



CONTROLLED DOCUMENT

CSI ORGANIC CERTIFICATION POLICY MANUAL

CSI
QUALITY SYSTEM PROCEDURE

ORG-QSP 10.1.0

Centre for Systems Integration
200 - 240 Catherine Street
Ottawa, Ontario
K2P 2G8

September 7, 2016

Revision 15.0

© 2016 CENTRE FOR SYSTEMS INTEGRATION "ALL RIGHTS RESERVED"

TABLE OF CONTENTS

REVIEW	5
AMENDMENT RECORD	6
DISTRIBUTION	7
ACRONYMS	8
1 INTRODUCTION	9
1.1 SCOPE	9
1.2 REFERENCES	9
1.3 DEFINITIONS	9
2 OVERVIEW OF ORGANIC CERTIFICATION AND CSI	10
2.1 WHAT DOES “CERTIFIED ORGANIC” MEAN?	10
2.2 ABOUT THE CENTRE FOR SYSTEMS INTEGRATION	10
2.2.1 <i>Scope of the CSI Organic Certification Program</i>	11
2.2.2 <i>Legal Structure and Finances</i>	11
2.3 SERVICES NOT PROVIDED BY CSI	11
2.4 CONTACTING CSI	12
3 ORGANIC CERTIFICATION APPLICATION PROCESS	12
3.1.1 <i>Initial Application Overview</i>	12
3.1.2 <i>Renewal Application Overview</i>	12
3.1.3 <i>Information Exchange</i>	12
3.1.4 <i>Requirements When an Operator Changes CBs</i>	13
4 APPLICATION DATES	14
4.1 NEW AND CONTINUING APPLICATIONS	14
4.2 LATE APPLICATION	15
5 CERTIFICATION FEES	15
5.1 BASE CLIENT AND CLIENT SCOPE FEES – PRODUCERS AND PROCESSORS	16
5.2 ADDITIONAL CERTIFICATION FEES	19
5.2.1 <i>Certificate Fees</i>	19
5.2.2 <i>Products, Ingredients, Label and Input Review Fees</i>	19
5.3 INPUT MATERIAL REVIEW FEES	20
5.4 OTHER FEES	20
5.5 INSPECTION CHARGES	21
5.5.1 <i>T3 (Crop Producers) and First Certification Inspections</i>	21
5.5.2 <i>Recertification Inspections</i>	22
5.5.3 <i>Additional Inspection Charges</i>	23
5.6 NON-REFUNDABLE FEES	23
5.7 REFUNDABLE FEES	23
5.7.1 <i>Withdrawal before Initial Review</i>	23
5.7.2 <i>Withdrawal after Initial Review but Prior to On-Site Inspection</i>	23
5.7.3 <i>Withdrawal after On-Site Inspection but Prior to Certification Review</i>	24
5.7.4 <i>Withdrawal after Certification Review</i>	24
5.7.5 <i>Withdrawal after Certification is Granted or Denied</i>	24
5.8 FEES FOR ON-FARM PROCESSING	24
5.9 FEES FOR OPERATIONS SUBCONTRACTED BY A CSI CERTIFIED OPERATION	24
6 CERTIFICATION POLICIES AND PROCEDURES	25
6.1 GENERAL CONDITIONS FOR CERTIFICATION	25

6.2	INITIAL CERTIFICATION	25
6.2.1	<i>Application for Initial Certification</i>	25
6.2.2	<i>Organic System Plan Review prior to inspection</i>	26
6.2.3	<i>Assigning Inspectors</i>	26
6.2.4	<i>Scheduling Inspections</i>	27
6.2.5	<i>Conducting the On-site Inspection</i>	28
6.2.6	<i>Granting Initial Certification</i>	28
6.2.7	<i>Certification Package</i>	29
6.2.8	<i>Denial of Initial Certification</i>	30
6.2.9	<i>Withdrawal of Application for Initial Certification</i>	31
6.3	RENEWAL OF CERTIFICATION	31
6.3.1	<i>Renewal Procedure</i>	31
6.3.2	<i>Granting Continued Certification</i>	32
6.3.3	<i>Notification of Issues of Non-Compliance</i>	32
6.3.4	<i>Resolution</i>	33
6.3.5	<i>Proposed Suspension</i>	33
6.3.6	<i>Suspension and Cancellation</i>	33
6.4	COMMUNICATIONS WITH CFIA	34
6.5	VOLUNTARY WITHDRAWAL OF ORGANIC CERTIFICATION	35
6.6	EXTENSIONS AND REVISIONS TO CERTIFICATION	35
6.6.1	<i>Processed Products Made in a Certified Organic Facility</i>	36
6.6.2	<i>Processed Products Made in a Facility Not Inspected by a Certification Body</i>	36
6.6.3	<i>New Crops on Existing Fields Listed on the System Plan</i>	36
6.6.4	<i>Livestock</i>	36
6.6.5	<i>New Acreage or Location</i>	36
6.6.6	<i>Deleting Acreage or Type of Certification</i>	36
6.7	IMPARTIALITY COMMITTEE	36
6.7.1	<i>Appeals to the CSI Impartiality Committee</i>	37
7	MATERIALS REVIEW AND APPROVAL	37
7.1	COMMERCIAL MATERIAL REVIEW AND APPROVAL FOR USE IN CERTIFIED ORGANIC OPERATIONS	37
8	SURVEILLANCE AND TESTING	38
8.1	ON-SITE INSPECTIONS	38
8.2	SCHEDULING INSPECTIONS	38
8.3	INFORMATION PROVIDED TO THE INSPECTOR	38
8.4	VERIFICATION OF INFORMATION DURING AN INSPECTION	39
8.5	EXIT INTERVIEW	39
8.6	ADDITIONAL DOCUMENTS PROVIDED TO THE INSPECTED OPERATION	39
8.7	INSPECTION REPORT	39
8.8	INSPECTOR QUALIFICATIONS	39
8.9	CONFIDENTIALITY DURING INSPECTIONS	39
8.10	CONTRACTING INSPECTORS	40
8.11	INVESTIGATION OF CERTIFIED OPERATIONS	40
8.12	UNANNOUNCED INSPECTIONS	40
8.13	CONDUCTING AND REPORTING UNANNOUNCED INSPECTIONS	41
8.14	INSPECTION AND TESTING OF AGRICULTURAL PRODUCTS	42
8.15	TESTING RESULTS	43
9	LABELLING	43
9.1	USE OF CSI NAME AND LOGO	43
9.2	CSI PRIVATE LABELLING POLICY	44
10	OTHER CERTIFICATION BODIES	45
11	NON-DISCRIMINATION POLICY	45

12	CONFIDENTIALITY	45
13	CONFLICT OF INTEREST	46
14	COMPLAINTS, DISPUTES AND APPEALS	46
15	REPORTING TO COMPETENT AUTHORITIES	46

REVIEW

This CSI Quality System Procedure (QSP) is subject to periodic review to verify the activities described therein in order to 1) meet the described objectives; and 2) continue to be the best activity to achieve the described objectives. Amendments will be issued to ensure the QSP continues to meet current needs.

ENDORSEMENT

This CSI Quality System Procedure is hereby approved.

A handwritten signature in blue ink, appearing to read 'Roy van Wyk', is written over a large, faint circular watermark or stamp.

Roy van Wyk
Executive Director

Date: September 7, 2016

AMENDMENT RECORD

The Quality Manager is responsible for all revisions and amendments of this document. Amendments to this procedure will be given a consecutive number and will be dated. This record is updated only to reflect minor changes made to the quality manual in between major revisions (i.e. noted as “1.1” for a minor change to revision 1.0).

Amendment No:	Amendment Content and Pages:	Entered by:	Date:
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

DISTRIBUTION

Executive Director, CSI
Organic Program Manager, CSI
Certification Personnel, CSI
CSI Organic Inspectors
CSI Certified Organic Operations

ACRONYMS

CFIA	Canadian Food Inspection Agency
CGSB	Canadian General Standards Board
COO	Canada Organic Office
COR	Canada Organic Regime
CSI	Canadian Seed Institute doing business as Centre for Systems Integration
EC	European Council / European Commission
EU	European Union
IOIA	Independent Organic Inspectors Association
IRCA	International Register of Certified Auditors
JAS	Japanese Agricultural Standards
MAFF	Ministry of Agriculture, Fisheries and Forestry of Japan
NOP	National Organic Program
OPR	Organic Products Regulations
QMS	Quality Management System
QSP	Quality System Procedure
QM	Quality Manager
RAB	Registrar Accreditation Board
RSE	Registered Seed Establishment
SWI	Specific Work Instruction
USDA	United States Department of Agriculture

1 INTRODUCTION

The CSI organic certification program is designed to provide unbiased third-party inspections for organic certification of farms and processors under the Canadian Organic Regime (Organic Products Regulations, 2009, CAN/CGSB-32.310 and CAN/CGSB-32.311), and all equivalency arrangements negotiated between the Canadian Organic Regime (COR) and various trading partners (e.g. NOP, EU, JAS, etc.). The purpose of this policy manual is to define the responsibilities and activities which comprise the certification of organic farm, livestock and processor applicants.

1.1 Scope

This QSP outlines the application and certification procedures for clients who apply to CSI for certification as an organic farm, livestock operator or organic processor under the Canadian Organic Regime.

1.2 References

The publications referred to in the development of this CSI policy manual include the CFIA Organic Products Regulations, the COO Operating Manual, all current CFIA policy directives, the Canadian Organic Standard (CAN/CGSB-32.310), the Permitted Substances Lists (CAN/CGSB-32.311) and all pertinent equivalency arrangement criteria.

