

	Canada Organic Regime Operating Manual		
	Canada Organic Regime Operating Manual (Version 18)	Canada Organic Regime Operating Manual (Version 19)	
	Column 1: Reference of Canadian Provision ver 18	Column 3: Reference of Canadian Provision ver 19	
Comparison of changes made to the Canada Organic Regime Operating	COR OM version 18	COR OM version 19	Explanation
Colour key:	changes made		Note: in case of discrepancy between this document and the online version of the COR OM, the online version always takes precedence.
	removed		
	incorporated into a different section		
	new		
Section(s)	version 18	version 19	Notes on the changes made
Table of contents	Appendix G - Letter of good standing for an operator changing CB under the Canada Organic Regime (Template)	Appendix G - Letter of good standing for an operator changing CB under the Canada Organic Regime (Template) - Informative	added word "informative"
References	ISO/IEC 17065 : 2012 - Conformity Assessment – Requirements for bodies certifying products, processes and services V18: July 31, 2020	ISO/IEC 17065 : 2012 - Conformity assessment – Requirements for bodies certifying products, processes and services 2020-07-01	Edited the word "assessment" The 31st removed from date
Definitions	Nonconformity - Occurrence of a condition that does not conform to the specifications of the prescribed standards (CAN/CGSB-32.310, CAN/CGSB-32.312)	Nonconformity - Occurrence of a condition that does not conform to the specifications of the prescribed standards (CAN/CGSB-32.310, CAN/CGSB-32.312, CAN/CGSB-32.311, ISO 17065, ISO 17011 and Part 13 of the SFCR))	edited
Revision history		V18 (revised); Date: January 2021; Scope of revision: Appendix F	New: Text corrected in 1st policy step
Revision history		V18 (revised); Date: February 2021; Scope of revision: C.2.4.4	New: The applicable type of certification" updated to match Canada Organic Standard wording Wording changes
Revision history		V18 (revised); Date: June 2021; Scope of revision: A.3, A.3.4, A.4.7-A.12, B.3.13, C.2.4.4 (3rd bullet), and deleted A.13-A.14	New: Various edits
Revision history		V18 (revised); Date: July 2021; Scope of revision: A.6.17, B.7.9, B.7.10, B.7.11, C.2.3.1	New: All references to "days" are now "working days" B.7.11 elaborated
Revision history		V18 (revised); Date: June 2022; Scope of revision: Appendix D	New: All references to "days" are now "working days"
Revision history		V 19; Date: May 2023; Significant changes to sections on grower group, certification C.2.4.4, and certificate template. All references to "days" are now "working days" except for B.5.1, B.7.9 and B.7.10. Minor editorial revisions throughout parts A, B and C and appendices.	New: Changes throughout document
Overview		In this document, the word "days" is only used when directly referencing a part of the SFCR that explicitly mentions a specified number of days (COR OM B.5.1-SFCR section 362, COR OM B.7.9-SFCR subsection 364(5) and COR OM B.7.10-SFCR paragraph 365(1)(a)). SFCR's use of "days" is interpreted as and understood to be "calendar days". All other parts of this document clearly specify "working days".	explanation of use of "days" vs "working days" in COR OM
Part A	CVBs	CVB	
A.3.3.9	The final assessment report shall be reviewed and approved by the CFIA National Manager responsible for COR and a copy shall be sent to the applicant without undue delay.	The final assessment report shall be reviewed and approved by the CFIA National National Manager responsible for COR and a copy shall be sent to the applicant.	Wording changes
A.6.17	Each party may decide to terminate the agreement for any other reasons. That party shall give to the other party a minimum of 60 days notice prior to the termination of the agreement.	Each party may decide to terminate the agreement for any other reasons. That party shall give to the other party a minimum of 60 working days' notice prior to the termination of the agreement.	Wording changes
			text changed to be more clear
A.9	Table 2 column titles	text changed from specific years such as 2009, 2010 to "First year" "Second year" etc.	
