



Organic Food Development & Certification Center of China

**Organic Product Certification
Implementation Scheme
(Canada Organic Product Certification)**

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1. Objective

In order to regulate the activities of organic production and certification of OFDC and OFDC certified operators, so as to ensure the consistence and effectiveness of OFDC certification procedure and management requirements, the rule is established according to the Regulation on Certification and Accreditation of P.R.C, the Safe Food for Canadians Act, Part 13 of Safe Food for Canadians Regulations, Canada Organic Regime Operating Manual and other related laws, regulations, and other related requirements.

2. Applicable Scope

The rule is applicable to the organic products production and certification under Canada Organic Products Regulation. The term “operation” in this rule include all production and processing operations, including packaging and labeling pertaining to the product.

3. Applicable Standard

- 1) Organic Production Systems General Principles and Management Standards; and
- 2) Canada Organic Production System Permitted Substances Lists

4. Certification Procedure

4.1 Application

4.1.1 OFDC must open at least the following information for the applicants:

4.1.1.1 The certification scope approved by Certification and Accreditation Administration of PRC (hereafter shorted as CNCA) and accredited by Canada Food Inspection Agency (hereafter shorted as CFIA);

4.1.1.2 Certification Procedures and requirements;

4.1.1.3 Certification standards;

4.1.1.4 Certification charge;

4.1.1.5 Right and obligations of OFDC and applicant;

4.1.1.6 OFDC procedure for handling compliance, appeal and dispute;

4.1.1.7 OFDC procedure for approve, suspend and withdraw of certification;

4.1.1.8 Requirements for usage of Canada organic product logo, OFDC logo and name by certified operator;

4.1.1.9 Requirements for promotion within scope of certificate by certified operator.

4.1.2 The applicant must supply at least the following documents according to requirements of OFDC:

4.1.2.1 Legal licenses, such as Business License, Organization Code License, Land Usage Verification, etc. If the applicant does not conduct production or processing directly, the applicant must supply contracts with all of its sub-contracted operators.

4.1.2.2 Basic situation of the applicant and operation:

- a) Name, address, contact information of the applicant;
- b) Name, address, contact information (if not same as the applicant) of the operator (producer/processor), and basic situation of the production base/processing plant;
- c) Production history of last three years, including farming, pest/disease control, inputs usage and harvest in the plant production, and/or breeding method, disease control, inputs usage,

animal transportation and slaughtering in the animal cultivation;

- d) Description to the production/processing scope, types, acreage, yield and amount of processing, package/labeling amount, etc.;
- e) a statement naming the substances used in the production and processing of the agricultural product and describing the manner in which those substances are used; and
- f) in the case of a multi-ingredient product, a statement setting out its composition and the percentage of organic products it contains;
- g) a report setting out in detail the methods used in the production/processing of the agricultural product and organic product packaging/labeling, and the control mechanisms in place to ensure that those methods comply at all times with the requirements set out in CAN/CGSB 32.310;
- h) Situation of applying and obtaining other organic certification. The application shall include the name(s) of CBs to which prior applications for certification were submitted by the applicant within the previous years (under COR or other schemes such as USDA NOP, EU, JAS etc.), including all details pertaining to processing the application, and the resulting decision. The applicant shall not hold a valid Canadian Organic Standards certificate for an identical/same product, issued by another CFIA accredited CB.

4.1.2.3 Description of production base, including the location, fields distribution, fields acreage, buffer zones and adjoining field usage, etc.; description of environment surrounding the processing plant, layout plan, and the processing flowchart, etc.;

4.1.2.4 The plan of production, processing and sales of the products applied for organic certification, including the types, acreage, estimated yield/processing amount, packaging/labeling amount, sales amount, and sales destination, etc.;

4.1.2.5 Documents verifying the environmental quality of the production base and processing plant;

4.1.2.6 Documents verifying the qualification of the technician and management staff;

4.1.2.7 Statement of complying Canada Organic Standards;

4.1.2.8 Management system documents for organic production and processing;

4.1.2.9 Other related documents if needed.

4.1.3 Time for submitting application

A person who wishes to obtain an organic certification for an agricultural product shall apply to OFDC, within 12 months before the day on which the product is expected to be marketed. For special products, the time for submitting application must in line with the following table:

Item	Type of the Agriculture Products	time for submitting application
1	Maple products	15 months before the day on which the product is expected to be marketed
2	Field crops or crops grown in greenhouses with an in-ground permanent soil system	15 months before the day on which the product is expected to be marketed

4.2 Accepting application

4.2.1 OFDC must complete reviewing to application documents within 10 days after receiving the application from the applicant, and decide whether to accept the application.

4.2.2 If agree to accept the application, OFDC must sign certification contract with the applicant; if not, OFDC must inform the applicant in written for explanation.

4.2.3 OFDC must ensure through the review of application documents:

4.2.3.1 The documents are complete and show understanding and meeting to certification standard and requirements;

4.2.3.2 Any disputing in understanding with the applicant has settled; If an interpretation of an applicable Standard is required by a certificate holder or OFDC at any point during certification activities, it can be sought from the standards interpretation committee (SIC);

4.2.3.3 OFDC has the competence and capability to conduct certification service to the applied operation, site and special requirements.

4.2.3.4 OFDC must verify whether the applicant holds other types of certifications - packaging and labelling certificate and/or attestation of compliance, whether the applicant holds a valid Canadian Organic Standards certificate for an identical/same product, issued by another CFIA accredited CB, whether the operator is in the list of cancelled holders of certificates posted on the CFIA web site.

4.2.4 OFDC must keep the records of reviewing.

4.3 Inspection preparation and implementation

4.3.1 Assignment of inspection

OFDC must issue inspection assignment which must include content of, but not limited to:

4.3.1.1 Applicant's contact information, address, etc.

4.3.1.2 Applicable standards and related laws/regulations for the inspection;

4.3.1.3 Inspection scope, including the inspected products, types, production site (base), processing site, etc.

4.3.1.4 Inspection points, including the management system, audit system and input usage, etc.; for continuous certification, the inspection must pay attention to the corrective actions to the non-compliances issued by OFDC last year, if applicable.

4.3.1.5 Frequency and estimated duration of on-site inspection: When assigning inspection, OFDC shall document frequency and estimated duration of on-site inspection, taking into account the intensity of the production system, the production type, the company's size, the results of the previous verification, complaints received, and parallel production, etc.

4.3.2 OFDC must assign applicable inspector according to the inspection types and qualification of inspector. The assignment of the inspector must be approved by the applicant, but the applicant is not allowed to appoint inspector. A inspector is not allowed to inspect a same operator continuously for 3 years or more.

4.3.3 Document review

OFDC must review the management system documents of the applicant/operator before the on-site inspection, so as to ensure the suitability, adequacy and compliance to standard, and keep the reviewing record.

4.3.4 Inspection Plan

4.3.4.1 OFDC must make inspection plan and confirm it with the applicant before on-site inspection. The inspection plan must include: inspection basis, inspection content, person to

be interviewed in inspection, sites to be visited in inspection, and time arrangement of the inspection, etc.

4.3.4.2 The inspection time must be arranged in proper phase during the production/processing, at least once in the production/processing period. The inspector must conduct a visual examination of each production unit (e.g. fields, crops, plants, livestock, buildings, facilities and vehicles) where production or preparation of agricultural and food products are carried out.

1) The inspection time can be decided by communication of the applicant and inspector, so that to ensure that the inspector witnesses the way the operator proceeds at a given point within the production cycle, thus implying that the inspection shall be carried out when grounds, premises, and activities subjected to compliance requirements may be observed.

2) In cases involving producer operations, the timing of on-site inspection shall take place during the production season. This period begins as soon as all operations subject to inspection (seeding, tapping, etc.) begin and ends with the packaging or placing in containers for storage of products to be certified.

3) In cases involving processing operations, on-site inspections may be carried out any time during the year. On the other hand, for separated production (i.e., when both certifiable and non-certifiable products are manufactured at the same facility), the inspection shall be carried out at time when the products that are targeted for certification are being processed.

4) If OFDC determines it is not possible to conduct the inspection while organic product is being processed, OFDC shall record the reason(s) supporting this determination. OFDC shall then arrange for the inspection to be conducted at a time when the facilities and activities that demonstrate compliance or capacity to comply can be assessed. There shall be no more than two consecutive years without an inspection when organic product is being processed.

