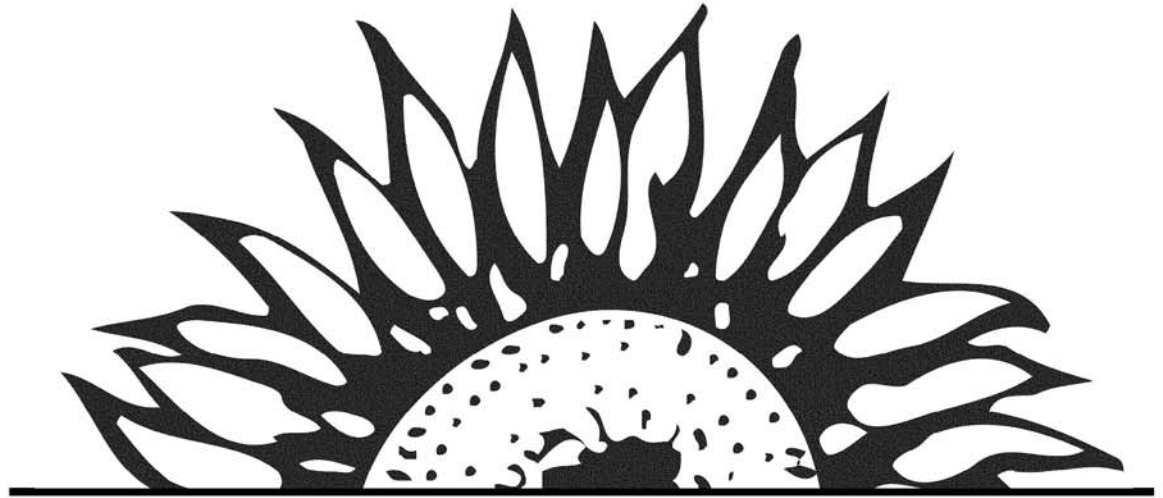




CCOF
Certification Services, LLC.

www.ccof.org



MANUAL THREE

CCOF International
A Guide to CCOF Global Market Access

Edition: July 2008- Updated December 1, 2009.

Introduction

CCOF Global Market Access provides verification of organic farmers, livestock operations, handlers and processors in accordance with European Economic Community Regulations 834/2007 (EEC), the standards of Canadian Organic Regime (COR), and other relevant international standards. These regulations differ from the United States Department of Agriculture (USDA), National Organic Program (NOP) standards in specific areas. While CCOF Certification Services, LLC (CCOF CS) believes that the various standards are very similar and share essential core principles and values, the details of the standards are different. CCOF CS has developed this program in order to provide CCOF CS clients with the proper verification that allows them to demonstrate their compliance with various export standards.

The contents of this manual identify areas where CCOF Global Market Access requirements must be met in addition to the USDA NOP Standards.

The contents of this manual also define procedures that CCOF Global Market Access employs for our own compliance to ISO Guide 65 requirements and Canadian accreditation requirements. For example, the appeal procedures defined under the NOP does not apply to a decision made by CCOF CS under Global Market Access. Separate appeals procedures are defined in this manual.

CCOF CS will update changes to EEC Regulations and member state interpretations of the regulation as they become known. European Union Member States do interpret the EEC regulations in different ways and thus some countries may require additional documentation without prior notice.

CCOF CS will notify producers of the changes to the CCOF Global Market Access Standards and will provide clients with six months notice prior to enforcement of any standard change when possible.

1. FREQUENTLY ASKED QUESTIONS

What Is The CCOF Global Market Access (GMA) Program?

CCOF Global Market Access (GMA) provides additional standards, which were developed to provide clients QS-02-00, V4, R2 07/01/10

sufficient access to export markets not accessible with USDA NOP certification alone, and for compliance and/or equivalence to European Union Regulation 834/2007, Canadian organic standards, and other relevant foreign standards. The USDA National Organic Program requirements are baseline standards, which must be met by those producing or selling products in the United States. However, for exporting to some other countries, the USDA standards alone do not suffice for the export of U.S. product.

The GMA program screens CCOF clients against a variety of known foreign standards, export arrangements, and other international requirements to provide clients with documentation of compliance or specific requirements that must be met to achieve compliance/equivalency with various international requirements.

As foreign countries develop new mandatory national standards or export requirements change, CCOF CS will continue to modify the GMA program to ensure access to foreign markets.

How much does the GMA program cost?

The GMA program is competitively priced at only \$250 at the time of initial enrollment and \$250 due January 1 thereafter. This includes review to all standards as requested by the client.

Am I eligible for CCOF Global Market Access Certification?

If you are currently certified by or applying for certification with CCOF CS for USDA NOP certification, then you are eligible for CCOF Global Market Access.

Who needs to be certified to the CCOF Global Market Access program?

Any CCOF CS producer that may export product directly or may sell product to a handler that will export a processed product needs certification. In both situations, CCOF CS clients will need the additional verification provided by the CCOF Global Market Access program in order to demonstrate compliance with various international standards. Producers of the following products should seriously consider obtaining CCOF Global Market Access certification: all nuts, tree fruit, grapes (for wine and raisin production), specialty lettuce, strawberries, dates and dairy (especially if dehydrated for milk powder).

Producers must apply for CCOF Global Market Access in advance of the

harvest or production of the product in order to ensure that that compliance can be verified prior to export.

How do I obtain CCOF Global Market Access Certification?

Step 1

Indicate on your application form or annual continuation of certification contract that you request CCOF Global Market Access, and submit directly to CCOF CS.

Step 2

Pay the required fees. CCOF CS will invoice you at the time of application or continuation of certification. If you are applying before or after continuation of certification, CCOF CS will invoice you upon review of the application.

Step 3

Complete an inspection. After the inspection, CCOF CS will review the inspection and determine compliance.

What are the additional standards for CCOF Global Market Access?

The additional requirements of CCOF Global Market Access are baseline European Union Standards and the standards set by the Canadian Organic Regime (as needed). Other areas covered include the Canadian Organic Regime/US National Organic Program Equivalency Agreement, MAFF/USDA Export Arrangement between the US, Japan, and Taiwan, and Quebec's organic requirements.

The simple answer is that CCOF global market access is a condensed version of the European Union Regulation 834/2007 and Canadian Organic Regime. It only identifies those standards that are "additional" to the USDA NOP, and often requested for the acceptance of US product being exported.

Do I have to enter my entire operation or can I enter a portion of my operation?

No, CCOF CS can certify to various CCOF Global Market Access requirements on a field-by-field or product-by-product basis; However, the issues of whole farm conversion and the conversion time associated with various materials prohibited by CCOF Global Market Access may at times make this impractical. All sites, fields and orchards are subject to various conversion rates. The sites will be considered from the time they first apply for certification as either transitional or organic, with intent for full farm conversion to organic. Please note however, that CCOF CS will consider a separate application from a

separate business entity or from a clearly defined division of a parent company as a separate entity.

