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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 clients located within Canada. These regulations differ from the United States Department of Agriculture National Organic Program (NOP) standards and are required for organic clients 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, processes, packages, or labels organic products within Canada you must be certified to the COR organic regulations. Clients that already have a product certified to COR or produce or handle non-food items such as cosmetics, Natural Health Products, and pet food 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 regulations.

### **Q2: HOW MUCH DOES CCOF COR COMPLIANCE CERTIFICATION COST?**

A2: For certification of clients located in Canada, CCOF CS charges a minimum annual certification of Fee Category tier 9 per Certification Fee Schedule, plus all other applicable fees (such as inspection fees, Global Market Access Program fees, late fees, etc.) as described in the CCOF Certification Services Program Manual. Where Organic Production Value (OPV) is greater than \$600,000, CCOF CS applies the annual certification fee described in the CCOF Certification Services Program Manual Fee Schedule.

### **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. Clients 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 CS invoices when we receive the COR Compliance Application and again each year at the Continuation of Certification, due January 1.

**Step 3:** Complete an inspection. After the inspection, CCOF CS reviews the inspection and determines 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 [Safe Food for Canadians Regulations \(SFCR\) Part 13](#)**, published May 30, 2018; came into force on January 15, 2019. For the interpretation of the SFCR Part 13, see sections C.5.6 through C.5.12 of the Canada Organic Regime Operating Manual.
- **Organic Production Systems General Principles and Management Standards (CAN/CGSB-32.310)**. 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 Regime Operating Manual Published by the CFIA**. This manual identifies the procedures necessary for entities involved in administering 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 result in certification processes or requirements that affect clients seeking certification under COR.



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

A5: Clients located in Canada must be certified to the COR regulations directly and cannot be certified to the NOP regulations unless they handle products outside the scope of COR, such as cosmetics, Natural Health Products, or pet food. Once certified to either the COR or NOP regulations, 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 regulations as equivalent, with minor critical variances that must be verified by the certifier. Once the critical variances are verified, products certified to the COR regulation 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 CS offers verification to the US/Canada Equivalency for clients in the United States and Mexico through enrollment in our Global Market Access (GMA) program. Fees and program descriptions are outlined in the CCOF CS Certification Services Program Manual and the Global Market Access Program Manual. For more information about the Canada and Mexico Equivalency Agreement refer to the Global Market Access Program Manual.

## **SECTION TWO: CERTIFICATION PROCESS**

The process and requirements for certification to the CCOF COR Compliance program is described in the CCOF Certification Services Program Manual. The CCOF Certification Services Program Manual describes all aspects of the certification process, including Application, Application Review<sup>1</sup>, Granting of Certification<sup>2</sup>, On-Site Inspection<sup>3</sup>, Additional (Announced & Unannounced) On-site Inspections, Noncompliance Procedure, Certification Sanctions<sup>4</sup>, Denial of Certification (Applicants)<sup>5</sup>, Suspension and Cancellation of Certification<sup>6</sup>, Appeals<sup>7</sup> and Complaints<sup>8</sup>.

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 LOG<sup>9</sup>**

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

### **2.2 APPLICATION<sup>10</sup>**

To request certification to COR Compliance, an operation must complete the CCOF Application and COR Organic System Plan (OSP). The process for application is described per the CCOF Certification Services Program Manual and the forms can be downloaded at the [Resource Library - CCOF.org](https://www.ccof.org/resource-library)

CCOF CS reviews the application and OSP, verifying both for completeness. CCOF CS determines if it has the competence and administrative capacity to perform the certification activity.<sup>11</sup>

All applicants who wish to transfer certification to CCOF CS must provide written consent for CCOF CS to receive from the sending certifier or certifiers the following upon application:

- Current certification decisions,
- Any major non-compliances,
- Evidence of corrective actions(s),

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<sup>1</sup> ISO/IEC 17065 7.1-7.3.5

