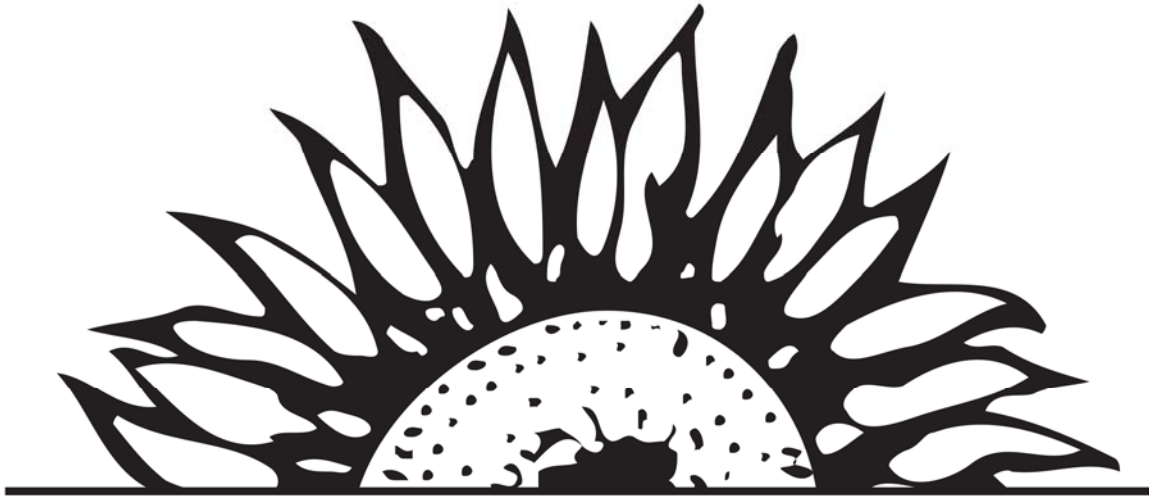




**CCOF**  
**Certification Services, LLC**  
[www.ccof.org](http://www.ccof.org)



# **GLOBAL MARKET ACCESS**

## **Program Manual**

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# TABLE OF CONTENTS

<b>TABLE OF CONTENTS</b> .....	<b>2</b>
<b>INTRODUCTION</b> .....	<b>3</b>
<b>SECTION ONE: FREQUENTLY ASKED QUESTIONS</b> .....	<b>3</b>
Q1: HOW MUCH DOES THE CCOF GMA PROGRAM COST?.....	3
Q2: IS MY OPERATION ELIGIBLE FOR THE CCOF GMA PROGRAM? .....	3
Q3: WHO NEEDS TO BE ENROLLED IN THE CCOF GMA PROGRAM?.....	3
Q4: DOES MY OPERATION HAVE TO BE NOP OR COR CERTIFIED IF I ONLY WANT TO EXPORT PRODUCTS ABROAD? .....	4
Q5: HOW DO I OBTAIN EXPORT CERTIFICATES FROM CCOF?.....	4
Q6: WHAT ARE THE LABELING REQUIREMENTS FOR EXPORTED PRODUCTS? .....	4
Q7: HOW DO I OBTAIN CCOF GMA VERIFICATION?.....	4
Q8: WHAT ELSE DO I NEED TO KNOW ABOUT INTERNATIONAL EXPORTS? .....	4
<b>SECTION TWO: EXPORT ARRANGEMENTS &amp; REQUIREMENTS BY FOREIGN MARKET</b> .....	<b>5</b>
PART A: CANADA/US.....	5
PART B: EUROPEAN UNION.....	6
PART C: JAPAN .....	7
PART D: KOREA .....	8
PART E: SWITZERLAND.....	8
PART F: TAIWAN.....	9



# 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, Japan, Korea, Taiwan and Switzerland, and COR certified operations equivalence verification for export to the US, the EU, Switzerland, and Japan.

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 the EU, Canada, Japan, Korea, Taiwan and Switzerland, and from Canada to the US, the EU, Switzerland, and Japan, 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.

- EU, Canada, Japan, Korea, Switzerland, US (from Canada): \$250 annually each.
- EU 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, Japan, Korea or Switzerland from the US.
- Export CCOF certified organic products to Canada from any location.
- Export CCOF certified organic products to the US, the EU, Switzerland, or Japan from Canada.
- Design labels for products that will be sold in the EU, Canada, Japan, Korea, or Switzerland.
- Produce wine that may be exported to the EU or Switzerland.



- Grow crops or make products containing crops that appear on CCOF's list of high risk crops (such as carrots, potatoes, or leafy greens) that are exported to Canada or used in products exported to Canada. See [www.ccof.org/canada](http://www.ccof.org/canada) for the full list of high risk crops.
- Raise non-ruminant livestock or make livestock products from non-ruminant livestock that are exported to Canada.
- Raise livestock or make livestock products that are exported to the US from Canada
- 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 emailing [export@ccof.org](mailto:export@ccof.org) and using the Export Certificate Request Packet for the specified market, available at [www.ccof.org/export](http://www.ccof.org/export). 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. The EU, Canada, Japan, Korea, and Switzerland all have specific labeling requirements, explained in detail in the CCOF International Market Labeling Guide, available at [www.ccof.org/international](http://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](http://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](mailto: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, please complete and submit the Export and Transaction Certificate Request Form, along with the template export certificate for the market you are exporting to. 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 compliance with the terms of the US/Canada Organic Equivalence Arrangement, including having met the critical variances, described below. This Attestation Statement must be included on accompanying documents or packaging for all shipments of organic products exported between Canada and the US.