Handlers and processors are not required to enter as an entire operation. Individual products may be certified under CCOF Global Market Access for handling and processing operations. However, handlers must be able to evidence recordkeeping.

What are USDA Export Arrangements?

The USDA has mutual agreements with other countries and economic regions that outline their respective standards. Export arrangements thus far include Japan, New Zealand, Quebec, United Kingdom, Denmark and British Columbia. In some cases, such as Japan & Taiwan, additional provisions and standards must be met to export product. CCOF CS monitors these arrangements and other international standards, to ensure access to markets.

What is the European Union Regulation 834/2007? (EEC 834/2007)

All products sold as “organic” in the European Union must have been grown and processed in accordance with EU Council Regulation No. 834/2007 and 889/2008. The regulations provide European members states with the minimum standards to which products must be grown if they are to be sold as “organic.” EEC 834/2007 gives individual member states the authority to adopt and enforce stricter regulations within the country, but not to restrict trade among other member states. Organic producers, processors and handlers may need to meet additional requirements established by individual member states or certification agencies in the importing country. CCOF CS cannot anticipate all the demands of each member state, but has a very strong reputation within the EU and can usually resolve questions raised by EU members.

What is the Canadian Organic Regime (COR) and COR Equivalency?

All products sold as “organic” in



Canada must meet the requirements of the Canadian Organic Regime (COR) as of June 30, 2009. These standards QS-02-00, V4, R2 07/01/10

are required to be met for all products entering Canada or Canadian Provinces. All ingredients in products destined for Canada must also meet COR in order for the final product to receive certification¹. GMA service for COR compliance is required for all operations located in Canada.

NOP/COR Equivalency Program: On June 18, 2009 the CFIA and US NOP signed a historic organic standards equivalency agreement. This agreement establishes the two country’s standards as equivalent with the exception of minor variances that must be addressed in the certification or import/export process. The CCOF GMA program for CCOF operations outside of Canada will verify and document compliance with the US/Canada equivalency agreement.

COR is overseen by the Canadian Food Inspection Agency (CFIA) and is composed of several constituent parts. Each part plays a role in defining how operators demonstrate compliance and the administrative and other roles of certifiers, standards setting bodies, and enforcement arms.

- **Regulation establishing COR, released in its final version June 24, 2009.**
- **Organic Production Systems General Principles and Management Standards (CAN/CBSB-32.310-2006).** These are the National Standard of Canada which establishes the production practices that must be followed by operators.
- **Organic Production Systems Permitted Substances Lists (PSL).** This list identifies materials that may be used in the production of organic products under COR.
- **Canada Organic Regime Quality Management System Manual (QMS).** Published by the CFIA, this manual identifies the manual for entities involved in administrating the COR. These include requirements and procedures for certifiers, accreditors, and the CFIA itself. The QMS includes numerous requirements that affect certifiers accreditation and will result in certification processes or requirements that affect operations seeking certification under COR.

What about COR Compliance for Operations Located in Canada?

CCOF maintains COR certification accreditation for certification of operators and their production fields or facilities located in Canada. These

operators must enroll both the CCOF GMA and COR Compliance Certification Program. This program will verify compliance to the full COR standards as applied in Canada. Because additional verification is required and additional accreditations must be maintained, the cost of this program is an additional \$750 per year. All applicable additional program requirements are contained below in CCOF COR Compliance Program section.

Additional facilities associated with US-based certification clients will be verified by CCOF for compliance with COR as needed by the parent entity.

The CCOF COR Compliance Program combines requirements from all identified constituent parts of COR to provide a convenient and manageable single set of requirements for operators and identifies specific CCOF practices and procedures that must be followed. Where COR equivalency requirements differ from baseline NOP or other practices they are identified in Manual III.

A paper copy of any of these components is available on request to CCOF clients enrolled in GMA. Where materials or practices are allowed by the NOP but prohibited or substantively limited under COR, they are identified in the CCOF COR Compliance Program Manual. Where NOP compliance, materials use or other practices result in substantive compliance with COR they are not.

2. PARTICIPATION REQUIREMENTS

2.0 CCOF USDA NOP Certification

All CCOF CS clients must be certified according to the NOP Standards. Certification with CCOF Global Market

Access is an additional certification and may only be granted simultaneously or after the NOP certification is granted. The NOP program is described in Manual One: A Guide to CCOF NOP Certification, and in Manual Two: A Guide to USDA Requirements for Organic Producers. The fee for this service is per Manual One: A Guide to CCOF NOP Certification Services.

2.1 Certificates of Compliance

CCOF Global Market Access offers verification to a variety of standards, and issues certificates for equivalency to EU 834/2007 and/or Canadian Organic Regime equivalency or Canadian Organic Regime compliance as needed. The certificate for those

¹ COR QMS 1.3.1

who meet the general requirements as set forth in this Section 2.0

Participation Requirements, and Section 4.0 Additional Standards shall receive:

- CCOF EU 834/2007 Certificate of Equivalency, and/or
- CCOF Canadian Organic Regime Certificate of Equivalency, and/or
- CARTV (Quebec) compliance, and/or
- MAFF/USDA (Japan) Export Arrangement compliance
- CCOF Canadian Organic Regime Certificate of Compliance
- Other standards or export arrangements as applicable.

2.2 Complaint Log Standard²

CCOF Global Market Access is recognized by the USDA Agriculture Marketing Services (AMS) and the International Organic Accreditation Service (IOAS) for operating in accordance to ISO Guide 65: Guidelines for the operation of a certification body. As such, and to maintain compliance with COR requirements³, all CCOF Global Market Access clients must keep a record of all complaints received that relate to a product's compliance with CCOF Global Market Access standards. A record of all complaints must be made available to CCOF CS when requested. The record must show that appropriate action is taken with respect to each received complaint.

2.3 Export Certificate (EC) Service

Only those CCOF CS clients granted a *Certificate of Compliance* as per Section 2.1 may receive Export Certificate Service for verification of shipments for domestic and international trade, particularly to the European Union and its member states.

Export certificates may be requested in writing using the Export Certificate and Transaction Certificate Request Cover Sheet and Request Form available at www.ccof.org/forms.php.

The fee for this service is per Manual One: A Guide to CCOF CS.

CCOF CS will provide applicable export documentation as follows:

- European Union documentation (for EU member nations) including, but not limited to, Import authorization and Import Certificate for all clients with products certified as equivalent to EEC834/2007
- CCOF provides TM-11 export certificates where required by

USDA export arrangements with foreign governments.

CCOF CS cannot guarantee that the CCOF Global Market Access standards will meet the requirements of other unpublished or newly developing standards, nor can CCOF CS anticipate additional procedures or requirements that may be implemented by various regulatory bodies. However, at a client's request, CCOF CS will provide all complete, accurate, and relevant information from a client's file in order to demonstrate compliance.

