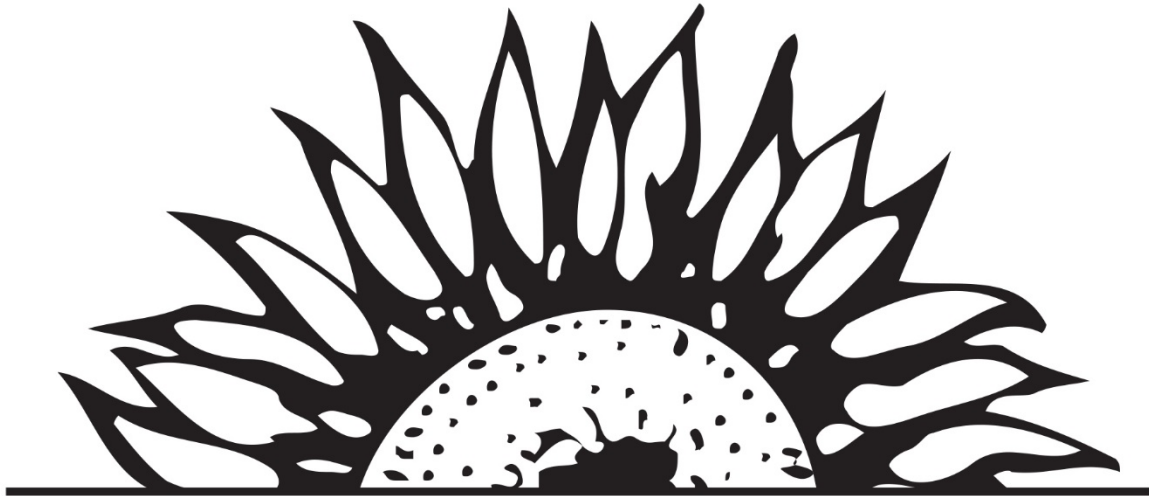




CCOF
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INTERNATIONAL STANDARD

Program Manual

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ACRONYMS USED

CCOF CS: CCOF Certification Services

EU: European Union

EC: European Commission

NOP: National Organic Program

OSP: Organic System Plan

Swiss Organic Ordinances: Swiss Federal Ordinances on Organic Farming and the Labeling of Organically Produced Products and Foodstuffs

USDA: United States Dept. of Agriculture

INTRODUCTION

The CCOF International Standard program described in this manual applies ONLY to operations who export organic products to the EU or Switzerland from Mexico.

Operations located in the US or Canada and looking to export their product should review the CCOF Global Market Access Program Manual. The US and Canadian governments have entered into equivalence arrangements with several governmental bodies to reduce the regulatory burdens on US and Canadian operations looking to export to these markets.

In order to serve the needs of our clients, CCOF maintains accreditation by the Committee on Accreditation for Evaluation of Quality (CAEQ) to the ISO/IEC 17065 requirements and prescribed additional EU requirements. CCOF's accreditation to the ISO/IEC 17065 standard has allowed the EU to directly approve the CCOF International Standard program, described in this manual, as equivalent to their independent governmental standards, known as Regulation (EU) 2018/848 and the Swiss Organic Ordinances.

As evidenced by the US/EU and US/Swiss equivalence arrangements, these organic certification programs and standards are very similar to the USDA NOP, and share essential core principles and values. However, EU and Swiss standards differ from the NOP standards in specific areas, which are identified in this manual. All standards identified in this manual must be met in addition to the NOP Standards. The contents of this manual also define procedures that CCOF CS employs for our own compliance to ISO/IEC 17065 requirements.

As foreign countries develop new mandatory national standards or export requirements change, CCOF CS will continue to modify this program to ensure access to foreign markets, and notify clients of these changes via our magazine and e-newsletters.

CCOF CS will notify producers of the changes to the CCOF International Standard program and will provide clients with six months notice prior to enforcement of any standard change, when possible.

SECTION ONE: FREQUENTLY ASKED QUESTIONS

Q1: DO I NEED TO BE CERTIFIED TO THE CCOF INTERNATIONAL STANDARD PROGRAM?

A1: Any operation that plans to export organic product to the EU/Switzerland from Mexico must enroll in the CCOF International Standard program in order to receive the necessary certification required for export. This includes operations in Mexico that conduct the final processing of a product that is sent to the EU or Switzerland. Operations wishing to export organic products to Great Britain must seek certification with a certification agency recognized as equivalent by the Department for Environment Food & Rural Affairs (DEFRA).