<sup>2</sup> ISO/IEC 17065 7.6

<sup>3</sup> ISO/IEC 17065 7.4

<sup>4</sup> ISO/IEC 17065 7.11 & 7.13

<sup>5</sup> ISO/IEC 17065 4.4.3

<sup>6</sup> ISO/IEC 17065 7.11-7.11.6

<sup>7</sup> ISO/IEC 17065 7.13

<sup>8</sup> ISO/IEC 17065 7.13

<sup>9</sup> ISO/IEC 17065 4.1.2.2.c.2 & 4.1.2.2.j

<sup>10</sup> ISO/IEC 17065 7.1-7.3.5

<sup>11</sup> COR Operating Manual C.2.1.6



- Copies of transactions certificates or information regarding sales, and/or
- Any denials or suspension/cancellation.

In the COR program, clients are not allowed to hold a valid Canadian Organic Standards certificate for an identical/same product issued by another CB<sup>12</sup>.

The operation must have a “letter of good standing” from their sending certifier. A signed copy of this letter must be provided to CCOF. For applicants that are granted certification under CCOF’s COR Compliance program that are changing certifiers, CCOF CS notifies the sending certifier when the operation is certified. The sending certifier then terminates the certification agreement it has with the operator.<sup>13</sup>

### **2.3 ON-SITE INSPECTION<sup>14</sup>**

CCOF CS reserves the right to make all inspection assignments. CCOF CS clients must 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 raise objections based on conflicts of interest or other reasons. The certification body rules on whether the grounds on which the inspector is refused are accepted. To safeguard impartiality, CCOF CS strives to rotate the scheduling of an inspector after inspecting the same operation for more than 3 consecutive years. If there are extenuating circumstances, CCOF CS records the justification accordingly.<sup>15</sup>

CCOF CS ensures inspections are conducted at least once in a 12-month period. For mixed operations (organic and conventional) the inspection is conducted when organic product is being run.<sup>16</sup> If this is not possible, CCOF CS records the reasons. There must be no more than two consecutive years without an inspection when organic product is being processed.

The CCOF CS inspector starts the inspection by conducting an introductory meeting with the representatives of the operation and concludes with an Exit Interview meeting.

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

### **2.4 ADDITIONAL ON-SITE PROVISIONS**

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

CCOF CS includes 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 regulations.<sup>17</sup>

The inspections for all clients seeking COR certification includes 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 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.<sup>18</sup>

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

CCOF CS ensures that all production and processing operations, including packaging and labeling and any subcontracted activities included in their application and/or OSP are inspected. The inspector verifies whether the standards are being

<sup>12</sup> COR Operating Manual C2.1.5

<sup>13</sup> COR Operating Manual C.10

<sup>14</sup> ISO/IEC 17065 7.4 & COR Operating Manual C.2.2

<sup>15</sup> COR Operating Manual, C.2.2.13

<sup>16</sup> COR Operating Manual, C.2.2.11

<sup>17</sup> COR Operating Manual C.2.2

<sup>18</sup> COR Operating Manual C.2.2



implemented and correspond to the OSP submitted.<sup>19</sup> The inspector also verifies any changes in the regulations or changes to CCOF's policies or procedures (when applicable) have been effectively implemented by the operator.<sup>20</sup>

## **2.5 ADDITIONAL (ANNOUNCED & UNANNOUNCED) ON-SITE INSPECTIONS<sup>21</sup>**

CCOF CS reserves the right to conduct additional on-site inspections of both applicants for certification and certified clients to determine compliance with the applicable international organic production and handling regulations. The performance of unannounced inspections is decided by CCOF CS based on risk analysis, considering factors such as the type of production, the operator's record of compliance and complexity of production, or to ensure corrective actions have been addressed and nonconformities have been resolved.

The CAEQ 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 can be announced or unannounced at the discretion of CCOF CS or as required by the CAEQ or CFIA.<sup>22</sup>

In addition to the regular inspections, CCOF CS conducts unannounced inspections representing 5% of COR clientele (minimum one) based on risk criteria:<sup>23</sup>

- 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 MATERIAL REVIEW<sup>24</sup>**

In addition to the normal process of CCOF CS initially reviewing materials used by clients in their organic operation, CCOF CS also re-reviews COR materials every 5 years. If a change occurs regarding the composition of the material and a new material review decision is reached, clients are required to comply and implement the appropriate changes when communicated by CCOF CS.