B.2.1	by	By	Uppercase 'B'

B.2.2.7	B.2.2.7 In circumstances where the applicant CB has more than 3 offices, including its main office, the CVB shall use a sampling process in order to determine which offices shall be visited, based on the following criteria:	B.2.2.7 In circumstances where the applicant CB has multiple offices, the CVB shall visit the main office and will select to visit the CB satellite offices based on the key activities (ISO 17011 7.4.5) concerning the certification process.	edited text
B.2.2.7.1-B.2.2.7.3	B.2.2.7.1 An obligatory visit to the main office B.2.2.7.2 The 2 offices handling most of the applicant's operators B.2.2.7.3 The 2 offices carrying out the key activities concerning the certification process		removed text (specific number of office requirements) by deleting B.2.2.7.1-B.2.2.7.3
B.5.1	Any applicant CB has the right to request that the CFIA review the accreditation decision. The appeal against the decision shall be made within 30 working days of notification of that decision pursuant of the SFCR.	Any applicant CB has the right to request that the CFIA review the accreditation decision. The appeal against the decision shall be made within 30 days of notification of that decision pursuant of the SFCR (362).	added SFCR (362) reference edited the word "working days" to "days"
B.7.1	procedure	procedures	word pluralized
B.7.2.1	Recommend to the CFIA to reduce the current accreditation scope	Recommend to the CFIA to reduce the accreditation scope	Word change
B.7.3.2	if the CB does not have any operators after two consecutive surveillance assessments in an accreditation cycle	if the CB does not have any operators after 2 consecutive surveillance assessments in an accreditation cycle	The number "2" is used instead of the word "two"
B.7.9	The CB has 15 working days after the day the accreditation was suspended to submit their list of operators as per clause 364(5) of the SFCR.	The CB has 15 days after the day the accreditation was suspended to submit their list of operators as per clause 364(5) of the SFCR.	edited the word "working days" to "days"
B.7.10	The CB has 30 working days after the day the accreditation was suspended to take corrective action as per clause 365(1 a) of the SFCR.	The CB has 30 days after the day the accreditation was suspended to take corrective action as per clause 365(1)(a) of the SFCR.	edited the word "working days" to "days"
B.7.13	In the case when the CVB is not satisfied with the CB's corrective actions or the CB did not submit corrective actions within the time allowed, the CVB shall recommend to the CFIA accreditation cancellation of accreditation as per clause 365(1) of the SFCR	In the case when the CVB is not satisfied with the CB's corrective actions or the CB did not submit corrective actions within the time allowed, the CVB shall recommend to the CFIA cancellation of accreditation as per clause 365(1) of the SFCR.	Wording changes to remove duplicated word.
B.8.4		B.8.4 When forwarding complaints to the appropriate CB, the CVB shall ensure the complainant's confidentiality is maintained.	text was cut off. Fixed it to match what was written in the COR OM french version.
B.12.1.4	B.12.1.4 The CB shall return its previous Accreditation Letter to the CFIA immediately after receiving an updated letter from the CFIA after the change has been completed	B.12.1.4 The CB shall cease use of the previous Accreditation letter and destroy it.	text edited
B.15		*All audits conducted by CVBs may be performed remotely in case of: -the climactic or socio-economic conditions are unfavorable and/or make them impossible, (for example for safety reasons: pandemics, country at war, conflict or instability, extreme weather condition); (FOOTNOTE 6) *In normal conditions B.15.1.1 applies	Some new content and some moved from B.15.2.1 Footnote 6 moved here, up from B.15.2.1

B.15.1.1	B15.1.1 The CVBs may conduct the following audits remotely: surveillance audit additional assessment follow-up audit	B15.1.1 The CVBs may conduct the following audits remotely: • surveillance audit • additional assessment - as a result of a complaint • follow-up audit - to verify implementation of a corrective action following a NC.	clarification added
B.15.1.2	B15.1.2 The CVBs shall not conduct the following audits remotely: initial audit renewal audit witness audit verification audit	B15.1.2 The CVBs shall not conduct the following audits remotely: • initial audit • reassessment audit • witness audit • verification audit	reworded
B.15.2.1	The climactic or socio-economic conditions are unfavorable and/or make them impossible, (for example for safety reasons: pandemics, country at war, conflict or instability, extreme weather condition).		moved up to B.15
B.15.2.1	B.15.2.1 The CVB may consider conducting a remote audit in the following possible situations: the CB has the capacity and technical resources (for example good internet connection) to be assessed remotely and secure access to the CB intranet for reviewing documentation can be granted the CB has a good certification system in the previous 2 years (for example in relation to the number of NCs, complaints, appeals) the climactic or socio-economic conditions are unfavorable and/or make them impossible, (for example for safety reasons: pandemics, country at war, conflict or instability, extreme weather condition)Footnote 6 low number of clients for its accreditation scope visiting sites with no key activities to be assessed in addition to the main site (for example distance between parts of a network, multi-sites, satellite office) would be very costly and would require an unreasonable amount of time visit is difficult to carry out within a given time frame or does not