4.3.5 Implementation of the Inspection

OFDC must conduct inspection according to related laws/regulations, standards and quality system documents of the applicant/inspected operator, to evaluate the management system, the consistency of the operation with the documents, the conformity of the operation with the standards. The inspection contents must include at least the following:

- a) The inspector shall conduct an opening meeting with a representative of the applicant to confirm the inspection objectives, scope and criteria as the first step of inspection. The inspector shall perform a visual examination of all components and production units (e.g. fields, crops / plants, livestock, processing plant, buildings and facilities, storage, and vehicles etc.). The evaluation of a product shall cover all production and processing operations, including packaging and labeling pertaining to the product. The inspector must provide the inspection information in detail, such as the numbers of the fields, the names of the facilities or names of the products that have been inspected.
- b) The inspection must cover the entire agricultural production system being managed by the operator, even if only part of the operator's operations were targeted by the certification application. The inspector shall identify and check the land, premises and equipment not included in the certification application, and shall at a minimum include the following: crop areas or harvesting zones; harvest storage locations; preparation, processing and packaging sites; application dates for phytosanitary products.

- c) Review and verify the accuracy and conformity of the supplied documents with the organic standards, including interview the management staff, internal inspector and producers; the organic inspector must visit the systems and facilities upon which an operator relies to produce and/or prepare each product included within its application to ensure that the standards are fully applied and correspond to the submitted production or preparation specifications.
- d) Audit the verification whether the environmental quality of the production base is compliant with national related standards; identify and evaluate whether there is risk of contamination to the organic production base.
- e) Identify and investigate area of high risk, such as the risk of potential contamination from adjoining farm, flood.
- f) Where there is reason to suspect there is any split production or similar product that the operator has not report to CB, or in high risk of cross-contamination in split production, the inspection must include non-organic production unit, include visual observation and determination to the non-organic production site and crops planted in it.
- g) The inspector shall verify that prohibited substances have not been, and are not being, applied to the operation. OFDC must verify that the substances and the materials used in the production of organic products comply with CAN/CGSB 32.311 as applicable to the nature of the product and production system. Reviewing the letter of commitment alone is insufficient to verify compliance. OFDC shall comprehensively verify whether prohibited substances have been, and are being, used by reviewing field history records, local government records, visual inspection records, and test records. OFDC can determine input compliance with CAN/CGSB 32.311 as applicable to the nature of the product and production system by contacting the supplier/formulator/manufacture to obtain full disclosure of the ingredients in the input material and the processes used to produce the ingredients and the input material. OFDC may consult with another CFIA accredited CB that has already evaluated a specified input material and, accept that CB's assessment of the input's compliance with CAN/CGSB 32.311. OFDC may consult with a third party organization that is accredited under ISO 17065 to conduct input evaluation. OFDC take responsibility for all input evaluation activities outsourced to a third party, subject to a legally binding contract. OFDC must annually confirm that input product formulations and processes have not changed. OFDC shall file a complaint to the IOAS if OFDC has evidence that another CB has approved an ineligible input. OFDC can also submit a complaint if OFDC becomes aware that another CB has rejected an input that OFDC have accepted. In case that an agreement cannot be reached OFDC can file a complaint with the CFIA.
- h) The inspector must conduct a review of record keeping, to verify that the organic plan accurately reflects the operation and is in compliance with the Canadian Organic Standard CAN/CGSB 32.310. Records to be verified include records related to production (ex: inventory, sales, purchases) and to management (e.g., accounting, complaints), an estimate of the potential yield for the coming year, as well as appropriate product packaging and labeling;
- i) The inspector must conduct an audit of the balance in the quantities produced and sold

over the previous period, and including amounts still in inventory during this same period. For applicants performing operations related to food preparation (processing and/or packaging), the inspector must audit the input/output balance for acquired commodities, and for the corresponding commodities included in the products sold and on inventory. The calculation sample shall include more than one run of the product and at least one prominent commodity. Where there is no organic product available during first inspection, the operator's system for input/output shall be verified.

- j) The inspector shall strive to review different commodity at each inspection, if applicable. However, if justified by the inspector, additional commodity may be included in this calculation. This justification shall be recorded in the inspection report..
- k) The inspector shall perform trace back audits as per 4.4 of CAN/CGSB 32.310 to verify that the integrity of the organic product is maintained. Products and/or their ingredient components must be traceable to the operators own production locations (fields/plots) or suppliers as applicable to the product and nature of the operation. Trace back audits will be checked based on conventional products to ensure the operator has established an effective traceability system where there is no organic product available during first inspection.
- l) Verify that previously imposed conditions have been fulfilled; If there is any change in standard or OFDC certification requirement, the inspector must verify whether the operator is compliant with the changed standard or requirement.
- m) Evaluate the internal audit and continuous improvement to the management system; Evaluate if applicable, the previously submitted corrective actions due to the nonconformity issued by CB.
- n) The inspector shall at end of the inspection conduct a closing meeting to; inform the operator's representative of inspection results as well as findings made concerning the compliance with certification requirements, without any corrective action request from the VO; provide opportunity for the operator to confirm the accuracy of information collected during the inspection, by signing the inspection finding report (paper copy or electronic copy); provide a summary of this review in writing to the operator.

4.3.6 Evaluation and Confirmation to the environmental quality

4.3.6.1 The inspector must verify whether the environmental quality of the production base is in line with the requirement in Canada Organic Standard.

4.3.6.2 If the applicant is not able to provide verification to its environmental quality, and OFDC is not able to ensure the environmental quality, the applicant is required to entrust qualified agency to test the environmental quality of the production base and provide the effective test report.

4.3.7 Samples collection and test

4.3.7.1 OFDC has set up procedure of samples collection and test (including residue and GMO analysis), according to related standards and regulations. OFDC must ensure that the inspectors are trained on how to sample, label, and store products under proper chain of custody until samples are submitted for testing.

4.3.7.2 When there is reason to suspect that prohibited material was used, or the production base/product has been contaminated during on-site inspection, the inspector must conduct

sampling for test. When there is a reason to suspect that the agricultural input or product has come into contact with a prohibited substance, method or ingredient in the production and handling of organic products, OFDC shall require pre-harvest or post-harvest testing of any agricultural input used or agricultural product to be sold, labeled or represented as being in compliance with the requirements of the Canadian Organic standards . OFDC must provide inspectors with the proper sampling equipment at the time of the inspection as per specific sampling protocols provided by the laboratory.

4.3.7.3 OFDC shall investigate if there is suspicion that an organic product has been contaminated by or commingled with genetically engineered (GE) materials. The investigation may include sampling and testing for GE presence.

4.3.7.4 OFDC may sample and test as part of an investigation of a complaint concerning the use of or contamination with prohibited substance. Intentional use of prohibited substances by an operator shall result in OFDC initiating the suspension and cancellation process as per Part 13 of the SFCR. OFDC should consider referring to Codex Alimentarius Commission (Codex) for information on recommended methods of sampling for the determination of chemical residues as guidance. Base on result of sample testing, OFDC will implement follow-up actions in accordance with 4.3.7.7 and cooperate with CFIA's investigation if necessary.

4.3.7.5 The inspector shall provide the operator with a receipt for each sample when take samples.

4.3.7.6 The sample must be submitted to lab that has qualification of ISO17025 accredited, or similar qualification.

4.3.7.7 Actions if chemical residues are detected

a) OFDC actions when chemical residues are detected below 0.01 ppm

- 1) OFDC shall inform the operator that chemical residues are present.
- 2) At the next scheduled inspection, OFDC will assess why chemical residues were present and may sample for chemical residues.
- 3) Deliberate use of prohibited chemicals by an operator shall result in OFDC initiating suspension/cancellation process as per Part 13 of SFCR.

b) OFDC actions when chemical residues are detected at or above 0.01 ppm and at or below 5% of the MRL, or between 0.01 ppm and 0.1 ppm if no MRL is specified

- 1) OFDC shall inform the operator that chemical residues are present and request the results of the operator's investigation into the source of the contamination.
- 2) to follow up, the OFDC may decide to:
 - conduct an inspection
 - sample products currently available at the operation or production site for chemical residues. If the affected lot is not available, a different lot should be sampled. If the affected product is not available, a similar product should be sampled
 - issue a non-conformity (NC) and request corrective action within a specified time frame
- 3) If the follow up activities indicate that the presence of prohibited chemicals is not due to deliberate use, OFDC must notify the operator that the product(s) remain in compliance with the Canadian Organic Regime.
- 4) If the follow up activities indicate deliberate use of prohibited chemicals by an operator ,

OFDC must initiate suspension/cancellation of the operation as per Part 13 of SFCR.

