reviewed as compliant to that equivalence. Export certificates may be requested by accessing the Export Certificate Request Packet at www.ccof.org/export for the specified market and submitting the completed packet to export@ccof.org. Export certificates for the EU, Switzerland or Northern Ireland are electronic only and processed in [TRACES](#). Certificates processed in TRACES and certificates for Great Britain (England, Scotland, and Wales) must be approved by CCOF before the consignment leaves the US or Canada, email export@ccof.org for assistance. There is a \$75 fee for each Export certificate, plus applicable shipping fees, per the CCOF Certification Service Program Manual.

CCOF also provides all operations certified to a GMA program with an organic certificate addendum showing the equivalence arrangements they are compliant with. This certificate addendum, referred to as GMA certificate, should be given to buyers with the export certificate, as evidence of compliance to the equivalence.

Q6: WHAT ARE THE LABELING REQUIREMENTS FOR EXPORTED PRODUCTS?

A6: Labels must meet the organic labeling requirements of the destination market. Canada, the EU, the UK, Switzerland, Japan, Korea, and Taiwan all have specific labeling requirements, explained in detail in the CCOF International Market Labeling Guide, available at www.ccof.org/international. Operation's shipping to the US from Canada will need to meet the US labeling requirements, outlined at www.ccof.org. All labels should be submitted to CCOF for approval prior to printing. The fees charged for each export market verification include the review of labels to ensure compliance with the export market requirements.

Various products may also be subject to national regulations and laws regarding food labeling or other standards. CCOF strongly recommends working with your importer to ensure compliance to all food labeling requirements for the destination market.

Q7: HOW DO I OBTAIN CCOF GMA VERIFICATION?

A7: Submit the CCOF GMA application or GMA Wine Application indicating your desired export markets. CCOF will perform a desk audit of your operation and issue a Certificate of Compliance, otherwise called GMA Certificate, for the equivalence arrangements that you comply with. In cases where some portion of your operation complies, and some does not, an onsite inspection may be required before CCOF can grant you export verification.

Q8: WHAT ELSE DO I NEED TO KNOW ABOUT INTERNATIONAL EXPORTS?

A8: In addition to the requirements of governmental bodies, some foreign importers also demand certification or approval by private bodies, such as BioSuisse in Switzerland. Additionally, some buyers may desire direct governmental certification, such as to JAS in Japan. While the need for certification to standards in addition to those described in this manual are uncommon, CCOF has worked to develop programs and partnerships to provide the necessary documentation where possible. If you believe that you need additional export documentation other than what is provided by the CCOF GMA program, please contact CCOF at export@ccof.org to discuss your needs.

Additionally, please note that organic standards agreements do not negate the need to meet foreign market labeling laws or other food or fiber regulations that may affect labeling, product composition, or other aspects of your products. CCOF is only qualified to address organic standards issues.

SECTION TWO: EXPORT ARRANGEMENTS & REQUIREMENTS BY FOREIGN MARKET

All products being shipped to a market under a USDA NOP or CFIA COR Organic Equivalence Arrangement must be accompanied by an export certificate, often referred to as a certificate of import or import certificate. These certificates are specific to each transaction and must be issued by CCOF. To request an export certificate from CCOF, complete and submit the Export Certificate Request Packet to export@ccof.org or complete the certificate process in TRACES for export to the EU, Switzerland or Northern Ireland. There is a \$75 fee for each export certificate, plus applicable shipping fees.

PART A: CANADA/US

The Canadian Food Inspection Agency (CFIA) and USDA NOP organic standards equivalence arrangement establishes the standards of the two countries as equivalent, with the exception of some critical variances that must be addressed in the certification and/or import/export process. For CCOF operations certified to either the NOP or COR standards, the CCOF GMA program documents compliance with the US/Canada Organic Equivalence Arrangement.

All NOP or COR certified products crossing the borders into Canada or the US must be accompanied by an attestation statement that the product has been produced in accordance with the terms of the US/Canada Organic Equivalence Arrangement, including having met the critical variances, described below. This attestation statement must be provided by the certifier (CCOF) and must accompany all shipments of organic products exported through this equivalence. For NOP or COR operations, the attestation statement must be displayed on the organic certificate or associated documents. The CCOF GMA program organic certificate addendum fulfills the attestation requirement.

All ingredients in products destined for Canada or the US must be certified or equivalent to the standards of the Canadian Organic Regime (COR) or National Organic Program (NOP), for the final product to receive GMA compliance for the US/Canada Equivalence. All NOP certified products, except those on the list of high risk crops (www.ccof.org/Canada), and all COR products, except those containing livestock ingredients, will automatically be considered COR/NOP equivalent.

Canada Labeling Requirements:

All labels for organic products sold in Canada must be labeled in full compliance with Canadian labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Canada can be found in the International Market Labeling Guide at www.ccof.org/international.