For COR operations, the Attestation Statement must be displayed on the organic certificate or associated documents. The CCOF GMA program organic certificate addendum fulfills this requirement. For NOP operations, the Attestation Statement does not need to be provided by the certifier (CCOF) but may be claimed by the members of the supply chain alone. If your product meets the terms of the arrangement, you may complete the Attestation Document, available at [www.ccof.org/export](http://www.ccof.org/export), and provide it to Canadian border authorities as requested. However, if you or your buyer wishes to receive the Attestation Statement on an organic certificate addendum, you will need to enroll in the CCOF GMA program.

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](http://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](http://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](http://www.ccof.org).

#### **Critical Variances / Production Requirements for Product Entering Canada:**

All raw produce, ingredients in processed products, and processed products<sup>1</sup>:

1. Must be produced without the use of sodium nitrate.
  - a. Clients must be prepared to demonstrate that products/ingredients were not grown with sodium nitrate to USDA and/or Canadian personnel through auditable records such as certifier affidavits, supplier attestations, or documentation from NOP certifiers, such as client profiles or similar documents, to ensure compliance.
  - b. 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.

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<sup>1</sup> CAN/CGSB 32310-2006.



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):

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

### Critical Variances / Production Requirements for Product Entering the US:

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

### **PART B: EUROPEAN UNION**

The USDA NOP and CFIA COR have both established organic standards equivalence arrangements with the European Union Commission. Both arrangements establish the standards of the US and Canada as equivalent with the EU's, 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 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 the EU must be certified or equivalent to the EU standards, for the final product to receive GMA certification for the EU.

- For exports from the US:
  - All NOP certified ingredients, except wine, will automatically be considered EU 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 Labeling Requirements:

All labels for organic products sold in the EU 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 can be found in the International Market Labeling Guide at [www.ccof.org/international](http://www.ccof.org/international).

### Critical Variances / Production Requirements:

Products sent to the EU 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 EEC 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 EEC 203/2012 and outlined below:

Wine Production Material/ Practice	EU status	EU regulation reference
Enzymes (other than pectolytic enzymes)	Prohibited	EC 203/2012 Article 29c, Annex VIIIa
Partial dealcoholisation of wine	Prohibited	EC 606/2009, Annex I A, Point 40
Electrodialysis treatment to ensure the tartaric stabilization of the wine	Prohibited	EC 606/2009, Annex I A, Point 36
Treatment with cation exchangers to ensure tartaric stabilization of the wine	Prohibited	EC 606/2009, Annex I A, Point 43
Partial concentration through cooling	Prohibited	EC 1234/2007 Annex XVa, Section B.1, Point (c)
Elimination of sulphur dioxide by physical processes	Prohibited	EC 606/2009, Annex I A, Point 8
Centrifuging and filtration with or without an inert filtering agent	Restricted: the size of the pores shall be not smaller than 0.2 micrometer	EC 606/2009, Annex I A, Point 3
Heat treatments	Restricted**: temperature shall not exceed 70 °C (158 °F)	EC 606/2009, Annex I A, Point 2
Use of ion exchange resins	Allowed**	EC 606/2009, Annex I A, Point 20
Reverse osmosis	Allowed**	EC 1234/2007, Annex XVa, Section B.1, Point (b)

\*\*to be re-examined by August 2015; may be further restricted or prohibited

### 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. Livestock and 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](http://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](http://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](http://www.ccof.org/international).

#### **Critical Variances / Production Requirements:**

Apples and pears must not be grown using antibiotics (streptomycin or tetracycline).

### **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](http://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	EU status	EU regulation reference
Enzymes (other than pectolytic enzymes)	Prohibited	EAER Ordinance on Organic Farming Annex 3b, Section A (10)
Partial dealcoholisation of wine	Prohibited	EAER Ordinance on Organic Farming Article 3c (3) (d)
Electrodialysis treatment to ensure the tartaric stabilization of the wine	Prohibited	EAER Ordinance on Organic Farming Article 3c (3) (c)
Treatment with cation exchangers to ensure tartaric stabilization of the wine	Prohibited	EAER Ordinance on Organic Farming Article 3c (3) (e)
Partial concentration through cooling	Prohibited	EAER Ordinance on Organic Farming Article 3c (3) (a)
Elimination of sulphur dioxide by physical processes	Prohibited	EAER Ordinance on Organic Farming Article 3c (3) (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	EAER Ordinance on Organic Farming Article 3c (2) (b)
Heat treatments	Restricted**: temperature shall not exceed 70 °C (158 °F)	EAER Ordinance on Organic Farming Article 3c (2) (a)
Use of ion exchange resins	Prohibited	EAER Ordinance on Organic Farming Annex 3b, Section A
Reverse osmosis	Prohibited	EAER Ordinance on Organic Farming Annex 3b, Section A

### **PART F: TAIWAN**

The US and Taiwan have an agreement in place where NOP certified products may be shipped to Taiwan so long as they meet the production requirement below. As the production requirements are, in most cases, verification of compliance with NOP standards, additional supplier verifications will not be required until further notice. CCOF clients should be aware that the Taiwanese organic authorities have strongly based their organic system on analytical testing, and residue analyses at port are likely.

### Production Requirement / Critical Variances:

Products shipped to Taiwan must be produced “using zero prohibited substances”. Livestock and meat products must be produced without the use of systemic pain killers or analgesics, including the use of Lidocaine and Procaine (though these materials may be used in topical applications).





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