- 5) OFDC will report findings to the CFIA through IOAS by using the CFIA standardized reporting template.
- c) OFDC actions when chemical residues are detected above 5% of the MRL, or above 0.1 ppm if no MRL is specified
 - 1) OFDC shall immediately initiate an investigation to determine why chemical residues are present and inform the operator of the detection.
 - 2) OFDC must inform the operator that the contaminated product shall remain on hold during the course of the investigation. In the case of perishable products, the operator may request permission from OFDC to downgrade the product for conventional sale.
 - 3) OFDC must schedule an inspection and conduct additional sampling of products currently available at the operation or production site as part of the investigation. If the affected lot is not available, a different lot shall be sampled. If the affected product is not available, a similar product shall be sampled.
 - 4) If the inspection and sampling indicate continued presence of prohibited chemicals which is not due to deliberate use, OFDC shall issue a Nonconformity (NC) and request corrective action within a specified time frame. Products (lots) with chemical residues detected above 5% of the MRL shall lose their organic certification status as per section 7.11.1 (b) of ISO/IEC 17065 if chemical residues are detected above 5% of an applicable MRL OR above 0.1 ppm if no MRL is specified.
 - 5) Deliberate use of prohibited chemicals by an operator shall result in OFDC initiating the suspension/cancellation process as per Part 13 of SFCR.
 - 6) OFDC will report findings to the CFIA through IOAS by using the CFIA standardized reporting template within 60 working days from the conclusion of the investigation.

4.3.7.8 OFDC may recover from the applicant the fee for follow-up actions caused by the detection of prohibited chemicals

4.3.7.9 OFDC must maintain records to demonstrate it conduct chemical residue sampling and testing of our operators products and follow up on chemical residue results that were forwarded to them for action.

4.3.8 Subcontract of the supplier

4.3.8.1 All the points of organic production/processing/packaging procedure must be covered during inspection. If the operator subcontracts part of its operation to other supplier, the inspection must include the subcontracted operation as well.

4.3.8.2 Once the certified operator plans to subcontract part of its operation to other supplier, it must inform OFDC about its plan for approval. Only after been approved by OFDC can the operator subcontract its activities to other supplier.

4.3.8.3 The operator must bear full responsibility to its subcontract operation.

4.3.9 Inspection report

4.3.9.1 The inspection checklist/report must be in fixed format provided by OFDC.

4.3.9.2 The inspection checklist/report must provide enough information so as to ensure impartial, objective and complete judgment to any operation. The information include inspection date, time and duration; identification of land and premises visited on the production/handling site; names of interviewees; types of documentation audits performed

(input/output balance, harvest/sales, trace back exercise, label review, etc); information that provided by the operator, inspection results; list of findings to the conformity with all certification requirements.

4.3.9.3 The inspector must make evaluation to the general situation of the applicant/operation, but shall not make written conclusion to the operation/products of whether it can be certified.

4.3.9.4 The inspection shall submit inspection report to OFDC Certification Committee within 30 days of completion of the inspection.

4.3.9.5 According to the information provided in the inspection report, OFDC CC may, based on the information provided by the inspector, issue a notification of non-conformity (citing the applicable standard clauses) to the operator. The operator shall respond to the non-conformity report within 30 working days of its receipt. The response shall either provide evidence of completion of corrective action taken to address each NC or present a plan as to how each NC will be addressed. The deadline for completing corrective actions for the non-conformities in the plan shall not exceed 90 working days from receipt of the non-conformity report. If the response is not accepted, or if no response is received within the specified time limit, the certification body shall issue a suspension notice. The operator may request one additional extension of time before suspension. After suspension, the operator shall submit corrective actions within 30 days. If the corrective actions are still not accepted, the certification body shall issue a cancellation notice and provide an opportunity for a hearing.

4.3.9.6 In the case where the operator requests and OFDC grants a one-time extension (SFCR paragraph 349 (2) (b)), the period of extension may extend beyond 90 working days from receipt of the NCs as long as the times are justified and documented.

4.4 Certification decision

4.4.1 When the operation is inspected and the inspection report is submitted to OFDC, OFDC must conduct evaluation according to all the information. The decision to certify a product shall be taken if OFDC determines that all procedures and activities contained in the production or preparation plan are in compliance with OPR requirements and that the applicant is able to conduct operations in accordance with this plan or after the corrections of minor non-compliances. This acceptance is valid until the results of the next annual evaluation are known and a new decision is made.

When a subjective judgment is required to determine compliance, OFDC shall document explanatory information, assuring consistent and uniform application of the requirements and certification decisions.

4.4.2 Certification Approval

Approve certification if the applicant/operation compliant with following conditions:

4.4.2.1 The operation and management system is in line with related standards and regulations; or

4.4.2.2 The operation and management system is not totally compliant with related standards and regulations, and the applicant has taken corrective actions, or has verified its capability of take correction in limited time, and has been approved by OFDC;

4.4.2.3 The applicant admits to fulfill the certification contract, and has paid certification fees according to the contract.

4.4.2.4 Operator is not in the list of cancelled holders of certificates posted on the CFIA web

site, or received conformation from the CFIA that the operator is removed from the CFIA list.

4.4.3 Extension of Certification

In the valid period of the certificate, the certificate holder can be approved for extension, if it compliant with following conditions:

4.4.3.1 The scope applied for extension is within the scope of legal documents and qualification requirements;

4.4.3.2 The management system must cover the scope applied for extension, which is in line with related standard, sampling requirements and other related requirements;

4.4.3.3 The plan of extension includes production amount, products, and production areas to be enhanced in line with related standard.

4.4.4 Reduction of Certification

In the valid period of the certificate, the certificate holder can be approved for reduction in the following conditions:

4.4.4.1 Part of the product type, production scope, or main producing procedure is not able to compliant with standard or other related requirements continuously;

4.4.4.2 Part of the product type, production scope, or main producing procedure is not willing to keep the certification qualification.

4.4.5 Change of Certification

In the valid period of the certificate, the certificate holder must apply for changing of its certification in the following conditions:

4.4.5.1 The certificate holder has changed;

4.4.5.2 The operator has changed;

4.4.5.3 Changes of extension/reduction (refer to 4.4.3 and 4.4.4);

4.4.5.4 When the operation exceeds conversion period;

4.4.5.5 Changes or modifications to the production method;

4.4.5.6 Changes or modifications to production site, buildings, facilities, or equipments, etc.

4.4.6 Refusal of Certification

In one of the following situations, certification is not approved to the application/operation:

4.4.6.1 Has not set up management system, or the management system has not be implemented effectiveness;

4.4.6.2 Use prohibited materials;

4.4.6.3 The operation procedure is not traceable;

4.4.6.4 The applicant does not complete corrective actions or does not provide plans for corrective measures to satisfy certification requirements in the limited time required by OFDC;

4.4.6.5 Other issues that is major non-compliance.

4.4.6.6 If OFDC has reason to believe that an applicant for initial certification has willfully made a false statement regarding its production system and operations related to the products included in the application, OFDC may deny certification, without issuing a notification of non-compliance.

OFDC shall issue a written notice of denial of certification to any applicant to whom it denies certification, either because operations resulting in the products included in the application are still noncompliant with requirements or simply because the applicant did not respond to the notification of noncompliance. This notice shall state the reason(s) for denial and the

applicant's right to: file an appeal of the denial; reapply for certification to any accredited CB, including OFDC who denied certification.

4.4.7 Suspension of Certification

4.4.7.1 In the valid period of the certificate, the certification must be suspended, while the certificate holder must pause using the organic certificate and logo, in one of the following situations:

- a) the holder of the certification does not comply with any provision of the Safe Food for Canadians Act, or Part 13 of the SFCR;
- b) the substances used by the holder of the certification are other than those set out in CAN/CGSB32.310 or CAN/CGSB 32.311;
- c) the agricultural product comes into contact with substances other than those set out in CAN/CGSB32.310 or CAN/CGSB 32.311;
- d) the substances used by the holder of the certification are the ones set out in CAN/CGSB32.310 or CAN/CGSB 32.311, but are not used in the manner described in that standard; or
- e) the production, processing, packaging and labeling methods used by the certificate holder do not comply with the requirements set out in CAN/CGSB 32.310 and do not comply with the general principles respecting organic production set out in that standard;
- f) in the case of a multi-ingredient product, less than 70% of its contents are organic.