Q2: HOW MUCH DOES THE CCOF INTERNATIONAL STANDARD PROGRAM COST?

A2: The CCOF International Standard program is priced at \$1,200 at the time of initial enrollment and \$1,200 each year at the annual renewal, due January 1.

Q3: AM I ELIGIBLE FOR CCOF INTERNATIONAL STANDARD CERTIFICATION?

A3: All operations that seek CCOF International Standard Certification must first be certified to the NOP. Any operation that is certified by or applying for certification with CCOF CS for USDA NOP certification is eligible for enrollment in the CCOF International Standard program.



Q4: HOW DO I OBTAIN CCOF INTERNATIONAL STANDARD CERTIFICATION?

A4: There are three simple steps for attaining CCOF International Standard certification:

Step 1: Complete the International Standard Application and submit it directly to CCOF.

Step 2: Pay the required fees. CCOF will invoice you when we receive your International Standard Application, and again each year at the annual renewal, due January 1.

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

Q5: WHAT ARE THE ADDITIONAL STANDARDS FOR CCOF INTERNATIONAL STANDARD CERTIFICATION?

A5: All crops and products that seek CCOF International Standard Certification must first be compliant with the NOP regulations. The additional production standards and labeling requirements under the CCOF International Standard program are described later in this Manual. These are the additional standards that the CAEQ has determined are required by the EU and Switzerland in order to view an NOP certified operation as equivalent to their standards. It only identifies those standards that are in addition to the USDA NOP, described in the CCOF NOP Standards Manual.

Q6: WHAT TYPES OF PRODUCTS CAN BE CERTIFIED UNDER THE CCOF INTERNATIONAL STANDARD PROGRAM?

A6: CCOF currently maintains accreditation for unprocessed plant products (EU Category A) and processed agricultural products for use as food (EU Category D). This includes organic crops, processed food products, and processed agricultural products containing alcohol. Seeds, vegetative propagating materials, and wine produced or processed (including bottling) in Mexico requires additional certification. Contact CCOF if you plan to export seeds, vegetative propagating materials, or wine from Mexico to the EU or Switzerland.

Q7: WHAT DO I NEED TO EXPORT MY PRODUCTS TO THE EU OR SWITZERLAND UNDER THE CCOF INTERNATIONAL STANDARD PROGRAM?

A7: First, you must complete the application, inspection and certification process described in this manual for the crops or products that are to be exported. If you are found to be compliant with the applicable standards CCOF CS will issue you an International Standard certificate.

You can then request the appropriate Export Document from CCOF CS for each shipment. The Export Document contains transaction-specific details, such as trade code, product name, lot number and weight of the shipment.

For products being exported to Switzerland, please be aware that BioSuisse is a privately owned standard not related to the Swiss governmental standard certification. Certification to BioSuisse is not required to ship to Switzerland, but may be requested by your importer. Certification is only granted by BioSuisse and CCOF does not currently provide BioSuisse certification. If you believe you require BioSuisse certification contact export@ccof.org for guidance.

Q8: DO I HAVE TO ENTER MY ENTIRE OPERATION OR CAN I ENTER A PORTION OF MY OPERATION?

A8: CCOF CS can review specific fields, crops, or products for certification for the EU and Switzerland. However, the issues of whole farm conversion under the EU, and the conversion time associated with various materials prohibited by the CCOF International Standard program, may at times make this impractical for farmers. CCOF CS will consider an application from a separate business entity or from a clearly defined division of a parent company as a separate entity.

Handlers and processors are not required to enroll the entire operation in the CCOF International Standard program. CCOF CS can review individual products to the CCOF International Standard.

Q9: WHY ARE THERE ADDITIONAL REQUIREMENTS TO EXPORT MY PRODUCTS TO THE EU OR SWITZERLAND?

A9: All products sold as “organic” in the EU or Switzerland must be certified or equivalent to the EU or Swiss organic standards. The USDA has an organic equivalence arrangement with the EU and Switzerland, declaring the standards functionally equivalent. However, the US/EU, and US/Swiss equivalence arrangements apply only to products where the final processing or packaging occurs in the United States. Operations who ship product directly to the EU or Switzerland from Mexico are not covered by these Organic Equivalence Arrangements.