## **2.7 ORGANIC CERTIFICATE<sup>25</sup>**

The organic certificate for operators in the COR Compliance Program is generated by CCOF CS. In addition to the requirements for organic certificates as stated in the CCOF Certification Services Program Manual, organic certificates issued to CCOF CS COR clients also include specifics required by the COR Operating Manual.

Multi-ingredient food commodities are identified on the COR Compliance Program certificate as "Organic" for products containing 95% or higher organic content, or as "70-95% organic content (COR)" as applicable.

## **2.8 MODIFICATION OF CERTIFICATION<sup>26</sup>**

CCOF CS informs 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.

## **2.9 RENEWAL<sup>27</sup>**

Certified clients are required to renew certification in full on January 1 of each year. Additionally, certified clients must submit their intention to maintain certification in writing no later than the date that is 6 months prior to the end of that period and as appropriate to the nature of the operation.

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<sup>19</sup> COR Operating Manual C.2.2.16

<sup>20</sup> COR Operating Manual C.2.5.4

<sup>21</sup> COR Operating Manual C.2.6

<sup>22</sup> COR Operating Manual C.2.6.6

<sup>23</sup> COR Operating Manual C.2.6.4

<sup>24</sup> COR Operating Manual C.2.2.7

<sup>25</sup> COR Operating Manual C.2.4.4

<sup>26</sup> ISO/IEC 17065 7.10

<sup>27</sup> COR Operating Manual C.2.5.2



## **2.10 TRANSFER CERTIFICATION TO ANOTHER CB<sup>28</sup>**

A CCOF CS certified client who decides to change their certification to a different certification body (CB) must notify CCOF CS of their intent to change the CB and request a “letter of good standing” to be sent to the new CB. The operation must maintain their current certification with CCOFCS until the new certification process is complete and the new CB has issued documents confirming the certification of the operation. The operation must stop using their CCOF CS certificate after the new certification process is complete and the operation has received the new certificate. The operation cannot use up existing supplies of labels which identify CCOF CS on products they produce from the moment the operation receives the new certificate. New labels identifying the new CB must be used at once. The operation may sell certified prepackaged products labelled with CCOF CS as the CB as long as these products were packaged before the CB change and an inventory list was provided to both CBs.

## **2.11 REINSTATEMENT**

To reinstate cancelled certification, the operator must submit an application for organic certification to CCOF CS accompanied by evidence demonstrating correction of each noncompliance taken to comply with and remain in compliance with the organic regulations and standards. CCOF CS conducts inspection and review of the operator and the organic system plan. CCOF CS reinstates certification after the CFIA has been notified and CFIA removes the operator from the CFIA published list of suspended and cancelled organic certifications.

## **2.12 NONCOMPLIANCE,<sup>29</sup> SUSPENSION<sup>30</sup> and CANCELLATION OF CERTIFICATION<sup>31</sup>**

When CCOF CS issues a notice of noncompliance, the operator has 30 working days to provide a response. If the operator requests an extension regarding the notice of noncompliance, CCOF CS may extend the timeframe needed to submit corrective actions. CCOF CS can only grant one extension per notice of noncompliance. If the operator does not provide an adequate response to a notice of noncompliance within 30 working days, does not provide an adequate response within the extended timeframe as described above, or does not provide a response at all within 30 working days, CCOF CS issues a notice of suspension<sup>32</sup>. The operator then has 30 working days to submit a corrective action plan in response to the notice of suspension. If the response is adequate, CCOF CS closes the noncompliance and lifts the suspension. If the response is inadequate, or no response is received, CCOF CS issues a notice of proposed cancellation, which includes the opportunity to be heard in respect to the cancellation (i.e. right to appeal). If no appeal is received, certification is cancelled by CCOF CS.