require on-site presence documentation review is not sufficient to take a decision on a minor change in current accreditation and requires interviews	B.15.2.1 The CVB may consider conducting a remote audit if the CB has the capacity and technical resources (for example good internet connection) to be assessed remotely with secure access to the CB intranet for reviewing documentation in any of the following possible situations: • the CB has a good certification system in the previous 2 years (for example in relation to the number of NCs, complaints, appeals) • CB system is not complex (for example number of operators, type of certification, grower group) • additional CB offices with no key activities • documentation review and interviews are sufficient to make a decision on a minor change in current accreditation	several clarification/edits made, some text moved to B.15 and footnote 6 moved up to B.15
B.15.2.7	B.15.2.7 ... with the exception of cases when the government authorities advise otherwise due to high risk of personal safety.	B.15.2.7 The CVB shall not schedule a remote audit at a CB with recurring and numerous issues (for example noncompliance, notice of intention to suspend, complaints, appeals)	removed redundant text, already mentioned in an above section
C.2.1.2	C.2.1.2 The CB shall require that the applicant provide all the relevant documents and information deemed essential to the assessment as described in subsection 344(2) of the SFCR. In addition, the application shall include the name(s) of CBs to which prior applications for certification were submitted by the applicant within the previous years, including all details pertaining to processing the application, and the resulting decision.	C.2.1.2 The CB shall require that the applicant provide all the relevant documents and information deemed essential to the assessment as described in subsection 344(2) of the SFCR. In addition, 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.	added reference to other schemes

C.2.1.5	C.2.1.5 The CB shall verify that the applicant does not hold a valid Canadian Organic Standards certificate for an identical/same product, issued by another CFIA accredited CB and if the product is certified as organic under another organic system.	C.2.1.5 The CB shall verify that the applicant does not hold a valid Canadian Organic Standards certificate for an identical/same product, issued by another CFIA accredited CB and if the product is certified as organic under another organic system (such as USDA NOP, EU, JAS etc.).	added reference to other schemes
C.2.2.6	C.2.2.6 The CB shall take responsibility for all input evaluation activities outsourced to a third party.	C.2.2.6 The CB shall take responsibility for all input evaluations including those activities outsourced to a third party.	added "including those"
C.2.2.8	The CB shall file a complaint to the CVB or directly to the CFIA if the CB has evidence that another CB has approved an ineligible input. The CVBs shall come to collective decision on the status of the input in timely manner.	The CB shall file a complaint to the CVB or directly to the CFIA if the CB has evidence that another CB has approved an ineligible input. If a CB becomes aware that another CB has rejected an input that they have accepted, the first CB can also submit a complaint.	New sentence added Part was moved to the new section C.2.2.8.1
C.2.2.8.1		C.2.2.8.1 The CBs and CVB(s) shall come to collective decision on the status of the input within 60 working days. The CVBs may consult technical experts with knowledge in inputs in order to reach an unbiased decision. Any costs/fees associated with this would be the responsibility of the complaining CB(s) if the complaint is found to be unfounded and by the CB(s) that improperly approved the input if the complaint is upheld. In case the CVBs and CBs cannot reach an agreement they can file a complaint with the CFIA.	New
C.2.2.22	C.2.2.22 The VO shall strive to review different commodity every year, if applicable. However, if justified by the VO, additional commodity(ies) may be included in this calculation. This justification shall be recorded in the inspection report.		section moved to C.2.2.23
C.2.2.22	C.2.2.22 The CB shall ensure that for applicants performing operations related to food preparation (processing and/or packaging), the VO calculates the input/output balance for acquired commodities and for the corresponding inputs included in the products sold and on inventory. The calculation sample shall include more than 1 run of the product and at least 1 prominent commodity. The VO shall strive to review different commodity every year, if applicable. However, if justified by the VO, additional commodity(ies) may be included in this calculation. This justification shall be recorded in the inspection report.	C.2.2.22 The CB shall ensure that for applicants performing operations related to food preparation (processing and/or packaging), the VO calculates the input/output balance for acquired commodities and for the corresponding inputs included in the products sold and on inventory. The calculation sample shall include more than 1 run of the product and at least 1 prominent commodity. In the case of initial application, where there is no organic product available during first inspection, the operator's system for input/output shall be verified. Input/output balance will be performed as soon as an organic product is available at first run. Certificate will only be issued upon condition that there will be a subsequent inspection when organic products are being run (production).	New information added. Clarifying traceback and in out balance sections to make them distinct from one another.