In order to serve the needs of operations located in Mexico, CCOF created the International Standard Program, and applied for direct equivalence recognition to the EU commission. CCOF was granted recognition by the EU in 2011, and by the Swiss in 2012. Direct equivalence recognition allows CCOF operations located in Mexico to export directly to the EU or Switzerland, as well as provide the final processing for organic product exported to the EU or Switzerland. This direct equivalence recognition will expire on December 31, 2024.¹ After that date, control bodies in third countries must be recognized by the European Commission and operators must be in direct compliance with the EU regulations.

Regulation (EU) 2018/848 gives individual member states the authority to adopt and enforce stricter regulations within the country, but not to restrict trade among other member states. Organic producers, processors and handlers may need to meet additional requirements established by individual member states or certification agencies in the importing country. CCOF CS cannot anticipate all the demands of each member state, but has a very strong reputation within the EU, and can usually resolve questions raised by EU members.

CCOF CS will update changes to EC and Swiss Regulations and EU member state interpretations of the regulation as they become known. European Union Member States may interpret the EU regulations in different ways, and thus some countries may require additional documentation without prior notice.

Q10: HOW DO I GET THE EXPORT DOCUMENTS I NEED TO SEND MY PRODUCT ABROAD?

A10: CCOF CS clients who have been verified as compliant with the International Standard and granted an International Standard *Certificate of Compliance* may be issued Export Certificates by CCOF for shipment of organic products to the EU, Switzerland, and Northern Ireland.

EU, Switzerland and Northern Ireland: EU Member States, Switzerland and Northern Ireland require a Certificate of Inspection (COI) issued through TRACES, the EU's electronic document system. The COI must be requested for each shipment *before* your product leaves Mexico. Once enrolled in the International Standard program, email export@ccof.org for registration assistance in TRACES. The fee for this service is per the CCOF Certification Services Program Manual.

CCOF CS cannot guarantee that the CCOF International Standard will meet the requirements of other unpublished or newly developing standards, nor can CCOF CS anticipate additional procedures or requirements that may be implemented by various regulatory bodies. However, at a client's request, CCOF CS will provide all complete, accurate, and relevant information from a client's file in order to demonstrate compliance.

SECTION TWO: CERTIFICATION PROCESS

CERTIFICATION PROCESS

The process and requirements for certification to the CCOF International Standard 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 Review², On Site Inspection, Granting certification³, Continuation of Certification⁴, Modification of Certification⁵, Certification Sanction⁶, Noncompliance Procedure, Denial of Certification for Applicants⁷, Proposed Suspension or Revocation⁸, Suspension or Revocation⁹, Discontinuance of Certification, Reinstatement, Appeals¹⁰ and Complaints¹¹.

¹ CR (EC) 834/2007 Article 33(3); REG (EU) 2018/848 Article 57

² ISO/IEC 17065 7.2 & 7.3

³ ISO/IEC 17065 7.4, 7.5 & 7.6

⁴ ISO/IEC 17065 7.9

⁵ ISO/IEC 17065 7.10

⁶ ISO/IEC 17065 7.11 & 7.13

⁷ ISO/IEC 17065 7.11 & 7.13

⁸ ISO/IEC 17065 7.11

⁹ ISO/IEC 17065 7.11

¹⁰ ISO/IEC 17065 7.13

¹¹ ISO/IEC 17065 7.13



Areas where the CCOF International Standard certification program process differs from that described in the CCOF Certification Services Program Manual, including additions, deletions or modifications, are listed below.

2.1 APPLICATION¹²

To request enrollment in the CCOF International Standard program, indicate on the CCOF International Standard Application form your desired scope of certification (producer, processor, etc) and expected or planned international markets.

If a CCOF client is also certified by another certification agency for the same scope, the client must provide CCOF with written consent to receive from the other certifier or certifiers the following upon application:

- Current certification decisions,
- Any major non-compliances,
- Evidence of corrective actions(s),
- Reports of inspection carried out in the preceding 3 years,
- Derogations granted or requests for derogation being processed by the previous control authority or control body,
- Information relating to any ongoing dispute relevant for the certification of the operator,
- Copies of transactions certificates or information regarding sales, and/or
- Any denials or suspension/revocations.

For such dual or multiple certification operations, CCOF CS will make every effort to coordinate the inspection with the other certifier(s) to reduce costs to the client.

CCOF CS will not certify operators that have been withdrawn by their previous control authority or control body in the last 2 years, unless the recognition of the previous control authority or control body has been withdrawn by the Commission in accordance with Article 46(2a) of Regulation (EU) 2018/848 for the specific third country and category of products.

Clients must enroll in the CCOF International Standard program before harvest or production of the product, in order to ensure that compliance can be verified prior to export.