US Labeling Requirements:

All labels for organic products sold in the US must be labeled in full compliance with US labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to the US can be found on the CCOF website: www.ccof.org.

Critical Variances / Production Requirements for Product Entering Canada from the US:

All raw produce, ingredients in processed products, and processed products¹:

1. Must be produced without the use of sodium nitrate.
 - a. If a portion of the crops are produced without the use of sodium nitrate, they must be segregated from crops produced using sodium nitrate. Fields are not required to undergo transition after the use of sodium nitrate.
2. Must not be produced by hydroponic or aeroponic methods.
3. Livestock products (other than from ruminants) must be from animal systems that meet the stocking rates as set forth in the Canadian Standard (see the table below):

¹ CAN/CGSB 32310-2006.

| Livestock | Canadian Measurement | US Equivalent | Canadian Measurement | US Equivalent |
|---|--|---|--|------------------------------------|
| | Indoor Space | | Outdoor Runs and Pens | |
| SWINE | | | | |
| Sows and piglets up to 40 days old | 7.5 m ² for each sow and litter | 80.7 sq. ft. for each sow & litter | 2.5 m ² for each sow and litter | 26.9 sq. ft. for each sow & litter |
| Growing pigs up to 30 kg. (66#) | 0.6 m ² /head | 6.5 sq ft/head | 0.4 m ² /head | 4.3 sq ft/head |
| Growing pigs 30 – 50 kg. (66# -110#) | 0.8 m ² /head | 8.6 sq ft/head | 0.6 m ² /head | 6.5 sq ft/head |
| Growing pigs 50 – 85 kg. (110# - 87#) | 1.1 m ² /head | 11.8 sq ft/head | 0.8 m ² /head | 8.6 sq ft/head |
| Growing pigs > 85 kg (> 187#) | 1.3 m ² /head | 14 sq ft/head | 1.0 m ² /head | 10.8 sq ft/head |
| Sows in group pens | 3 m ² /head | 32.3 sq ft/head | 3 m ² /head | 32.3 sq ft/head |
| Boars in individual pens | 9 m ² /head | 96.8 sq ft/head | 9 m ² /head | 96.8 sq ft/head |
| POULTRY | | | | |
| Laying hens | 6 birds/1 m ² | 6 birds/10.8 sq ft | 4 birds/1m ² | 4 birds/10.8 sq ft |
| Broilers | Maximum 21 kg./1m ² | 46 # /10.8 sq ft | 4 birds/1m ² | 4 birds/10.8 sq ft |
| Turkeys, geese and large birds | Maximum 26 kg./1m ² | 57.2 # /10.8 sq ft | 17 kg./1m ² | 37.4 #/10.8 sq ft |
| PASTURED POULTRY or mobile housing | | | | |
| Laying hens | | | 2000/hectare | 800/acre |
| Broilers | | | 2500/hectare | 1000/acre |
| Large birds | | | 1300/hectare | 540/acre |
| RABBITS | | | | |
| Young rabbits | 0.3 m ² /head | 3.2 sq ft/head | 2 m ² /head | 21.5 sq ft/head |
| Pregnant does | 0.5 m ² /head | 5.4 sq ft/head | 2 m ² /head | 21.5 sq ft/head |
| Does and offspring | 0.7 m ² of floor space /doe and offspring | 7.5 sq ft of floor space /doe and offspring | 2 m ² /head | 21.5 sq ft/head |

Critical Variances / Production Requirements for Product Entering the US from Canada:

Livestock and livestock products must be produced without the use of antibiotics.

PART B: EUROPEAN UNION AND UNITED KINGDOM

The USDA NOP and CFIA COR have both established organic standards equivalence arrangements with the European Union Commission and the UK’s Department for Environment, Food & Rural Affairs (DEFRA). The UK will retain the EU regulations after their exit from the EU, until full implementation of the UK standards come into force. Both arrangements establish the standards of the US and Canada as equivalent with the EU regulations, with the exception of some critical variances that must be addressed in the certification and/or import/export process. For CCOF operations, where the final processing or packaging of organic product occurs in the United States, or the final processing occurs in Canada, the CCOF GMA program will document compliance with the EU and UK Organic Equivalence Arrangements with the US and Canada. If your operation is located in Mexico, the above EU and UK Organic Equivalence Arrangements do not apply, and your operation is NOT eligible for CCOF GMA. You will need to enroll in our CCOF International Standard program.

All ingredients in products destined for the EU and UK must be certified or equivalent to the EU standards, for the final product to receive GMA certification for the EU and UK.

- For exports from the US:
 - All NOP certified ingredients, except wine, will automatically be considered EU and UK equivalent.
 - Wine requires additional equivalence verification.