C.2.2.24	C.2.2.23 The CB shall ensure that the VO performs products/ingredients trace back audits while on site. 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. C.2.2.24 The CB shall ensure that the VO interviews people knowledgeable within the operation at the time of inspection.	C.2.2.23 The VO shall strive to review different commodity every year, if applicable. However, if justified by the VO, additional commodity(ies) may be included in this calculation. This justification shall be recorded in the inspection report. C.2.2.24 As per 4.4 of CAN/CGSB 32.310, the CB shall ensure that the VO performs products/ingredients trace back audits 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 in the case of first application where there is no organic product available during first inspection. Trace back audit will be performed as soon as an organic product is available at first run.	Former C.2.2.23 is now incorporated into C.2.2.24. Also edited to add more information and reference to 32.310 4.4
C.2.2.24-C.2.26			numbering change required: C.2.2.24 is now C.2.2.25, C.2.25 is now C.2.2.26, and C.2.2.26 is now C.2.2.27

C.2.2.26(former C.2.2.25)	C.2.2.25 The CB shall ensure that the VO: conducts a closing meeting at the end of the visit, intended 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 provides opportunity for the operator to confirm the accuracy of information collected during the inspection provides a summary of this review in writing to the operator	C.2.2.26 The CB shall ensure that at the end of the visit the VO conducts 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 • provide a summary of this review in writing to the operator	minor edits to text
C.2.2.27(former C.2.2.26)	C.2.2.26 The VO shall submit to the CB a report mentioning verification results and findings as to the conformity with all certification requirements, and including the following data as a minimum: date, time and duration of inspection names of interviewees (main representatives involved with the inspection) identification of land and premises visited on the production/handling site types of documentation audits performed (in/out balance sheet, yields/sales, trace back exercise, etc.) inspection results list of findings identified by the VO	C.2.2.27 The VO shall submit to the CB a report mentioning verification results and findings as to the conformity with all certification requirements, and including the following data as a minimum: • date, time and duration of inspection • names of interviewees (main representatives involved with the inspection) • identification of land and premises visited on the production/handling site • types of documentation audits performed (in/out balance sheet, yields/sales, trace back exercise, label review etc.) • inspection results • list of findings identified by the VO	added label review as an example of types of documentation audits performed
C.2.3.1	C.2.3.1 The CB shall inform the operator of all NCs and shall require from the operator to respond to the NC report issued by the Certification Body within 30 working days of its receipt. The response shall either provide evidence of completion of corrective action(s) 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 CB shall accept times greater than those stated for the closure of a NC as long as they are justified and documented.	C.2.3.1 The CB shall inform the operator of all NCs with reference to the applicable clause from the standard and shall require from the operator to respond to the NC report issued by the Certification Body within 30 working days of its receipt. The response shall either provide evidence of completion of corrective action(s) 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 CB shall accept times greater than those stated for the closure of a NC as long as they are justified and documented.	added "with reference to the applicable clause from the standard "
C.2.3.2		In the case where the operator requests and the CB grants a one time extension (SFCR 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.	New
C.2.3.3 (formerly C.2.3.2)		The CB shall ensure that corrective actions aiming to address all nonconformities have been implemented by the operator by conducting an on-site visit or other appropriate forms of verification.	Clause was previously under C.2.3.2
C.2.3.4 (formerly C.2.3.3)		The CB shall inform the applicant that at any point within the certification cycle, preceding the CB's decision, the applicant may request that the processing of its application be stopped. The applicant shall be informed that they are liable for the costs of services provided up to the time of withdrawal of its application. In such case, the CB shall not issue a decision regarding the products that were subject of the certification request.	Clause was previously under C.2.3.3
C.2.4.4	The CB shall provide the applicant with a certificate that confirms the certification of the organic product and/or certification of packaging and labelling activities of the organic product. These certificates shall include the following:	The CB shall provide the applicant with a certificate that confirms the certification of the organic product and/or certification of packaging and labelling activities of the organic product. In accordance with ISO 17065 7.7.1, these certificates shall include the following:	wording changes, added ISO reference 17065
		The wording "Pursuant to part 13 of the <i>Safe Food for Canadians Regulations</i> (SFCR)..."	New
		The name, address, and contact information of the certification body (as appears on the CFIA web site)	New/changed
		Certification number (as issued by the CB, it will vary by CB)	New

	The name of the holder of the certificate, whereby the holder is the legal name of the person(s) who produced/processed/packaged/labelled 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"	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"	wording changes, added address requirement and referencet to "traded"
		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.	Merged bullets
	A list of the certified products, which shall be identified by their specific product name and any trademarks under which they are marketed	A list of the certified products, which shall be identified by their specific product name and any trademarks under which they are marketed_Product names on certificates should coincide with label/shipping bill/import-export documentation	Merged bullets.