2.2 CERTIFICATES OF COMPLIANCE

If CCOF finds that a client meets the applicable standards described in Section three of this manual, CCOF will issue an International Standard Certificate of Compliance, which will indicate verification of equivalence to Regulation (EU) 2018/848 and the Swiss Organic Ordinances, as applicable.

The Certificate of Compliance is valid for 18 months from initial inspection and renewed after annual inspections.

2.3 SHARING OF CERTIFICATION DOCUMENTS WITH OUTSIDE PARTIES

In the case of transfer of certification, CCOF CS will provide the control file of the operator to the new certification body within 30 days of notification of transfer by the operator.

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 enrolled in the CCOF International Standard program, or their customers. When inspection reports etc. are provided, CCOF will notify the client of this occurrence.

When exchanging information with other control bodies and competent authorities, CCOF follows the CCOF Certification Services Manual section Confidentiality - Confidentiality and Public Information, & Data Reporting. We maintain an Information Exchange Template in our database, which may be used when exchanging this information.¹³

2.4 ON-SITE INSPECTION PROVISIONS¹⁴

¹² ISO/IEC 17065 7.2 & 7.3

¹³ REG (EU) 2018/848, Article 43

¹⁴ CDR (EU) 2021/1698 Chapter III, Article 9.4 & REG (EU) 2018/848, Article 38.3



In addition to the on-site provisions in the CCOF Certification Services Program Manual, CCOF International Standard program inspections for clients enrolled in the CCOF International Standard program must 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.

CCOF International Standard program inspections will also include the full inspection of all conventional storage areas, including, but not limited to, conventional input and seed storage facilities¹⁵. The inspection will also include an evaluation of production techniques to ensure they prevent or minimize any contribution to environmental contamination.

Inspectors may take samples for testing of products not authorized for organic production or for checking production techniques not in conformity with the organic production rules. Effective January 2014, samples are taken from at least 5% of all operations enrolled in the International Standard Program annually, with a minimum of one per year¹⁶. Selection of operation(s) are sampled based on risk of noncompliance, and is taken into account all stages of production, preparation and distribution. Samples may also be taken and analyzed for detecting possible contamination by products not authorized for organic production. However, such analysis shall be carried out where the use of products not authorized for organic production is suspected¹⁷.

2.5 ADDITIONAL (ANNOUNCED & UNANNOUNCED) ON-SITE INSPECTIONS¹⁸

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. At minimum, CCOF CS will conduct, based on risk or random selection, additional inspections of at least 10% of total CCOF International Standard program clients, plus additional 10% unannounced inspections of total annual inspections performed¹⁹. Selection of operation(s) are sampled based on risk of noncompliance at all stages of production, preparation and distribution; which may include:

- Possible non-compliant activity; or
- Potential for drift; or
- Observation of specific crops or production activities; or
- Any logical reason; or
- Random selection.

The accreditation authority(s) of CCOF CS 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 the accreditation body.

2.6 DISCONTINUANCE OF CERTIFICATION²⁰

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.

2.7 SUSPENSION AND REINSTATEMENT²¹

In the case of a major or critical noncompliance, CCOF CS may limit the scope of the certification. CCOF CS sends the client a written notification of scope limitation, identifying the parcels, crops, products, or facilities which are no longer certified to the CCOF International Standard. A client whose ISP (EU) certification has been limited must not market affected products as organic.

¹⁵ CDR (EU) 2021/1698, Article 11.1(b)

¹⁶ CDR (EU) 2021/1698, Article 12.2

¹⁷ CDR (EU) 2021/1698, Article 12.4

¹⁸ ISO/IEC 17065 7.9, CDR (EU) 2021/1698, Article 9.5

¹⁹ CDR (EU) 2021/1698, Article 9.5

²⁰ ISO/IEC 17065 7.11

²¹ ISO/IEC 17065 7.11



If a client has been issued a notification of Proposed Suspension and the client fails to resolve the issue through correction, rebuttal, filing of an appeal, or requesting mediation, CCOF CS sends the client a written notification of Suspension. A client whose ISP (EU) certification is suspended must not market products as organic during this time.

If a client properly requests mediation or files an appeal, CCOF CS does not issue a Suspension while final resolution of the appeal or mediation is pending.

