



CCOF

Certification Services, LLC

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COR

COMPLIANCE

Program Manual

**For the Certification of Operations Located in Canada to the
Canadian Organic Regime (COR)**

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ACRONYMS USED

CFIA: Canadian Food Inspection Agency

COR: Canadian Organic Regime

NOP: National Organic Program

OSP: Organic System Plan

USDA: United States Dept. of Agriculture

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 organic operations or facilities in Canada as of June 30, 2009.

SECTION ONE: FREQUENTLY ASKED QUESTIONS

Q1: DO I NEED TO BE CERTIFIED TO THE CCOF COR COMPLIANCE PROGRAM?

A1: If any part of your organic operation produces, handles, or processes organic products within Canada you must be certified to the COR organic standards. Operations that already have a product certified to COR, products produced under transition to organic or 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. CCOF can offer NOP certification to operators in Canada that produce these products that are outside the scope of the COR standards.

Q2: HOW MUCH DOES CCOF COR COMPLIANCE CERTIFICATION COST?

A2: For certification of operations located in Canada, CCOF will charge a \$1,500 minimum annual certification fee, plus all other applicable fees (such as inspection fees, Global Market Access Program fees, late fees, etc.) as described in the CCOF Certification Program Manual. Where Organic Production Value (OPV) is greater than \$600,000, the annual certification fee described in the CCOF Certification Services Program Manual Fee Schedule will apply.

Q3: HOW DO I OBTAIN COR COMPLIANCE CERTIFICATION FROM CCOF?

A3: 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. Operations with production in both the United States and Canada must maintain separate COR certification for Canada and NOP certification for the US.

Step 2: Pay the required fees. CCOF will invoice you when we receive your COR Compliance Application and again each year at the Continuation of Certification, due January 1.

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

Q4: WHAT/ WHO IS THE CANADIAN ORGANIC REGIME (COR)?

A4: 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 the Organic Products Regulation (COR), final version released June 24, 2009.**
- **Organic Production Systems General Principles and Management Standards (CAN/CBSB-32.310-2015).** These are the National Standards of Canada which establish the production practices that must be followed by operators.
- **Organic Production Systems Permitted Substances Lists (CAN/CGSB 32.311).** This list identifies materials that may be used in the production of organic products under COR.
- **Canada Organic Office Operating Manual** Published by the CFIA, this manual identifies the procedures necessary for entities involved in administrating the COR. These include requirements and procedures for certifiers, accreditors, and the CFIA itself. The Operating Manual includes numerous requirements that affect certifiers' accreditation and will result in certification processes or requirements that affect operations seeking certification under COR.



Q5: WHAT IS THE DIFFERENCE BETWEEN CERTIFICATION TO THE CANADIAN ORGANIC REGIME (COR) AND THE US/CANADA ORGANIC EQUIVALENCE?

A5: Operations located in Canada must be certified to the COR standards directly, and cannot be certified to the NOP standards unless they are outside the scope of COR, such as personal care products or pet food. Once certified to either the COR or NOP standards, products are eligible to meet the US/Canada equivalence arrangement.

The US/Canada equivalence arrangement, signed on July 1, 2009, establishes the COR and NOP standards as equivalent, with minor critical variances that must be verified by the certifier. Once the critical variances are verified, products certified to the COR standard may be shipped to the US and use the USDA organic seal, and products certified to the NOP can ship product to Canada and use the Canadian organic seal.

CCOF offers verification to the US/Canada equivalence, as well as other Canada equivalence arrangements, through enrollment in our Global Market Access (GMA) program. Fees and program descriptions are outlined in the CCOF Certification Services Program Manual and Global Market Access Program Manual

SECTION TWO: CERTIFICATION PROCESS

The process and requirements for certification to the CCOF COR Compliance program are described in the CCOF Certification Services Program Manual. The CCOF Certification Services Program Manual describes all aspects of the certification process, including Application, Application Review¹, Granting of Certification², On-Site Inspection³, Additional (Announced & Unannounced) On-site Inspections, Noncompliance Procedure, Certification Sanctions⁴, Denial of Certification (Applicants)⁵, Suspension and Cancellation of Certification⁶, Appeals⁷ and Complaints⁸.