3. CERTIFICATION

3.0 Certification Process

CCOF CS operates additional standards similar to the certification process outlined in Manual One. To make additional certification easy for you, the full context of the certification process is outlined below with specific references to Manual One: A Guide to CCOF Certification, and notations of additional and/or different aspects of the certification process.

3.1 Application⁴

To request Global Market Access, indicate on the CCOF Application your desired scope of certification and expected or planned international markets. Applications are described per Manual One: A Guide to CCOF Certification and can be downloaded at www.ccof.org.

All applicants with dual or multiple certifications with the same certification scope must obtain written consent from the applicant to receive from the certifier or certifiers the following upon application:

- Current certification decisions,
- Any major non-compliances,
- Evidence of corrective actions(s),
- Copies of transactions certificates or information regarding sales, and/or
- Any denials or suspension/revocations.

For applicants certified by one or more certification agencies, CCOF CS will make every effort to coordinate the inspection with the certifier(s) to reduce costs to the client.

3.2 Application Review⁵

The Application Review is described per Manual One: A Guide to CCOF Certification, Section 2.2 Application Review and Cost Estimate. The findings of this review will be

communicated to the client per Section 3.7 Certification Sanctions.

3.3 On-Site Inspection⁶

The on-site inspection is described per Manual One: A Guide to CCOF Certification, Section 2.3 On-Site Inspection.

CCOF reserves the right to make all inspection assignments. CCOF clients may not influence the choice of inspector or contact inspectors directly to solicit inspection assignments. Operators have the right to be informed about the identity of the inspector before the inspection visit, and may raise objections based on conflicts of interest or other reasons. The certification body shall rule whether the reasons are accepted.⁷

CCOF CS may provide foreign accreditation agencies and/or import authorities with copies of inspection reports when required exclusively for the purpose of gaining import licenses for CCOF clients enrolled in GMA or their customers. When inspection reports etc. are provided CCOF will notify the client of this occurrence.

3.3.1.1 GMA Program On-site Provisions⁸

In addition to the on-site provisions in Section 2.3, Global Market Access inspections for clients enrolled in the GMA program must also include identification and investigation of areas of risk, review of records and accounts, productions/sales reconciliation on farms, and input/output reconciliation and trace back audits in processing and handling.

CCOF reserves the right to make all inspection assignments. CCOF clients may not influence the choice of inspector or contact inspectors directly to solicit inspection assignments. Operators have the right to be informed about the identity of the inspector before the inspection visit, and may raise objections based on conflicts of interest or other reasons. The certification body shall rule whether the reasons are accepted.

3.3.1.2 EEC On-Site Provisions

In addition to the on-site provisions for inspections in CCOF Manual I, Global Market Access inspections for EEC 834/2007 clients must also include the full inspection of all conventional storage areas, including, but not limited to, conventional input and seed storage facilities.⁹

² ISO Guide 65 §15

³ CAN QMS 8.1.2.e

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⁴ ISO/IEC Guide 65 4.1.4, 4.5.3.i.1-4.5.3.i.2, 4.6.1, 4.6.2.a

⁵ ISO/IEC Guide 65 8.1.1, 8.1.3-8.1.4, 8.2.1.a-b, 8.2.2.a-b, 8.1.2.a-h, 9.0-9.3

⁶ ISO/ICE Guide 65 9.2, 9.4, 10

⁷ CAN QMS 4.5.3.1

⁸ EEC 889/2008 Article 32(d) and Article 66

⁹ EEC 889/2008 Article 66(3)

3.3.1.3 Canada On-Site Provisions- Only applicable to operations located in Canada.

In addition to other on-site provisions, Global Market Access inspections for Canadian Organic Regime clients will take into account the intensity of the production system, production types, company size, previous inspection/review results, complaints, and parallel production.

CCOF will also include identification and investigation of areas of risk, review of records and accounts, productions/sales reconciliation on farms, and input/output reconciliation and trace back audits in processing and handling, and verification that changes have taken place per any changes in COR standards.¹⁰

Inspections for clients seeking COR compliance may also include the full inspection of all conventional crops and applicable storage areas, including, but not limited to, conventional input and seed storage facilities. This is applicable where there are organic and non-organic fields/farms operated by the same clients in the same area.¹¹

Clients must be able to demonstrate during onsite inspections functioning audit trail/record keeping systems that include traceability.

3.3.2 Additional (Announced & Unannounced) On-site Inspections¹²

CCOF CS reserves the right to conduct additional on-site inspections of both applicants for certification and certified operations to determine compliance with the applicable international organic production and handling regulations. The documentation of additional inspections will be deemed necessary by CCOF CS based on risk analysis, taking into account factors such as the type of production, the operator's record of compliance and complexity of production.

The International Organic Accreditation Services (IOAS) may require that additional inspections be performed by CCOF CS for the purpose of determining compliance or equivalence with applicable international organic production and handling regulations. Additional inspections may be announced or unannounced at the discretion of the CCOF CS or as required by IOAS.

At minimum, CCOF CS must conduct unannounced inspections of at least

5% of the total GMA clients, in addition to 3% of COR primary producers, and 5% of other COR clientele. CCOF CS will assign the inspection based on the following criteria:

- Identification of a possible non-compliance activity;
- Potential for drift;
- Achievement of geographic crop and seasonal diversity;
- Other logical reason(s), including random selection.

3.4 Granting of Certification¹³

Granting certification is described per Section 2.1 Certificates of Compliance, Section 2.3 Export Certificate Service and per Manual One: A Guide to CCOF Certification, Section 2.4 Granting Certification.

CCOF will inform clients, in writing, when they are affected by a change, modification (such as reduction, expansion, or extension), or withdrawal of certification in whole or in part¹⁴.

3.5 Continuation of Certification¹⁵

Continuation of Certification is per Manual One: A Guide to CCOF Certification, Section 2.5 Continuation of Certification.

3.6 Modification of Certification¹⁶

Modification of Certification is per Manual One: A Guide to CCOF Certification, Section 2.6 Modification of Certification.

3.7 Certification Sanctions¹⁷

Certification Sanctions are per Manual One: A Guide to CCOF Certification, Section 2.7 Certification Sanctions.

3.7.1 Noncompliance Procedure

Noncompliance Procedure is per Manual One: A Guide to CCOF Certification, Section 2.7.1 Noncompliance Procedure.

3.7.2 Denial of Certification (Applicants)¹⁸

Denial of Certification is per Manual One: A Guide to CCOF Certification, Section 2.7.2 Denial of Certification.

3.7.3 Proposed Suspension or Revocation¹⁹

Proposed Suspension or Revocation is per Manual One: A Guide to CCOF Certification, Section 2.7.3 Proposed Suspension or Revocation.

3.7.4 Suspension or Revocation²⁰

Suspension or Revocation is per Manual One: A Guide to CCOF Certification, Section 2.7.4 Suspension or Revocation.

3.7.5 Discontinuance of Certification²¹

Discontinuance of Certification is per Manual One: A Guide to CCOF

Certification, Section 2.7.5

Discontinuance of Certification.