Clients seeking reinstatement should contact CCOF CS to request information about the reinstatement process and pay any applicable fees. To reinstate certification, the client submits a request to CCOF CS for reinstatement of its certification. The reinstatement request must be accompanied by evidence demonstrating correction of each Noncompliance taken to comply with and remain in compliance with the organic regulations and standards; this is followed by CCOF CS performing an inspection and review of the operation to ensure that the client is compliant and capable of ongoing compliance. If the operator is compliant, then CCOF CS reinstates certification. During the reinstatement process, CCOF CS communicates with the CAEQ the client's intentions for reinstatement and the CCOF CS final reinstatement decision.

2.8 APPEALS²²

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 Regulation (EU) 2018/848 or applicable standard.
- 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 COMPLAINTS²³

CCOF CS reserves the right to investigate complaints of noncompliance with CCOF International Standards, and/or complaints against the performance of CCOF CS as a certification body.

If a certified operator suspects that a product it has produced or received from another operation does not comply with the CCOF International Standards, the operator must identify and separate the product, verify whether the suspicion can be substantiated, and not place the product on the market as organic unless the suspicion can be eliminated. If the suspicion is substantiated or cannot be eliminated, the operator must notify CCOF CS, provide all available evidence, and fully cooperate in verifying and identifying the reasons for the suspected noncompliance.²⁴

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

²² ISO/IEC 17065 7.13

²³ ISO/IEC 17065 7.13

²⁴ REG (EU) 2018/848 Article 27(a)-(e)



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.

2.10 CCOF INTERNATIONAL STANDARD CLAIMS AND SEAL USE

A client can only make certification claims which are consistent with the scope of the certification that has been granted by CCOF and as displayed on their CCOF International Standard and NOP certificates.

Clients that withdraw from certification or whose CCOF International Standard program certification is surrendered or revoked will be required by CCOF to immediately cease use of the CCOF name, logo and seal.

2.11 GMO EXCLUSION PROGRAM AND TESTING POLICY²⁵

The deliberate use or negligent introduction of genetically engineered organisms (GMOs) or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited, including animals, seed, propagation material, pollen and farm inputs such as fertilizers, soil conditioners, crop protection and processing materials²⁶.

The CCOF International Standard program uses the Organic System Plan (OSP) submitted by each certified client as the primary framework to allow clients to identify GMO critical control points within their system, such as, but not limited to: seeds, ingredients, processing aids and other potential sources of GMO risk. Information about the practices observed by CCOF inspectors related to the exclusion of GMO's is documented in the CCOF inspection reports. CCOF documents and communications, including the website, inspector guidelines, the OSP, and inspection reports may be periodically revised based on the latest available information regarding GMO crops and products.

When there is significant news, updates or changes related to the presence of GMO crops or materials in the marketplace, CCOF CS may provide information in the CCOF newsletter, website or other communications to clients and the public.

CCOF CS does not require mandatory GMO testing for verification of organic production. Testing is only performed when there is a specific cause for concern, such as suspected negligence or fraud that may have resulted in GMO presence in organic products or production systems. Contamination by GMOs may alter the organic status of an operation even if circumstances are beyond the control of the operator.

2.12 SUPPLY CHAIN CERTIFICATION REQUIREMENTS²⁷

All suppliers of products, or ingredients used to produce products, that are certified to this standard must also be certified to the EU or Swiss organic standards directly, or to a standard listed by the European Commission as equivalent to Regulation (EU) 2018/848, or by the Swiss FOAG as equivalent to the Swiss Organic Ordinances.

Products or ingredients supplied by uncertified handlers, including importers or brokers who take possession or title, may not be used in products certified to this standard.

The following products/ingredients may be used in products certified to this standard:

- Those certified directly to the EU or Swiss standards anywhere in the world
- Those certified to the USDA National Organic Program where final packaging or processing is in the US.
- Those certified to the Canadian Organic Regime standards where final packaging or processing is in Canada.
- Those certified to standards or by control bodies listed as equivalent by the EU commission- subject to change, see [EU list](#) to verify current approvals.

The following products/ingredients may not be used in products certified to this standard without additional requirements:

- Those certified to the USDA National Organic Program where final processing or packaging does not occur in the United States.

²⁵ ISO/IEC 17065 7.9; REG (EU) 2018/848, Article 5(f)(iii) and Article 11

²⁶ REG (EU) 2018/848, Article 11

²⁷ REG (EU) 2018/848, Article 34.1; Article 37



- Those certified to the Canadian Organic Regime where final processing or packaging does not occur in Canada.

Contact CCOF if you are considering exporting products from either of these categories.