Areas where the CCOF COR Compliance certification program process differs from that described in the CCOF Certification Services Program Manual, including additions, deletions or modifications, are listed in this manual.

2.1 COMPLAINT LOG⁹

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 when requested. The record must show that appropriate action is taken with respect to each received complaint.

2.2 APPLICATION¹⁰

To request certification to COR Compliance, an operation must complete the CCOF Application and COR Organic System Plan. The process for application is described per the CCOF Certification Services Program Manual and the forms can be downloaded at www.ccof.org/documents.

All applicants who wish to change certifiers must provide written consent for CCOF to receive from the sending 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.

For applicants that are granted certification under CCOF's COR Compliance program that are changing certifiers, CCOF will notify the sending certifier when the operation is certified. The sending certifier will then terminate the certification agreement it has with the operator.

2.3 ON-SITE INSPECTION¹¹

The CCOF CS inspector will start the inspection by conducting an introductory meeting with the representatives of the operation.

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.

CCOF may provide foreign accreditation agencies and/or import authorities with copies of inspection reports when

¹ ISO/IEC 17065 7.1-7.3.5

² ISO/IEC 17065 7.6

³ ISO/IEC 17065 7.4

⁴ ISO/IEC 17065 7.11 & 7.13

⁵ ISO/IEC 17065 4.4.3

⁶ ISO/IEC 17065 7.11-7.11.6

⁷ ISO/IEC 17065 7.13,

⁸ ISO/IEC 17065 7.13

⁹ ISO/IEC 17065 4.1.2.2.c.2 & 4.1.2.2.j

¹⁰ ISO/IEC 17065 7.1 -7.3.5

¹¹ ISO/IEC 17065 7.4 & COO Operating Manual C2.3



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.

2.4 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, the performance of input/output reconciliation and trace back audits in processing and handling, and verification that changes have taken place per any changes in COR standards.¹²

The inspections for all clients seeking COR compliance certification may include the observation of the entire agricultural production system being managed by the operation, even if only part of the operation is enrolled in the organic certification program. Inspections may include observation of non-organic production and processing operations, including packaging and labeling of non-organic products. This requirement applies where there are organic and non-organic sites managed by the same clients in the same location.¹³

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

2.5 ADDITIONAL (ANNOUNCED & UNANNOUNCED) ON-SITE INSPECTIONS¹⁴

CCOF 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 performance of unannounced inspections will be decided by CCOF based on risk analysis, taking into account factors such as the type of production, the operator's record of compliance and complexity of production, or ensure corrective actions addressed and resolved nonconformities.

The CAEQ may require that additional inspections be performed by CCOF 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 or as required by CAEQ.

In addition to the regular inspections, CCOF will conduct unannounced inspections of at least 3% of COR primary producers, and 5% of other COR clientele. CCOF may use any of the following criteria when deciding to assign an unannounced inspection to an operation:

- Possible non-compliant activity
- Potential for drift
- Observation of specific crops or production activities
- Result of a complaint or investigation
- Any logical reason
- Random selection

2.6 MODIFICATION OF CERTIFICATION¹⁵

CCOF will inform clients, in writing, when they are affected by a change, modification (such as reduction, expansion, or extension), or cancellation or suspension of certification in whole or in part.

2.7 SUSPENSION¹⁶ AND CANCELLATION OF CERTIFICATION¹⁷

Under COR, certification continues until cancelled or suspended. If an operation voluntarily withdraws from the CCOF COR Compliance Program, CCOF will issue a Notice of Cancellation of Certification. In the case of cancellation of certification, the operation has the right to be heard, either orally or in writing. 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.

