
OFDC COR Export Management Guidance

1. Objective

This guidance specifies OFDC's management for issuing USDA NOP Import Certificates for organic products certified under the Canada Organic Regime (COR) in China when exported to the United States. It ensures authenticity, accuracy and traceability of export documents, fulfils supervisory requirements of the U.S.-Canada Organic Equivalency Arrangement (USCOEA) and the Canadian Food Inspection Agency (CFIA), and is developed in accordance with the Canada Organic Regime Operational Manual (COR OM).

2. Scope

This document applies to OFDC's acceptance, review, on-site verification, issuance, filing and subsequent administration of USDA NOP Import Certificate applications submitted by operators holding valid COR organic certification within China (certificate holders) for export to the United States.

This document applies only to products meeting all below conditions: a) Products are produced, processed or packaged within the territory of China; b) Products hold valid COR organic product certificates; c) Products fall within the equivalence scope defined under USCOEA (excluding aquaculture products and animal products produced with antibiotic use); d) Products continuously comply with CAN/CGSB-32.310 and CAN/CGSB-32.311 standards throughout the supply chain.

3. References

- 3.1 Part 13 of the Safe Food for Canadians Regulations (SFCR)
- 3.2 Canada Organic Regime Operational Manual (COR OM)
- 3.3 U.S.-Canada Organic Equivalency Arrangement (USCOEA)
- 3.4 USDA NOP Import Certificate Issuance Guidance
- 3.5 OFDC-COR-GZ-01 OFDC Organic Certification Implementation Scheme (Canada Organic Standard Certification)

4. Responsibilities

4.1 Certification Department

- Receive and conduct completeness review of export document application materials;
- Coordinate with Inspection Department to arrange on-site verification;
- Prepare, issue and register USDA NOP Import Certificates;
- Enter issuance information into the Organic Integrity Database (OID).

4.2 Inspection Department

- Arrange inspectors to complete on-site verification of export certificate application information during routine annual on-site inspections;

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- Arrange ad-hoc on-site verification for first-time applicants or where material changes occur in export product quantity or variety.

4.3 Certification Committee

Review on-site verification reports submitted by inspectors.

5. Procedures

5.1 Application Acceptance

OFDC only accepts USDA NOP Import Certificate applications from certificate holders who hold OFDC-issued COR organic certification and comply with U.S.-Canada organic equivalence. Applications for export documents targeting other equivalent markets such as Japan or EU are not covered by this procedure and shall follow respective OFDC procedures.

5.1.1 Written application submitted by certificate holder to OFDC shall include at least:

1. Export document type: USDA NOP Import Certificate
2. Name and address of U.S. importer / consignee (full state name, no abbreviation)
3. Product destination (U.S. city and state)
4. Product name (consistent with organic certificate; common name for raw materials, principal display panel name for packaged goods)
5. Lot / batch code
6. Net weight / quantity
7. COR organic product certificate number (issued by CFIA-recognized CB)
8. Country of origin of product (China)
9. Name and address of port / place of departure
10. HTS tariff code (if applicable)
11. Transport identifiers (flight number, vessel / voyage number, container number etc., if applicable)

Certificate holders shall submit true and complete application materials for export documents, cooperate with OFDC for on-site verification, ensure exported product quantity shall not exceed produced, processed or traded quantity, and guarantee continuous compliance of products with COR standards across the whole supply chain.

5.1.2 Within 5 working days upon receipt of application, Certification Department shall complete completeness check of application materials. Where materials are incomplete, the applicant shall be notified once-for-all to supplement required documents.

5.1.3 Certification Department shall verify the following:

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1. Certificate holder's COR certification status is valid without suspension, withdrawal or other abnormal status;
 2. Organic product certificate is issued by OFDC;
 3. Products fall within USCOEA equivalence scope and are not excluded items (aquaculture products, animal products with antibiotic use);
 4. Country of origin of product is China.

5.2 On-site Verification

5.2.1 For first-time applicants for export to USA, or where material changes take place in quantity or variety of exported products, OFDC shall assign inspectors to perform on-site verification to confirm completeness and accuracy of application information.

5.2.2 For continuously-certified certificate holders, inspectors shall verify completeness and accuracy of export-certificate application information during annual on-site inspection (refer to COR OM C.2.5.4).

5.2.3 On-site verification shall cover at least below items:

1. Verify consistency between exported product name, batch number and organic product certificate;
2. Confirm exported quantity does not exceed produced, processed or traded quantity:
— Review production / processing records — Review internal inventory records — Review sales invoices (at minimum) — Review packing lists / shipping documents — Review inventory reconciliation records — Conduct financial review when necessary
3. Confirm organic integrity of products is maintained and not compromised;
4. Verify product labelling complies with U.S. NOP and Canadian labelling requirements;
5. Confirm products fall under USCOEA equivalence scope and are not excluded items (aquaculture products, animal products with antibiotic use).

5.2.4 Inspectors shall submit verification report to Certification Department within 10 working days after completion of on-site verification. The report shall give clear conclusion: Approve issuance / Disapprove issuance / Further supplementary materials required.

5.3 Document Issuance

5.3.1 Based on on-site verification report and other review results, Certification Department shall complete preparation and issuance of USDA NOP Import Certificate within 5 working days.

5.3.2 USDA NOP Import Certificate shall adopt electronic format via OID system or USDA-approved template, with true, accurate and complete content.