4.4.7.2 As per Part 13 of the SFCR, no certification shall be suspended unless OFDC has taken the following steps:

- a) OFDC has notified in writing the holder of the certificate the grounds for suspension (proposed suspension) and the period within which corrective action must be taken in order to avoid the suspension; and
- b) OFDC has notified in writing the holder of the certificate of the suspension, if the holder failed to take corrective actions within the period specified by OFDC, or if OFDC granted an extension at the written request of the holder, within any later period specified by OFDC.

4.4.7.3 OFDC may grant an extension of the period for corrective action must be taken only once..

4.4.7.4 OFDC must notify the holder of the certificate in writing of the suspension and the date on which it takes effect.

4.4.7.5 The suspension of a certification must be lifted if OFDC determines that corrective action has been taken.

4.4.8 Cancellation of Certification and Reinstatement

4.4.8.1 As per Part 13 of the SFCR, in the valid period of the certificate, the certification must be withdrawn, while the certificate holder must stop using the organic certificate and logo, in one of the following situations:

- a) the holder of the certification fails to take corrective actions within 30 days following the day on which the certification was suspended.
- b) the holder of the certificate made false or misleading statements, which was not in compliance with section 15 of the Safe Food for Canadians Act in respect of the

application for organic product certification or packaging and labeling certification, or at any time during the period of validity of the certification; or

- c) while the certification is suspended, the holder of the product certificate sends or conveys products labeled as organic or bearing organic logo, applies or attaches labels bearing organic expression or organic logo, or uses such an expression in the advertisement of a product, or conducts any activity with respect to a product that is identified in the certificate; and the holder of the packaging and labeling certificate packages or labels an organic product.

4.4.8.2 No certification shall be cancelled unless OFDC has taken the following steps:

- a) OFDC has notified in writing the holder of the certificate of the grounds for the cancellation (proposed cancellation) and provided with an opportunity to appeal in respect of the cancellation; and
- b) OFDC has sent a notice in writing to the holder of the certificate of the cancellation and the date on which it takes effect.

4.4.8.3 The Organic Production Systems: General Principles and Management Standards (CAN/CGSB-32.310) require that the Standard be fully applied on a production unit at least 12 months before the harvested product is considered organic for these food commodities (per 5.1.1 and 7.2.8). These 12 months must be under the oversight of OFDC.

4.4.8.4 A cancelled operator who wishes to be reinstated must apply as a new applicant as per section 344 of the SFCR, and meet the conditions as follows:

- 1) the production unit (the applicant) must be under OFDC oversight for at least 12 consecutive months prior to the harvest of a product in order for it to be covered by the organic certificate (issued at the end of the 12 months).
- 2) an applicant cannot market products harvested during or prior to the start of the 12 months of oversight as organic.

For the requirements of the standard to be met, the oversight is based on the time of harvest, and not the expected time of sale.

4.4.9 Withdrawal of Certification (voluntary cancellation by the holder of the certificate)

OFDC will cancel certification under the following cases:

- a) The certificate holder is not willing to or not able to comply with new standard or regulations, if the certification standard or regulation has been changed;
- b) The operator or the sub-contracted operator stopped to produce the certified products;
- 3) The operator submit written request for withdrawal of its certificate. At any point within the certification cycle preceding the decision made by OFDC, the applicant may request that the processing of its application be stopped. The applicant shall, however, be liable for the costs of services provided up to the time of withdrawal of its application. In such case, OFDC shall not issue a decision regarding the products that were the subject of the certification request, as per Part 13 of the SFCR.

4.5 OFDC must issue certificate to the applicant and approve it to use certification logo.

4.6 OFDC must sign contract with the certificate holder for usage of certification logo, so as to specify the conditions and requirements for using logo.

4.7 All certification decisions should be copied to the data update personnel in a timely manner.

4.8 Certificate withdrawal

When withdrawing the certificate, OFDC process is that checking whether transaction certificate is issued based on the operation certificate, or the products of the operation are used as raw materials for any processor:

- a) In case no transaction certificate is issued, and the products of the operation are not used as raw materials for any processor, OFDC will directly withdraw the certificate.
 - b) In case a transaction certificate is issued, OFDC will require the operator to notify the buyer of its product in written to ensure that the labeling related to organic production is removed from the product. If the product has been sold in Canada, OFDC will require the operator to recall the product, and notify CFIA immediately.
 - c) In case the products of the operation are used as raw materials for a processor which is certified by OFDC, OFDC will re-evaluate the conformity of involved processed products, whether the proportion of organic ingredients is not less than 95%, and notify the processor the result of re-evaluation. If the involved processed products no longer meet the requirements of the COR standard, and transaction certificate issued to the involved processed product, or the involved processed product has been sold in Canada, OFDC will take actions as 4.8 b).
- If the processor is certified by other CB, OFDC will require the operator to notify the processor in written with the information about the withdrawal of operation certificate.

5 Certificate, logo and labeling

5.1 OFDC must use the format of organic certificate approved by IOAS for Canada organic certification.

5.2 OFDC must issue to the applicant a certificate that confirms the certification of the organic product and/or certification of packaging and labelling activities of the organic product. These in accordance with ISO 17065 7.7.1, these certificates shall include the followings:

5.2.1 The wording "Pursuant to part 13 of the Safe Food for Canadians Regulations (SFCR)..."

5.2.2 The name, address, and contact information of the certification body (as appears on the CFIA web site).

5.2.3 Certification number (as issued by the CB, it will vary by CB).

5.2.4 The name and address of the holder of the certificate, whereby the holder is the legal name of the person(s) who produced/processed/packaged/labelled/traded the product and that had applied for certification. A "person" means "an individual, a corporation, an association, or an organization recognized as a legal entity".

When applicable, the certificate or document should also include the name of the holder who commonly does business under, or the name which the holder is commonly known by in the marketplace. All other non-legal names/business names on the certificate in addition to the legal name shall be clearly referred to as "doing business as" or "DBA". The certificate cannot bear the names of multiple legal entities. A parent company and any of their subsidiary companies are separate legal entities.

5.2.5 Approved certification scope, including the following, including, as appropriate:

5.2.5.1 The products certified, which shall be identified by type or range of products including their specific name and if applicable, the one or more trademarks under which they are being

marketed (if applicable); product names on certificates should coincide with label/shipping bill/import-export documentation;

5.2.5.2 In the case of a multi-ingredient food commodity, whether at least 70% of its contents are organic products or whether at least 95% of its contents are organic products;

5.2.5.3 The standard under which each product or product type is certified;

5.2.5.4 The applicable type of certification, among the following:

- crop production
- Livestock feed
- specialized production (sprouts, mushrooms, greenhouse crops, wild crops)
- processed products
- grower group certification

5.2.6 the date on which the certification was initially granted;

5.2.7 the date of last inspection

5.2.8 the date by which the operator shall submit application for subsequent annual inspection as per subsection 346 (1) of the SFCR;

5.2.9 the location (address, town, province/state, country) of all production units covered by this certification (includes but is not limited to: all production, processing, harvest, and storage sites). (not applicable for grower group members);

5.2.10 The following wording: “This certification remains valid unless suspended or cancelled by OFDC pursuant to part 13 of the Safe Food for Canadians Regulations (SFCR)”.

5.2.11 Date, name and signature of CB representative;

5.2.12 Certification logo and accreditation logo;

The Organic Product Certificate will only be issued once the organic product meets the requirements of the Canadian organic standards.

In cases when the CFIA accredited CBs need to make certification decision for certified operator (primary producers only) that due to extraordinary circumstances cannot produce organic products during a particular season (for example extreme weather conditions that affect their crops), the CB is required to present the issue to their CVB.

The CVB and the CFIA will review the request and will inform the CB of the approach to be taken.