		The wording "Certified in accordance with the terms of the U.S.-Canada Organic Equivalency Arrangement" (when applicable)	New
		The applicable type of certification:	
	Organic insects	Insects	removed redundant word
		Trade of organic products (for example, importer, exporter, distributor)	New
		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)	wording changes - added "production units" and exceptions made for grower group
		the date by which the operator shall submit application for subsequent annual inspection as per 346 (1) of the SFCR	wording changes
		The following wording "This certification remains valid unless suspended or cancelled by the (INSERT THE NAME OF THE CB) pursuant to part 13 of the <i>Safe Food for Canadians Regulations</i> (SFCR)"	New
		Date, name and signature of CB representative	New
C.2.5.2	The CB shall require the holder of the certificate to submit the information specified in part 13 of the SFCR once every 12-month period, which begins on the day on which the certificate is issued. The CB shall require the holder of the certificate to submit 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 in a time frame specified by the CB and as appropriate to the nature of the operation.	The CB shall require 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 CB shall require the holder of the certificate to submit their intention to maintain certification <u>in writing</u> no later than the date that is 6 months prior to the end of that period and the completed recertification documentation in a time frame specified by the CB and as appropriate to the nature of the operation.	wording changes: added subsection 346 (1) in SFCR and "in writing"
C.2.6.1	C.2.6.1 In addition to the annual inspections the CB shall plan and conduct unannounced inspections representing 5% of the holders of certificates (minimum 1) to which CB grants certificates for products and/or packaging and labelling certificate under the COR. Exceptions to the 5% rule are listed in the table below.	C.2.6.1 In addition to the annual inspections the CB shall plan and conduct unannounced inspections representing 5% of the CB's clients to which CB grants certificates for products and/or packaging and labelling and/or attestation of compliance under the COR. Exceptions to the 5% rule are listed in the table below.	clarified the requirements
C.2.6.1 Table 7	1 unannounced inspection per accreditation cycle	1 unannounced inspection per CB accreditation cycle	specified "CB"

C.2.6.3	C.2.6.3 Unannounced inspections shall be limited in scope and shall cover only certain aspects of the operation. The criteria used in choosing operators for unannounced inspections shall be random, risk based, and as a result of a complaint or investigation. The CBs should apply a combination of all 3 above mentioned criteria when planning the unannounced inspections for each year. The CB is not obliged to disclose to the operator the reason for the unannounced or additional inspection.	C.2.6.3 Unannounced inspections shall be limited in scope and shall cover only certain aspects of the operation. Every year the operators for unannounced inspections shall be randomly selected based on risk, and/or as a result of a complaint or investigation. The CB may disclose to the operator the reason for the unannounced or additional inspection.	clarified the requirements
C.2.6.4	The CB shall consider the following examples when developing risk-based criteria for unannounced inspections, as a minimum:	The CB shall consider the following examples when developing risk-based criteria for unannounced inspections, as a minimum (list is not exhaustive):	wording changes
C.2.6.6	C.2.6.6 The CB shall comply with any requests from the CFIA or the CVB that additional inspections be conducted by the CB when the compliance of the operation is in doubt or for other valid reasons.	C.2.6.6 In addition to the scheduled 5% unannounced inspections, the CB shall comply with any requests from the CFIA or the CVB to conduct additional inspections (announced or unannounced) when the compliance of the operation is in doubt or for other valid reasons.	added further specifications regarding announced and unannounced
C.2.7.6	C.2.7.6 The CB shall have a legally binding contract with laboratory(s) that hold current accreditation to ISO/IEC 17025: 2005 - General Requirements for the Competence of Testing and Calibration of Laboratories, and for which the scope of accreditation allows for the testing of the specific substance in food.	C.2.7.6 The CB shall have a legally binding contract with laboratory(s) that hold current accreditation to ISO/IEC 17025: 2017 - General Requirements for the Competence of Testing and Calibration of Laboratories, and for which the scope of accreditation allows for the testing of the specific substance in food.	updated ISO 17025 date
C.2.7.7	CFIA accredited CBs must maintain records to demonstrate that they conduct chemical residue sampling and testing of their operators products and follow up on chemical residue results that were forwarded to them for action.	CFIA accredited CBs must maintain records to demonstrate that they conduct chemical residue sampling and testing of their operators products and follow up on chemical residue results that were forwarded to them for action. CBs must consider the guidance document "Directive 14-01: Procedure for follow-up on positive chemical residue results in organic products" and "Chemical residues and organic production" when following up on any chemical residue positive result.	New information and hyperlinks added.