SECTION THREE: CCOF INTERNATIONAL STANDARD

The CCOF International Standard for crop production and processing/handling certification is outlined below. Operations seeking certification to the CCOF International Standard must also meet all applicable provisions of the NOP regulations in the CCOF NOP Standards Manual

TERM DEFINITIONS

Factory Farm- A farm in which the animal spends its entire life indoors and there is a high stocking rate of animals in the facility.

Handle- To sell, process, or package agricultural products, except such term shall not include the sale, transportation, or delivery of crops or livestock by the producer thereof to a handler. A handling scope certification is required for anyone engaged in processing.

Handler- Any person engaged in the business of handling agricultural products, including producers who handle crops or livestock of their own production, except such term shall not include final retailers of agricultural products that do not process agricultural products. A handling scope certification is required for anyone engaged in processing.

Processing/Handling operation- Any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products. A handling scope certification is required for anyone engaged in processing.

Conversion- The act of certification to organic standards of a conventional operation. The practices and requirements for certification are defined within each regulation.

Parallel Production- Growing the same crop variety both organically and non-organically within the same production unit.

3.1 CCOF USDA ORGANIC CERTIFICATION

All CCOF CS clients enrolled in the CCOF International Standard program must be certified to the USDA Organic Standards. The NOP program, including the fees for service, is described in the CCOF Certification Program Manual and the CCOF NOP Standards Manual.

3.2 COMPLAINT LOG REQUIREMENT²⁸

The operation must keep a record of all complaints received that relate to a product's compliance with the CCOF International Standard. 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.

3.3 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 organic label requirements of the export market.

The requirements for labeling organic products under the CCOF International Standard can be found in CCOF's International Market Labeling Guide, located at www.ccof.org/labeling.

Retail labels must include the CCOF Control Number. Contact CCOF before you use the CCOF Control Number to verify current number to be used. CCOF certified organic products using the EU logo must use CCOF's Control Number and indicate the place of farming (i.e. "Non-EU Agriculture") in the same visual field as the EU logo.

²⁸ ISO/IEC 17065 4.1.2.2.j



3.4 CROP PRODUCTION STANDARDS

| Production Standard | | CCOF International Standard |
|---------------------|---|--|
| 3.4.1 | Conversion | <p>All sites, fields, and orchards must not have any prohibited substances applied within 36 months of the first organic harvest. CCOF CS will report the conversion date as the date of application to CCOF CS or the first date of certification of the operation under another certifier unless there is documentation as described below.</p> <ul style="list-style-type: none"> a) Sites will be considered within the CCOF International Standard program from the time of application for certification as either in-conversion or organic²⁹ b) CCOF CS reserves the right to determine that an operation has converted according to Article 10 of Regulation (EU) 2018/848 where there is documentation of conversion. c) Clients seeking to export to Switzerland may be subject to additional conversion requirements and should ensure that product is from an operation that has been certified by CCOF CS or another agency for at least three years. |
| 3.4.2 | Genetically Modified Organisms (GMOs) ³⁰ | <p>The following organic and non-organic crops grown or handled on an operation must be evaluated for the potential for GMO contamination from pollen drift, and producers must have documentation pertaining to purchase and planting, including brand and variety name:</p> <p>Corn, Potato, Tomato, Rape Seed/Canola Oil, Soybean, Zucchini, Alfalfa (including rhizobium inoculant Dormal Plus), Cotton, Other(s) TBA.</p> <p>See above Section 3.7 GMO Exclusion Program and Testing Policy for more information.</p> |
| 3.4.3 | Container, Hydroponic and Aeroponic Production ³¹ | <p>Prohibited, except in the following circumstances:</p> <ul style="list-style-type: none"> - Growing seedlings or transplants in containers for further transplanting - Growing plants for the production of ornamentals and herbs in pots to be sold together with the pot to the final customer - Sprout Production by moistening seeds - Obtaining chicory heads including by dipping in clear water |