5.3 in the case of product packaging and labeling certification, the date on which it expires which may not exceed 12 months;

5.4 The certification of a product, once issued, shall remain valid unless suspended or cancelled by OFDC according to the requirements of the SFCR..OFDC shall follow subsection 350(3) of the SFCR requirements for cancellation in the case of voluntary withdrawal by the operator.

5.5 OFDC and the certificate holder must use Canada organic logo and OFDC logo in line with OFDC Certificate and Logo Usage Control Procedure and requirements of Canada Organic Product Logo usage as followings:

5.5.1 Legend of Canada organic certification logo

Figure
organic
logo



1: Canada
certification

The logo is displayed in either black with a white background (as illustrated), in black with a transparent background or in colour. If displayed in colour, the background is white or transparent, the outer and inner borders are green (Pantone no. 368), the maple leaf is red (Pantone no. 186) and the lettering is black.

5.5.2 Use of The Canada Organic Agriculture Product Logo

- 1) No person shall affix the logo set out in Figure 1 to a product other than an organic product, and
- 2) Despite subsection 1), no person shall affix the logo set out in Figure 1 to a multi-ingredient product whose organic content is less than 95%.

5.5.3 Labeling and Advertising Requirements

5.5.3.1 No person shall affix a label to a product, or

make an advertisement for a product, that contains the words “organic”, “organically grown”, “organically raised”, “organically produced” — or similar words, including abbreviations of, symbols for and phonetic renderings of those words — unless the product is

- (a) An organic product, other than an organic product that is a multi-ingredient product; or
- (b) A multi-ingredient product whether at least 70% of its contents are organic products or whether at least 95% of its contents are organic products.

5.5.3.2 Despite 5.3.3.1, a multi-ingredient product that is an organic product but contains less than 95% organic contents may be labeled or advertised with the words “organic ingredients” if those words

- (a) are immediately preceded with the percentage, rounded down to the nearest whole number, of the contents that are organic; and
- (b) are of the same size and prominence as the preceding words, numbers, signs or symbols that indicate the applicable percentage.

5.5.3.3 Despite subsection 5.3.3.1, a list of ingredients on a label affixed to a multi-ingredient product that is not an organic product may indicate which of the ingredients are organic.

5.5.4 Other Requirements

No person shall affix a label containing the words referred to in subsection 5.3.3.1 and 5.3.3.2 to an organic product unless the label also contains

- (a) The name of the certification body that has certified the product as organic;
- (b) In the case of a multi-ingredient product, the organic contents identified as organic in its list of ingredients; and
- (c) in the case of an imported product for which the agricultural product legend is used on the label, the statement “Product of” immediately preceding the name of the country of origin or the statement “Imported” in close proximity to the legend.

5.5.5 Languages

Any claim or statement referred to in sections 5.3.3 and 5.3.4 shall appear on the label of an organic product in English and in French or in one of those languages if, in accordance with

subsection B.01.012(3), (7) or (11) of the Food and Drug Regulations, the information that is required by those Regulations to be shown on the label of the food may be shown in that language only.

6 Post-certification management

6.1 OFDC must conduct effective measures to ensure the continuous compliance of the certified operator, including obtain information of important change of the operator, conduct unannounced inspection if necessary. For COR certification, the additional inspection must be conducted in the following policy:

In addition to the annual inspections OFDC shall plan and conduct unannounced inspections representing 5% of the operators (minimum one) to which it grants certificates for products and/or packaging and labeling under the Canada Organic Regime. Where the number of clients is 1–4, one unannounced inspection may be conducted within one accreditation cycle; where the number of clients is 5–32, one unannounced inspection may be arranged each year. OFDC is not obliged to disclose to the operator the reason for the unannounced or additional inspection.

6.2 OFDC must conduct audit to the logo usage, labeling and marketing of the products, so as to ensure consistency of products with the certificate (including amount of logo used, and products name), and detect any improper reference to the Canada Organic Regime or fraudulent use of the CB name and certificates.

6.3 OFDC must control handling of TC, so as to ensure the products and logo is in the scope of the certificate; the TC/traceability document issued by OFDC shall cover all information listed in Annex3 – OFDC Traceability document template.

6.4 Once the certified operator violates the Canada Organic Products Regulation, Canada Organic Office Operating Manual, and/or Canada organic standards, OFDC must suspend or withdraw the certificate and require stop using the logo in time, and make it public.

7 Continuation of certification

7.1 OFDC shall update application documentation, training materials, certification procedures and checklists to reflect the most recent versions of the Canadian Organic Standards.

7.2 OFDC shall notify the applicant of any amendments to the regulations or the standards within two months after their publication. The applicant shall within 12 months or any period longer than 12 months that is specified within the standards after the publication date of an amendment to CAN/CGSB - 32.310 and CAN/CGSB - 32.311 come into compliance with any changes to the requirements.

7.3 OFDC shall document the procedures to verify annually that the SFCR requirements for certification continue to be met by the holder of certificate.

7.4 The holder of the certificate to submit the information specified in subsection 346(1) of the SFCR once every 12-month period, which begins on the day on which the certificate is issued. The holder of the certificate shall submit in writing their intention to maintain certification no later than the date that is 6 months prior to the end of that period and the completed recertification documentation no later than one month prior to the end of that period and as appropriate to the nature of the operation.

7.5 OFDC shall proceed with an on-site inspection to verify compliance with the applicable

requirements as outlined in 4.3 when the holder of the certificate submits all information requested by OFDC. There shall be no more than 2 consecutive years without an inspection of the organic product being processed (applicable only for processed products). Where applicable, the inspector shall verify on site the completeness and accuracy of the operator's export certificate application information, and confirm that the quantity of exported products is consistent with the quantity produced, processed, or traded.

7.6 The inspector shall verify on-site that any changes in the organic standards and the CB requirements have been effectively implemented by the operator.

7.7 The CB shall ensure that the VO verifies on-site that previously submitted corrective actions have been, and remain, fully implemented.

7.8 The CB shall ensure that the onsite inspection/verification is completed prior to the end of the 12 month period from the day the certificate was granted as per SFCR subsection 346 (2).

7.9 OFDC shall verify that all requirements for certification are met resulting either in continuation or initiation of suspension or cancellation. OFDC shall make its certification decision for continued certification as outlined in 4.4.

8 Sale or Distribution of Certified Product

8.1 The certificate holder/certified operator shall not put up for sale any product for which it has requested certification; and bearing the word organic or its derivatives and marked according to OFDC requirements, for as long as it has not been informed of the decision made by OFDC stating that the products are certified.

8.2 Any person who imports a product or markets it in Canada as an organic product shall be able to demonstrate, at all times, that the product meets one of the requirements set out in Canada Organic Products Regulation and Canada organic standards, and shall retain the documents attesting that the product is organic.

9 Appeals and Compliance

9.1 The holder of certificate shall notify OFDC without delay of any complaint received relating to the organic integrity of the product referred to in the certification.

9.2 If the applicant has dispute to OFDC certification decision, it can appeal to OFDC within 10 days. OFDC must handle the appeal within 30 days after the reception, and then inform the result of treatment to applicant. If the applicant still has dispute to the treatment, it can appeal to IOAS.

10 Requirements When an Operator Changes a CB under the COR

10.1 Requirements On the Operator

10.1.1 The operator who wishes to change its current CB (sending) to a new CB (receiving) shall complete an application form prescribed by the new CB and follow the application requirements as per 4.1.

10.1.2 The operator shall notify the sending CB of their intent to change OFDC. The operator shall request a "letter of good standing" to be sent to the new CB (receiving), confirming that all non-conformities (NCs) and any contract conditions (for example, outstanding fees) have been addressed. The sending CB shall send this letter directly to the new CB.

10.1.3 The operator shall maintain their current certification until the new CB has issued

documents confirming the organic certification of the operator's products as per section 345(2) of the SFCR.

10.1.4 The operator shall not use up existing supplies of labels which identify the sending CB on products they produce. The operator may sell certified prepackaged products labelled with the name of the sending CB as long as these products were packaged before the CB change and an inventory list was provided to both CBs.

10.2 Requirements on Sending CB

10.2.1 As soon as it is informed of the issuing of a compliance certificate by the receiving CB, the sending CB shall notify the operator that it terminates the certification agreement it has with the operator and that it will no longer monitor the compliance of its operation.

10.2.2 OFDC shall require the operator to return any documents confirming the organic certification (such as certificates and attestations) that were previously issued by it to this operator as per section 345(2) of the SFCR and stop immediately the use of any labels or advertising which identify OFDC on products they market.