C.2.8	C.2.8 Suspension and cancellation	C.2.8. Suspension, cancellation and reinstatement	added the word "reinstatement"
C.2.8.6		C.2.8.6 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 (sections 5.1.1 and 7.2.8). These 12 months must be under the oversight of a CFIA accredited certification body (CB).	new sections and content
C.2.8.7 (C.2.8.7.1-C.2.8.7.3)		C.2.8.7 A cancelled operator who wishes to be reinstated must apply as a new applicant. For food commodities that require an application to be filed 15 months before the day on which the food commodity is expected to be sold, CFIA interprets the requirements as follows: C.2.8.7.1 the production unit (the applicant) must be under CB 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 by the CB at the end of the 12 months). C.2.8.7.2 products harvested by the applicant during or prior to the start of the 12 months of oversight are conventional and cannot be marketed as organic. C.2.8.7.3 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.	new sections and content
C.8.4		The operator shall submit this information to the CB, the CVB or the CFIA upon request.	New

C.9.4	The CB shall maintain records of the following: • certificates newly issued, renewed, 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 nonconformities issued • number of samples collected • number of complaints • number of attestations issued	The CB shall maintain records of the following: • certificates newly issued, renewed, 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 nonconformities issued • number of samples collected • number of complaints • number of attestations of compliance issued	added the word "compliance"
C.9.5	The CB shall provide this information to the CVB or the CFIA upon request.	The CB shall submit this information to the CVB or the CFIA upon request.	Wording change
C.10.1.2	C.10.1.2 The operator, including those who intend to become part of a grower group, shall notify their current CB of their intent to change the CB and shall request a "letter of good standing" to be sent to the new CB (receiving), confirming that all nonconformities (NCs) and any contract conditions (for example, outstanding fees) have been addressed. The current CB shall send this letter directly to the new CB. If necessary, the receiving CB can directly request additional information to the sending CB.	C.10.1.2 The operator, including those who intend to become part of a grower group, shall notify their current CB of their intent to change the CB and shall request a "letter of good standing" (Appendix G) to be sent to the new CB (receiving), confirming that all nonconformities (NCs) and any contract conditions (for example, outstanding fees) have been addressed. The current CB shall send this letter directly to the new CB. If necessary, the receiving CB can directly request additional information to the sending CB.	added reference to Appendix G
C.12.1.5	All members of the grower group shall apply similar production systems and should be in geographical proximity. Only small farmers can be members of the group covered by group certification. Large farms can also belong to the group but have to be inspected annually by the CB.	All members of the grower group shall apply similar production systems and should be in geographical proximity to each other. Only small farmers can be members of the group covered by group certification. Large farms can also belong to the group but have to be inspected annually by the CB.	Wording changes
C.12.1.7	The grower group shall have in place an effective and documented internal control system.	The grower group shall have in place an effective and documented internal control system (ICS).	Abbreviation added
C.12.1.10	Participation in the grower group shall be limited to those members who market their organic production only through the grower group, unless the member is individually certified.	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 group of operators shall register to only one group of operators for a given product. The maximum size of a group of operators shall be 2 000 members.	New information added: size maximum. Previous info removed: "unless the member is individually certified"
C.12.2	Requirements for internal control system	Requirements for internal control system (ICS)	Abbreviation added
C.12.2.1	The grower group shall document 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 to ensure compliance with the Canada Organic Regime.	The grower group shall document and implement an internal control system (ICS) for supervision and documentation of production practices and inputs used at each sub-unit, and collected at each production unit, site, or facility. An identified person or body is responsible for verifying compliance with the Canada Organic Regime of each member of the group.	wording changes
C.12.2.3	The internal control system shall be implemented by competent personnel. Internal inspectors designated by the grower group shall carry out internal controls.	The internal control system shall be implemented by competent personnel including ICS manager and ICS inspectors. Internal inspectors designated by the grower group shall carry out internal controls.	wording changes
C.12.2.4	Adequate number of internal inspectors shall be identified from within the group. The internal inspectors shall be trained and, ensure that potential conflicts of interest are limited.	Adequate 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.	wording changes
C.12.2.5	The internal inspectors shall carry out at least 1 annual inspection visit to each individual operator including visits to fields and facilities.	The ICS inspectors shall carry out at least 1 annual on-site 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.	wording changes with new info.