1.3 Definitions

For the purposes of this CSI Quality System Procedure, the definitions in the Organic Products Regulations, 2009 and the Canadian Organic Standard (CAN/CGSB-32.310) apply, as well as the following:

Applicant: The entity wishing to apply to CSI and become certified as an organic producer or processor, as a packager/labeller, or be issued an attestation of compliance.

Certification: A determination made by a certification body that a production or processing operation is in compliance with the Canadian Organic Regime and all applicable equivalency arrangement criteria.

Certification Director: Person(s) responsible for determining certification of an applicant's production or products based on the recommendation of a Report Reviewer.

Competent Authority: Canadian Food Inspection Agency

Inspector: Person responsible for conducting an inspection of an applicant for organic certification in accordance with ORG-SWI 10.1.1; also referred to by CFIA as a verification officer (VO).

Organic Program Manager: Person with the responsibility for managing the operations of the organic certification program, in cooperation with the certification personnel and office staff, including inspector assignments; annual assessment of competence of the certification personnel, inspectors and certification director; planning unannounced inspections; communications with CFIA and the SIC; etc.

Operator: An entity which is certified as meeting an organic standard.

Report Reviewer: Person responsible for reviewing the inspection report, identifying the non-compliance(s), issuing the notice of non-compliance, verifying closure of the non-compliance(s) and making a recommendation to the Certification Director.

Review Committee: Committee consisting of the Organic Program Manager, at least one Report Reviewer and any other competent individuals as may be required to review a submitted inspection report, and make a determination of compliance. The inspector(s) who conducted the inspection under review may not be part of the review committee.

2 OVERVIEW OF ORGANIC CERTIFICATION AND CSI

2.1 What does “certified organic” mean?

Organic certification is defined by the Canada organic standard:

“Organic production is a holistic system designed to optimize the productivity and fitness of diverse communities within the agro-ecosystem, including soil organisms, plants, livestock and people. The principal goal of organic production is to develop operations that are sustainable and harmonious with the environment.” *CAN/CGSB-32.310-2015 Introduction*

2.2 About the Centre for Systems Integration

Centre for Systems Integration (CSI) is a division of the Canadian Seed Institute. CSI is accredited as an organic certification body by the Canadian Food Inspection Agency (CFIA).

Our mission is:

To assure the integrity of organic agricultural production and processing, CSI will:

- Maintain organic certification programs to inform producers and processors on the requirements for producing organic agricultural products in accordance with applicable organic laws;
- Provide annual independent third-party inspections of producers and processors of organic agricultural products;
- Certify producers and processors as meeting the organic standards and applicable laws.

2.2.1 Scope of the CSI Organic Certification Program

CSI certifies all products that fall within the scope of the Canada Organic Regime according to the Organic Products Regulations, 2009, CAN/CGSB-32.310 and CAN/CGSB-32.311, including all equivalency arrangements negotiated by CFIA.

2.2.2 Legal Structure and Finances

The Centre for Systems Integration is a division of the Canadian Seed Institute. CSI is organized as a federal not-for-profit corporation in Canada. CSI is governed by a Board of Directors appointed by industry associations, in accordance with CSI's by-laws. The financial affairs of the organization are managed by the Executive Director in consultation with the CSI Board of Directors. The Executive Director contracts with an accounting firm, selected by the Board of Directors, who prepares tax returns, financial reports and budget analyses as needed. The Executive Director also hires a bookkeeper to perform general bookkeeping.

2.2.3 Notification of Regulatory or Standard Amendments or Interpretations

CSI is obligated to notify its certified operations of any amendments made to those regulations or standards that affect the operation's certification within two months after their publication. Operators are allowed up to 12 months after the publication date of an amendment to CAN/CGSB-32.310 and CAN/CGSB-32.311 to come into compliance with any changes. CSI provides links to all applicable standards and regulations on its website. A link is provided to the proposed and published Questions and Answers from the Standards Interpretations Committee (SIC).

If interpretation of a standard is required at any point during the certification activities, CSI submits a question to the SIC in accordance with the COO Operating Manual. Any issue subject to a question of interpretation will be placed on hold until a final response from the SIC is returned. All certification activities shall continue as normal while a question is under discussion by the SIC. Once the final interpretation is published, the result will be communicated to the affected operator(s), and CSI and/or the operator will take appropriate actions as required by the final interpretation.

If changes are required by the operator to comply with the final interpretation, the operator's certification shall not be suspended or cancel certification issued that is affected by the interpretation so long as the operator undertakes the required changes in a time frame established by CSI in accordance with normal non-compliance procedures.

2.3 Services not provided by CSI

- CSI does not provide consultation on overcoming identified barriers to certification.
- CSI does not provide counseling or consultation on organic production.
- CSI does not provide referrals to commercial providers of products or services.
- CSI does not engage in buying, selling, brokering or marketing of products.
- CSI does not release confidential information without prior consent from the operator.

2.4 Contacting CSI

CSI invites comments and questions from consumers, producers and/or processors interested in organic certification. Inquiries may be directed to the CSI head office in Ottawa, Ontario or to the Organic Program Manager. Contact information is available on the CSI website:

[Centre for Systems Integration - Contact information](#)

3 ORGANIC CERTIFICATION APPLICATION PROCESS

3.1 Application

3.1.1 Initial Application Overview

New applicants are provided with access to the application forms appropriate to their scope.

The applicant may withdraw their application at any time. An applicant who withdraws their application shall be liable for the costs of services provided up to the time of withdrawal (see sections 6.6 and 6.7).

The application and certification decision process for new applicants is summarized in the new applicant certification flowchart (ORG_27A), available on the CSI website.

3.1.2 Renewal Application Overview

To renew certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to CSI:

- A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic plan during the previous year; and any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year; and
- Other information as deemed necessary by CSI to determine compliance with the applicable organic standards.

The renewal process for certified operations is summarized in the recertification process flowchart (ORG_27B), available on the CSI website.

3.1.3 Information Exchange

CSI shall exchange information with other CBs and/or CFIA to verify the validity of the information provided by an applicant or a certified operator, as necessary.

3.1.4 Requirements When an Operator Changes CBs

A. Transfers to CSI

If an operator wishes to change to CSI as their certification body, they shall follow the procedure for an initial applicant with CSI as described. The operator shall notify their current CB of their intent to change to CSI, and provide CSI with a copy of this correspondence. CSI must receive a letter of good standing from the applicant's previous CB in order to proceed with the application. The operator shall fulfill the requirements of the current CB to maintain their certification until CSI has issued a certificate and product list. CSI shall ensure that any previous issues of non-compliance have been satisfactorily closed with the previous CB before proceeding with a certification decision, including failure on the part of the applicant to pay any fees owing to the previous CB.

CSI shall notify the previous CB when a certification decision has been made.

The operator is not permitted to use up existing supplies of labels once certification has been changed to CSI.

B. Transfers from CSI to another CB

If an operator wishes to change to another CB from CSI, certification will continue with CSI under the terms of the service contract until CSI is notified by the operator or the new CB that certification has been granted. CSI shall provide the operator requesting a transfer with a letter of good standing if appropriate. CSI shall require the operator to return any documents confirming the organic certification that had previously been issued. Also, the operator is required to stop immediately the use of any labels or advertising which identify CSI in relation to any products the operator markets.

3.2 Surveillance

CSI requires an operator to provide updated information relating to the organic system plan with regards to any of the changes cited below:

- Changes significantly affecting the product's design or specification;
- Changes in the standards to which compliance of the product is certified;
- Changes in the ownership, structure or management of the operator; or
- Any other information that becomes known to CSI indicating that the product may no longer comply with the requirements of the certification system.

CSI shall determine if the proposed changes require further review, inspection or amendment to certification. If such is the case, the operator shall not be allowed to release certified products resulting from the changes identified until CSI has notified the operator accordingly. Surveillance activities to determine the effects of any such changes include, as appropriate, inspection and/or assessment of the production system.

Surveillance activities shall be adapted to each situation, taking into account complexity of the product, maturity of the normative documents, experience of the operator, life cycle of the product and changing of technology.

CSI's surveillance activities include regular inspections, unannounced inspections, investigative inspections and sampling and testing. These activities are described in section 8 of this document.

All aspects of a production unit are subject to scrutiny during the inspection, including both organic and non-organic activities. All land, premises and equipment not included in the certification application shall be identified and checked, including crop areas or harvesting zones; storage locations; preparation, processing and packaging sites; and application dates for pest control products. Increased surveillance shall be applied to operations during the inspection where the inspector has identified potential risks. Potential high-risk situations in agriculture and processing include:

- Split production, increasing the risk of commingling or contact with prohibited substances (either declared or suspected, if undeclared);
- Intensive production and/or high dependence on external inputs.

The inspection of high-risk operations shall include the following aspects, when they belong to the same production unit:

- i. Adjacent crop areas or collection zones
- ii. Follow-up of the use of crop production aids
- iii. Follow-up of the use of medication in livestock
- iv. Premises and equipment
- v. Handling and storage locations of harvests (organic and non-organic)
- vi. Preparation areas where processing or packaging operations take place
- vii. Administrative follow-up regarding related activities such as storage and sales to verify whether documentation is well-managed and makes clear distinctions between organic and non-organic products.

4 APPLICATION DATES

4.1 New and Continuing Applications

New applications for certification are accepted at any time and will be processed immediately. However, the length of time between application and certification depends on several factors, including the time of year, the completeness of the application, an inspector's schedule in the producer's area, and the requirements of the relevant scheme to which the applicant is requesting certification. All on-site inspections must take place when the operation's production practices and compliance with the regulations can be observed.

For continuation of certification of producers, CSI will send a notification letter and appropriate forms, field lists and input lists in February of each year, to be returned to CSI by **April 30th** of that same year.

For continuation of certification of processors, CSI will send a notification letter, input and/or product reports from the database, and recertification forms to clients at least **60 days prior** to the anniversary date of the previous year's inspection.