10.2.3 OFDC shall, upon request by the operator, send a letter of good standing to the new CB (receiving) confirming that all NCs and any contract conditions (for example, outstanding fees) have been addressed by the operator. A letter of good standing shall only be issued when all NCs have been addressed by the operator.

10.2.4 OFDC shall continue to monitor the operator's compliance with COR requirements and shall ensure that the operator resolves any outstanding NCs before the new certificate is issued by the new (receiving) CB.

10.2.5 OFDC shall allow the operator to retain a copy of the current certificate only when the operator can demonstrate that previously certified products are still in inventory.

10.2.6 OFDC shall report the cancellation in a monthly report to the CFIA as a "cancellation due to a CB change".

10.3 Requirements on receiving CB

10.3.1 OFDC shall require the operator to submit an application for certification as a new applicant, complete an application form prescribed by the new CB (receiving) and follow the application requirements as per C.2.1 of the COR Operating Manual.

10.3.2 OFDC shall request information on the name of the applicant's current (sending) CB. OFDC shall review the information provided by the sending CB including the letter of good standing.

10.3.3 OFDC shall schedule and conduct an on-site inspection of the operator's facility as per C.2.3 of the COR Operating Manual prior to making a certification decision.

10.3.4 OFDC shall issue a new certificate only after the certification process is complete and the applicant has been determined to be in compliance with all the COR requirements. The initial date on the new certificate shall be the date on which the receiving CB issued the certificate.

10.3.5 OFDC shall inform the sending CB within 5 working days that the receiving CB has issued a new certificate to the operator.

11 Records control by OFDC and operator

11.1 OFDC shall document procedures to ensure it maintains a record system that complies

with the SFCR requirements.

11.2 OFDC shall ensure that its records are to be kept for a minimum of 5 years.

11.3 OFDC shall ensure that the operator maintains records and relevant supporting documents concerning the inputs, production, preparation and handling of crops, and organic products that are or are intended to be sold, labelled or otherwise represented as organic in accordance with the CAN/CGSB-32.310 for a minimum of 5 years.

11.4 The operator shall submit this information to OFDC, IOAS or CFIA upon request.

12 CB Records

12.1 OFDC shall record all data listed below and shall provide it to IOAS and CFIA annually by the end of the calendar year for each operator granted certification. For those elements of this information provided via the Internet, it is acceptable to provide the URL to this information instead. For those elements of this information not provided via the Internet, that information shall still be provided annually by OFDC and IOAS shall transfer it to the CFIA.

12.1.1 Legal (corporate) name of operator.

12.1.2 Full address of the of operator's head office including phone numbers and fax numbers.

12.1.3 Type of operation (primary, processing or exporter).

12.1.4 Generic names of the products certified.

12.1.5 One example of a package using the certification marking (an electronic copy is acceptable).

12.2 OFDC shall maintain records of all major changes that took place during the previous year and that have affected corporate structure and directors, the administrative structure, the main managers of the organization and members of the committees. It shall provide this information to IOAS or the CFIA upon request.

12.3 OFDC shall maintain records of all modifications made to policies, internal procedures and regulations governing the organization and its certification system. It shall provide this information to IOAS or the CFIA upon request.

12.4 OFDC shall maintain records of the certificates newly issued, renewed, suspended and withdrawn listed by operator category under the COR, number of annual inspections, number of annual inspections by activity, number of unannounced inspections and number of unannounced inspections by activity; number of non-conformities issued; number of samples collected; number of complaints.

12.5 OFDC shall provide this information to the IOAS or the CFIA upon request.

13 Requirements for Grower Group Certification under COR

13.1 Requirements for Multi-site Organization

13.1.1 The grower group composed of production units, sites, or facilities, shall be organized as a "person" according to Part 13 of the Safe Food for Canadians Regulations (SFCR). A "person" is defined as "an individual, or a corporation, or a co-operative or an organization."

13.1.2 The grower group may be organized by itself, i.e. as a co-operative, or as a structured group of producers affiliated to a processor.

13.1.3 All members of the grower group shall apply similar production systems and should be in geographical proximity. The grower group is composed of small organic farms. Large organic farms may also belong to the group, provided that they are inspected annually by

OFDC.

13.1.4 The grower group shall be established formally, based on written agreements with its all members. It shall have central management, established decision procedures and be a legal entity.

13.1.5 The grower group shall have in place an effective and documented internal control system.

13.1.6 The management of the grower group shall sign a written contract with OFDC specifying the responsibilities of the grower group and of the internal control system. The management shall obtain signed obligations from all grower group members to comply with the Canada Organic standard and to permit inspection by OFDC, IOAS or the CFIA.

13.1.7 The practices of the grower group operation shall be uniform and reflect a consistent process or methodology, using the same inputs and processes.

13.1.8 Participation in the grower group shall be limited to those members who market their organic production only through the grower group. A member of a grower group shall register to only one grower group for a given product. The maximum size of a grower group shall be 2000 members.

13.2 Requirements for Internal Control System (ICS)

13.2.1 The grower group shall design and implement an Internal Control System (ICS), with supervision and documentation of production practices and inputs used at each sub-unit, and collected at each production unit, site, or facility. The ICS shall designate a person or body responsible for verifying compliance of each member of the group with COR requirements.

13.2.2 The internal control system shall include a contractual arrangement with each member of the grower group.

13.2.3 The internal control system shall be implemented by competent personnel including ICS manager and ICS inspectors. ICS inspectors designated by the grower group shall carry out internal controls.

13.2.4 An appropriate number of ICS inspectors shall be identified from within the group based on the type, structure, size, products, and the activities of the group. The ICS inspectors shall be trained annually and their knowledge shall be assessed and documented at the end of the training.

13.2.5 The ICS inspectors shall carry out at least one annual onsite inspection visit to each individual member including visits to fields and facilities. Any additional risk-based inspections shall be conducted in accordance with the schedule and the procedures provided by the ICS manager.

13.2.6 The ICS inspectors shall draft internal inspection reports and submit it within a timeframe specified in the ICS to the ICS manager.

13.2.7 The internal control system shall contain appropriate records including:

13.2.7.1 production description, production and/or preparation specifications for products to which the application applies;

13.2.7.2 maps, description of the farms and the facilities of all members;

13.2.7.3 list of inputs (ingredients and agricultural substances);

13.2.7.4 a copy of organic production and/or preparation plans;

13.2.7.5 traceability records, including information on the quantities, on the following activities,

where relevant:

- (i) purchase and distribution of farm inputs including plant reproductive material by the group;
- (ii) production including harvest;
- (iii) storing;
- (iv) preparation;
- (v) transportation of products from each member to the joint marketing system;
- (vi) placing on the market of products by the grower group.

13.2.7.6 corrective actions required by OFDC during the previous certification cycle, as well as any corrective measures implemented by members concerning these requests;

13.2.7.7 a complete list of registered group members.

13.2.7.8 continuous verification of implementation of the internal inspections.

13.2.7.9 summary of the internal inspection reports including the date of the last internal inspection with the name of the ICS inspector.

13.2.7.10 the training of members of the group on the ICS procedures and the requirements of COR.

13.2.7.11 the approval of new members in an existing group or, where appropriate, the approval of new production units or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report.

13.2.8 The internal control system shall have a mechanism to remove non-compliant group members from the list. OFDC should be notified when a (noncompliant) member is sanctioned and/or when voluntarily withdrawn.

13.2.9 The internal control system shall record all non-compliances as well as the corrective actions imposed with agreed time for completion. The ICS shall require from the operator member to respond to the NC report issued by the ICS within 30 working days of its receipt. The response shall either provide evidence of completion of corrective action taken to address each NC or present a plan with milestones as to how each NC will be addressed. This plan shall include a completion date not exceeding 90 working days from receipt of the NCs. The ICS shall accept times greater than those stated for the closure of a NC as long as they are justified and documented.

13.3 Certification Process

13.3.1 Initial Certification

13.3.1.1 OFDC shall evaluate the effectiveness of the internal control system to assess compliance of all members with the requirements set out in CAN/CGSB 32.310 and CAN/CGSB 32.311.

13.3.1.2 The certification inspection of the grower group by OFDC shall include an assessment of the risks to organic integrity within the grower group and the environment in which it functions. A sample of all sites under the grower group's responsibility shall be subject to inspection visits by OFDC.