C.12.2.6		The ICS inspectors shall draft internal inspection reports and submit it within a timeframe specified in the ICS to the ICS manager.	New

			Previously C.12.2.6, many additions made re: training requirements, approval of new members, record keeping requirements etc.
C.12.2.7 (formerly C.12.2.6)	The internal control system shall contain appropriate records including: production description, production and/or preparation specifications for products to which the application applies maps, description of the farms and the facilities of all members list of inputs (ingredients and agricultural substances) a copy of organic production and/or preparation plans remedial actions required by the CB during the previous certification cycle, as well as any corrective measures implemented by members concerning these requests a complete list of group members continuous verification of implementation of the internal inspections summary of the internal inspection reports	The internal control system shall contain appropriate records including: • production description, production and/or preparation specifications for products to which the application applies • maps, description of the farms and the facilities of all members • list of inputs (ingredients and agricultural substances) • a copy of organic production and/or preparation plans • 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) delivery of products from each member to the joint marketing system; (vi) placing on the market of products by the group of operators. • corrective actions required by the CB during the previous certification cycle, as well as any corrective measures implemented by members concerning these requests • a complete list of registered group members • continuous verification of implementation of the internal inspections • summary of the internal inspection reports including the date of the last internal inspection with the name of the ICS inspector • the training of members of the group on the ICS procedures and the requirements of COR • 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	
C.12.2.7-C.12.2.8			sections renumbered: C.12.2.7 is now C.12.2.8 C.12.2.8 is now C.12.2.9
C.12.2.9	The internal control system shall record all nonconformities. The ICS shall require from the operator 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.	The internal control system shall record all nonconformities. The ICS shall require the 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.	formerly C.12.2.8 edited "operator" to "member"
C.12.3.1	internal control system	ICS	
C.12.3.3	The percentage of group members subject to the initial certification inspection shall be based on the results of a risk assessment and the following calculations.	The number of group members subject to the initial certification inspection shall be based on the results of a risk assessment and the following calculations.	changed word "percentage" to "number"
C.12.3.3.1.1		•volume and value of the production; •the type of non-compliances	New additions for factors to consider
C.12.3.3.2	For normal risk situation, the percentage of group members subject to the initial certification inspection shall not be lower than the square root of the total number of units under the responsibility of the group.	For normal risk situation, the number of group members subject to the initial certification inspection shall not be lower than the square root of the total number of units under the responsibility of the group.	changed word "percentage" to "number"
C.12.3.5.4	all noncompliance have been dealt with appropriately by the internal control system	noncompliances have been dealt with appropriately by the ICS	wording changes

C.12.3.5.5	inspection records have been maintained by the internal control system	inspection records have been maintained up to date by the ICS	wording changes
	The VO shall carry out a witness audit to determine whether the inspections of the internal control system are conducted as written.	The VO shall carry out a witness audit to determine whether the inspections of the ICS are conducted as written by competent ICS inspectors.	wording changes
C.12.3.6			
			New information added. Minimum number of members selected is now defined as square root total number of members multiplied by 1.5. Wording referencing "operators" was changed to "members".
C.12.4.1	Each year the CB shall define and justify a risk-based sample of members subject to annual inspection to assess the effectiveness of the ICS.	Each year the CB shall define and justify a risk-based sample of members subject to annual inspection to assess the effectiveness of the ICS. The minimum number of members subject to annual CB inspection shall be square root of the total number of members multiplied by 1.5.	
C.12.4.2 (formerly C.12.4.3)			Former C.12.4.3 is now C.12.4.2, and vice versa.