For clients issued a packager/labeler certificate or an attestation of compliance, the certificate is re-issued on **March 31st** of each year, and an inspection of the operation must take place within 12 months of the original inspection date.

4.2 Late Application

Applications are processed so they can be assigned to inspectors based on geographic location and type of operation. Late applications can greatly decrease the efficiency of the certification process. Applicants are encouraged to make every effort to submit their application materials on time.

Applications for continued certification submitted after the producer deadline of April 30 or after the 12-month anniversary of the last inspection date for processors shall be accepted if accompanied by a request deemed reasonable by CSI for late submission. Late submission of an application without a documented, justifiable reason for extension beyond the 12-month interval between inspections may result in a suspension of certification for operations applying for continuation of certification.

5 CERTIFICATION FEES

CSI's revenue is generated through certification fees. Certification fees are made up of three components:

- Base Client Fees;
- Client Scope Fees; and
- Certificate Fees.

All certification fees outlined in section 5.2 apply to all clients and as do any other fees listed after section 5.2.

A deposit of \$325 is required at the time of submission of the application. The deposit will be applied to the final total amount owing for the certification. After the operation is inspected, the applicant will be invoiced for the base client fee, the client scope fee, certification fee and any other applicable fees that are still outstanding.

GST or HST, depending on the province where the operator is located, is applicable to all fees assessed.

5.1 Base Client and Client Scope Fees – Producers and Processors

5.1.1 First Year Fees

5.1.1.2 Producers

Application Fee	\$ 325
Crop or Maple Acreage Fee* (added to the base farm fee)	Fee
1 - 50 acres	\$ 300
51 – 100 acres	\$ 550
101 - 300 acres	\$ 650
301 - 400 acres	\$ 750
401 - 500 acres	\$ 800
501 - 600 acres	\$ 850
601 - 1000 acres	\$ 1025
1000 - 2000 acres	\$ 1200
Greater than 2001 acres	\$ 1500

* Above fees apply only to the farm areas included in the application

Livestock/Poultry Additional Fees

Dairy	\$ 750
Other Livestock / Poultry Operations (with pasture)	\$ 600
Other Livestock (with pasture, 20 animals or less)	\$ 250
Other Livestock (without pasture)	\$ 850

Other Farm Scope Certification Fees

Greenhouse (per building) / Apiculture / Sprouts / Wild Crop	\$ 250
Mushroom Production (for primary installation)	\$ 1300
Mushroom Production (for additional buildings within 50 km of primary installation)	\$ 250
Basic On-Farm Handling (e.g. washing, packaging and labelling)	\$ 200
Subcontracted Off-Farm Processing plus cost of inspection (\$65 per hour)	\$ 200

For CSI clients, the cost of the inspection is included in the assessed fees identified above, unless a specific inspection fee is identified for an activity. However, inadequate preparation (incomplete records, undeclared inputs etc.) on the part of the applicant, undeclared subcontractor arrangements, or unforeseen problems that arise during the inspection or review process, may result in additional fees being assessed.

Additional Inspection Fee – per hour	\$ 65
--------------------------------------	--------------

5.1.1.2 Processors

CSI divides processor certification into different categories:

- a) Packaging and/or labelling
- b) Basic processor (i.e. single ingredient products)
- c) Complex processor (multi-ingredient products; 2 product categories or less)
- d) Complex processor (multi-ingredient products; more than 2 product categories)
- e) Attestation of compliance

A product category is defined as a group of products that are similar in ingredient composition. Please speak with a CSI representative to determine which category of processor is applicable.

	Fee
Packaging / Labelling	\$ 900
Subcontractor (plus cost of inspection \$65 per hour)	\$ 200
Basic Processor	\$ 1300
Complex Processor (2 product categories or less)	\$ 1500
Complex Processor with more than 2 products categories	\$ 2000

For CSI clients, the cost of the inspection is included in the assessed fees identified above, unless a specific inspection fee is identified for an activity. However, inadequate preparation (incomplete records, undeclared inputs etc.) on the part of the applicant, undeclared subcontractor arrangements or unforeseen problems that arise during the inspection or review process, may result in an additional fee being charged assessed.

Additional Inspection Fee – per hour	\$ 65
--------------------------------------	--------------

5.1.2 Second Year Fees for CSI clients or Previously Certified Clients

These fees are applicable to CSI clients in the years following their initial application, as well as to operators who decide to become certified through CSI when they have been certified by another CB the year previous, and have switched CBs with their certification in good standing.

5.1.2.1 Producers

Application Fee	\$ 325
Crop or Maple Acreage Fee* (added to the base farm fee)	Fee
1 – 50 acres	\$ 200
51 - 100 acres	\$ 450
101 - 300 acres	\$ 550
301 - 400 acres	\$ 650

401 - 500 acres	\$ 700
501 - 600 acres	\$ 750
601 - 1000 acres	\$ 925
1000 - 2000 acres	\$ 1200
Greater than 2001 acres	\$ 1500

* Above fees apply only to the farm areas included in the application

Livestock/Poultry Additional Fee

Dairy	\$ 650
Other Livestock / Poultry Operations (with pasture)	\$ 550
Other Livestock (with pasture, 20 animals or less)	\$ 200
Other Livestock (without pasture)	\$ 800

Other Farm Scope Certification Fees

Greenhouse (per building) / Apiculture / Sprouts / Wild Crops	\$ 225
Mushroom Production	\$ 1200
Basic On-Farm Handling (e.g. washing, packaging and labelling)	\$ 200
Subcontracted arrangements (plus cost of inspection)	\$ 200

For CSI clients, the cost of the inspection is included in the assessed fees identified above, unless a specific inspection fee is identified for an activity. However, inadequate preparation (incomplete records, undeclared inputs etc.) on the part of the applicant, undeclared subcontractor arrangements or unforeseen problems that arise during the inspection or review process, may result in an additional fee being charged assessed.

Additional Inspection Fee – per hour	\$ 65
--------------------------------------	-------

5.1.2.2 Processors

	Fee
Packaging/Labelling	\$ 800
Subcontractor (plus cost of inspection \$65 per hour)	\$ 200
Basic Processor	\$ 1200
Complex Processor (2 product categories or less)	\$ 1400
Complex Processor (more than 2 product categories)	\$ 1800

For CSI clients, the cost of the inspection is included in the assessed fees identified above, unless a specific inspection fee is identified for an activity. However, inadequate preparation (incomplete records, undeclared inputs etc.) on the part of the applicant, undeclared subcontractor arrangements or unforeseen problems that arise during the inspection or review process, may result in an additional fee being charged assessed.

Additional Inspection Fee – per hour	\$ 65
--------------------------------------	-------

5.2 Additional Certification Fees

5.2.1 Certificate Fees

Certification Fees

CDN Certificate Fee	\$ 50
CDN Attestation of Compliance Certificate Fee	\$ 50
Equivalency Certificate Fee (per arrangement)	\$ 50
Bio-Suisse Verification Fee	\$ 350

5.2.1.1 Attestation of Compliance

The attestation of compliance fee is applicable to operations who do not meet the requirements for issuance of either a processor certificate or a packager/labeler certificate, and are a service provider, such as custom seed cleaning operations, warehouses or distributors, traders, transportation providers, slaughter facilities, etc.

In order to receive an attestation of compliance, an operator must make application using the CSI processor or packager/labeler forms, and select the “Attestation of Compliance” option. All procedures for receiving applications, conducting inspections, reviewing files and making decisions of compliance shall be the same as the procedures for certification of a processor. All conditions concerning identification and issuance of non-compliances, suspension and/or cancellation of an attestation of compliance shall also follow the same procedures as for certified operations.

Attestations of compliance expire after a 12-month period, and are renewable annually.

CSI will accept an attestation of compliance from any other CFIA accredited CB as evidence that the operation in question meets the requirements of the OPR, and no further verification is required by CSI of that operation.

5.2.2 Products, Ingredients, Label and Input Review Fees

For CSI clients, the cost of the products, ingredients, labels and input reviews is generally included in the fees listed above. However, additional time may be required by CSI:

- To review incomplete product profiles, ingredient information, labels or input records;
- To complete product label, product profile or input reviews when the number of labels, ingredients or inputs exceeds 10; or
- Other unforeseen circumstances that increase the amount of time to complete a review.

When such situations arise, an additional fee of \$16 per input material review or label will be assessed to the operator. Other additional work required on an operator’s file outside of an inspection may be subject to an hourly fee of \$60. Prior to assessing any additional fees, CSI will discuss the reasons for the extra time required and the additional fees with the client.

5.3 Input Material Review Fees

These fees apply only to an operation that requests formal approval by CSI of its input product for commercial purposes. These fees do not apply to inputs that are used by certified operations as part of their farm or processor certification.

Material Review Fees

Commercial Material Review and Approval for Use in Certified Organic Operations

Application	\$ 325
Inspection fee – per hour	\$ 65
Input Approval Certificate Fee	\$ 50

5.4 Other Fees

Administration Fees

Inspection Fee in response to a Certificate Revision – per hour	\$ 65
Import or Transaction Certificates (per certificate)	\$ 15
Cheque returned for non-sufficient funds	\$ 30
Late fee charges (past the due date)	1 1/2 % per month

Complaint Fees

Investigative inspection fee – per inspector, per hour Plus any additional expenses incurred in conducting the investigation (e.g. if outside experts are asked to participate, travel costs, etc.)	\$ 65
---	-------

Travel expenses (e.g. transportation and accommodation) to be charged

Travel expenses incurred for inspections for certification are billed based on the travelling distance. The rate per kilometer is established from the Treasury Board of Canada’s travel directive issued in April and October of every year. If the inspector must visit off-site storage locations or other subcontractors as part of the inspection, these mileage fees will also be charged if the inspector drives.	See TB Directive
If transportation means other than driving such as train or airplane have to be used, with the pre-approval by the applicant, the actual costs will be billed.	Actual amount

If inspections of multiple operators are carried out in one trip, the expenses will be prorated to the operators.

Pro-rated

If the inspector has to stay overnight for the inspection for certification, with the pre-approval by the applicant, the actual costs will be charged.

Actual amount

Mileage will be billed from the inspector's home for all inspections carried out. Whenever possible this fee will be pro-rated across a number of clients. Cost of airfare will be agreed upon by the client prior to the inspection.

If necessary, lodging and meals will be billed at cost.

Non-Compliance Fees

(Additional fees will be assessed for each non-compliance issued after the first two)

Issuance of each additional non-compliance(s)

\$ 30

(When it has been determined, based on what was in the NCR, that on-site inspection is necessary to verify the completion of the corrective actions to close the NCR, the inspection fee below will be charged based on the hours spent for the on-site inspection conducted.)

On-site inspection fee to verify NC closure (per hour)

\$ 65

Travel costs for follow-up inspection

At cost

5.5 Inspection Charges

For CSI clients, the cost of the inspection is included in the assessed fees identified above, unless a specific inspection fee is identified for an activity. The estimated amounts of inspection time included in the fees are as follows:

5.5.1 T3 (Crop Producers) and First Certification Inspections

Crop Acreage	Estimated Inspection Time		
	Plan Review	On-site Inspection	Report Writing
1 – 50 acres	1.0	2.0	1.5
51 – 100 acres	1.0	3.0	2.0
101 – 300 acres	1.0	3.5	2.0
301 – 400 acres	1.0	4.0	2.0
401 – 500 acres	1.0	4.0	3.0
501 – 600 acres	1.0	4.0	3.0
601 – 1000 acres	1.0	5.0	3.0
1001 – 2000 acres	1.5	6.0	3.0
Greater than 2001 acres	1.5	7.0	3.0

Additional Livestock/Poultry			
Dairy	1.0	3.0	2.0
Other Livestock/ Poultry Operations (with crop land)	1.0	2.0	2.0
Other Livestock	1.0	3.0	2.0
Dairy Herd Transition Monitoring	1.0	3.0	1.5

Other Farm Scope Certification Fees			
Pre-certification Monitoring	0.5	2.0	1.0
Greenhouse/Apiculture/Sprouts/Wild Crop	0.5	1.0	0.5
Mushroom Production	2.0	6.0	3.0
Basic Handling of On-Farm Products	0.3	1.0	0.5

Processor Type	Estimated Inspection Time		
	Plan Inspection	On-site Inspection	Report Writing
Packaging / Labelling	1.0	3.0	2.0
Subcontractor	1.5	6.0	1.0
Basic Processor	2.0	6.0	2.0
Complex Processor (2 products categories or less)	2.0	6.0	2.0
Complex Processor (more than 2 product categories)	2.0	7.0	3.0

5.5.2 Recertification Inspections

Crop Acreage	Estimated Inspection Time		
	Plan Inspection	On-site Inspection	Report Writing
1 – 50 acres	1.0	2.0	1.0
51 – 100 acres	1.0	3.0	1.5
101 – 300 acres	1.0	3.5	1.5
301 – 400 acres	1.0	4.0	1.5
401 – 500 acres	1.0	4.0	2.5
501 – 600 acres	1.0	4.0	2.5
601 – 1000 acres	1.0	5.0	2.5
1001 – 2000 acres	1.5	6.0	2.5
Greater than 2001 acres	1.5	7.0	2.5

Additional Livestock/Poultry			
Dairy	1.0	3.0	1.0
Other Livestock/ Poultry Operations (with crop land)	1.0	2.0	1.0
Other Livestock	1.0	3.0	1.0
Other Farm Scope Certification Fees			
Greenhouse/Apiculture/Sprouts/Wild Crop	0.5	1.0	0.5
Mushroom Production	1.0	4.0	4.0
Basic Handling of On-Farm Products	0.3	1.0	.5

Processor Type	Estimated Inspection Time		
	Plan Inspection	On-site Inspection	Report Writing
Packaging / Labelling	1.0	2.0	1.0
Subcontractor	1.5	6.0	1.0
Basic Processor	2.0	5.0	2.0
Complex Processor(2 product categories or less)	2.0	5.0	2.0
Complex Processor(more than 2 product categories)	2.0	6.0	3.0

5.5.3 Additional Inspection Charges

If the inspector is required to spend more time than has been allocated in the estimates described above for an inspection, the inspector is required to complete section 6 of the CSI Time Sheet (ORG_23A_HST or ORG_23B_GST), where the amount of time required over the estimates and the reasons for the increased time are described. Reasons may include, but are not limited to: poor preparedness on the part of the operator, more time required for field visits due to distances, additional visits to subcontractors (e.g. off-site storage facilities), additional time required conducting traceability or mass balance audits, etc.

5.6 Non-refundable Fees

The remainder of the fees is due in full once the certification process is completed. If an application is withdrawn prior to completion of the certification process, a portion of the fee may be waived, depending on the stage at which the withdrawal takes place (see next section). All fees are due in full even if certification is denied, suspended or cancelled.

5.7 Refundable Fees

A withdrawal means that the applicant has ended the application process, or the operator has indicated in writing (with a signature) of their intent to withdraw from certification with CSI. CSI will request that any and all certificates issued be returned to the CSI office.

5.7.1 Withdrawal before Initial Review

No refund for the \$ 325 application fee.

5.7.2 Withdrawal after Initial Review but Prior to On-Site Inspection

The following fees shall apply and be due:

- \$ 325 application fee;
- \$ 150 minimum review for continued certification application or a \$ 175 minimum review for initial application;

- \$ 75 for a dairy review;
- \$ 50 for other livestock review;
- \$ 125 for a processor review;
- \$ 75 for a packaging/labelling review;
- \$ 25 for an on-farm handling review;
- \$ 65 for inspector preparation time, if applicable.

5.7.3 Withdrawal after On-Site Inspection but Prior to Certification Review

The same charges apply as for withdrawal after initial review, plus the cost of inspection.

5.7.4 Withdrawal after Certification Review

No portion of the total certification fees is refundable after the certification review is complete.

5.7.5 Withdrawal after Certification is Granted or Denied

No portion of the total certification fees is refundable after the certification decision is complete.

5.8 Fees for On-Farm Processing

Producers wishing to be certified for on-farm processing must pay the full processor fee if the processing substantially alters the product produced on the farm (e.g. milk to cheese).

5.9 Fees for Operations subcontracted by a CSI Certified Operation

If a CSI certified operator subcontracts with a non-certified operation that does not have an attestation of compliance issued by another CFIA-accredited CB, an additional fee of \$200 will be assessed (in addition to all other applicable fees) plus the cost of inspection of the subcontracted facility. This exception to the requirement for full processor certification status of the subcontracted entity is designed to allow a reasonable fee for operators to have products undergo simple processing, storage, slaughter, etc. at an off-site location. No certificate will be issued to the subcontracted operation.

The certified operation must have established a contract or written agreement with the subcontracted facility defining the activities and types of products included in the arrangement.

It is the responsibility of the CSI client to submit a Processor Organic System Plan to CSI for review and to have procedures in place at the subcontracted facility to maintain organic integrity. It is also the responsibility of the CSI client to have operational control at the time of processing or handling of their organic product to ensure the subcontracted facility is adhering to the documented organic handling procedures.

In the event that two or more CSI certified clients wish to contract with the same facility, CSI will recommend to the subcontractor that they obtain an Attestation of Compliance. The subcontractor shall complete the appropriate forms and be subject to the same procedure as certified operations, with the exception being that the subcontractor shall select “Attestation of Compliance” instead of certification to the COR.

6 CERTIFICATION POLICIES AND PROCEDURES

6.1 General Conditions for Certification

In order to be certified by CSI, an applicant shall agree to the conditions set out in the “CSI Organic Inspection and Service Contract” (ORG_17_Service contract). The contract must be signed and returned to CSI prior to CSI commencing any organic certification activities. All applicants are asked to disclose other certifications that they currently hold, to allow CSI to verify that an operation does not hold more than one product certification under COR for any given site.

Upon acceptance of an application for certification, CSI agrees to abide by its confidentiality, conflict of interest and non-discrimination policies.

CSI considers that the personnel currently employed, by reason of the basic training that has been undertaken, on-going participation in workshops and additional training, that the personnel have the competence to undertake certification activities for all crop, livestock, specific production requirements under the COR, and processing applications received. If an application is received for a type of product, a normative document or a certification scheme for which CSI personnel does not have prior experience or competence, the applicant is informed that CSI is not able to accept the application.

6.2 Initial Certification

6.2.1 Application for Initial Certification

Applications received by CSI are reviewed by the CSI office for completeness and proper enclosures, including the signed fee quote and signed service contract. A notice of receipt is sent to the applicant within 10 days. Applicants submitting incomplete applications (e.g. no signed application, service contract, fee quote, etc.) will be notified with a request to submit the missing items. Upon receipt of a complete application it will be forwarded to the Organic System Plan Reviewer so that a review of the system plan may be conducted to verify compliance with the standard(s).

Field crop producer applications must be received 15 months in advance of the anticipated date of marketing of organic product. Compliance to the COR must be assessed during this period. One inspection must occur during production in the year before field crops may be eligible for certification and one inspection during production in the year field crops are eligible for certification.

New applications for certification are accepted at any time and will be processed immediately. However, the length of time between application and certification depends on several factors, including the time of year, the completeness of the application, an inspector's schedule in the producer's area, and the requirements of the relevant scheme to which the applicant is requesting certification. All on-site inspections must take place when the operation's production practices and compliance with the regulations can be observed.

All persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions, as well as all parties responsibly connected to CSI, are required to complete an annual conflict of interest declaration.

6.2.2 Organic System Plan Review prior to inspection

The review of the system plan by the Organic System Plan Reviewer consists of a determination by a review of the application documentation as to whether the applicant appears to comply or may be able to comply with the requirements of the standards to which the applicant has requested certification. The system plan reviewer also reviews the previous inspection report and certification letter (available in the database) if the applicant was previously certified, and verifies that any notices of non-compliance, suspension or denial of certification have been appropriately addressed.

Applications are assigned to an Organic System Plan Reviewer based on:

1. Absence of any conflict of interest between the organic system plan reviewer and the applicant.
2. Work-load considerations.

Any input materials associated with an application are reviewed by the Organic Input Materials reviewer.

6.2.3 Assigning Inspectors

Once the Office Assistant is notified by the Organic System Plan Reviewer that the review is complete, the Office Assistant contacts the Organic Program Manager, who is responsible for:

- Assigning a CSI organic inspector with the appropriate qualifications from the CSI organic inspector list; and
- Verifying that the qualifications of the inspector match the certification being sought against the relevant scheme.

The Organic Program Manager verifies with the applicant that the prospective inspector is acceptable, and upon confirmation, notifies the Office Assistant of the name of the inspector accepted by the applicant. The Office Assistant keeps record of the inspector assigned to each operation.

An inspector is selected for an inspection by CSI based on the following criteria:

- The inspector must possess the correct scope to conduct the inspection.
- The inspector must be competent to conduct the inspection based on their previous experience with the type of operation (e.g. an inspector with no experience in inspecting dairy farms will not be selected to conduct an inspection of a dairy operation that includes a farm, even if the inspector has taken the basic training).
- The inspector must be within reasonable geographic proximity to the applicant.
- The inspector may not be in conflict of interest with the applicant, as defined in the agreement signed by the inspector with CSI.

Applicants who object to the inspector must notify CSI within 10 days of receipt of the notice or prior to inspection if the inspection is to take place within 10 days. The applicant may refuse the assigned inspector if there are reasonable grounds that a conflict of interest between the two parties exists.

An application may be rejected. If so, the applicant will be notified in writing of the reasons.

6.2.4 Scheduling Inspections

CSI conducts an initial on-site inspection of each production unit, facility, and site that produces or processes organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining continued certification.

CSI may conduct additional on-site inspections of applicants for certification and certified operations as required to determine compliance with the applicable standards.

The competent authority may also require that additional inspections be performed by CSI for the purpose of determining compliance with the applicable standard.

Additional inspections may be announced or unannounced at the discretion of CSI or as required by a competent authority.

The initial on-site inspection must be conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the requirements of the applicable standard. All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities are operational and demonstrate the operation's compliance with the applicable standard including products, except that this requirement does not apply to unannounced on-site inspections.

Where a facility has both organic and non-organic products the inspection shall be conducted when organic products are being handled. An inspection will not be scheduled until such time as the operation has the necessary infrastructure in place to produce or handle organic products.

6.2.5 Conducting the On-site Inspection

Inspections are conducted according to CSI ORG-SWI 10.1.1 – How to conduct an organic inspection. All contracted inspectors and certification personnel receive training on these procedures prior to doing any work for CSI, and CSI offers periodic training for all certification personnel, including inspectors, on updates to the inspection procedures.

6.2.6 Granting Initial Certification

A review is conducted of the report at the earliest opportunity by a Report Reviewer. The reviewer responsible for the file may request that the Organic Program Manager convene a review committee if a major non-compliance is identified either by the inspector or through the course of the review; or if additional expertise is required to conduct the review. The review committee shall consist of the Organic Program Manager and/or an external specialist identified in coordination with the Certification Director with appropriate expertise for the type of operation in question.

The Report Reviewer who is the lead on the file issues any notices of non-compliance to the applicant, and makes the recommendation to the Organic Certification Director for granting or denying certification. CSI reserves the right to require another inspection if deemed necessary to confirm resolution of the non-compliance issues.

If necessary, CSI will issue a non-compliance letter. The non-compliance letter contains an explanation of the non-compliances issued and dates by which corrective actions must be made.

Applicants must have all non-compliances addressed and corrections agreed to by CSI prior to granting certification.

Upon closure of the non-compliances, the Report Reviewer will make a recommendation on certification to the Certification Director.

The Certification Director will conduct a review of the file in order to make the certification decision.

Applicants are not permitted to offer any product for sale that is represented as organic in any way until informed by CSI that the products included in the inspection have been certified. In the case of new organic producers (i.e. field crops, in-ground greenhouse systems, maple products), the operator must wait 15 months from the date of application at the beginning of the last 12-month transition period to represent products as organic (as per Schedule I of the Organic Products Regulations, 2009).

CSI will issue a certificate which specifies the:

- Name and address of the certified operation;
- The standard to which the operation has been certified to;
- Effective date of certification;
- Categories of organic operation, including crops, livestock, or processed products produced by the certified operation; and
- CSI's name, address, and telephone number.

Each certificate issued shall be accompanied by an organic product list. The product lists shall contain all products granted certification by CSI, including crops, livestock and/or processed products. Processed product lists may include products labelled under a co-packing arrangement, if applicable. All labels under the control of an operation, or controlled under a co-packing arrangement, shall be reviewed and approved by CSI and listed on the product list.

Once certified, a production or processing operation's organic certification continues in effect until surrendered by the organic operation; or suspended or cancelled by CSI; or in the case of packager/labeler certificates or attestations of compliance the 12-month certificate period expires. CSI will provide the applicant with a copy of the test results for any samples taken by an inspector.

If CSI is granting certification to an operator who had its certification previously cancelled and whose name appears on the CFIA published list of suspended and cancelled organic certification, this shall not be completed until CSI has received confirmation from CFIA that the date of certification reinstatement is posted on the CFIA website.

In the event that an operator does not have product compliant with the Canadian Organic standard, either because its production system is not yet operational, or because the operator is currently inactive, only a certificate for the facility will be issued.

6.2.7 Certification Package

Once certification is granted, the following documents are sent to the certified operation:

- The appropriate certificates and product lists according to the operation's scope of certification;
- A certification letter;
- A copy of the inspection report;
- A copy of the signed exit interview;
- A copy of any non-compliances which were issued as a result of the inspection;
- A signed copy of the service contract;
- A list of the input materials for the current year; and
- A statement to collect any outstanding fees.

6.2.8 Denial of Initial Certification

When CSI has reason to believe, based on a review of the submitted information that an applicant for certification is not able to comply or is not in compliance with the applicable organic standard, CSI must provide a written notification of non-compliance to the applicant. CSI may also deny initial certification if there is reason to believe that the applicant has willfully made a false statement regarding its operations. CSI is not required to issue a notice of non-compliance in this case. Applications for certification are not permitted to extend beyond 12 months from the initial application date. If the issues raised during the inspection cannot be resolved in that time, certification will be denied.

When correction of an issue of non-compliance is not possible, a notification of non-compliance and a notification of denial of certification may be combined in one notification. The notification of non-compliance shall provide:

- A description of each non-compliance;
- The facts upon which the notification of non-compliance is based;
- Whether an additional inspection or further testing may be required; and
- The date by which the applicant must rebut or correct each issue of non-compliance and submit supporting documentation of each correction when correction is possible.

Upon receipt of a notification of non-compliance, the applicant may:

- Correct the non-compliances and submit a description of the corrective actions taken with supporting documentation to CSI; or
- Correct the non-compliances and submit a new application to CSI or to another certification body: *Provided*, that, the applicant include a complete application, the notification of non-compliance received from CSI, and a description of the corrective actions taken with supporting documentation.

After issuance of a notification of non-compliance, CSI shall:

- Evaluate the applicant's corrective actions taken and supporting documentation submitted, conduct an on-site inspection if necessary, and
 - i. When the corrective action is sufficient for the applicant to qualify for certification, consequently grant certification; or
 - ii. When the corrective action is insufficient for the applicant to qualify for certification, issue the applicant a written notice of denial of certification.
- Issue a written notice of denial of certification to an applicant who fails to respond to the notification of non-compliance.

An applicant for certification who has received a written notification of non-compliance or a written notice of denial of certification may apply for certification again at any time with any certification body or again to CSI. The applicant also has the right to appeal the denial of certification in accordance with CSI's appeal procedures.

When such applicant submits a new application to a certification body other than CSI, the applicant for certification must include a copy of the notification of non-compliance or notice of denial of certification and a description of the actions taken, with supporting documentation, to correct the non-compliances noted in the notification of non-compliance issued by CSI.

When CSI receives a new application from the applicant for certification, which includes a notification of non-compliance or a notice of denial of certification, CSI must treat the application as a new application and begin a new application process. If CSI has reason to believe that an applicant for certification has willfully made a false statement or otherwise purposefully misrepresented the operation or its compliance with the certification requirements, CSI may deny certification.

6.2.9 Withdrawal of Application for Initial Certification

The applicant may withdraw their application at any time by notifying CSI in writing. An applicant who withdraws their application shall be liable for the costs of services provided up to the time of withdrawal of the application as described in section 6. An applicant who voluntarily withdraws their application prior to the issuance of a notice of non-compliance will not be issued a notice of non-compliance. Similarly, an applicant who voluntarily withdraws their application prior to the issuance of a notice of denial of certification will not be issued such notice.

6.3 Renewal of Certification

6.3.1 Renewal Procedure

To continue certification, a certified operation must pay the annual certification fees and submit updated information to CSI.

The procedure for renewal is described in the Certification Renewal Flowchart (ORG_27B). The renewal application dates are described in section 4.1. An inspection is conducted of the operator in accordance with CSI ORG-SWI 10.1.1 – How to Conduct an Organic Inspection.

Advertising material collected by the inspector or submitted by the operator with the recertification system plan will be reviewed by the Report Reviewer. The operator's website (if applicable) shall also be reviewed concurrently with the inspection report for accuracy and clarity in declaring the products or services marketed by the operator. Any question arising from this review regarding the clarity of the advertising/website shall prompt the Report Reviewer to obtain an opinion from the Organic Program Manager. Any questions regarding the meaning or intent of the advertising shall be put to the operator, and the CSI staff will make a determination as to whether change is necessary, with the final decision being that of the Certification Director.

If at any time during the initial application process, the certification renewal process or at any other time when doubt is raised on the part of the inspector, the Organic Program Manager, in cooperation with the other members of CSI's certification team, shall ensure that all requirements of certification are clearly understood by the operator.

At a minimum, the operator will be required to submit documented evidence to CSI to demonstrate their understanding of the requirement in question, and to demonstrate compliance of their system with the requirement. Further follow-up (e.g. a possible follow-up inspection) to ensure the understanding and compliance of the operator will be determined as necessary by the Organic Program Manager and the Certification Director.

If the operator continues to demonstrate ignorance of the certification requirements, CSI will undertake the necessary measures (including possible issuance of a non-compliance, proposal for suspension and possible suspension) until the issue is resolved to ensure organic product integrity is not put at risk.

CSI will, within a reasonable time, arrange and conduct an on-site inspection of the certified operation *except* when it is impossible for CSI to conduct the annual on-site inspection following receipt of the certified operation's annual update of information, CSI may allow continuation of certification and issue an updated certificate of organic operation on the basis of the information submitted and the most recent on-site inspection conducted during the previous 12 months. However, the next annual on-site inspection must be conducted within the first 6 months following the certified operation's scheduled date of annual update.

6.3.2 Granting Continued Certification

A review is conducted of the report at the earliest opportunity by a report reviewer, The Report Reviewer responsible for the file may request that the Organic Program Manager convene a review committee. The review committee shall consist of the Organic Program Manager, the Report Reviewer and an external specialist (if necessary) with appropriate expertise for the type of operation in question.

The Report Reviewer issues any notices of non-compliance necessary to the applicant, and makes the recommendation to the Certification Director for granting or denying certification. CSI reserves the right to require another inspection if deemed necessary to confirm resolution of the non-compliance issues.

If CSI determines that the certified operation is complying with the requirements of the organic standards, CSI informs the operator of the continued certification by issuing a certification report, a letter, an updated organic product list and an updated certificate.

6.3.3 Notification of Issues of Non-Compliance

If CSI has reason to believe, based on the on-site inspection and a review of the submitted information, that a certified operation is not complying with the requirements of the applicable organic standards, CSI shall provide a written notification of all issues of non-compliance to the operation.

Such notification shall provide:

- A description of each issue of non-compliance;
- The facts upon which the notification of issues of non-compliance is based;
- Whether an additional inspection or further testing may be required; and
- The date by which the certified operation must correct each issue of non-compliance and submit supporting documentation of each such correction when correction is possible.

6.3.4 Resolution

When a certified operation demonstrates that each issue of non-compliance has been resolved, CSI shall send the certified operation a written notification of non-compliance resolution (i.e. a copy of the completed non-compliance form). Continued certification is granted and if necessary, an updated certificate is issued. Organic certification will not be granted until all issues of non-compliance have been resolved. The applicant shall provide a response to CSI to propose resolution of the non-compliance(s) within 30 days of notification. If the applicant is proposing a plan for resolution of a non-compliance, the plan shall include a completion date not exceeding 90 days from receipt of the non-compliances. CSI may accept a time greater than those stated above for closure of a non-compliance so long as it is justified and documented.

6.3.5 Proposed Suspension

When correction of the issue of non-compliance is not completed within the prescribed time period, CSI shall send the certified operation a written notification of proposed suspension of certification. When correction of an issue of non-compliance is not possible, the notification of the issue of non-compliance and the proposed suspension of certification may be combined in one notification.

The notification of proposed suspension of certification shall state:

- The reasons for the proposed suspension;
- The proposed effective date of such suspension;
- An indication of the evidence required to address the non-compliance.

If an operation does not implement the required corrective measures or their implementation is not possible within the period specified in the notice of proposed suspension, the operator may obtain an extension of the period. The decision to grant an extension to the period set in the notice of proposed suspension is made at CSI's discretion, on a case-by-case basis.

6.3.6 Suspension and Cancellation

If the operator has failed or is unable to implement the required corrective measures within the period specified in the notice of proposed suspension, certification is suspended by CSI and the operator is notified in writing of the suspension and the measures that must be taken in order to lift suspension.

The suspension remains in effect until the required corrective measures are implemented by the operator and verified by CSI in an appropriate manner or until the cancellation of certification. The operator has 30 days, or another time period determined if CSI decides to grant an extension upon request, to address the issues resulting in suspension and effectively implement corrective measures. If the operator demonstrates that the reasons for suspension have been effectively corrected and addressed upon review by the Organic Program Manager and with the approval of the Certification Director, suspension will be lifted and the certification process will continue.

All correspondence to operators regarding proposed suspension, suspension or cancellation is prepared by the Organic Program Manager, and is reviewed and signed by the Certification Director before being sent.

If the operator does not effectively correct and address the reasons for suspension, certification shall be cancelled. The operator shall be advised of the cancellation and their obligations under the service contract via registered letter. CSI shall advise the operator of an opportunity to be heard, either orally or in writing, in respect of the cancellation. CSI must provide the operator that opportunity. Appeals will be submitted to the CSI Appeals Committee. The decision to cancel certification shall be maintained if the appeal process renders a decision that is unfavourable to the operator.

Any suspension or cancellation of certification of products listed on a certificate issued by CSI, or suspension or cancellation of an operator's certification, shall be made public via an update to the CSI client list on the website. The CVB shall be notified of any suspension or cancellation notices issued by CSI, including the products affected by the decision.

If CSI has reason to believe that the application of a certified operation contains false or misleading information, CSI shall send the certified operation a notification of cancellation of certification. The appeal procedures described above shall apply in these instances also.

A certified operation whose certification is suspended or cancelled must not sell, label or represent product as "organic" and must discontinue the use of the CSI logo and/or the logo of the applicable certification scheme(s) during the period of suspension or cancellation.

All suspensions and cancellations are reported to the appropriate authority according to established reporting procedures. If CSI reinstates a suspended certification, this shall be done only after the appropriate authority has been notified and the date of the certification reinstatement is posted on the CFIA published list of suspended and cancelled operations. CSI shall submit a request to CFIA for posting of the date of certification reinstatement within five working days from the certification decision. CSI must receive confirmation from CFIA that the date of the certification reinstatement is posted on the CFIA website before completing certification of a previously suspended or cancelled operation.

6.4 Communications with CFIA

CSI will submit notification to CFIA once a month in the prescribed manner of any notice of denial of certification issued and notification of suspension or cancellation issued.

6.5 Voluntary Withdrawal of Organic Certification

Once an operation is certified, its certification continues until withdrawn by the organic operation or suspended or cancelled by CSI. An operation may voluntarily withdraw from the certification program by notifying CSI in writing at any time. After voluntary withdrawal from the certification program, the operation is no longer authorized to sell certified organic products or use the CSI or certification scheme logo as of the date that CSI is notified of the withdrawal, unless the product was packaged and labeled under the certification previously held by the operator.

The operation may re-apply for certification at any time, by following the procedures for new applicants. Depending on the time of withdrawal, a portion of fees paid may be refunded in accordance with CSI's fee policy. CSI requests that the certificate(s) issued to the operation be returned if organic certification is voluntarily withdrawn.

When an operation voluntarily withdraws its organic certification, CSI will send a letter confirming receipt of the notice of voluntary withdrawal. The operation's organic certification will be effectively cancelled.

6.6 Extensions and Revisions to Certification

If the applicant wishes to certify additional crops, livestock, products, facilities or acreage after the operation has had its annual inspection additional information must be submitted along with the appropriate fees. CSI will notify the applicant of the status of the requested revision. The producer must not sell, label and/or represent any product not listed on the new field/product list. If the applicant is adding new fields or new facilities an additional inspection will be necessary and applicable fees shall be assessed. A fee for a revised certificate will be charged. If the certificate or product list is reissued, the word "Amended" will appear on the certificate, the date of issue will be updated, and the crops, fields and/or products certified will reflect the amendment. CSI will also request that the certified operation return the original certificate.

If the name or address of the certified operation changes after certification, but prior to the next inspection, it is the responsibility of the certified operation to notify CSI. CSI will then re-issue the certificate, and also have the certified operation sign a new certification agreement. CSI's database and public client list will be updated in the case of any amendment.

Whenever a change to certification is either required by CSI or requested by the client, CSI shall determine whether all of the normal certification activities are required, or if some may be excluded. When a certification requirement that is not a product requirement changes, any exclusion of the evaluation, review, decision, issuance of certification documentation or issuance of certification documentation of revised surveillance activities shall be recorded.

Additional information required varies by type of operation as follows:

6.6.1 Processed Products Made in a Certified Organic Facility

The operator must submit a letter requesting the change, an explanation of the manufacturing process, the product profile, the supplier list, copies of all organic certificates for ingredients in the product, and a sample of the label/packaging.

6.6.2 Processed Products Made in a Facility Not Inspected by a Certification Body

An additional inspection will be required. The operator must submit the same information listed in 6.7.1 for processed products. In addition, information must be provided about the new facility. CSI will then send the processor a fee quote and application forms as required.

6.6.3 New Crops on Existing Fields Listed on the System Plan

The applicant shall submit the type of crop, field number, planting and/or harvest date, plus the reason it was not included in the organic system plan or update.

6.6.4 Livestock

The applicant shall submit they type of livestock, quantity, certificate, date purchased, housing and pasture information. CSI will determine whether an additional inspection is required.

6.6.5 New Acreage or Location

The applicant shall submit a letter with a description of the land and directions to the field, a map of the acreage, adjoining land-use information, and prior land-use information. An additional inspection is required. If the acreage being added produced certified organic crops at the time of purchase or rent, a copy of the current certificate and certified product for the acreage in question shall be submitted.

6.6.6 Deleting Acreage or Type of Certification

The applicant shall submit a request in writing to delete acreage, location, products, livestock or scope from certification, as well as the reason for the request. CSI will make the necessary changes in the database and issue an amended certificate and product list to reflect the changes.

6.7 Impartiality Committee

A committee has been established with the responsibility of verifying that the implementation of CSI organic certification services is done in an impartial and non-discriminatory manner. The committee will consider the appropriate organic standards and legislation when forming opinions and recommendations. The committee will operate according to its Terms of Reference.

The Executive Director brings the decision of the committee regarding the impartiality of CSI's organic certification process to the Board of Directors for consideration. This committee will also be responsible for hearing any appeals made with regards to a decision by CSI to cancel an operation's certification.

6.7.1 Appeals to the CSI Impartiality Committee

An applicant for certification may appeal a decision made by CSI concerning the operation's compliance with the applicable regulations or standards; CSI's notice of denial of certification; or CSI's notification of cancellation of certification to the CSI Impartiality Committee.

The appeal procedures are described in the CSI internal process map QMS 117-3 Appeal Procedures. If the Impartiality Committee supports a certification applicant's or certified operation's appeal of CSI's decision, the applicant will be issued organic certification, or a certified operation will continue its certification, as applicable to the operation. If the Impartiality Committee denies an appeal, a formal administrative proceeding will be initiated to deny or cancel the certification.

7 MATERIALS REVIEW AND APPROVAL

All inputs for crop production, livestock production and processing must be reviewed and approved by CSI prior to use. Reviews are conducted according to the CSI internal procedure for input reviews. All review results are recorded in the CSI database. Inputs used by an operator are recorded in that operator's file in the database. Lists of inputs are provided to operators with the certification package, and as part of the recertification notification sent every year. Lists of inputs are reviewed at the time of inspection each year for accuracy and completeness.

7.1 Commercial Material Review and Approval for Use in Certified Organic Operations

Upon request from a commercial entity, CSI will conduct a review of an input material for use by certified organic operations. The commercial entity must submit an application (ORG_24_Approved Input Submission Checklist), with the appropriate attachments that pertain to the input material for which they are seeking approval. The Service Contract for Input Approval (ORG_25) must also be submitted, along with the fee as specified in section 6 with applicable GST. The submission is reviewed, and an inspector is assigned if required to confirm compliance with the applicable standards. The applicant is notified of the inspector selected, and as per section 6.2.1, may request that another inspector be assigned.

The inspector makes arrangements with the applicant to conduct an inspection of the process and records. Once the inspection is complete, a narrative report is submitted to CSI for review. If approved, a statement of approval is issued to the commercial entity for the input material in question. CSI clients who have obtained approval for input materials must submit an application annually for renewal of approval.

8 SURVEILLANCE AND TESTING

8.1 On-Site Inspections

CSI conducts an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining whether the certification of the operation should continue. All on-site inspections are conducted according to the CSI specific work instruction ORG-SWI 10.1.1.

CSI may conduct additional on-site inspections of applicants for certification and certified operations as required to determine compliance with the applicable standards.

Additional unannounced inspections may be conducted at the discretion of CSI based on the risk assessment process or as required by CFIA.

8.2 Scheduling Inspections

The initial on-site inspection must be conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the requirements of the applicable standard. All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities are operational and demonstrate the operation's compliance with the applicable standard including products, except that this requirement does not apply to unannounced on-site inspections. Where a facility has both organic and non-organic products the inspection shall be conducted when organic products are being handled. An inspection will not be scheduled until such time as the operation has the necessary infrastructure in place to produce or handle organic products.

8.3 Information Provided to the Inspector

CSI provides the following information to the inspector, as applicable to the type of operation. This information is provided via the CSI database, as applicable to the file:

- i. Initial organic system plan and any annual updates
- ii. Field history information
- iii. Appropriate field or facility maps
- iv. List of approved inputs for the current year
- v. Product profiles and labels
- vi. Previous year's certification letter and non-compliances issued, if applying for continued certification
- vii. Previous inspection report (either from CSI or a previous certification body)
- viii. System plan review notes
- ix. Appropriate inspection report forms

8.4 Verification of Information during an Inspection

The purpose of the on-site inspection of an operation is to verify:

- The operation's compliance or capability to comply with the applicable standard;
- That the information, including the organic production or handling system plan, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation;
- That prohibited substances have not been and are not being applied to the operation. At the discretion of CSI, the collection and testing of seeds; plant tissue; and plant or processed product samples may be warranted.

8.5 Exit Interview

The inspector will conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of the observations made and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern. A copy of the exit interview is provided to the operator with the certification package.

8.6 Additional Documents Provided to the Inspected Operation

At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken. A copy of all test results will be sent to the inspected operation by CSI.

8.7 Inspection Report

After the applicant's operation is inspected, the inspector forwards an inspection report to the CSI office for review within 7 days of the inspection. The inspector's job is to report on compliance with organic standards based on the application and his or her examination of the farm or processing facility and record-keeping system.

8.8 Inspector Qualifications

Inspectors must meet the qualifications described in section 4 of CSI AUD-QSP 3.1.0. Assigned inspectors must be competent in the subject matter of the inspection.

8.9 Confidentiality during Inspections

Inspectors must abide by the confidentiality policies and procedures described in their inspector agreement.

8.10 Contracting Inspectors

Inspectors are independent contractors and are not employees of CSI.

8.11 Investigation of Certified Operations

CSI has the right and duty to investigate complaints raised against CSI certified operations. Investigations may include additional inspections, unannounced inspections and/or testing. The scope and depth of the investigation is determined on a case-by-case basis. Additional or unannounced inspections resulting from complaints received by CSI will be billed at cost to the operation (see complaint fees section 5.4). Any investigation of an operation who is the subject of a complaint received by CSI will be inspected by a team of at least two inspectors, chosen by CSI. Investigative inspection situations are explained in more detail in ORG-SWI 10.1.1

8.12 Unannounced Inspections

CSI recognizes that the production and processing of organic goods is an on-going process and that annual inspections can only gather information concerning the client's operation at that moment. Areas of on-going potential risk include:

- Contamination or commingling of organic product;
- Contamination of the site;
- Failure to adhere to standards for production and processing of organic product;
- Mislabelling;
- Fraud; and/or
- Any other major or minor non-compliance with the organic scheme against which the client is certified.

To help mitigate this risk, CSI requires a risk assessment of all clients be completed by the Report Reviewer during the inspection report review. The risk assessment checklists identify the risks associated with the certification of organic farm production and processing and a value is assigned to each practice listed. The resulting Total Risk Value will be used by the Organic Program Manager to determine the sampling requirements and by the CSI Organic Certification Director to determine candidates for unannounced inspections, and/or product monitoring.

The CSI risk mitigation tools include the following procedures and activities undertaken during the certification process:

- Submission of a system plan by the client and confirmation of adequacy by an Organic System Plan Reviewer;
- Completion of an on-site inspection looking at critical areas of investigation by a CSI recognized organic inspector;
- Training of inspectors to ensure they have a knowledge of the applicable organic rules and of CSI's procedures and documentation;
- Review of inspection documentation (checklists and report) by a qualified Report Reviewer / Review Committee;

- Completion of risk assessment checklist(s) by a CSI Report Reviewer; and
- Evaluation of risk posed by the certification of a client by the Report Reviewer utilizing information gained from all of the above sources and a recommendation made to the Certification Director.

Unannounced inspections will be selected during a meeting between the Organic Program Manager and the Certification Director by:

- Identifying clients that have a risk factor of greater than 41 but less than 60 as potential candidates;
- Identifying clients that have a risk factor of 60 or greater as mandatory candidates;
- Verifying if the mandatory candidates are equal to or greater than 3% of primary producers and 5% of other CSI clients. If not, then a random selection of the potential candidates will be added to obtain the necessary numbers. If this is still not sufficient then candidates will be chosen from those that have a risk factor greater than 28.

Unannounced inspections will be coordinated by CSI. The Organic Program Manager will assign an inspector and direct the inspector to verify compliance in areas from the risk assessment checklist pose the greatest risk to organic integrity. This may include the taking of samples for testing.

8.13 Conducting and Reporting Unannounced Inspections

Unannounced inspections are assigned in a similar manner to other inspections with regards to the selection of an inspector with adequate scope, experience and absence of any conflict of interest to conduct the inspections. CSI may choose to subcontract with an inspector to conduct several unannounced inspections if they are located in one geographic area.

In the case of an unannounced inspection, the Organic Program Manager prepares notes for the inspector to direct the inspector if there are specific areas of the operation to be included in the unannounced inspection. The inspector also receives a letter of introduction to provide to the operator. Unannounced inspections are normally conducted without prior notice to the operator. If advance notice (of not more than 24 hours) is required, the inspector shall document the reasons that advanced notice was given.

The inspection is conducted according to normal CSI inspection procedures. If the unannounced inspection is directed at a specific area, the inspector is not expected to complete any forms relating to other areas of the operation not included in the inspection. The inspector completes a narrative report, an exit interview form, and identifies any potential issues of non-compliance. The report is entered into the CSI database as an unannounced inspection, and any supporting documentation is sent to CSI.