Clients must also cease all claims of the CCOF logo and name, destroy or return all certificates, labeling and marketing materials containing reference to CCOF, and are liable for the costs of services provided up to the point of withdrawal.

3.7.7 Reinstatement

Reinstatement is per Manual One: A Guide to CCOF Certification, Section 2.7.7 Reinstatement.

3.8 Appeals²²

An applicant for certification may appeal a CCOF CS notice of denial of certification, and a certified operation may appeal a CCOF CS notification of proposed suspension or revocation of certification or other adverse action or decision. CCOF CS will carry out the appeal pursuant to the following:

- All written communications between parties involved in appeal proceedings must be sent to the recipient's place of business by a delivery service, which provides dated return receipts.
- An appeal of a noncompliance decision must be filed as required in the notification or within 30 days from receipt of the notification, whichever occurs later. All appeals must include a copy of the adverse decision and a statement of the appellant's reasons for believing that the decision was not proper or made in accordance with EU 834/2007 or COR regulations.
- The appeal will be considered "filed" on the date received by CCOF CS. All appeals shall be reviewed in a timely manner, heard and decided by persons not involved with the decision being appealed. The CCOF CS Ad Hoc Appeals Committee shall render a final and non-appealable decision to sustain, deny, suspend or revoke certification. Alternatively, they may sustain or deny an appeal regarding an adverse action.

3.9 Complaints²³

¹³ ISO/IEC Guide 65 4.2.b, 4.6, 11.b, 12-12.4

¹⁴ COR QMS 14.1.3

¹⁵ ISO/IEC Guide Section 13

¹⁶ ISO/IEC Guide 65 4.6-4.6.2.c, 12.1, 12.4, 13-13.3

¹⁷ ISO/IEC Guide §4.6.1, 4.6.2-4.6.2.c, 4.8.1, & 12.4

¹⁸ ISO/IEC Guide Section 4.2.b

¹⁹ ISO/IEC Guide 65 4.6

²⁰ ISO/IEC Guide 65 4.6-4.6.2.a

²¹ ISO/IEC Guide 65 4.6.2.a

²² ISO/IEC Guide 65 7, COR QMS 4.2i

¹⁰ COR QMS 4.5.3.i

¹¹ COR QMS 9.2.2.b

¹² EEC 889/2008 Article 63(1)(c) & 65(4) & COR QMS 13.01.a

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CCOF CS reserves the right to investigate complaints of noncompliance with applicable to CCOF Global Market Access organic production and handling regulations including EEC, Canada (COR) or other requirements, and/or complaints against the performance of CCOF CS as a certification body. CCOF CS is committed to investigating complaints that are submitted in writing and that provide evidence that supports the allegation(s). CCOF CS conducts investigations in a timely manner, confidentially and based only on documented evidence. If a certified party or applicant refuses to cooperate in an investigation, CCOF CS may deem this sufficient cause for denial or suspension and/or revocation of certification. A certified party must also maintain records of such complaints per Section 2.2 Complaint Log Standard.

3.10 CCOF Global Market Access Claims

No operation may represent product as organic or in compliance with GMA standards/programs or utilize the CCOF seal or other GMA or COR seals until it has been informed, in writing, by CCOF CS that the products in question have been certified appropriately to the standard represented.²⁴

As per OSP requirements in CCOF manuals one and two all clients must disclose all labels and brands manufactured under CCOF NOP and GMA certification(s). This must include any and all organic private labels or other brands not owned by the client.²⁵

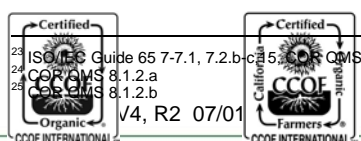
3.10.1.a EU 834/2007 Claims

CCOF Global Market Access does not issue claim(s) for CCOF EU acceptance, only a certificate per Section 2.1 Certificates of Compliance.

3.10.1.b Seal/Logo Use

CCOF will utilize the logos below on GMA certificates to indicate the compliances/equivalencies achieved within the program. On November 17, 2007 CCOF adopted a new seal and logo with broader national appeal for CCOF's nationally-based growers and processors. The new CCOF GMA seal is utilized by CCOF to indicate compliance with GMA requirements. This seal or the GMA Classic seal may be utilized by CCOF clients to indicate GMA compliant products. The standard CCOF seal may also be used on any CCOF certified product.

CCOF GMA Seals GMA Classic



All labels used on packaging must be attached to the OSP and pre-approved by CCOF CS, preferably prior to printing.

An operator can only make claims regarding certification which are consistent with the scope of the certification that has been granted and as displayed on their GMA certificate. The CCOF seal may be used on any CCOF certified product

Operations found to be COR equivalent may use either the NOP Seal or COR seal as limited by specific labeling restrictions.

An operator can only make claims regarding certification which are consistent with the scope of the certification that has been granted.

CS certified clients that withdraw, drop or are decertified from Global Market Access may be required by CCOF to immediately cease use of the CCOF name, logo and seal.

3.11 GMO Exclusion Program and Testing Policy²⁶

3.11.1 Exclusion Program

The deliberate use or negligent introduction of genetically engineered organisms or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited. Global Market Access incorporates procedures to verify that GMO exclusion is being achieved. This shall include animals, seed, propagation material, pollen and farm inputs such as fertilizers, soil conditioners, crop protection or processing materials²⁷. This GMO exclusion program is documented and implemented primarily via the Organic System Plan (OSP) and Inspection Report formats. The OSP provides a framework by which organic producers can identify and address GMO critical control points within their system. The Inspection Report form prompts inspectors to verify relevant GMO critical control points. The OSP and Inspection Reports are periodically revised based on the latest available information regarding GMO crops and products.

CCOF CS periodically provides updates regarding GMO crops and

²⁶ ISO/IEC Guide 65 7-7.1, 7.2.b-c, 15, ; EEC 834/2007 Article 4(a)(iii)
²⁷ EEC 889/2008 Article 9(1)

materials in the marketplace in the CCOF Newsletter.

3.11.2 GMO Testing

CCOF CS does not require mandatory GMO testing for verification of organic production. Testing is only performed when there is a specific cause for concern, such as suspected negligence or fraud that may have resulted in GMO presence in organic products or production systems.

3.12.1 The Ministry of Agriculture, Forestry and Fisheries of Japan (MAFF) Export Arrangement

CCOF CS operates in accordance to the USDA/MAFF-Japan Export Arrangement as published on the USDA website. Clients must meet NOP regulations and the relevant requirements of Section 6.0 Crop Materials. All ingredients in processed products must also be produced according to these restrictions.

3.12.2 The Conseil des Applications Agroalimentaires du Quebec (CARTV)

CCOF CS operates in accordance to the CARTV Export Arrangement as recognized by the CARTV website. Clients must meet NOP regulations and the relevant requirements of Section 10 Quebec Labeling Requirements.