13.3.1.3 The number of group members subject to the initial and the annual certification inspection shall be based on the results of a risk assessment. For normal risk situation, it shall not be lower than the square root of the total number of units under the responsibility of the group. If the risk is higher than normal, the resulting number of the preceding formula shall be

multiplied by 1.2, whereas with a high risk, it shall be multiplied by 1.4. All calculation totals ending with decimals are to be rounded up. Factors to define the risk shall include:

13.3.1.3.1 factors related to the magnitude of the grower group

- Organisation size and sites' size
- Value of the products
- Number of years the grower group has functioned
- Number of new members registered yearly
- Staff turnover
- The management structure of the internal control system
- Volume and value of the production
- The type of non-compliances

13.3.1.3.2 factors related to the characteristics of the grower group

- Variations in the product systems
- Risks for intermingling and/or contamination
- Geographical dispersion of the sites
- Degree of uniformity among the production units, sites or facilities

13.3.1.4 OFDC shall assign inspectors who have appropriate training on inspection of internal control systems.

13.3.1.5 During the certification inspection the inspector shall determine whether:

13.3.1.5.1 all internal control documentation is in place;

13.3.1.5.2 internal inspections of all group members have been carried out annually;

13.3.1.5.3 new group members are only included after successful resolution of any non-compliances found during the internal inspection, according to the procedures agreed with OFDC;

13.3.1.5.4 all non-compliances have been dealt with appropriately by the internal control system;

13.3.1.5.5 inspection records have been maintained up to date by the internal control system.

13.3.1.6 The inspector shall verify all shared facilities managed by the ICS, including post-harvest handling facilities, storage facilities, and processing facilities, to ensure compliance with CAN/CGSB 32.310 and CAN/CGSB 32.311.

13.3.1.7 The OFDC inspector shall conduct a witness audit of the ICS internal inspection at least once a year to determine whether the internal control system inspections are conducted as described in its written procedures.

13.3.2 Maintenance of Certification

13.3.2.1 Each year OFDC shall define and justify a risk-based sample of members subject to annual inspection. The minimum number of members subject to annual CB inspection shall be square root of the total number of members multiplied by 1.5.

13.3.2.2 The OFDC inspector shall verify all shared facilities managed by the ICS annually to confirm their continued compliance with the requirements of the Canadian Organic Standards.

13.3.2.3 The OFDC inspector shall conduct a witness audit of the ICS internal inspection at least once a year to determine whether the ICS inspections are conducted in accordance with its written procedures.

13.3.2.4 In cases of high risk members the CB may increase the number of group members

subject to annual inspection to at least 2 times the square root of the number of the members in the grower group (for example, ICS has issued a lot of internal sanctions, or a lot of new members).

13.3.2.5 The members visited by OFDC shall be predominantly different from one year to another. Some of the selection criteria of the sites being subject to visits may include:

- Results from internal control system inspection;
- Complaint files;
- Significant variations of the sites' size;
- Changes since the last certification.

13.3.2.6 OFDC shall ensure that the grower group maintains an updated list of all members and informs OFDC in timely manner any time when changes to the status of the members and changes to the group as a whole occurs.

13.3.2.5 OFDC shall ensure that the grower group has established procedures for adding new members to the grower group.

13.4 Records

13.4.1 OFDC shall ensure that the grower group has record-keeping protocols for the individual production units, sites, or facilities within a grower group.

13.4.2 OFDC shall maintain records of sample inspection to ensure that over time the inspections are representative of the grower group as a whole and take into account any previously identified risk.

13.5 Certification Documents

13.5.1 OFDC shall provide certification documents to the grower group as a whole.

Members within a grower group that has had its operations or product certified cannot not possess individual certificates unless that member has obtained its own certification independent from the grower group for a different product.

13.6 Suspension and Cancellation

13.6.1 OFDC shall hold the grower group as a whole responsible for compliance of all members.

13.6.2 OFDC shall have a documented suspension policy in the event of non-compliance by the grower group or a member.

13.6.3 OFDC shall suspend or cancel the certification granted to the grower group as a whole, in accordance with Section 21 from the Regulations, in cases where the grower group's internal control system fails to take corrective actions on these non-compliances.

14 Export documents

14.1 General requirements

14.1.1 OFDC shall establish and implement a written export document control procedure, specifying the requirements for application, review, issuance and record keeping of export documents for organic products exported to countries with which Canada has equivalence arrangements.

14.1.2 OFDC shall ensure that the export document control procedure covers all types of export certification documents, limited to the USDA NOP Import Certificate. Under the COR equivalence arrangements with the European Union, Japan and Taiwan, the products must be

produced in Canada or finally processed/packaged in Canada; therefore, OFDC shall not issue the export certification documents required under equivalence arrangements for these countries or regions.

14.2 Verification before issuance Before issuing any export document, OFDC shall require the certified operator to provide sufficient evidence demonstrating that the quantity of organic products to be exported does not exceed the total quantity actually produced, prepared or traded by the operator.

14.2.2 The certified operator shall provide at least the following documents as evidence:

- a) production/processing records;
- b) internal inventory records of the certified operator;
- c) supply agreements or sales invoices;
- d) packaging/shipping documents;
- e) financial records where necessary.

14.2.3 The inspector shall verify, during the annual on-site inspection, the completeness and accuracy of the information maintained and submitted by the certified operator in relation to export certificate applications, see Section 7.5.

14.3 Record keeping

14.3.1 OFDC shall keep copies of all issued export documents.

14.3.2 OFDC shall also keep all supporting documents relied upon when issuing export documents, including but not limited to:

- a) invoices;
- b) transport documents;
- c) processing records;
- d) inventory reconciliation records.

14.3.3 The above records shall be kept for at least 5 years in accordance with Chapter 11 of this scheme.

14.3.4 OFDC shall ensure that the above export documents and supporting documents are available at any time upon request by CFIA or IOAS.

15 Transition arrangements

15.1 During the transition period, OFDC shall verify, in combination with the certified operator's annual inspection or any additional inspection where necessary, whether the operator has rectified its operation to comply with the 2026 edition of the standards. Where non-compliance with the new standard is found, OFDC shall issue a notification of nonconformity to the certified operator and require the operator to submit a rectification plan within 30 working days. The rectification completion date shall not exceed 90 working days.

15.2 The certified operator shall complete rectification of all nonconformities before the transition deadline, March 2027. For a certified operator that has not completed rectification after the transition period and cannot demonstrate full compliance with the 2026 edition of the standards, OFDC shall initiate suspension or cancellation procedures in accordance with Part 13 of the SFCR.

15.3 For a certified operator for which no nonconformity has been raised during the transition period and whose compliance with the new standard has been confirmed by OFDC, the

certification certificate shall remain valid after the end of the transition period.

Annex 1: OFDC COR Certification Scope List

Third Country	Code Number	The product categories approved						Certification categories approved
		crop production	feed product ion	specialized product ion	food processing	organic product trade	subsequent packaging(labeling change activities after splitting or reassembling certified products)	grower group
CN (China)	—	✓	✓	✓	✓	✓	✓	✓

Annex 2: Inspection Implementation

1 Inspection arrangement

OFDC has three types of inspection, including the routine inspection, additional inspection and unannounced inspection.

1.1 Arrangement of routine inspection

In December of each year, the Inspection Dept. must make the routine inspections plan for next year of all the certified operators, send the application form, questionnaire and other files to the operators for re-certification, inform each operator 4 months before the expiration date of the certificate, and remind the operator for more times within 3 months before the expiration date.

1.2 Arrangement of additional inspection

1) In the following situations, the Inspection Dept. may decide to arrange additional inspection:

- The certified operator applies for extending/reducing certification, and the Inspection Dept. consider additional inspection is needed to be arranged for verification.
- If there is parallel production/processing exist in the farm or processing plant.
- If there is new buildings/facilities/equipments putted into use.

The Inspection Dept. must arrange time and assign inspector for the additional inspection.

2) In the following situations, the Certification Dept. can ask the Inspection Dept. to arrange additional inspection to the certified operator:

- OFDC CC considers that information from the inspection or corrective actions to non-conformities are not enough, so that additional inspection is needed for verification;
- Significant changes occurred in the certified operator, and OFDC CC considers that additional inspection is needed for verification;
- When the compliance of the operation is in doubt or for other valid reasons, OFDC must conduct additional inspections according to requirements for related authorities.