CCOF shall reinstate suspended certification only after the CFIA has been notified and the date of the certification reinstatement is posted on the CFIA published list of suspended and cancelled organic certifications.

CCOF will report to CFIA all suspensions and cancellations of certification within 30 days via CCOF's Certification Verification Body (CAEQ).

CCOF will not grant certification to an operator who has previously cancelled or whose name appears on the CFIA published list of suspended and cancelled organic

¹² COO Operating Manual 2.3.12 & 2.3.13

¹³ COO Operating Manual C2.3.1 & C 2.3.4

¹⁴ COO Operating Manual 2.9.1, 2.9.2 & 2.6.1

¹⁵ ISO/IEC 17065 7.10

¹⁶ ISO/IEC 17065 7.11

¹⁷ ISO/IEC 17065 7.11-7.11.6 & COO Operating Manual 2.7.4, 2.10.2, 2.10.3 & 2.10.4



certifications unless the operator has undergone application and CCOF has received conformation from the CFIA that the date of the certification reinstatement is posted on the CFIA list. CCOF will send the request within 5 working days from the certification decision.

2.8 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 cancelled certification, proposed suspension, 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 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. CCOF will send acknowledgement in writing to the appellant, that we have received the appeal.
- 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. Only persons who were not involved in making the decision being appealed may serve on the Ad Hoc Appeals Committee. The number of persons assigned to an appeal must be a minimum of three persons, allowing for a majority vote.
- CCOF shall give formal notice of the outcome and the end of the appeal process to the appellant.

2.9 COMPLAINTS OR DISPUTES¹⁹

CCOF reserves the right to investigate complaints or disputes of noncompliance applicable to the COR Compliance program organic production and handling

regulations, and/or complaints against the performance of CCOF as a certification body from operators or outside persons or organizations. CCOF is committed to investigating complaints or disputes that are submitted in writing and that provide evidence that supports the allegation(s). CCOF 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 may deem this sufficient cause for denial or suspension and/or cancellation of certification. A certified party must also maintain records of such complaints per Section 2.1 Complaint Log as described above.

SECTION THREE: COR STANDARDS²⁰

CCOF's COR Compliance program is approved by the Committee on Accreditation for Evaluation of Accreditation (CAEQ) for providing certification services to those who demonstrate full compliance with the Canadian National Organic Standards (CAN/CBSB-32.310-2015, CAN/CGSB 32.311 Permitted Substances Lists and the COO operation Manual). The full text of the Canadian National Organic Standards may be accessed at any time via www.ccof.org/canada 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.

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 CS will notify producers of 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 two months from publication of any notice of amendments to the regulations and 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.

If at any point during certification activities, interpretation of an applicable regulation is required, it can be sought from the Standards Interpretation Committee, as described in the Canada Organic Office Operating Manual.

¹⁸ ISO/IEC 17065 7.13 & COO Operating Manual C4.2.1

¹⁹ ISO/IEC 17065 7.13 & COO Operating Manual C4.2.2 and C4.2.3

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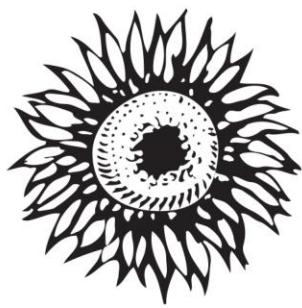
²⁰ ISO/IEC 17065 4.1.2.2, 6.11, 6.2.1, 7.1.2, 7.10 & COO Operating Manual C5.1, C5.4, C5.8



3.1 ORGANIC PRODUCT LABELING REQUIREMENTS

CCOF clients must disclose all labels and brands manufactured under CCOF certification(s), including private labels or other brands not owned by the client. All labels used on packaging must be included in the Organic System Plan and approved by CCOF CS prior to printing. Labels must meet the Canadian organic label requirements, described in the CCOF Canada labeling guide at www.ccof.org/canada.





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