In the case of suspension and cancellation of certification, the operation has the right to be heard, either orally or in writing. During suspension, clients must cease all claims of the CCOF logo and name. If certification is cancelled, in addition to ceasing all use of the CCOF logo and name, they must 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 cancellation. If an operation voluntarily withdraws from the CCOF COR Compliance Program, CCOF CS issues a notice of cancellation of certification without the notice of suspension and/or notice of proposed cancellation.

CCOF CS reports to CFIA all suspensions and cancellations of certification within 30 days via CCOF’s Conformity Verification Body (CAEQ).

CCOF CS does not grant certification to an operator who has previously cancelled or whose name appears on the CFIA published list of suspended and cancelled organic certifications unless the operator has undergone application, inspection, review, and CCOF has received confirmation from the CFIA that the operator has been removed from the CFIA published list.

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<sup>28</sup> COR Operating Manual C.10

<sup>29</sup> ISO/IEC 17065 7.11 & COR Operating Manual C.2.8

<sup>30</sup> ISO/IEC 17065 7.11 & COR Operating Manual C.2.8

<sup>31</sup> ISO/IEC 17065 7.11-7.11.6 & COR Operating Manual C.2.8

<sup>32</sup> COR Operating Manual, Appendix D





## **2.13 APPEALS<sup>33</sup>**

An applicant for certification can appeal a CCOF CS notice of denial of certification, and a certified operation can appeal a CCOF CS notification of suspension, proposed cancellation, other adverse action or decision. CCOF CS carries 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 is considered "filed" on the date received by CCOF CS. CCOF CS sends acknowledgement in writing to the appellant that the appeal was received.
- 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 cancel 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 CS gives formal notice of the outcome and the end of the appeal process to the appellant.
- The operation can submit a complaint to the CCOF conformity verification body (CAEQ) if they are not satisfied with the appeal process.

## **2.14 COMPLAINTS OR DISPUTES<sup>34</sup>**

CCOF CS 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 CS as a certification body from operators or outside persons or organizations. CCOF CS is committed to investigating complaints or disputes that are submitted in writing and that provide evidence that supports the allegation(s). CCOF CS conducts investigations in a timely manner, confidentially and based only on documented evidence. If a certified party or applicant refuses to cooperate in an investigation, CCOF CS may deem this sufficient cause for denial or suspension and/or 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 REGULATIONS<sup>35</sup>**

CCOF's COR Compliance program is approved by the Committee on Accreditation for Evaluation of Quality (CAEQ) for providing certification services to those who demonstrate full compliance with the Canadian National Organic Standards (CAN/CGSB-32.310, CAN/CGSB 32.311, and the COR Operating Manual). The full text of the Canadian National Organic Standards may be accessed at any time via [www.ccof.org/organic-certification-services/international-programs/international-services-canada/#tab-operations-located-in-canada](http://www.ccof.org/organic-certification-services/international-programs/international-services-canada/#tab-operations-located-in-canada) or by contacting the CCOF CS 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 the CCOF COR Compliance program include the preparation and handling of organic products, the packaging and labeling of organic products, and an attestation of compliance for services.

### **3.1 NOTIFICATION OF CHANGES**

CCOF notifies clients of any amendments to the COR regulations within 2 months after their publication. Clients in CCOF's COR Compliance program are given up to 12 months from the publication date of amendments to the

<sup>33</sup> ISO/IEC 17065 7.13 & COR Operating Manual C.4.2.1

<sup>34</sup> ISO/IEC 17065 7.13 & COR Operating Manual C.4.2.2 and C.4.2.3

<sup>35</sup> ISO/IEC 17065 4.1.2.2, 6.11, 6.2.1, 7.1.2, 7.10 & COR Operating Manual C.5.1, C.5.2, C.5.5





regulations 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 Regime Operating Manual.

### **3.2 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 International Market Labeling Guide](#) at [www.ccof.org/canada](http://www.ccof.org/canada).