²⁹ REG (EU) 2018/848, Article 10

³⁰ REG (EU) 2018/848, Article 11

³¹ REG (EU) 2018/848, Annex II 1.1 – 1.4



| Production Standard | | CCOF International Standard |
|---------------------|---|--|
| 3.4.4 | Split & Parallel Production³² | <p>Operations that are able to evidence that organic and conventional production are physically, financially, and operationally separate and split, will not be considered to be engaged in parallel production. CCOF CS will make a determination as to the status with regard to parallel production based on the client OSP and inspection.</p> <p>For Production Units under EU-organic production and partly in conversion to EU-organic production with parallel production, CCOF may allow exceptions on a case by case basis. Specific exceptions to parallel production may include:</p> <p>Allowance of visually distinct crops that are grown both organically and non-organically; provided that records are adequate to show the separation.³³</p> <p>Perennial crops may be grown in parallel production if a plan is in place to bring the non-organic production into organic management.</p> <p>An exception can be made for seed production if the following is met:</p> <ol style="list-style-type: none"> Measures are taken to ensure permanent separation of the seed; CCOF is notified at least 48 hours prior to the harvest of seed; Upon harvest completion, the exact quantities, and other distinguishing features and confirmation of segregation activities are reported to CCOF.³⁴ |
| 3.4.5 | Seeds and Planting Stock³⁵ | Producers must use organically grown seeds, annual seedlings, and planting stock as required by the NOP Regulation. CCOF CS has the authority to determine if equivalent organic varieties are available and thus require their use. CCOF CS may be required to use seed databases that are developed by EU member nations in accordance with Article 48. |

3.5 RESTRICTED/PROHIBITED CROP PRODUCTION MATERIALS³⁶

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under the CCOF International Standard.

| Crop Materials | | CCOF International Standard |
|----------------|---------------------------|---|
| 3.5.1 | Ammonium Carbonate | Prohibited in crop production. |
| 3.5.2 | Boric Acid | Prohibited as a pest control substance. |
| 3.5.3 | Hydrogen Peroxide | For crop pest control. |
| 3.5.4 | Peat | Use limited to horticulture (market gardening, floriculture, arboriculture, nursery). |
| 3.5.5 | Peracetic Acid | Prohibited |

³² REG (EU) 2018/848, Article 9.7

³³ REG (EU) 2018/848, Article 9.10(c)

³⁴ REG (EU) 2018/848, Article 9.8

³⁵ REG (EU) 2018/848, Annex II, 1.8

³⁶ REG (EU) 2018/848 Article 24 & CIR (EU) 2021/1165



| Crop Materials | | CCOF International Standard | | | | | | | | | | | | | | | | |
|----------------|----------------------------------|--|---------|---------|---|---------|-----|---------|-----|-------|-----|----------|-----|-------|-----|----------|---|-------|
| 3.5.6 | Raw Manure | <p>Factory Farmed Manure is prohibited. This includes raw manure only. Manure that is an ingredient in processed products that contain manure, or compost that contains manure is not considered raw manure.</p> <p>Factory farmed manure includes:</p> <ul style="list-style-type: none"> a) Manure from animals treated with genetically modified Bovine Growth Hormone. b) Manure from caged poultry (or other caged animals), as well as manure from poultry held at a stocking density in excess of 12 birds per square meter. <p>CCOF CS requires that all manure sources be documented³⁷.</p> <p>Animal manures may be applied to organic land at a rate of no more than 156 lbs of nitrogen per acre/per year on a rolling average basis. Calculation:</p> <table border="1"> <tbody> <tr> <td>170</td> <td>kg of N</td> <td>1</td> <td>Hectare</td> </tr> <tr> <td>170</td> <td>kg of N</td> <td>2.4</td> <td>Acres</td> </tr> <tr> <td>374</td> <td>lbs of N</td> <td>2.4</td> <td>Acres</td> </tr> <tr> <td>156</td> <td>lbs of N</td> <td>1</td> <td>Acres</td> </tr> </tbody> </table> | 170 | kg of N | 1 | Hectare | 170 | kg of N | 2.4 | Acres | 374 | lbs of N | 2.4 | Acres | 156 | lbs of N | 1 | Acres |
| 170 | kg of N | 1 | Hectare | | | | | | | | | | | | | | | |
| 170 | kg of N | 2.4 | Acres | | | | | | | | | | | | | | | |
| 374 | lbs of N | 2.4 | Acres | | | | | | | | | | | | | | | |
| 156 | lbs of N | 1 | Acres | | | | | | | | | | | | | | | |
| 3.5.7 | Sodium Nitrate | Prohibited | | | | | | | | | | | | | | | | |
| 3.5.8 | Vitamins B ₁ , C, & E | Prohibited | | | | | | | | | | | | | | | | |