3.12.3 EEC 834/2007 Accredited Certification Agencies and Other Agencies Providing Certification to EEC Regulations

CCOF CS will only recognize an ingredient certificate from other certification agencies for EEC 834/2007 where those programs are accredited to the NOP and ISO Guide 65 or EN 45011 under:

- USDA ISO Guide 65 Accreditation (Required for suppliers located in the U.S.)
- EN 45011 Accreditation (Required for suppliers affected by EN45011)
- ANSI ISO Guide 65 Accreditation (Required for suppliers located outside the U.S.)

3.12.4 Taiwan

CCOF operates in accordance with the USDA/Taiwan Export Arrangement as published on the USDA NOP website. Note that USDA Export Arrangements only extend to products produced and/or shipped from the US. Products shipped to Taiwan must be produced "using zero prohibited substances".

Livestock and meat products must be produced without the use of systemic pain killers or analgesics; including the use of Lidocaine and Procaine. CCOF

clients requesting export documents for Taiwan must verify these requirements in writing in their export document request. As these are at their core verification of compliance with US NOP standards, additional supplier verifications will not be required until further notice. CCOF clients should be aware that the Taiwanese organic authorities have strongly based their organic system on analytical testing and residue analyses are likely.

3.12.5 CCOF Private Retail Certification Program

Retail operations with locations in foreign countries or regions without clearly applicable national standards may participate in CCOF's Private Retail Organic Certification program. This program is offered as an optional addition under the CCOF, Global Market Access program.

Under this program CCOF CS will provide full inspection and certification to the best practices and standards of both CCOF's baseline NOP program and applicable national standards in the country of operation. The client operations will be required to maintain appropriate and consistent labeling claims in subject departments and identify themselves as "certified organic" or "CCOF Certified Organic" or "Certified Organic by CCOF".

However, under the program, labeling provisions allowing the use of either the NOP or other national seals will not be applied.

Certificates for this program will reference the CCOF Private Retail Certification Program and not reference or function as formal NOP certifications. All other applicable CCOF standards,

policies, practices, and systems in both Manual II and III will apply.

To ensure consistency and the highest standards possible, operations enrolled in the CCOF Private Retail Certification Program will complete CCOF's standard retail OSP. CCOF inspections will verify NOP and additional relevant standards and best practices as relevant to the country of operation. CCOF GMA on-site, appeal, and other program provisions will apply.

Costs for this program will include standard fees as described in Manual 1 and GMA enrollment.

4. GLOBAL MARKET ACCESS STANDARDS

This section outlines the additional standards that CCOF Global Market Access enforces to comply with all applicable standards, based on European Union (EU) 834/2007 Regulations and other standards as applicable, per the following scopes of certification: Crop Production, Livestock, and Processing/Handling.

Based on the Global Market Access information and scope of certification indicated in the client's Organic System Plan, CCOF CS will determine the client's equivalence to EU 834/2007 or compliance to COR, and other standards as applicable.

If the standard is "Determined to be equivalent to NOP", CCOF CS has already assessed this standard as part of the entry-level NOP organic certification, and no additional compliance measures are required.

5.0 Production Terms

Factory Farm- a farm in which the animal spends its entire life indoors and there is a high stocking rate of animals in the facility.

Handle To sell, process, or package agricultural products, except such term shall not include the sale, transportation, or delivery of crops or livestock by the producer thereof to a handler. A handling scope certification is required for anyone engaged in processing.

Handler- Any person engaged in the business of handling agricultural products, including producers who handle crops or livestock of their own production, except such term shall not include final retailers of agricultural products that do not process agricultural products. A handling scope certification is required for anyone engaged in processing.

Handling operation- Any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products. A handling scope certification is required for anyone engaged in processing.

Primary Ecosystems- land that is in its natural state and has not been cultivated within the last 100 years.

Conversion - the act of certification to organic standards of a conventional operation. The practices and requirements for certification are defined within each regulation.

Parallel Production-growing the same crop variety both organically and non-organically within the same production unit. Prohibited under EU standards, with specific exceptions for perennial crops in conversion. Substantial separation of business operations and business identities may be required to ensure compliance. Alternately, full farm conversion of the business may be required.

6. CROP PRODUCTION REQUIREMENTS AND MATERIALS UNDER NOP/COR EQUIVALENCY

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under CCOF Global Market Access. The following charts list are those materials that are prohibited and/or restricted on crops for each export program. COR equivalency requirements appear below.

Crop Production Standards	NOP/COR Equivalency Requirements
Hydroponic and Aeroponic Production	Products produced using Hydroponic or Aeroponic production methods under the NOP may not be sold as organic in Canada.
Sodium Nitrate (Chilean Nitrate)	<p>Raw produce²⁸ shipped to Canada under the NOP/COR equivalency agreement must not be produced with the use of Chilean Nitrate. As with other GMA programs, operations must be able to appropriately segregate crops produced to COR equivalency requirements from NOP production when Sodium Nitrate is used. Fields are not required to undergo transition after the use of Sodium Nitrate.</p> <p>Operations must be prepared to demonstrate through auditable records that raw produce labeled for sale in Canada, represented as COR equivalent, or listed by CCOF on client profiles as COR equivalent are produced without Sodium Nitrate. It the client's responsibility to ensure that they notify CCOF of changes to field compliance status due to the use of Chilean Nitrate. Operations should be prepared to demonstrate compliance to USDA and/or CFIA personnel as necessary.</p> <p>Certified operations shipping raw produce may utilize certifier affidavits, supplier attestations, or documentation from NOP certifiers, such as client profiles or similar documents, to ensure compliance.</p>

6.1 CROP PRODUCTION STANDARDS EU REQUIREMENTS

Crop Production Standards	European Union Regulation 834/2007
Conversion	<p>All sites, fields, and orchards must not have any prohibited substances applied within 36 months of the first organic harvest. CCOF CS will report the conversion date as the date of application to CCOF CS or the first date of certification of the operation under another certifier unless there is documentation as described below.</p> <ol style="list-style-type: none"> Sites will be considered within the CCOF Global Market Access program from the time of application for certification as either transitional or organic²⁹ CCOF CS reserves the right to determine that an operation has converted according to EEC Annex 1 Section 1.2 (a) and (b) where there is documentation of conversion, including but not limited to, registration with the California Department of Food and Agriculture, Organic Program. All CCOF CS Clients should note that Switzerland is not a member of the EU and thus may require additional conversion requirements. Clients seeking to export to Switzerland should ensure that product is from an operation that has been certified by CCOF CS or another agency for at least three years.
Crop Rotation for the Production of Annual Crops.³⁰	NOP Equivalent
Genetically Modified Organisms (GMOs)³¹	<p>The following organic and non-organic crops grown or handled on an operation must be evaluated for the potential for GMO contamination from pollen drift, and producers must have documentation pertaining to purchase and planting, including brand and variety name: Corn, Potato, Tomato, Rape Seed/Canola Oil, Soybean, Zucchini, Alfalfa (including rhizobium inoculant Dormal Plus), Cotton, Other(s) TBA</p> <p>The deliberate use, or negligent introduction, of genetically engineered organisms or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited. This shall include animals, seed, propagation material, pollen and farm inputs such as fertilizers, soil conditioners, or crop protection materials³².</p> <p>Contamination by GMOs may alter the organic status of an operation, even if circumstances are beyond the control of the operator.</p>
Hydroponic and Aeroponic Production³³	Prohibited