- For exports from Canada:
 - All unprocessed plant products, live animals or unprocessed animal products and vegetative propagating material and seed for cultivation must be grown in Canada.
 - Processed agricultural products for use as food or feed must be processed in Canada with organically grown ingredients grown in Canada or imported into Canada in accordance with the Organic Products Regulations. Products that are only packaged and/or labeled in Canada do not meet the terms of the equivalence arrangement.
 - Wine is included in this equivalence and requires no additional verification outside the CCOF GMA Program.

EU and UK Labeling Requirements:

All labels for organic products sold in the EU and UK must be labeled in full compliance with EU labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to the EU and UK can be found in the International Market Labeling Guide at www.ccof.org/international.

Critical Variances / Production Requirements:

Products sent to the EU and UK must meet NOP or COR requirements. The equivalence arrangements cover live or unprocessed agricultural products and vegetative propagating materials and seeds for cultivations, as well as processed agricultural products for use as food and feed.

European Union Member States may interpret the EU regulations in different ways, which may result in some countries requiring additional documentation without prior notice. CCOF works to prevent situations like this and will work with you and your importer to solve any requests of this nature.

Wine Production Requirements / Critical Variances (US Export Only):

Wine may not contain any nonorganic grapes and must be produced using only the winemaking practices and substances detailed in the EU Organic regulations (EU) 2018/848, (EU) 2021/1165, and outlined below:

| Wine Production Material/ Practice | EU status | EU regulation reference |
|--|--|--|
| Yeast, Yeast extracts, Gum Arabic, Gelatin, Tannins | Must be organic when commercially available | (EU) 2021/1165 Annex V Part D |
| Nonorganic flavors (other than pieces of oak) | Prohibited | (EU) 2021/1165 Annex V Part D |
| Enzymes (other than Cellulase, Hemicellulase, Pectin lyases, Pectin methylesterase, Polygalacturonase) | Prohibited | (EU) 2021/1165 Annex V Part D |
| Partial dealcoholisation of wine | Prohibited | (EU) 2018/848 Annex II Part VI 3.2(d) |
| Electrodialysis treatment to ensure the tartaric stabilization of the wine | Prohibited | (EU) 2018/848 Annex II Part VI 3.2(c) |
| Treatment with cation exchangers to ensure tartaric stabilization of the wine | Prohibited | (EU) 2018/848 Annex II Part VI 3.2(e) |
| Partial concentration through cooling | Prohibited | (EU) 2018/848 Annex II Part VI 3.2(a) |
| Elimination of sulphur dioxide by physical processes | Prohibited | (EU) 2018/848 Annex II Part VI 3.2(b) |
| Centrifuging and filtration with or without an inert filtering agent | Restricted: the size of the pores shall be not smaller than 0.2 micrometer | (EU) 2018/848 Annex II Part VI 3.3 (b) |
| Heat treatments | Restricted: temperature shall not exceed 75 °C (167 °F) | (EU) 2018/848 Annex II Part VI 3.3 (a) |

PART C: JAPAN

The USDA NOP and CFIA COR have both established organic standards equivalence arrangements with the Japanese Ministry of Agriculture, Forestry and Fisheries (MAFF). Both arrangements establish the standards of the US and Canada as

equivalent with Japan's, with no critical variances. Alcoholic beverages are not included in the arrangements. For CCOF operations where the final processing or packaging of organic product occurs in the United States or Canada, the CCOF GMA program will document compliance with the Japan Organic Equivalence Arrangements with the US and Canada.

All ingredients in products destined for Japan must be JAS certified or equivalent for the final product to receive GMA certification for Japan. All NOP or COR certified products will automatically be considered JAS equivalent.

Japan Labeling Requirements:

All retail labels for organic products sold in Japan are required to display the JAS seal. The seal may be applied in Japan by a JAS-certified importer or applied in the US or Canada through a consignment contract with a JAS-certified importer. See www.ccof.org/japan for more information about applying the JAS seal and working with certified importers and consignment contracts.

All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Japan can be found in the International Market Labeling Guide at www.ccof.org/international.

Critical Variances / Production Requirements:

Products sent to Japan must meet NOP or COR requirements.

PART D: KOREA

The Korean Ministry of Agriculture, Food and Rural Affairs (MAFRA) and the USDA NOP organic standards equivalence arrangement establishes the standards of the two countries as equivalent for processed products, as defined in the Korean Organic Food Code, with the exception of some critical variances that must be addressed in the certification and/or import/export process. For CCOF operations, where the final processing of organic product occurs in the United States, the CCOF GMA program will document compliance with the US/Korea Organic Equivalence Arrangement.

All ingredients in products destined for Korea must be certified or equivalent to the Korean organic standards for the final product to receive GMA certification for Korea. All NOP certified ingredients will automatically be considered Korea equivalent.