5.3.3 Issued USDA NOP Import Certificate shall contain at least:

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1. Certificate No.: unique identification number assigned by OFDC, each number shall be used only once;
 2. Date of issuance;
 3. OFDC name and address (consistent with information published on CFIA website);
 4. Certificate holder (exporter) name and address;
 5. U.S. consignee name and address;
 6. Product name, batch number, HTS code (if applicable);
 7. Total net weight, total container count (if applicable);
 8. Transport identifiers (if applicable);
 9. Applicable organic standard: Canada Organic Regime;
 10. Equivalency statement: "Certified in compliance with the terms of the U.S.-Canada Organic Equivalency Arrangement."

5.3.4 Certification Department shall input issuance information into OID system or record below items in control log:

1. Certificate number
2. Issuance date
3. Certificate holder name
4. Product name and quantity
5. U.S. consignee name
6. Status (Valid / Void / Destroyed)

5.3.5 Within 2 working days after issuing export document, Certification Department shall record issuance information in OFDC certification management system and notify certificate holder. USDA NOP Import Certificate is valid from issuance date until completion of U.S. customs clearance for the corresponding batch.

5.4 Document Filing

5.4.1 OFDC shall establish export-document files to register and archive each issued USDA NOP Import Certificate.

5.4.2 Export-document files shall include at minimum:

1. Copy of issued USDA NOP Import Certificate
2. Application materials submitted by certificate holder
3. On-site verification report
4. Copies of supporting documents: — Sales invoices — Shipping documents — Processing records — Inventory reconciliation records — Other records reviewed for issuing export documents (e.g. financial review records, production/processing mass-balance records, shipping-document review records)

5.4.3 Retention period for export-document files shall be no less than 5 years, or longer as required by CFIA / USDA.

5.4.4 File administrators shall guarantee completeness, security and traceability of files, preventing loss, damage, unauthorized access or modification.

5.5 Document Inquiry & Provision

5.5.1 Upon request from CFIA or IOAS, OFDC shall provide copies of relevant export documents and supporting documents within 10 working days.

5.5.2 Upon request from USDA NOP, OFDC shall provide relevant export documents and control-log information within specified time limit.

5.5.3 Upon request from certificate holder, OFDC may provide inquiry service for its own export documents.

5.5.4 Without written consent from certificate holder, OFDC shall not disclose export-document information to third parties, unless otherwise required by laws and regulations.

5.6 Document Amendment & Voiding

5.6.1 Where amendment is needed for an already-issued USDA NOP Import Certificate, certificate holder shall submit written amendment application to OFDC specifying reason and content for change.

5.6.2 OFDC shall review the amendment application and shall conduct re-on-site verification where necessary. Upon approval of the amendment application, OFDC shall void the original certificate in the OID system or recall the original hard-copy certificate, and issue the revised new certificate.

5.6.3 Voided USDA NOP Import Certificates shall be marked as void within OID system, or stamped "VOID" on hard-copy certificates, and archived together with the original for reference.

5.7 Non-conformity Handling

5.7.1 OFDC shall refuse to issue USDA NOP Import Certificate if any of the following is identified during document review or on-site verification:

1. Quantity of exported products exceeds produced, processed or traded quantity;
2. Exported products fall outside valid COR certification scope;
3. Products are not within USCOEA equivalence scope or belong to excluded categories (aquaculture products, animal products with antibiotic use);
4. Certificate holder's COR certificate is suspended or revoked;
5. Application materials contain false or misleading information;
6. Other non-compliances against COR or USCOEA requirements.

5.7.2 For circumstances listed in 5.7.1, Certification Department shall issue written notice to certificate holder stating grounds for refusal of issuance. The certificate holder may file an appeal in accordance with OFDC appeal procedures.

5.7.3 Where intentional false declaration by certificate holder is confirmed, OFDC shall initiate suspension or revocation procedures in accordance with *OFDC Procedure for Suspension, Revocation, Denial and Withdrawal of Certification*, and report to CFIA /IOAS.

6 Special Notes

6.1 Product Country-of-Origin

Per USCOEA provisions, the U.S.-Canada Equivalency Arrangement covers products under the jurisdiction of both certification systems; products are not required to originate from the United States or Canada. Accordingly, products produced in China may be exported to the United States and labelled organic under this procedure, provided they are COR-certified by a CFIA-recognized certification body.

6.2 Equivalence-scope Restrictions

Product categories covered by USCOEA include: crop products, wild-harvested crops, livestock and poultry products (without antibiotic use), processed products, planting seeds, and feed.

The following product categories are explicitly excluded under USCOEA:

1. Aquaculture products (including aquatic products, seaweed, etc.);
2. Animal products treated with antibiotics (any animal treated with antibiotics or its edible derived products).

The Certification Department shall verify during application intake that products do not belong to excluded categories.

6.3 Organic Integrity Database (OID)

Effective 19 March 2024, USDA NOP Import Certificates shall be issued electronically exclusively via the Organic Integrity Database (OID). OFDC shall ensure: a) Possession of USDA-assigned certification-body identifier; b) Assignment of dedicated personnel for OID system operations; c) Establishment of internal management rules for OID system usage.

7 Supporting Files

File No.	File Name
OFDC-D17-01	Application Form for USDA NOP Import Certificate (COR)
OFDC-D17-02	Export Product Verification Report
OFDC-D17-03	Resolution Form for USDA NOP Import Certificate Issuance