²⁸ U.S.-Canada Determination of Equivalency Directive from NOP to all USDA-ACAs

²⁹ EEC 889/2008 Article 36(1)(2)

³⁰ EEC 889/2008 Article 12(1)

³¹ EEC 834/2007 Article 4(a)(iii)

³² EEC 889/2008 Article 9(1)

³³ EEC889/2008 Article 4

Crop Production Standards		European Union Regulation 834/2007
Parallel Production ³⁴	<p>Growing the same crop variety both organically and non-organically (parallel production) is prohibited. Operations that are able to evidence that organic and conventional production are physically, financially, and operationally separate, will not be considered to be engaged in parallel production. CCOF will make a determination as to the status with regard to parallel production based on the client OSP and inspection. Specific exceptions may exist for perennial crops in conversion. Perennial crops may be grown in parallel production if a plan is in place to bring the non-organic production into organic management.</p> <p>An exception can be made for seed production if the following is met:</p> <ul style="list-style-type: none"> a) Measures are taken to ensure permanent separation of the seed; b) CCOF is notified at least hours prior to harvest of seed; c) Upon harvest completion, the exact quantities, and other distinguishing features and confirmation of segregation activities are reported to CCOF.³⁵ 	
Seeds and Planting Stock ³⁶	<p>Producers must use organically grown seeds, annual seedlings, and planting stock as required by the NOP Regulation. CCOF CS has the authority to determine if equivalent organic varieties are available and thus require their use. CCOF CS may be required to use seed databases that are developed by EU member nations in accordance with Article 48.</p>	

6.2 CROP PRODUCTION MATERIALS- MAFF/USDA (Japan) and EU requirements

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under CCOF Global Market Access. The following charts list are those materials that are prohibited and/or restricted on crops for each export program. COR equivalency requirements appear in a separate table below.

Crop Materials	MAFF-JAPAN	European Union Regulation 834/2007																
Ammonium Carbonate	NOP equivalent.	May not contact crops or soil																
Antibiotics (Streptomycin & Tetracycline)	NOP equivalent.	Prohibited																
Boric Acid	NOP equivalent.	Allowed as a micronutrient and for structural pest control, provided there is no contact with organic product																
Copper Salts and copper sulfate	NOP equivalent.	Restricted to a maximum of 6 ³⁷ kg/ha per year of elemental copper.																
Gibberillic Acid	NOP equivalent.	Prohibited																
Humic Acids	Prohibited (alkali-extracted types only).	NOP equivalent.																
Hydrogen Peroxide	NOP equivalent.	Restricted to use as a cleaning agent in livestock buildings an installations																
Lignin Sulfonate	Prohibited as a floatation agent	Restricted for use by processors and handlers only																
Manure	NOP equivalent.	<p>Factory Farmed Manure is prohibited.</p> <p>Factory farmed manure includes:</p> <ul style="list-style-type: none"> a) Manure from animals treated with genetically modified Bovine Growth Hormone. b) Manure from caged poultry (or other caged animals), as well as manure from poultry held at a stocking density in excess of 12 birds per square meter. <p>CCOF CS requires that all manure sources be ³⁸documented.</p> <p>Animal manures may be applied to organic land at a rate of no more than 156 lbs of nitrogen per acre/per year on a rolling average basis. Calculation:</p> <table border="1" style="margin-left: 20px;"> <tr> <td>170</td> <td>kg of N</td> <td>1</td> <td>Hectare</td> </tr> <tr> <td>170</td> <td>kg of N</td> <td>2.4</td> <td>Acres</td> </tr> <tr> <td>374</td> <td>lbs of N</td> <td>2.4</td> <td>Acres</td> </tr> <tr> <td>156</td> <td>lbs of N</td> <td>1</td> <td>Acres</td> </tr> </table>	170	kg of N	1	Hectare	170	kg of N	2.4	Acres	374	lbs of N	2.4	Acres	156	lbs of N	1	Acres
170	kg of N	1	Hectare															
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³⁴ EEC 889/2008 Article 40(1)

³⁵ EEC 889/2008 Article 40(1)

³⁶ EEC 889/2008 Article 45(1)(b)

³⁷ EEC 889/2008 Annex II

³⁸ EEC 889/2008 Article 3(2), Annex 1

Crop Materials	MAFF-JAPAN	European Union Regulation 834/2007
Peracetic Acid	NOP equivalent.	Restricted to use as a cleaning agent in livestock buildings and installations
Peat	NOP equivalent.	Use limited to horticulture/nursery production
Polyethylene, polypropylene or polycarbonates	NOP equivalent.	NOP equivalent.
Sodium Nitrate (Chilean Nitrate)	NOP equivalent.	Prohibited
Sodium Silicate	NOP equivalent.	NOP equivalent.
Spinosad	NOP equivalent.	Restricted use only if produced by strains not genetically modified and used only when measures are taken to minimize the risk to key parasitoids and to minimize the risk of development of resistance
Vitamins B ₁ , C, & E	NOP equivalent.	Prohibited

7. LIVESTOCK

The CCOF GMA program provides verification to EU Equivalency requirements.

Livestock Standards	European Union Regulation 834/2007
Animal Identification	Livestock must be identified permanently using techniques adapted to each species, in the case of large mammals, individually or in the case of poultry and small animals, individually or by batch. ³⁹
Artificial Lighting for Poultry ⁴⁰	Laying hens may only receive a maximum of 16 hours of light per day with a continuous nocturnal rest period without artificial lighting of at least 8 hours.
Conversion	Animals brought onto the farm from non-organic sources should not exceed 10%, based on approval from CCOF CS. Conversion may be up to 40% of the herd if there is a breed change or an extension of the farm.
Livestock Production	Artificial reproduction, such as cloning and embryo transfer are prohibited.
Feeding of Young ⁴¹	Young mammals must receive a diet based on organic milk for not less than 90 days for bovines and equidae, 45 days for sheep and goats, and 40 days for pigs. Organic milk from the animal's mother (maternal milk) is preferable.
Health and Feed	Herbivores daily feed rations must consist of at least 60% roughage, fresh or dried fodder or silage. However, CCOF may permit a reduction to 50% for dairy animals for a maximum period of three months in early lactation ⁴²
Housing/Herd Management	<p>Landless operations are not allowed. Animal production must be an integrated part of the soil and land management associated with the farm. Use of pasture must be maximized.</p> <p>Livestock grazed on Bureau of Land Management (BLM) land must be segregated from conventional animals. Stocking rates must take any conventional livestock grazing on the same land in account and be consistent with sustainable pasture management described by EEC1698/2005 or EEC 1257/1999.⁴³</p> <p>Livestock housing must have smooth, non-slippery floor. At least half of the total floor area must be solid and not slatted or grid flooring.⁴⁴</p> <p>Livestock housing must be provided with comfortable, clean, and dry laying/rest areas of sufficient size, consisting of a construction which is not slatted.⁴⁵ The housing of calves in boxes is forbidden after the age of one week.⁴⁶</p> <p>Buildings housing poultry must be emptied, cleaned and disinfected between flocks. Runs should be left empty to allow for grass to re-grow. Exceptions to this rule are free range poultry.⁴⁷</p> <p>Housing, pens, equipment and utensils must be properly cleaned and disinfected to prevent cross-infection and the build up of disease carrying organisms⁴⁸.</p> <p>Indoor finishing of meat (final fattening stage) animals may not exceed 1/5 of the animals' total life or a maximum period of 3 months.⁴⁹</p>
Methionine	Prohibited.