Korean Labeling Requirements:

All labels for organic products sold in Korea must be labeled in full compliance with Korean labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Korea can be found in the International Market Labeling Guide at www.ccof.org/international.

Critical Variances / Production Requirements:

Only processed products, as defined by the Korean Food Code, are allowed to be exported to Korea.

PART E: SWITZERLAND

The USDA NOP and CFIA COR have both established organic standards equivalence arrangements with the Swiss Federal Office for Agriculture (FOAG). Both arrangements establish the standards of the US and Canada as equivalent with Switzerland's, with no critical variances. For CCOF operations, where the final processing or packaging of organic product occurs in the United States or Canada, the CCOF GMA program will document compliance with the Swiss Organic Equivalence Arrangements with the US and Canada. If your operation is located outside of the United States or Canada, the Organic Equivalence Arrangements do not apply and your operation is NOT eligible for CCOF GMA. You will need to enroll in our CCOF International Standard program.

All ingredients in products destined for Switzerland must be certified or equivalent to the Swiss standards, for the final product to receive GMA certification for Switzerland.

- For exports from the US, all NOP certified ingredients, except wine, will automatically be considered Swiss equivalent. Wine requires additional equivalence verification.

- For exports from Canada, live or unprocessed agricultural products and vegetative propagating material and seeds for cultivation must be grown in Canada. All COR certified processed agricultural products, including wine, will automatically be considered Swiss equivalent.

Swiss Labeling Requirements:

All labels for organic products sold in Switzerland must be labeled in full compliance with Swiss labeling requirements. All labels must be approved by CCOF prior to printing. Requirements for labeling organic products for export to Switzerland can be found in the International Market Labeling Guide at www.ccof.org/international.

Critical Variances / Production Requirements:

Products sent to Switzerland must meet NOP or COR requirements. The equivalence arrangements cover live or unprocessed agricultural products and vegetative propagating materials and seeds for cultivations, as well as processed agricultural products for use as food and feed.

Wine Production Requirements / Critical Variances (US Export Only):

Wine may not contain any nonorganic grapes and must be produced using only the winemaking practices and substances detailed in the Swiss Organic Ordinances and outlined below:

| Wine Production Material/ Practice | Swiss status | Swiss regulation reference |
|--|--|--|
| Yeast, Yeast extracts, Gum Arabic, Gelatin, Tannins | Must be organic when commercially available | EAER Ordinance on Organic Farming Article 3b |
| Nonorganic flavors (other than pieces of oak) | Prohibited | EAER Ordinance on Organic Farming Article 3b |
| Enzymes (other than Cellulase, Hemicellulase, Pectin lyases, Pectin methylesterase, Polygalacturonase) | Prohibited | EAER Ordinance on Organic Farming Article 3b |
| Partial dealcoholisation of wine | Prohibited | EAER Ordinance on Organic Farming Article 3c |
| Electrodialysis treatment to ensure the tartaric stabilization of the wine | Prohibited | EAER Ordinance on Organic Farming Article 3c |
| Treatment with cation exchangers to ensure tartaric stabilization of the wine | Prohibited | EAER Ordinance on Organic Farming Article 3c |
| Partial concentration through cooling | Prohibited | EAER Ordinance on Organic Farming Article 3c |
| Elimination of sulphur dioxide by physical processes | Prohibited | EAER Ordinance on Organic Farming Article 3c |
| Centrifuging and filtration with or without an inert filtering agent | Restricted: the size of the pores shall be not smaller than 0.2 micrometer | EAER Ordinance on Organic Farming Article 3c |
| Heat treatments | Restricted: temperature shall not exceed 75 °C (167 °F) | EAER Ordinance on Organic Farming Article 3c |

PART F: TAIWAN

The USDA NOP and CFIA COR have both established organic standards equivalency arrangements with the Government of Taiwan. Both arrangements establish the standards of the US and Canada as equivalent with Taiwan's with the exception of a critical variance that must be addressed in the certification and/or import/export process. For CCOF operations, where organic product is raised or grown or where the final processing or packaging of organic product occurs in the United States or Canada, the CCOF GMA program will document compliance with the Taiwan Organic Equivalence Arrangements with the US and Canada.

Taiwan Labeling Requirements:

All labels for organic products sold in Taiwan must be labeled in full compliance with Taiwan labeling requirements. All labels must be approved by CCOF prior to printing. Use of Taiwan's organic mark is restricted for use only by Taiwan businesses and may not be applied by US or Canadian exporters. Requirements for labeling organic products for export to Taiwan can be found in the International Market Labeling Guide at www.ccof.org/international.

Critical Variances / Production Requirements:

Products sent to Taiwan must meet NOP or COR requirements.



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