3.6 PROCESSING/HANDLING PRODUCTION STANDARD

| Processing/Handling Regulations | | CCOF International Standard |
|---------------------------------|--|--|
| 3.6.1 | Audit Control ³⁸ | All handlers must be certified, including importers or brokers who take possession or title of organic products. Uncertified suppliers may not be used and the Uncertified Handler Affidavit is not accepted. |
| 3.6.2 | Cleaning & Sanitizers ³⁹ | Hydrogen peroxide, ozone, and peracetic acid must be followed by a rinse when added to water contacting organic products. |
| 3.6.3 | Genetically Modified Organisms ⁴⁰ | See above Section 2.11 GMO Exclusion Program and Testing Policy. |
| 3.6.4 | Ingredients ⁴¹ | Suppliers/ ingredients must be EU certified or certified to an equivalent standard as determined by the EC. See above Section 2.12 Supply Chain Certification Requirements. |
| 3.6.5 | Storage and Warehouse Facilities | CCOF will inspect all storage and warehouse facilities used for organic products where activities are subject to control (potentially affect organic integrity, such as repacking, relabeling, etc). ⁴² |

³⁷ CIR (EU) 2021/1165, Annex II

³⁸ REG (EU) 2018/848, Article 2.2 & Article 34

³⁹ CR (EC) 889/2008 Annex VII & CIR (EU) 2021/1165 (18)(20)

⁴⁰ REG (EU) 2018/848, Article 5(f)(iii); Article 11

⁴¹ REG (EU) 2018/848, Article 34.1; Article 37

⁴² CDR (EU) 2021/1698, Article 9(a)



3.7 RESTRICTED/PROHIBITED PROCESSING/HANDLING MATERIALS⁴³

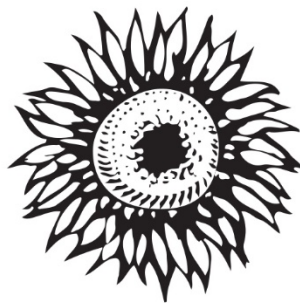
| | Processing Materials | CCOF International Standard |
|--------|---|--|
| 3.7.1 | Calcium phosphates | Allowed as monocalciumphosphate only as raising agent for self-raising flour and in preparations of foodstuffs of plant origin only. Dibasic and tribasic forms are prohibited. |
| 3.7.2 | Calcium sulfate | Allowed only as additive carrier and processing aid coagulation agent. |
| 3.7.3 | Carnauba wax | Effective Jan 1, 2022 only organic will be allowed for this substance. |
| 3.7.4 | Collagen gel | Prohibited |
| 3.7.5 | Colors | Allowed only for stamping meat and eggshells. |
| 3.7.6 | Ferrous sulphate | Prohibited |
| 3.7.7 | Gluono delta-lactone | Prohibited |
| 3.7.8 | Glycerol (Glycerine) | Effective Jan 1, 2022 only organic will be allowed for this substance. |
| 3.7.9 | Gums (Arabic; Guar; Locust bean; and Carob bean) | Effective Jan 1, 2022 only organic will be allowed for these substances. |
| 3.7.10 | Lecithins | Effective Jan 1, 2022 only organic will be allowed for this substance. |
| 3.7.11 | Magnesium stearate | Prohibited |
| 3.7.12 | Magnesium sulphate | Prohibited |
| 3.7.13 | Natural Flavors: where flavoring does not originate from the mentioned ingredient | Prohibited ⁴⁴ For example, “natural orange flavor” where the flavoring is at least 95% obtained from oranges is allowed. “Natural orange flavor” where the flavoring is less than 95% obtained from oranges is prohibited. |
| 3.7.14 | Potassium hydroxide | Prohibited |
| 3.7.15 | Potassium iodide | Prohibited |
| 3.7.16 | Potassium lactate | Prohibited |
| 3.7.17 | Potassium phosphate | Prohibited |
| 3.7.18 | Pullulan | Prohibited in organic products. Allowed in products making organic claims in the ingredient statement. |
| 3.7.19 | Sodium acid pyrophosphate | Prohibited |
| 3.7.20 | Sodium citrates | Prohibited |
| 3.7.21 | Sodium hydroxide | Allowed as a processing aid only for use in sugar(s), oil from plant origin excluding olive oil, and plant protein extracts. Allowed as a food additive or carrier only in flavors and baked goods for surface treatment or acid regulation. |
| 3.7.22 | Sodium phosphate | Prohibited |
| 3.7.23 | Steviol glycoside | Prohibited |

⁴³ REG (EU) 2018/848 Article 24, 25; CIR (EU) 2021/1165 Annex V

⁴⁴ REG (EU) 2018/848 Part IV Point 2.2.2







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