³⁹ EEC 889/2008 Article 75

⁴⁰ EEC 889/2008 Article 12(4)

⁴¹ EEC 889/2008 Article 20(1)

⁴² EEC 889/2008 Article 20(2)

⁴³ EEC 889/2008 Article 17(3)

⁴⁴ EEC 889/2008 Article 11(1)

⁴⁵ EEC 889/2008 Article 11(2)

⁴⁶ EEC 889/2008 Article 11(3)

⁴⁷ EEC 889/2008 Article 23(5)

⁴⁸ EEC 889/2008 Article 23(4)

⁴⁹ EEC 889/2008 Article 46

Livestock Standards	European Union Regulation 834/2007
Parallel Production	Conventional livestock must be of a different species. The animals must be reared in separate buildings and parcels which are clearly separate from organic livestock Non-organic livestock may utilize organic pastures as long as animals are not from concentrated animals feeding operations and are segregated from organic livestock. Stocking rates must take any conventional livestock grazing on the same land in account and be consistent with sustainable pasture management described by EEC1698/2005 or EEC 1257/1999. ⁵⁰
Stocking Densities and Manure ⁵¹	Stocking densities must consider the requirement that animal manures cannot be applied to organic land in excess of 156 lbs of nitrogen per acre/per year. All land in the organic system can be applied to the ratio. Maximum stocking densities are described by Annex IV of EEC889/2008 From annex IV: Dairy cows - there should not be more than .8 adult cows per acre (2.5 animals per hectare). Laying hens should not be more than 93 birds per acre (230 birds per hectare).
Transport and Slaughter	The duration of livestock shall be minimized. Loading and unloading of livestock must be carried out with caution and without the use of any types of electrical stimulation to coerce the animals The use of any allopathic tranquilizers, prior to and during transport is prohibited ⁵² Poultry must be at the following minimum age before slaughter ⁵³ : Chickens-81 days, Capon-150 days, Peking ducks-49 days, Muscovy Ducks (F)-70 days, Muscovy Ducks (M) -84 days, Mallard Ducks-92 days, Guinea fowl- 94 days, Turkeys (M) and Geese-140 days, Turkeys (F) -100 days. Where producers do not apply these minimum slaughter ages, they must use slow-growing breeds/varieties.
Veterinary Allopathic Drugs	Storage of allopathic veterinary medicine and antibiotics is permitted as long as they have been prescribed by a veterinarian in connection with a treatment referred to in Annex I, and stored in a supervised location and are documented. ⁵⁴ Records and documentation for livestock veterinary treatments must include the following information: The active pharmacological ingredient in the treatment, the diagnosis, dosage & duration, method of administration and legal withdrawal period. ⁵⁵

7.1 LIVESTOCK & LIVESTOCK PRODUCTS SHIPPED TO TAIWAN

The CCOF GMA program provides verification to USDA/Taiwan export arrangement standards applicable to livestock and livestock products.

Livestock Standards	Taiwan
Pain Killers and Analgesics-Lidocaine & Procaine	Livestock must be produced to NOP standards. The use of system pain killers and analgesics is prohibited. As such, Lidocaine and Procaine may not be used in this manner. Use as topical applications and the use of other topical analgesics and painkillers is allowed for products shipped to Taiwan.

8. PROCESSING/HANDLING STANDARDS & MATERIALS

Processing/ Handling Regulations	European Union Regulation 834/2007
Audit Control ⁵⁶	All handlers, including importers, must be certified.
Cleaning & Sanitizers ⁵⁷	Chlorine, hydrogen peroxide, ozone, and peracetic acid must not be added to water contacting organic products; except, municipal water or water treated with chlorine to meet drinking water standards is allowed.
Genetically Modified Organisms ⁵⁸	The deliberate use or negligent introduction of genetically engineered organisms or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited. This shall include ingredients and processing aids. Contamination by GMOs may alter the organic status of an operation even if circumstances are beyond the control of the operator.

⁵⁰ EEC 889/2008 Article 17

⁵¹ EEC 889/2008 Article Article 15(2) and Annex IV

⁵² EEC 889/2008 Article 18(4)

⁵³ EEC 889/2008 Article 12(5)

⁵⁴ EEC 889/2008 Article 35(3)

⁵⁵ EEC 889/2008 Article 76(e)

⁵⁶ EEC 834/2008 Article 82

⁵⁷ EEC 889/2008 Annex VIII B

⁵⁸ EEC 834/2007 Article 4(a)(iii) and 889/2008 Article 9(1)

Processing/ Handling Regulations	European Union Regulation 834/2007
Ingredients and processing aids ⁵⁹	<p>All ingredients must comply with the EEC regulations</p> <p>8.2.1 All ingredients claimed as organic under CCOF Global Market Access must comply or be recognized as equivalent with the European Regulation 834/2007. For certification transference and recognition, call CCOF CS.</p> <p>8.2.2 All processing aids used in processed products must be included in EEC 889/2008 Annex XIII Section A: Food Additives, including Carriers, and Section B: Processing Aids and Other Products.</p> <p>8.2.3 Where products contain non-organic agricultural ingredients, these ingredients must comply with Article 19(2) of EEC834/2007 and appear on Annex XI of EEC889/2008 or be provisionally allowed by a member state.</p> <p>CCOF has provided a listing below of substantive differences between materials allowed by NOP but restricted or prohibited under EEC Annexes. Materials that do not appear on the list below but are allowed under the NOP are generally allowed for use under CCOF's EU Equivalency program.⁶⁰</p>
Parallel or Split Production	NOP equivalent
Storage and Warehouse Facilities	NOP equivalent. CCOF will inspect all storage and warehouse facilities for all products subject to control. ⁶¹

8.1 PROHIBITED & RESTRICTED PROCESSING/HANDLING MATERIALS

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under CCOF Global Market Access. The following chart lists are those materials that are prohibited and/or restricted for processing for each export program. If a substance appears on the USDA National Organic Program Materials List, but not on this list, it is likely allowed under the CCOF Global Market Access program. Any restrictions regarding the use of the materials listed below must be followed for compliance to be granted under the program in question.