The Certification and Accreditation Dept. decides the additional inspection time, and inform the Inspection Dept. to arrange additional inspection.

3) The fees for additional inspection can be paid by the operator or OFDC. The inspection procedure is specified OFDC Product Certification Inspection Procedure.

1.3 Arrangement of Post-certification Supervision

1) There are two types of post-certification supervision, including announced inspection and unannounced inspection. The announced inspection is used for on-site verification according to OFDC Procedure for Suspension, Withdrawal, Rejection and Cancellation of Certification. The unannounced inspection is used for random sampled or specified unannounced inspection according to OFDC Guidance on Organic Certification Risk Management.

2) According to the grading method in “OFDC Guidance on Organic Certification Risk Management”, operators shall be graded as risk level L, M or H, for which unannounced inspection are required to be sampled by the Certification Dept. The detailed percentage of sampling must be in line with OFDC Guidance of Unannounced Inspection. The Certification Dept. shall provide the annual unannounced inspection plan in December of every year, and inform the Inspection Dept. to arrange the unannounced inspection in next year. OFDC shall consider the following examples when developing risk-based criteria for unannounced inspections, as a minimum: Type of operator (producer, processor, packager); New or experienced operator (categories for number of years' experience can be used); Size and complexity of operation (for example, total area under production, complexity of value chain); Type and value of product (for example, short supply, high price, susceptibility to disease or pests, ratio of price to quality); Number of parcels of land under transition; Local geography (for example, lay of land, buffer areas, water supply, presence of neighbours and types of neighbouring land uses, nearby spray operations); Only organic, split operation or parallel production; Total quantity of products produced and/or processed; Rapid increase in production versus stable production levels; Compliance history (non-conformities in previous inspections); Complaints received; Suspicion of fraud; Quality of information (information supplied in certification process); Economic fraud risk (multiple contracted suppliers, group certification); Detection of chemical residues or signs of prohibited substances; Irregularities in mass balance calculations and traceability records; Number of new suppliers; Number of changes to management team; Change in ownership; Brand names (number produced under the operation, processor not using own name); OFDC shall apply a checklist of risk based criteria when evaluating the risk to which the integrity of organic products can be compromised. OFDC shall define individual scores that can be applied to each risk criteria. These scores should be added to calculate a total score for each operator. Based on the scores, OFDC will determine which operators are selected for unannounced inspections.

3) For operators that were found any of the following situations, the Certification and Accreditation Dept. must add the operator in the unannounced inspections plan, and inform the Inspection Dept. to arrange the unannounced inspection before expiration date of the certificate:

- The products of the certified operator may not be able to constantly compliant with standards, technical criteria or related laws/regulations; or
- The operation of the certified operator may not be able to constantly compliant with main

requirements in standards; or

- The certified operator is complained, and OFDC accepted the compliance and decide unannounced inspection is needed for investigate for the compliance; or
- Other situation that may not in line with OFDC certification requirements, and may affect the certification status of the operator.

1.4 In addition to the scheduled required unannounced inspections, OFDC shall comply with any requests from the CFIA or the IOAS to conduct that additional inspections (announced or unannounced) when the compliance of the operation is in doubt or for other valid reasons..

2 Inspector allocations

2.1 The allocated inspector's specialty shall match the related inspected units. Lack of related experience of some inspection due to technique complexity, technical experts can be allocated to the inspection with inspectors.

2.2 Before inspection, the applicant/operator has right to know the identity of inspector, but has no right to select inspector or make some recommendations on inspector allocation. If finding some potential conflict interest, the operator has the right to refuse the inspector. This must be reported to Inspection Department I in written documentation.

2.3 It is the responsibility of the inspector to reject any inspection allocated when:

- The allocated items go beyond its inspection capacity;
- The inspector has a conflict of interests with the applicant/operator to be inspected;
- The inspector is unable to carry out the inspection within the scheduled period.

2.4 The inspector is not allowed to be assigned to inspect the same operation more than 3 consecutive years. If there are extenuating circumstances and the inspector inspects the same operation for more than 3 consecutive years, the justification must be recorded.

2.5 In order to ensure a complete and accurate inspection, the Inspection Dept. I should provide inspectors with complete files to do sufficient preparation. The documents to be provided shall include the inspection report and certification decision letter of previous year, questionnaire and other certification documents submitted by the applicant, and other files required by certification.

3 Inspection Plan

3.1 Arrangement of Inspection Time

1) The inspection time shall be arranged in the proper period during production/processing period, thus implying that the inspection shall be carried out when grounds, premises, and activities subjected to compliance requirements may be observed. The detail date of inspection must be discussed by the inspection team and applicant. In cases of agricultural operations, the timing of on-site inspection shall take place during the production season. This period begins as soon as all operations subject to inspection (seeding, tapping, etc.) begin and ends with the packaging or placing in containers for storage of products to be certified. In cases involving processing operations, on-site inspections may be carried out any time during the year. For operator that conducts both production and processing, and are not able to be conducted in one inspection, the production and processing must be inspected respectively.

2) The frequency of inspections must be decided according to product and/or risk. For example, if the farm produces several seasons of crops within one year, the inspections may

arranged in each crop production season, so that additional inspection may be needed to be arranged after initial routine inspection conducted.

3) Special requirements for high risk

a. In order to avoid contamination or commingling to organic products, OFDC must verify whether the operator has definite files to identify certified and un-certified products in all points of producing, processing, storing and trading. If the certified and un-certified products are not able to be identified clearly, the operator must take necessary measures to prevent contaminations or commingling during and after harvest.

b. In cases of intensive production, highly depending on outside inputs, and short production cycle, OFDC must increase inspection frequency to reduce risk of certification.

c. In case of double or multiple certifications in one production scope, OFDC must require a clear record of sales, labeling, and TC (if applicable) of different certification programs, which must be reviewed to avoid any risk of selling un-certified products as certified products.

d. The inspection could be arranged at following critical seasons, according to production conditions and risk evaluation of the inspected operator.

- Sowing seasons; or
- Fertilization using seasons; or
- Pest/disease/weeds control seasons; or
- Crop harvest seasons; or
- Parallel production/processing seasons.

3.2 Inspection Scope

1) The inspection scope covers all the points including production, processing and packaging of the operator. If some of the activities are subcontracted to other supplier, the subcontracted supplier must also be inspected, according to OFDC Guidance for Sub-contracted Operation for Certified Operator.

2) The inspection scope shall cover the whole production fields of the farm, and each category of the growing crops during inspection must be inspected. The inspection scope for processing plant must cover each processing unit, building, or site (including vehicles) where production or preparation of agricultural and food products are carried out, and all the processing process or steps must be inspected.

3) For those products that needed to be repackaged or divided outside of the production/processing site, the place for repackaging or dividing must be inspected as well to ensure organic integrity.

4) For CGG production, the inspection scope must be designed according to requirements in OFDC CGG Certification Guidance.

3.3 Change of Inspection Time and Inspection cancellation

1) When the inspection has to be cancelled due to the absence of applicant/operator, or insufficient preparation for inspection, the applicant should contact the Inspection Dept. as soon as possible to adjust the inspection time.

2) If an applicant/operator has postponed annual inspection several times for no reason, the Inspection Dept. should inform OFDC Certification Committee, who may adopt the procedure of suspending and withdrawing certification.

3) The following reasons may be considered for the change of inspection timing, and the

inspectors and/or applicants must submit written explanations, including reasons and advices to Inspection Dept.:

- The inspector has carried out necessary procedure, made inspection preparation or gone for inspection, while the applicant or certificate-holder cancels the inspection because of subjective/objective reasons; or
- The inspector consider the inspection time must be adjusted so as to arrange an more appropriate time; or
- The operation has been inspected at the same time of the year for more than 3 consecutive years; or
- Natural disasters and foreseeable conditions.

Inspection Dept. determines whether change inspection time considering the written explanations, and informs the inspector, applicants and/or operators for the change of inspection time after approved by the director of Inspection Dept.

4) The Inspection Dept. shall keep every inspection allocation and cancellation in the file.

Annex 2: Traceability document template

Template for COR Traceability document issued by OFDC

[illegible]

16. Name and signature of authorized person:

