



## **CONTROLLED DOCUMENT**

### **CSI ORGANIC CERTIFICATION POLICY MANUAL**

QUALITY SYSTEM PROCEDURE

ORG-QSP 10.1.0

Seeds Canada dba  
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1100-85 Albert Street  
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K1P 6A4

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Revision 21.0

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## REVIEW

This 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 Quality System Procedure is hereby approved.

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

Roy van Wyk  
Director, Client and Intellectual Property Services

Date: January 2, 2024

## 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	2024 fee increase (pgs 16-25)	Jennifer Scott	January 2, 2024
2			
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## DISTRIBUTION

Director, Client and Intellectual Property Services
Manager, Client Programs
Manager, Organic Program
Senior Programs Coordinator
Certification Personnel
Recognized Organic Inspectors
Certified Organic Operations

## ACRONYMS

CFIA	Canadian Food Inspection Agency
CGSB	Canadian General Standards Board
COR	Canada Organic Regime
CSI	Seeds Canada doing business as Centre for Systems Integration
EC	European Council / European Commission
EU	European Union
IOIA	International Organic Inspectors Association
JAS	Japanese Agricultural Standards
MAFF	Ministry of Agriculture, Fisheries and Forestry of Japan
NOP	National Organic Program
QMS	Quality Management System
QSP	Quality System Procedure
QM	Quality Manager
SC	Seeds Canada
SIC	Standards Interpretation Committee
SFCR	Safe Food for Canadians Regulations
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 (*Safe Food for Canadians Regulations (SFCR) Part 13*, CAN/CGSB-32.310, CAN/CGSB-32.311 and CAN/CGSB 32.312), the USDA National Organic Program (USDA-NOP) and all equivalency arrangements negotiated between the Canadian Organic Regime (COR), the USDA-NOP 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 and the USDA National Organic Program.

### 1.2 References

The publications referred to in the development of this CSI policy manual include the CFIA *Safe Food for Canadians Regulations*, the COR Operating Manual, all current CFIA policy directives, the Canadian Organic Standard (CAN/CGSB-32.310), the Permitted Substances Lists (CAN/CGSB-32.311), the Canadian Aquaculture Standard (CAN/CGSB-32.312), the USDA National Organic Program Regulations 7 CFR Part 205, the National Organic Program Handbook, and all pertinent equivalency arrangement criteria.

### 1.3 Definitions

For the purposes of this quality system procedure, the definitions in the *Safe Food for Canadians Regulations*, the Canadian Organic Standard (CAN/CGSB-32.310), the Canadian Aquaculture Standard (CAN/CGSB-32.312), and the USDA-NOP regulations 7 CFR Part 205 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 compliant 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 and/or the USDA National Organic Program

**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).

**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.

## 2 OVERVIEW OF ORGANIC CERTIFICATION AND CSI

### 2.1 What does “certified organic” mean?

Organic certification is defined by the Canada organic standard in its introduction:

“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.”

### 2.2 About the Centre for Systems Integration

The Centre for Systems Integration (“CSI”) is a division of Seeds Canada, a not-for-profit organization which offers audit, inspection, and verification services to clients in the Canadian seed industry and to the broader Canadian agricultural sector. Seeds Canada doing business as the Centre for Systems Integration is accredited to ISO/IEC 17065:2012 to deliver certification service under the Canada Organic Regime. CSI is also accredited by the USDA to deliver organic certification services under the National Organic Program.

***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 *Safe Food for Canadians Regulations*, CAN/CGSB-32.310, CAN/CGSB-32.311 and CAN/CGSB 32.312, including all equivalency arrangements negotiated by CFIA. CSI offers group certification according to the requirements of the COR Operating Manual. CSI certifies products to the USDA-NOP under the processor/handler scope.

CSI accepts applications for products that are outside the scope of the *Safe Food for Canadians Regulations* (e.g., cannabis, natural health products, personal care products, ornamental flowers, and plants, etc.). Such products will be certified if they meet the requirements of the Canadian organic standard, however the Canada organic logo cannot be used in association with any out-of-scope product.

## **2.2.2 Legal Structure and Finances**

The Centre for Systems Integration is a division of Seeds Canada. Seeds Canada is organized as a federal not-for-profit corporation in Canada. Seeds Canada is governed by a Board of Directors nominated from amongst Seeds Canada members. The financial affairs of the organization are managed by the Executive Director. The Board approves the annual budget and conducts its financial due diligence via the Board's Finance and Audit Committee. The Executive Director contracts an accounting firm, selected by the Board of Directors, to conduct the organization's annual financial audit. The Executive Director may hire a bookkeeper or accounting firm to support the organization with its bookkeeping needs.

## **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, CAN/CGSB-32.311 and/or CAN/CGSB-32.312 to come into compliance with any changes. CSI provides links to all applicable standards and regulations on its website. A current link is provided to the Organic Federation of Canada (OFC) website, where the Questions and Answers from the Standards Interpretations Committee (SIC) are published. CSI also notifies certified operators of changes to the COR Operating Manual (Part C) which is maintained by CFIA and available on the CFIA website.

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 COR Operating Manual or to IOAS, CSI's conformity verification body (CVB). Any issue subject to a question of interpretation will be placed on hold until a final response from the SIC or IOAS is returned. All certification activities shall continue as normal while a question is under discussion. 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.

A link is provided on CSI's website to the final questions and answers published by the SIC. Proposed answers and final answers are reviewed by CSI staff to assess the need for comment on proposed answers or impact on CSI clients of final answers. Final SIC answers directly impacting an operation or operations certified by CSI shall be communicated directly to the operator.

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; to the Manager of Organic Program; or to the Senior Program Coordinator. 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 (please refer to sections 6.6 and 6.7).

Any application must disclose to CSI whether the applicant holds other types of certifications (e.g., packaging, and labelling certificate, attestation of compliance) with another CB. Applicants are not permitted to hold a certificate with another CB for the same product(s) requested for certification by CSI.

The application and certification decision process for new applicants is summarized in the new applicant certification flowchart (FC\_02\_Organic program flowchart), 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.

#### 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 under the Canada Organic Regime**

#### **3.1.4.1 Changes 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 review of the applicant's system plan. 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.

The operator shall stop using their certificate issued by the sending CB after CSI's certification process is complete and the operator has received their new CSI certificate.

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.

The operator may sell certified pre-packaged products labelled with the name of the previous CB as long as these products were packaged before the operator changed to CSI and provided both CSI and the sending CB have an inventory list of the certified pre-packaged products referring to the sending CB.

#### **3.1.4.2 Changes 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 receiving CB requesting a change with a letter of good standing if appropriate. The operator agrees to abide by all requirements of the certification service contract held with CSI until certification with the new CB is confirmed. If the operator does not continue to maintain certification with CSI until a certificate is issued by the new CB, the operator's certification may be suspended and/or cancelled. 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 once CSI receives confirmation that the new CB has issued a certificate to the operator.

The operator may retain a copy of the certificate issued by CSI only if the operator has demonstrated that previously certified products are still in inventory.

### **3.1.5 Requirements When an Operator Changes Certifying Agents (CA) under the USDA-NOP**

#### **3.1.5.1 Changes to CSI**

If an operator wishes to change to CSI as their certifying agent (CA), they shall follow the procedure for an initial applicant with CSI as described. The operator shall fulfill the requirements of the current CA 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 CA before proceeding with a certification decision, including failure on the part of the applicant to pay any fees owing to the previous CA.

The operator shall stop using the certificate issued by the sending CA after CSI's certification process is complete and the operator has surrendered their certificate with the previous CA.

The operator is not permitted to use up existing supplies of labels once certification has been changed to CSI and the operator has surrendered their certificate with the previous CA.

The operator may sell certified pre-packaged products labelled with the name of the previous CA as long as these products were packaged before the operator changed to CSI and has provided CSI with an inventory list of the certified pre-packaged products which refer to the previous CA.

#### 3.1.5.2 Changes from CSI to Another CA

If an operator wishes to change to another CA from CSI, certification shall continue with CSI under the terms of the service contract until CSI is notified by the operator that they are surrendering their CSI certificate. If the operator does not continue to maintain certification with CSI until such time as a new certificate and product list are issued by the new CA, the operator's certification may be suspended and/or revoked.

The operator is required to immediately stop the use of any labels or advertising which identify CSI in relation to any products the operator markets once CSI receives confirmation that the operator has surrendered their CSI certificate.

## 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, considering the 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 manual.

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 may be observed.

Operations must notify CSI of their intent to maintain certification no later than six months prior to the end of the certification period.

A recertification package including a price quote, forms, field lists and input lists is sent to producers in February of each year, to be returned to CSI by **March 31<sup>st</sup>** of that same year.

A recertification package including a price quote, forms, product lists and input lists is sent to processors 90 days prior to the inspection anniversary date.

For clients issued a packager/labeler certificate or an attestation of compliance, the certificate is re-issued on **March 31<sup>st</sup>** 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 March 31<sup>st</sup> 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 operating revenue is generated through certification fees. Certification fees are made up of three components:

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

A deposit of \$375 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.

Fees are reassessed each year. Quotes issued to applicants at the time of application or recertification are subject to change in order to align with the fee schedule that follows.

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 Producers

<b>Application Fee</b>	<b>\$ 375</b>
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#### **Crop or Maple or Wild Crop Acreage Fee\* (added to the base farm fee)**

**Fee**

1 – 50 acres	<b>\$ 230</b>
51 - 100 acres	<b>\$ 515</b>
101 - 300 acres	<b>\$ 630</b>
301 - 400 acres	<b>\$ 750</b>
401 - 500 acres	<b>\$ 805</b>
501 - 600 acres	<b>\$ 860</b>
601 - 1000 acres	<b>\$ 1060</b>
1000 - 2000 acres	<b>\$ 1375</b>
Greater than 2001 acres	<b>\$ 1835</b>

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

#### **Livestock/Poultry Additional Fee**

Dairy	<b>\$ 750</b>
Other Livestock / Poultry Operations (with pasture)	<b>\$ 630</b>
Other Livestock (with pasture, 20 animals or less)	<b>\$ 230</b>
Other Livestock (without pasture)	<b>\$ 920</b>

#### **Other Farm Scope Certification Fees**

Greenhouse base fee (under 10,000 square feet)	<b>\$ 300</b>
Additional fees per 100 sq ft above 10,000 sq ft	<b>\$0.90/100 sq ft</b>
Mushroom Production (primary installation)	<b>\$ 1375</b>
Mushroom Production (for additional buildings within 50 km of primary installation)	<b>\$ 290</b>
Apiculture (base fee plus forage acre fee according to the farm acreage fees)	<b>\$ 290 + acreage fee</b>
Sprouts/Shoots/Microgreens or Insects	<b>\$ 745</b>
Basic On-Farm Handling (e.g., washing, packaging, and labelling)	<b>\$ 290</b>
Basic On-Farm Processing (product transformation with on-farm ingredients only)	<b>\$ 405</b>
Contracted Off-Farm Processing (plus cost of inspection)	<b>\$ 290</b>
Small-scale processing done on farm	<b>\$ 860</b>

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	<b>\$ 80</b>
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### 5.1.2 Group Certification Fees

Group certification fees are assessed in four main parts:

1. Fee for the inspection and administration of the internal procedures managed by the group manager.
2. Fee for the review of a witness audit of the group manager when conducting an internal inspection, plus the hours for the witness audit to be completed.
3. Fee for the verification audit done by the CSI inspector of an internal inspection of a group member; and
4. The applicable acreage fee applied to each of the producers selected as part of the sample which are inspected by CSI.

If any of the producers in the group require individual certification for products not included in the group certification scope, CSI will assess individual fees to each producer for the inspection and certification of these additional products.

#### Group Certification Fees

Group management inspection fee	<b>\$ 1720</b>
Witness audit of internal inspection (plus the cost of the inspection at \$70/hour)	<b>\$ 230</b>
Inspection of each producer that is part of the sample	<b>Acreage fee for individual producers</b>

### 5.1.3 Processors

CSI divides processors into different categories:

- a) Packaging and/or labelling or Traders
- b) Basic processor (i.e., single ingredient products)
- c) Simple small-scale processor
- d) Complex processor (less than 5 product types)
- e) Complex processor (less than 10 product types)
- f) Complex processor (10 product types or more)
- g) Attestation of compliance (conducts physical activities with respect to organic product where the ownership of the product remains with the primary producer/processor and the organic product is not yet in an impermeable package)

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

	<b>Fee</b>
Packaging / Labelling / Traders	<b>\$ 1100</b>
Subcontractor (plus cost of inspection \$70 per hour)	<b>\$ 250</b>
Simple small-scale processor	<b>\$ 1150</b>
Attestation of Compliance	<b>\$ 950</b>
Basic Processor	<b>\$ 1400</b>
Complex Processor (less than 5 product types)	<b>\$ 1620</b>
Complex Processor (less than 10 product types)	<b>\$ 2100</b>
Complex Processor (10 product types or more)	<b>\$ 2800</b>

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	<b>\$ 80</b>
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## 5.2 Aquaculture Fees

These fees apply to applicants seeking certification to CAN/CGSB-32.312 for crop production, livestock production (including invertebrate production), aquaponics and wild crops.

### 5.2.1 Aquaculture Production (including wild crops)

<b>Application Fee</b>	<b>\$ 375</b>
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#### **Crop or Wild Crop Acreage Fee**

1 - 50 acres	<b>\$ 345</b>
51 – 100 acres	<b>\$ 630</b>
101 - 300 acres	<b>\$ 745</b>
301 - 400 acres	<b>\$ 860</b>
401 - 500 acres	<b>\$ 920</b>
501 - 600 acres	<b>\$ 975</b>
601 - 1000 acres	<b>\$ 1175</b>
1000 - 2000 acres	<b>\$ 1375</b>
Greater than 2001 acres	<b>\$ 1850</b>

### 5.2.2 Aquaculture livestock production (including invertebrates)

Application Fee	\$ 375
Livestock Base Fee	\$ 1200
Additional Fees assessed beyond a six-hour inspection	\$ 80 / hr
Additional Site Fee	\$ 115 per site
Basic On-Farm Handling (e.g., packaging and labelling)	\$ 290

### 5.2.3 Aquaponics production

Application Fee	\$ 375
Aquaponic Base Fee (under 10,000 square feet)	\$ 290
Additional Fees per 100 sq ft above 10,000 sq ft	\$0.90/100 sq ft
Aquaponic Livestock Fee	\$ 575
Basic On-Farm Handling (e.g., packaging and labelling)	\$ 290
Subcontracted Off-Farm Processing plus cost of inspection (\$70 per hour)	\$ 290

## 5.3 Additional Certification Fees

### 5.3.1 Certificate Fees (applicable to all producer, processor/handler, and aquaculture applications)

#### Certification Fees

COR Certificate Fee	\$ 58
COR Attestation of Compliance Fee	\$ 58
Equivalency Certificate Fee (per arrangement)	\$ 58
COS Certificate Fee (for out-of-scope certification)	\$ 58
NOP Certificate Fee	\$ 1400
NOP Certificate Fee (when combined with COR certification)	\$ 700

### 5.3.2 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, transportation providers, slaughter facilities that are not responsible for final packaging and labelling of product, etc.

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. Certificates and product lists are re-issued on March 31<sup>st</sup> of the current year if the client has fulfilled all requirements for renewing the attestation of compliance in the previous 12 months.

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 SFCR, and no further verification is required by CSI of that operation.

### 5.3.3 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 \$55 per input material review or product/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 \$70.

## 5.4 Input Material Review Fees

These fees apply only to an operation that requests formal approval by CSI of its input product(s) 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

New Application Fee	\$ 460
Renewal Application Fee	\$ 410
Material Review Fee (per product – single ingredient)	\$ 90
Material Review Fee (per product – multi-ingredient, up to 25 products)	
Crop input material (initial)	\$ 175
Crop input material (renewal)	\$ 90
Livestock input material (initial)	\$ 230
Livestock input material (renewal)	\$ 90
Processing input material (initial)	\$ 230
Processing input material (renewal)	\$ 90

Inspection fee – per hour	\$ 80
26-50 Products (each additional product)	\$ 60
51-100+ Products (each additional product)	\$ 30
Review time required beyond one hour	\$ 80
Input Approval Attestation of Compliance Fee	\$ 60
Non-compliance fee (issued per NC for three or more)	\$ 35
Product Formulation Change (per hour)	\$ 90
New Product Addition (per hour)	\$ 90
ORG_11 Amendment Form	\$ 60

## 5.5 Other Fees

### Administration Fees

Inspection Fee if required to revise a certificate – per hour	\$ 80
Import or Transaction Certificates (per certificate); updates to product lists (per update); label reviews (per request); other additional requests	\$ 80
Cheque returned for non-sufficient funds	\$ 35
Late fee charges (applied 30 days after invoice is sent)	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.)	\$ 80
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### 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.

If transportation means other than driving such as train or airplane must be used, with the pre-approval by the applicant, the actual costs will be billed. If inspections of multiple operators are carried out in one trip, the expenses will be prorated to the operators.

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

**See TB Directive**

**Actual amount**

**Pro-rated**

**Actual amount**

Mileage will be billed from the inspector’s home for all inspections carried out. Whenever possible this fee will be pro-rated by the inspector across several clients. If required, the cost of airfare will be agreed upon by the client prior to the inspection. 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)	<b>\$ 35</b>
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(When it has been determined, based on what was in the NC, that on-site inspection is necessary to verify the completion of the corrective actions to close the NC, 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)	<b>\$ 80</b>
Travel costs for follow-up inspection	<b>At cost</b>

**5.6 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:

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	2.0	5.0	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	1.0	2.0	1.0
Mushroom Production	1.0	4.0	2.0
Basic Handling of On-Farm Products	1.0	1.0	1.0

<b>Group Certification Fees</b>			
Group management inspection	2.0	5.0	2.5
Witness audit of group manager	0.5	2.0	0.5
Inspections of producers in sample group (estimates per producer)	0.5	2.0	0.5

<b>Processor Type</b>	<b>Estimated Inspection Time</b>		
	Plan Inspection	On-site Inspection	Report Writing
Packaging / Labelling	1.0	3.0	2.0
Subcontractor	1.0	2.0	1.0
Basic Processor	2.0	4.0	2.0
Complex Processor (less than 5 product types)	2.0	5.0	2.0
Complex Processor (less than 10 product types)	2.0	8.0	3.0
Complex Processor (10 product types or more)	2.5	10	3.0

### 5.6.1 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\_23\_Time Sheet), 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.

## 5.7 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.

## 5.8 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 all certificates issued be returned to the CSI office.

### 5.8.1 Withdrawal before Initial Review

The \$ 375 application fee is refundable if an applicant stops the application process before the system plan review is started.



### **5.8.2 Withdrawal after Initial Review but Prior to On-Site Inspection**

The following fees shall apply and be due:

- \$ 375 application fee
- \$ 165 minimum review for continued certification application or a \$195 minimum review for initial application
- \$ 80 for inspector preparation time, if applicable.

### **5.8.3 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.

### **5.8.4 Withdrawal after Certification Review**

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

### **5.8.5 Withdrawal after Certification is Granted or Denied**

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

## **5.9 Fees for On-Farm Processing**

Producers wishing to be certified for on-farm processing will pay the appropriate fee after discussion with organic program staff to determine the scope and complexity of the products being processed on-farm.

## **5.10 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 \$275 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 certified operator to have documented procedures which describe the operational controls at the time of processing or handling of the organic product to ensure the subcontracted facility is adhering to organic handling procedures and practices.

If two or more CSI certified operations wish to subcontract with the same facility, CSI may 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** and/or **ORG\_33\_NOP 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. 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, maple producer applications and in-ground greenhouse operation 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 organic products 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**

CSI organic program staff collaboratively assign inspections to inspectors who are recognized by CSI as having the training and competency to conduct inspections to the standards requested. These assignment lists are provided to the inspectors and are subject to change at the discretion of the CSI organic program staff throughout the year. Inspectors are normally rotated off a client after three consecutive inspections. If there are extenuating circumstances that would require an inspector to conduct a fourth consecutive inspection, those reasons are documented.

For new applicants, an inspector with the appropriate scope and experience will be assigned to the operation. New assignments are added to the master list, and inspectors are notified of their updated assignment lists by a program coordinator.

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 to request a different inspector be assigned. The applicant may refuse the assigned inspector if there are reasonable grounds that a conflict of interest between the two parties exists.

An application for reassignment of an inspector 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.

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

CFIA may also require that additional inspections be performed by CSI to determine compliance with the COR regulations and standards.

Additional inspections may be announced or unannounced at the discretion of CSI or as required by CFIA and/or the USDA-NOP.

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 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 Manager of Organic Program convene a review committee if additional expertise is required to conduct the review. The review committee shall consist of the

Manager of Organic Program and an external specialist identified in coordination with the Manager of Client Programs 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 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.

The Certification Director will conduct a review of the file to make the certification decision. If an operation was previously cancelled, a request for reinstatement will be sent to CFIA, and the certificate will be held until confirmation is received that the operation is no longer listed as cancelled.

Operators applying for USDA-NOP certification whose certification was previously suspended will be required to request reinstatement of certification from the NOP and the request granted before CSI is able to issue a certificate.

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, aquaculture wild crops and aquaculture products with a production cycle of more than 12 months), 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.

CSI will issue a certificate which specifies the:

- Name and address of the certified operation.
- The standard to which the operation has been certified.
- Effective date of certification.
- Categories of organic operation, which are defined as follows:
  - Crop Production
  - Livestock Production
  - Livestock Feed
  - Specialized Production – Apiculture
  - Specialized Production – Maple
  - Specialized Production – Mushrooms
  - Specialized Production – Crops grown in structures and containers
  - Specialized Production – Wild Crops
  - Specialized Production – Sprouts, shoots, and microgreens
  - Specialized Production – Insects

- Processed Products (indicating multi-ingredient products of at least 95% organic content, and multi-ingredient products of at least 70% organic content)
- Handling (USDA-NOP)
- Group Certification
- Aquaculture Production (crops or livestock or wild crops)
- Aquaponic Production (crops or livestock)
- CSI's name, address, and telephone number.
- Any other information required under COR or the NOP.

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.

USDA-NOP certification continues to remain in effect until surrendered by the operation; or suspended or revoked by CSI.

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 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 after 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 includes 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.

An applicant who has applied for certification under the USDA-NOP and has received a Notice of Denial will be granted the right to either request mediation or to file an appeal with the USDA-NOP.

### **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 which demonstrates continued compliance with COR requirements and/or the USDA-NOP.

The renewal application dates are described in section 4.1. An inspection is conducted of the operator in accordance with **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 Manager of Organic Program. Any questions regarding the meaning or intent of the advertising shall be put to the operator, and CSI staff shall make a recommendation, with the final decision being that of the Executive Director.

CSI will, within a reasonable time, arrange and conduct an on-site inspection of the certified operation. When it is impossible for CSI to conduct the annual on-site inspection following receipt of the certified operation's annual update of information within the 12-month recertification period, CSI may conduct the inspection on a date beyond the period of 12 months from the previous year's inspection which shall not exceed three months. Justification for the delay shall be documented in the client's file.



If an operator chooses not to renew certification within the time frames for re-certification established by CSI and is not changing to another certification body or certifying agent, CSI will follow the procedures for suspension and/or cancellation/revocation of certification.

### **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 Manager of Organic Program convene a review committee. The review committee shall consist of the organic certification program staff, the report reviewer (if a contractor) 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 complies 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 and/or a notice of non-compliance resolution letter). 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 Reduction, Proposed Suspension, Suspension, Proposed Cancellation or Cancellation of Certification

#### 6.3.5.1 Certification to COR and the Canadian Organic Standards

If a report reviewer identifies and issues a non-compliance related to any one of the criteria listed in CAN/CGSB-32.310 section 1.4, a review committee meeting is convened and the review committee decides on the appropriate action to take with regards to the operation, which may include one or all the following actions:

- a) continuation of certification under conditions specified by CSI (e.g., increased surveillance).
- b) reduction in the scope of certification to remove nonconforming organic products.
- c) suspension of the certification pending remedial action by the operator.
- d) cancellation of the certification.

When correction of the issue of non-compliance is not completed within the prescribed period, or if a non-compliance is issued that requires immediate action, CSI shall send the certified operation a written notification of proposed suspension of certification.

If the operator does not successfully address the notice of non-compliance sent with the proposed suspension within the stated time frame, CSI will issue a notice of suspension.

The notification of suspension of certification shall state:

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

In addition to failure to address issues of non-compliance or submit recertification documents within the required time frames, an operator will be advised that suspension will result when their account has reached 90 days in arrears. CSI will give the operator an additional 30 days to remit the full balance owing. If, after the additional 30 days, the operator's account is still in arrears, certification shall be suspended.

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 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 Manager of Organic Program and the certification process continues.

If the operator does not effectively correct and address the reasons for suspension, cancellation of certification shall be proposed. The operator shall be advised of the proposed cancellation and their right to be heard, either orally or in writing, in respect of the proposed cancellation. Any appeals received will be submitted to the CSI Appeals Committee.

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. 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.

#### 6.3.5.2 Certification to the USDA-NOP

If a Report Reviewer identifies and issues a non-compliance related to any of the requirements of the organic regulations 7 CFR Part 205, a review committee meeting is convened and the review committee decided on the appropriate action to take with regards to the operation, which may include one or all of the following:

- a) Continuation of certification under conditions specified by CSI (e.g., increased surveillance).
- b) Notice of Non-Compliance.
- c) Notice of Non-Compliance and/or Proposed Suspension of Certification.
- d) Notice of Non-Compliance and/or Proposed Revocation of Certification.

If the operator does not successfully address the Notice of Non-Compliance, CSI shall issue a Notice of Proposed Suspension or Revocation. The Notice of Proposed Suspension or Revocation shall state:

- The reasons for the proposed suspension or revocation.
- The proposed effective date of the suspension or revocation.
- The operator's right to request mediation from the CA or to submit an appeal to the USDA-NOP.

Failure to request mediation or an appeal from the USDA-NOP shall result in the suspension or revocation of certification. Mediation shall be conducted in accordance with NOP §205.663. The suspension shall remain in effect until the required corrective measures are implemented by the operator and certification is reinstated by the USDA-NOP.

Any suspension or revocation of an operator's certification shall be made public via an update to the USDA-NOP Organic Integrity Database.

## **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 Cancellation and/or Surrender by Voluntary Withdrawal from Organic Certification**

Once an operation is certified under the COR, its certification continues until withdrawn by the organic operation or suspended or cancelled by CSI. Once an operation is certified under the USDA-NOP, its certification continues until surrendered by the organic operation or suspended or revoked. An operation may voluntarily withdraw/surrender 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 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 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. This section is not applicable to operations certified under the USDA-NOP.

#### **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 Appeals 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 Director of Client Strategy and Solutions brings the decision of the committee regarding the impartiality of CSI's organic certification process to the Business Services Committee of the Board of Directors for confirmation. This committee is also responsible for hearing any appeals made with regards to a decision by CSI to propose cancellation an operation's certification.

This section does not apply to operations certified under the USDA-NOP. All appeals under the USDA-NOP program must be submitted directly to the USDA-NOP.

### **6.7.1 Appeals**

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 proposed cancellation of certification to the CSI Appeals Committee.

The appeal procedure is described in CSI's internal procedures (QMS 117-3). If the committee supports an 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 committee denies an appeal, a formal administrative proceeding will be initiated to deny or cancel the certification.

The certificate holder, if not satisfied with the decision of the CSI Appeals Committee, may submit a complaint to CSI's Conformity Verification Body (CVB), which is IOAS ([www.ioas.org](http://www.ioas.org)) by emailing [info@ioas.org](mailto:info@ioas.org).

## **6.8 Group Certification**

### **6.8.1 General Requirements**

A group of production units, sites or facilities may make application to CSI for "group certification". The group is recognized as a "person" under Part 13 of the SFCR. Members of a group shall apply similar production systems and should be in close geographical proximity to one another. The group may be organized as a co-operative, or as a group of producers affiliated with a processor.

The group shall be formally established with written agreements with its members. The group shall be centrally managed, with established decision-making procedures and operate as a legal entity. Group members shall apply similar production systems and should be in geographical proximity. Only small farmers ( $\leq 100$  acres) may be members of the group covered by group certification. Large farms ( $> 101$  acres) may belong to the group but must be inspected annually.

The management of the group shall implement a documented internal control system (ICS), managed by an ICS manager. The ICS shall describe the supervision and documentation of the production practices and inputs used at each group member unit, site, or facility to ensure compliance with COR.

The group management shall designate an adequate number of internal inspectors to carry out internal controls on the group members. The ICS manager may also fulfill the role of internal inspector. Internal inspectors shall be appropriately trained, and the ICS manager shall ensure that potential conflicts of

interest are limited. Internal inspectors shall carry out at least on annual inspection visit to each individual operator in the group to verify fields and/or facilities.

The internal inspector must be competent to conduct the internal inspections of the group members. Competency may be demonstrated by meeting any of the following criteria:

- 1) The internal inspector is also an independent inspector recognized by CSI, who has worked as an inspector for CSI.
- 2) The proposed internal inspector is an inspector for another COR CB. In this case, the internal inspector submits a C.V. to CSI for review and determine if the individual's training and experience with another CB demonstrate competency to conduct group internal inspections.
- 3) The internal inspector candidate obtains a Certificate of Completion from a 100-level COR organic standards webinar offered by IOIA. CSI may require that the internal inspector candidate mentor with an experienced inspector prior to conducting internal inspections for a group.

The ICS shall have records which include:

- i. Production descriptions and specifications for the products being produced or prepared by the group.
- ii. Maps and a description of each farm and/or facility in the group.
- iii. A list of all inputs being used by group members (agricultural substances and/or ingredients).
- iv. A copy of each group member's organic system plan.
- v. Any notices of non-compliance issued by CSI in the previous certification cycle, as well as evidence of corrective measures implemented by group members in relation to the issues of non-compliance.
- vi. A complete list of group members.
- vii. Continuous verification of implementation of the internal inspections; and
- viii. A summary of the internal inspection reports.

The ICS shall include a mechanism for removing non-compliant group members from the list. The ICS shall also record all non-compliances identified through internal inspections as well as the corrective actions imposed by the ICS manager.

The internal control system manager shall record all non-conformities (NCs). An operator must respond to a NC within 30 working days of its receipt. The response shall either provide evidence of completion of the corrective actions taken to address the NC or present a plan for correction of the NC. The plan shall include a completion date not exceeding 90 working days from the receipt of the NC. The ICS manager may accept times greater than those stated for closure of an NC if the decision is justified and documented.

### **6.8.2 Initial Certification**

The CSI group certification system plan is completed and submitted. The ICS manager shall submit the appropriate system plans to CSI for each group member, as well as the list of approved inputs that the group members are permitted to use, and maps for each member in the group.

CSI shall conduct a risk assessment of the group to determine the percentage of members will be inspected. In the case of a normal risk assessment, the number of members inspected shall not be lower

than the square root of the total number of members in the group. If the risk is higher than normal, the risk factor is multiplied by 1.2. If the risk assessment is high, the risk factor is multiplied by 1.4.

Risk factors assessed include:

- Organization size and the size of each site.
- The value of the products.
- The number of years the group has functioned.
- The number of new members registered in a year.
- Staff turnover at the group management level.
- The management structure of the internal control system.

Factors related to the characteristics of the grower group include:

- Variations in the production systems.
- Risks for commingling or contamination of organic products.
- Geographical dispersion of the sites; and
- The degree of uniformity among the production units, sites, or facilities.

In addition to an inspection of the group management system and the sample of group members as determined by the risk assessment, the CSI inspector will also conduct a witness audit to determine whether the internal inspections of the ICS are being conducted as written.

For normal risk situations, the number of group members subject to inspection for initial certification shall not be lower than the square root of the total number of units under the responsibility of the group.

In cases of medium risk, the number calculated to determine the audit sample under normal risk shall be multiplied by 1.2. In cases of high-risk situations (for example, if the ICS has issued a lot of internal sanctions, or several new grower members are added), the number calculated to determine the audit sample under normal risk shall be multiplied by 1.4. All calculation totals ending with decimals shall be rounded up.

### **6.8.3 Maintaining Certification**

A risk assessment is done on the group annually. The sample of members selected each year for inspection shall be predominantly different from one year to the next. In addition to the risk factors listed in section 6.8.2, CSI may also consider the following factors when determining risk after initial certification:

- Results from the ICS inspections.
- Review of complaint files.
- Significant variations in a site's size.
- Modifications made since the last certification.

An annual inspection of the ICS manager and the selected sample of members is conducted by a CSI inspector according to ORG-SWI 10.1.1. The ICS manager shall maintain an up-to-date list of all group



members and shall inform CSI in a timely manner when there are changes in the status of a group member. The ICS shall include procedures for adding new group members.

In cases of high-risk situations CSI may increase the number of the annually inspected members to at least 2 times the square root of the number of the members in the grower group (for example, if the ICS has issued a lot of internal sanctions, or a lot of new grower members are added).

#### **6.8.4 Records**

The ICS shall include requirements for record keeping at each individual production unit, site, or facility in the group.

#### **6.8.5 Certification Documents**

CSI shall provide certification documents to the group management. Individual group members are only issued certification documents if a group member has obtained its own certification independently from the group.

#### **6.8.6 Suspension and Cancellation**

CSI holds the group management responsible for the compliance of all members with the requirements of COR. CSI may suspend either a group member or the entire group. In the case of suspension or cancellation, the procedures as described in section 6.3.6 of this document apply, in accordance with Part 13 of the SFCR, to either an individual member or to the entire group.

## **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 (RR03-4-1 Organic Input Materials Review). All review results are recorded in the CSI database. Inputs used by an operator are linked to 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.

CSI may seek clarification from the Standards Interpretation Committee (SIC) regarding the annotation for an input material as listed in CAN/CGSB-32.311 if there are questions related to an input material review. In the event of a disagreement with regards to compliance of an input material approved for use by another CB, CSI shall submit a complaint to IOAS and CFIA.

### **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 under COR. The commercial entity must apply (ORG\_24\_Aproved 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 plans 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 apply 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 and/or by the USDA-NOP.

### **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 software, 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. The inspector provides a copy of the exit interview to the client, and a copy is also included 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 is responsible for reporting on compliance with organic standards based on the application and his/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 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. Inspectors sign an annual confidentiality declaration.

## **8.10 Contracting Inspectors**

Inspectors are typically independent contractors. Staff members with appropriate scope may also be assigned to conduct inspections.

## **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 an inspector chosen by CSI. CSI may choose to send an inspection team to investigate depending on the circumstances. 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 staff to determine candidates for unannounced inspections.

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 of CSI organic program staff 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 5% of 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 enough then candidates will be chosen from those that have a risk factor greater than 28.

Unannounced inspections will be coordinated by CSI. An inspector is assigned and directed 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 in one geographic area.

In the case of an unannounced inspection, the Senior Programs Coordinator 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. Under the COR, if advance notice (of not more than 24 hours) is required, the inspector shall document the reasons that advanced notice was given.

Under the USDA-NOP, an operator should not be notified prior to the inspector's arrival. However, there may be special cases where extenuating circumstances make it impossible to conduct an unannounced inspection of the operation without prior notification (e.g., biosecurity issues). In such cases, the CA may notify the operation up to four (4) hours prior to the inspector arriving on-site to ensure that appropriate representatives of the operation are present.

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 Programs Delivery Coordinator 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.

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 compliant with the requirements of the SFCR may be subject to sampling and testing.

In the event CSI receives a complaint alleging the use of or contamination by a prohibited substance or prohibited methods, CSI may sample and test as part of the complaint investigation. If it is determined that an operator intentionally used prohibited substances, CSI shall initiate suspension procedures.

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 testing laboratory which CSI intends to use shall be disclosed to the operator prior to the sample being sent. If the operator has a conflict of interest with the proposed testing laboratory, another testing laboratory shall be selected.

Arrangements will be made for an inspector to obtain a sample and submit the sample to a CSI approved laboratory.

CSI has agreements with several laboratories to conduct GE and/or pesticide residue 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 the contracted laboratory, CSI shall take appropriate corrective actions.

## 8.15 Testing Results

### 8.15.1 Canada Organic Regime (COR)

Results of all analyses and tests will be provided to the certified operation. In the event of the detection of the presence or use of a prohibited substance, CSI will investigate to determine the cause of the presence of a prohibited substance in accordance with the requirements stipulated by CFIA in **Directive 14-01 - Sampling and testing organic products**. The investigation plan will be developed by CSI organic program staff depending on the level of chemical residue detection. The results of the investigation will be reviewed by the Manager of Organic Program who will provide recommendations to the Manager of Client Programs on next steps and on the certification status of the operator.

After the investigation, CSI shall report the results as required by the directive, depending on the level of chemical detection, to CFIA.

### 8.15.2 USDA-NOP

The testing of products under the USDA-NOP shall follow the requirements of NOP §205.670. Results of all analyses and tests will be provided to the certified operation. In the event of the detection of the presence of a prohibited substance, CSI will investigate to determine the cause of the presence of the prohibited substance in accordance with the requirements stipulated under NOP §205.670.

## 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. 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 Manager of Organic Program 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 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 Safe Food for Canadians Regulations Part 13.
- **NOP Certification or 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 referencing 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 (except for 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.

COI declarations are reviewed by the Quality Manager to identify and record any potential conflicts of interest and inform the other staff of pre-existing conflicts so that each file is handled from start to finish by certification personnel who are not in a conflict of interest, or have a potential conflict of interest, with the applicant or operator.

## **14 COMPLAINTS 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. CSI's complaints and appeals handling processes are available upon request.

Complaints concerning CSI must be documented and submitted to the Director of Client Strategy and Solutions. If a complaint personally involves the Director Client Strategy and Solutions, the complaint will be submitted to the Executive Director.

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 about CSI and/or request an interpretation from the SIC.

A summary of complaints received is reviewed at the annual management review meeting. A record of all complaints 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 IOAS of all suspended or cancelled operations by the 25<sup>th</sup> of each month.
- Annual report (December 31<sup>st</sup>) to IOAS and CFIA of information pertaining to COR certifications in accordance with section C.9 of the COR Operating Manual.

CSI shall report on the following items to IOAS as required in section C.9:

- Certificates newly issued, renewed and withdrawn listed by operator category under COR (listed by operator category).
- Number of annual inspections.
- Number of annual inspections by activity.
- Number of unannounced inspections and number of unannounced inspections by activity.
- Number of non-conformities issued.
- Number of samples collected.
- Number of complaints; and
- Number of attestations issued.

## **16 USDA-NOP SPECIFIC REQUIREMENTS**

For operators requesting certification to the USDA-NOP, all requirements of the USDA-NOP must be followed.

These requirements include the following:

- Investigations of certified operations shall be conducted in accordance with NOP §205.661.
- Non-compliances shall be issued in accordance with NOP §205.662.
- CSI shall make available to members of the public the following information, free of charge:
  - Certification certificates issued during the current and three (3) preceding calendar years.
  - A list of handlers whose operations it has certified, including for each the name of the operation, type(s) of operation, products produced, and the effective date of certification, during the current and three (3) preceding calendar years (via data that is entered into the Organic Integrity Database).
  - The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and preceding three (3) calendar years.
  - Other business information as permitted in writing by the handler.