C.12.4.2 (formerly C.12.4.3)	In cases of high risk situations the CB may increase the percentage 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 grower members).	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).	minor wording changes
C.12.6.1	C.12.6.1 The CB shall provide certification documents to the grower group as a whole. Members within a grower group that have had its operations or product certified cannot possess individual certificates unless that member has obtained its own certification independent from the grower group.	C.12.6.1 The CB shall provide certification documents to the grower group as a whole. Members within a grower group that have had its operations or product certified cannot possess individual certificates unless that member has obtained its own certification independent from the grower group for a different product.	added 'for a different product'
C.12.7.3	The CB shall suspend or cancel the certification granted to the grower group as a whole, in accordance with part 13 of the SFCR, in cases where the grower group's internal control system fails to act on these noncompliance.	The CB shall suspend or cancel the certification granted to the grower group as a whole, in accordance with part 13 of the SFCR, in cases where the grower group's internal control system fails to act on these non-compliances.	wording changes
			wording changes to match C.2.4.4
Appendix A: Certificate Template - Informa	Organic Certificate template	Organic Certificate Pursuant to part 13 of the Safe Food for Canadians Regulations (SFCR) Issued by: ... (Insert CB name, address, contact information) Certification number: ... Certificate Holder name and address: ... This certification is based on compliance with CAN/CGSB 32.310 / CAN/CGSB 32.311 General Principles and Management Standards and Permitted Substances Lists and/or CAN/CGSB 32.312 Organic Production Systems -Aquaculture - General principles, management standards and permitted substances lists and (if/when applicable) Certified in accordance with the terms of the U.S.-Canada Organic Equivalence Arrangement Certification type and % organic content: ... (Product addendum listing all certified products, including trademarks) (Location of all production units covered by this certification (address, town, province/state, country) (includes but is not limited to: all production, processing, harvest and storage sites) (not applicable to grower group members) Date on which the updated certificate is issued: ... Date by which the operator shall submit application for subsequent annual inspection: ... This certification remains valid unless suspended or cancelled by the ... (Insert the name of the CB) pursuant to part 13 of the Safe Food for Canadians Regulations (SFCR) Signed by (name and signature): (CB authorized representative) Dated:	

Appendix B: Attestation of compliance template - Informative		Appendix B — Attestation of compliance template - Informative	minor wording changes
Appendix C: The family of certification of documents		An operation must hold more than one certification document depending on the specific activities in which they are involved in. For example, an organic product certificate cannot cover activities done on products that are not under the ownership of the person doing the activity. Depending on the scenario, a Packaging and labelling certificate and/or an Attestation must be issued.	New
Table 10 scenario 9	Organic product certificate The brand owner may apply for product certification and sell the product under this documentation. It is not necessary to disclose the name and address of the original supplier on the packaging as long as the brand owner's name and address is included. The label must display the name of the CB which issued the final organic product certificate. The certification is not mandatory if the name and address of the original supplier is disclosed on the final packaging.	Organic product certificate Brand owner may apply for certification of the product, however, it is not mandatory. When the brand owner is a certificate holder, it is not necessary to disclose the name and address of the original supplier on the packaging as long as the brand owner's name and address is included. When the brand owner is not a certificate holder, for consumer access to information about the product, consideration could be given to providing the name and address of the original supplier on the final packaging. The label must display the name of the CB which issued the final organic product certificate.	wording changes with new information
Table 10 scenario 11	Contract service providers that only package and label organic products on behalf of the organic product certificate holder	Contract service providers that package and label organic products on behalf of the organic product certificate holder (as per SFCR 344 (2) (d))	wording changes with new information
Table 10 scenario 12	Contract service providers (for example for slaughter, transport, storage, seed cleaning, etc. excluding packaging and labelling) who perform contractual work for operators in relation to certified organic products but the ownership of the product continuously rests with the holder of the organic certificate.	Contract service providers excluding packaging and labelling (for example for slaughter, transport, storage, seed cleaning, etc.) who perform contractual work for operators in relation to certified organic products but the ownership of the product continuously rests with the holder of the organic certificate. Note: complex operations depending on individual circumstances are required to hold more than one type of document (for example, a butcher who provides the services of meat cutting AND packaging and labelling of products on behalf of an organic product certificate holder).	wording changes with new information
Appendix D - CB management of nonconformities and enforcement actions under the Canada Organic Regime (and description)	working days	days	flow chart is updated certain references to "working days" are now "days"
Appendix E - CVB Management of nonconformities and enforcement actions under the Canada Organic Regime (Initial Application/Reassessment for Accreditation (First part))	working days	days	flow chart is updated certain references to "working days" are now "days"
Description for flow chart showing CVB management of nonconformities and enforcement actions under the Canada Organic Regime Appendix E: Initial Application / Reassessment for Accreditation (1st part):	working days	days	certain references to "working days" are now "days"

Appendix F: CVB Management of nonconformities and enforcement actions under the Canada Organic Regime (Surveillance and Monitoring / Reassessment for Accreditation (Second part))	working days	days	flow chart is updated certain references to "working days" are now "days"
Description for flow chart showing CVB management of nonconformities and enforcement actions under the Canada Organic Regime Appendix F: Surveillance and monitoring / Reassessment for Accreditation (2nd part):	working days	days	certain references to "working days" are now "days"
Appendix G - Letter of good standing for an operator changing CB under the Canada Organic Regime (Template)	Appendix G - Letter of good standing for an operator changing CB under the Canada Organic Regime (Template)	Appendix G - Letter of good standing for an operator changing CB under the Canada Organic Regime (Template) - Informative	added "Informative"