The Office Assistant notifies a Report Reviewer that an unannounced inspection report has been received, and the Report Reviewer selected conducts a review of the inspection report. The review is entered into the database according to CSI procedures. If a noncompliance needs to be issued, the Report Reviewer will follow CSI procedures for issuing a non-compliance to an operation.

All normal time periods for response apply. If the operator does not resolve a non-compliance resulting from an unannounced inspection, normal proposed suspension, suspension and cancellation procedures will apply.

Since the unannounced inspection with no unresolved issues of non-compliance will not affect the status of an operator's certification, the form ORG_03 is not submitted to the Certification Director, as no decision on certification is required. If a noncompliance is issued and is not resolved, the Report Reviewer will ensure that ORG_03 is completed to document the recommendation to the Certification Director for suspension of certification.

If a change is required to the operator's certification due to an unannounced inspection, the Report Reviewer shall follow the procedures as described in section 10.2.10 of this manual.

8.14 Inspection and Testing of Agricultural Products

The purpose of sampling and testing in the CSI organic program is to investigate situations of potential contamination, either via GMO contamination or pesticide residues. All agricultural products that are to be sold, labelled or represented as being in compliance with the requirements of the Organic Products Regulations, 2009 may be subject to sampling and testing.

CFIA or CSI may require pre-harvest or post-harvest testing of any agricultural input used or agricultural product to be sold, labelled or represented as being in compliance with the requirements of the Organic Products Regulations, 2009 when there is reason to believe that the agricultural input or product has come into contact with a prohibited substance or has been produced using excluded methods. In the event of a complaint or the submission of information to CSI that substantiates that a product does not meet the requirements of the OPR, CSI may require sampling and testing as part of the investigation of the complaint.

Certified organic production or handling operations must make accessible for examination all agricultural products that are to be sold, labeled, or represented as certified organic. Such tests are conducted at CSI's own expense.

The Organic Program Manager, in consultation with the Report Reviewer and the Certification Director, will determine if pesticide residue or GMO testing is required during an inspection. If so, arrangements will be made for an inspector to obtain a sample of materials in question and forward to a CSI approved laboratory.

The testing laboratory subcontracted by CSI to conduct both GMO testing and pesticide residue testing is Eurofins Genescan USA, located in Metairie, Louisiana. The Eurofins laboratory is accredited to ISO 17025 for the applicable tests, and signs a yearly agreement with CSI describing the responsibilities and obligations of Eurofins and CSI with regards to testing. Sample integrity shall be maintained throughout the chain of custody, and CSI shall ensure that all sample submission requirements of the laboratory are adhered to by the inspector.

If there is any breach of the agreement between CSI and Eurofins, CSI shall take appropriate corrective actions. CSI will also undertake to subcontract testing to another qualified laboratory if Eurofins Genescan USA declares a conflict of interest with a particular sample or certified operator.

8.15 Testing Results

Results of all analyses and tests performed under this section will be provided to the certified operation. In the event of the detection of the presence or use of a prohibited substance, CSI will conduct an investigation to determine the cause of the presence of a prohibited substance. The investigation plan will be developed by the Organic Program Manager and presented to the Certification Director. The Certification Director will contact the applicant and request that all products under investigation not be placed on the market as organic product. The results of the investigation will be reviewed by the Organic Program Manager who will provide recommendations to the Certification Director on next steps and on the certification status of the applicant.

Subsequent to the investigation the Certification Director may require that the applicant inform their buyers in writing of the products to remove all indications that the product is organic.

9 LABELLING

9.1 Use of CSI Name and Logo

All operations certified by CSI may use the CSI name and logo in advertising/marketing information and on packaging, with approval from the CSI office and as stipulated in the Centre for Systems Integration Graphics Standard. Copies of labels must be included with the application and must be approved by CSI prior to use. Operations must discontinue the use of the CSI name and logo upon suspension or cancellation of certification.

It is not required by any certified operation that the CSI logo be used on any product sold, labelled or represented as organically produced as a condition of certification by CSI.

CSI staff and inspectors are encouraged to seek out labels on products certified by CSI in the marketplace, or to observe the marketing materials of operations certified by CSI, to monitor the use of the CSI certification mark, and/or the CFIA logo.

If any improper or fraudulent use of the marks is suspected, evidence shall be submitted to the Organic Program Manager for investigation, and notices of non-compliance shall be issued when necessary. Copies of any labels or materials obtained from the marketplace, either compliant or non-compliant, shall be kept in the operator's file.

CSI does not require compliance with any other production or handling practices other than those required under the certification schemes for which CSI is accredited in order for a certified operation to use the CSI logo.

Organic product shall be labelled as required by the relevant scheme and the intended sales market:

- **Canadian Organic Program** – according to the CFIA *Organic Product Regulations, 2009*.
- **NOP Equivalency** - The term “organic” shall be used and labelled in accordance with the NOP Standard, Subpart D – Labels, Labelling and Market Information. All products shall be labelled in accordance with Subpart D of the NOP.
- **EU Equivalency**– All products being marketed under this equivalency agreement shall be labelled as stipulated in Articles 24-26 of 834/2007 and Articles 57-62 of 889/2008.
- **JAS Equivalency** - including Ministerial Ordinance No. 62 of 1950.

All organic products must meet any additional labelling requirements of the country or province in which it is sold. All labels must be approved by CSI prior to use. All advertising and promotional material using the certification seal of the relevant scheme or making reference to the certification status shall be truthful and not misleading. Use of the CSI certification mark is not permitted on anything (e.g. processes or services) other than certified products.

The CSI logo may be used in marketing or advertising material, as may the CFIA, NOP and EU logos, with the approval of CSI. All use of certification marks and/or logos is reviewed on an annual basis as part of the recertification process. CSI will undertake an investigation of any complaint made to CSI with regards to misuse of certification mark or logo by a CSI certified operation.

9.2 CSI Private Labelling Policy

A CSI-certified processor may apply labels approved by other certification bodies to organic product processed at the facility. All such labels must be provided to CSI, and all such products labelled under another certification body's authority must be listed on the CSI product list. Any request to apply a private label must include any documentation necessary to support the organic status of the product.

A CSI-certified packaging and labelling facility may also develop labels for approval by CSI. The CSI-certified operation may then contract with a processor who will process the product in question and apply the labels. The CSI-certified operator must ensure that all documentation supporting the organic status of the contracted processor and all products is on file for review during annual inspections.

10 OTHER CERTIFICATION BODIES

CSI certified operators may purchase organic agricultural products certified under COR for use in their organic systems from operators who are certified either by CSI or another CFIA-accredited certification body, or under the terms of any equivalency agreement negotiated between Canada and another jurisdiction.

11 NON-DISCRIMINATION POLICY

CSI shall act effectively to assure it will:

- Provide services without bias toward race, creed, color, national origin, age, religion, ancestry, political beliefs, disability, lifestyle, sex or sexual orientation, or marital or familial status. Services are provided without regard to membership in any organization, and are not contingent upon the number of CSI certification services used;
- Recruit, hire, and promote for all job classifications based only on the individual's qualifications for and interest in the position being filled without regard to race, creed, color, national origin, age, religion, ancestry, political beliefs, union membership, disability, lifestyle, sex or sexual orientation, or marital or familial status.

12 CONFIDENTIALITY

CSI maintains strict confidentiality with respect to its clients under the certification services it offers and does not disclose to third parties (with the exception of government officials and the relevant competent authorities and their accredited certification bodies) any business-related information concerning any client obtained from the provision of its services. CSI personnel, inspectors and volunteers must agree not to disclose confidential information about an applicant's operation.

The following information about a certified operation is made available to the public:

- Organic certificates or field/product lists issued during the current calendar year;
- A current listing of suspended and cancelled operations (cancelled operations are listed for a year following cancellation);
- The fact that a certificate or field/product cannot be provided because a certified operation is in non-compliance proceedings (but not the reason for the non-compliance);
- Other business information as permitted in writing by the producer or processor.

13 CONFLICT OF INTEREST

All persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions, as well as all parties responsibly connected to CSI, are required to complete an annual conflict of interest declaration.

14 COMPLAINTS, DISPUTES AND APPEALS

CSI maintains documented procedures to address appeals related to certification decisions; complaints or disputes from operators regarding the application of CSI's certification program; and complaints or disputes from outside parties about CSI's operation.

Complaints and disputes concerning CSI must be documented and submitted to the Certification Director. In the event that a complaint or dispute personally involves the Certification Director, the complaint or dispute will be submitted to the Impartiality Committee. Anonymous complaints will not be accepted. The Certification Director may resolve the complaint or refer it to the Impartiality Committee for recommendation or resolution. If the complaint was made against the Certification Director, the Impartiality Committee has the responsibility to report the outcome of the complaint to the President of the CSI Board of Directors.

In cases where an interpretation has been submitted to the SIC in accordance with section 2.2.4, and CSI and the operator do not agree that the issue requires interpretation, CSI shall rely on section II and paragraph 1.4.1 of CAN/CGSB-32.310 when interpreting the issue. The operator may still make a complaint to CSI's CVB (i.e. the Standards Council of Canada) about CSI and/or request an interpretation from the SIC.

All complaints, whether pending or resolved, shall be reported to the board at its next regular meetings. A record of all complaint and dispute proceedings and resolutions is kept in the CSI office. Complaints made directly to a CSI certified operation concerning compliance with certification standards must be documented by the certified operator. The certified operator is responsible for responding to all complaints and must keep a record of its responses and any action taken to correct the cause of the complaints.

15 REPORTING TO COMPETENT AUTHORITIES

Canada Organic Regime

- Submit reports to SCC of all suspended or cancelled operations by the 25th of each month.
- Annual report (December 31st) to SCC and CFIA of information pertaining to COR certifications in accordance with section C.9 of the COO Operating Manual.