Processing Materials	NOP Allowance	European Union Regulation 834/2007
Beeswax	NOP equivalent.-Agricultural, non-organic allowed in "Made with organic..." products.	Allowed as processing aid-releasing agent
Boiler Chemicals: Cyclohexylamine Diethylaminoethanol Octadecylamine	Allowed for boiler water in packaging sterilization.	Prohibited
Calcium Phosphates	Monobasic, Dibasic and Tribasic calcium phosphates are allowed synthetics.	Allowed as monocalciumphosphate Dibasic and tribasic forms are prohibited.
Calcium sulfate	Allowed synthetic restricted to mined sources only.	Allowed as additive carrier and processing aid coagulation agent
Carnauba wax	Allowed	Allowed as processing aid-releasing agent
Casein	May only be used in products labeled "Made With Organic (specified ingredients)".	Allowed as processing aid
Colors	Nonsynthetic sources allowed and colors derived from non-organically produced agricultural sources (for list see 205.606.d.)	Must be organic or allowed list of non-organic agricultural products.
Ethanol	Prohibited unless organic.	Allowed as processing aid-solvent.
Ferrous Sulphate	Allowed for iron enrichment or fortification of foods when required by US regulations or recommended (independent organizations).	Prohibited

⁵⁹ EEC 834/2007 Article 19(2), EEC 889/2008 Article 27(1), 28, 29

⁶⁰ EEC889/2008 Article 32, 63, 66

⁶¹ EEC889/2008 Article 32, 63, 66, 67

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Processing Materials	NOP Allowance	European Union Regulation 834/2007
Glucosyl delta-lactone	Listed as a Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s) but prohibited if produced by the oxidation of D-glucose with bromine water.	Prohibited
Lignin sulfonates ⁶²	Allowed for the flotation of tree fruit.	Lignin sulfonates used for floating tree fruit are prohibited.
Magnesium stearate	Prohibited in agricultural products labeled as organic. Only allowed use in products labeled "made with organic" (specified ingredients or food groups).	Prohibited
Magnesium Sulphate	Only nonsynthetic sources allowed.	Prohibited
Potassium hydroxide	Allowed synthetic prohibited for use in lye peeling of fruits and vegetables.	Prohibited
Potassium Iodide	Prohibited in agricultural products labeled as organic. Only allowed use in products labeled "made with organic" (specified ingredients or food groups).	Prohibited
Potassium phosphate	Prohibited in agricultural products labeled as organic. Only allowed use in products labeled "made with organic" (specified ingredients or food groups).	Prohibited
Sodium Acid Pyrophosphate	Allowed as leavening agent.	Prohibited
Sodium citrates	Allowed	Prohibited
Sodium hydroxide	Allowed synthetic prohibited for use in lye peeling of fruits and vegetables.	Allowed for sugar production and oil production from Brassica rape seed (<i>Brassica spp</i>)
Sodium phosphate	Allowed synthetic restricted for use only in dairy foods.	Prohibited
Tetrasodium Pyrophosphate	Allowed-Texturizer in meat analog products.	Prohibited.

9. ORGANIC PRODUCT LABELING

Copies of all labels utilized under the CCOF Global Market Access must be submitted and approved by CCOF CS prior to use. Labels should generally meet the organic label requirements of the destination country. Specifically, products certified as meeting the NOP/COR Equivalency must be labeled in full compliance with COR labeling requirements if shipped to or sold in Canada.

Organic Labeling	European Union Regulation 834/2007	Canadian Organic Regime (COR)
100% Organic Requirements	This labeling claim category is unique to the US NOP and does not have a precise corollary in most other standards. Therefore, it is typically not addressed in their regulations or labeling requirements.	
"100% Organic" Requirements Continued	Claim non-existent but not prohibited.	According to verbal statements made by Canadian officials the organic claim "100% Organic" as identified in the NOP may be prohibited for use in Canada. Products containing 100% organic ingredients may be labeled as "organic". A percentage statement in addition to an "organic" claim such as "contains 100% organic ingredients" is truthful and as such may potentially be allowed in Canada. However, CCOF has received indications from Canadian officials that this is discouraged to avoid consumer confusion.

⁶² EEC 889/2008 Annex VIII
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Organic Labeling	European Union Regulation 834/2007	Canadian Organic Regime (COR)
<p>70% Organic Labeling: Required label statements</p> <p>Requirements for products containing 70%-95% organic ingredients.</p>	<p>Front panel Made With Organic (specified ingredients or food groups) claims are prohibited. Identification of organic ingredients as organic is limited to ingredient panel.</p> <p>An indication of the total percentage of organic ingredients in proportion to the total quantity of ingredients of agricultural origin must appear in the ingredient panel</p> <p>The reference to organic and percentage statement must appear in the same color and identical size and style of lettering as the rest of the ingredient panel⁶³</p>	<p>Products certified to US NOP standards under the "Made With Organic (specified ingredients or food groups)" will not meet COR requirements.</p> <p>Labels for products that consist of 70-95% certified organic may only include the statement "X% organic ingredients" or markedly similar phrasing to indicate the organic status of the product. The term "organic" may not be used.</p> <p>Operators must identify CCOF as the certifier on the label for all certified retail products. Labels must include the statement "certified organic by CCOF" or a similar statement. There is no limitation or requirement for where this is placed on labels.</p>
<p>95% Organic Labeling: Required label statements</p>	<p>CCOF's control number (US-BIO-660) must appear on the label of products certified "organic" and exported in accordance with Title III of EEC 1235/2008.</p> <p>Use of the EU organic seal on such products is optional, if used, the term "non-EU agriculture" must appear must appear in the same visual field as the seal⁶⁴</p> <p>See www.ccof.org/eu.php for additional labeling options and guidance documents regarding the EU logo.</p>	<p>NOP equivalent. Organic products may be labeled "Organic", "organically grown" etc. Note that the term "Certified Organic" as the principal display panel organic claim may not be utilized.</p> <p>Labels may also include an organic ingredient percentage statement in addition to the term organic. The ingredient statement must be all the same color, size, font, and style.</p> <p>Operators must identify CCOF as the certifier on the label for all certified retail products. Labels must include the statement "certified organic by CCOF" or a similar statement. There is no limitation or requirement for where this is placed on labels.</p>
<p>GMO-free Labels</p>	<p>NOP equivalent</p>	<p>Statements that an organic food products contains no GMO ingredients are prohibited unless the fact is proven by independent tests.⁶⁵</p>
<p>Identification of Responsible Party</p>	<p>NOP equivalent.</p>	<p>Final processor must be identified if label owner is not certified.⁶⁶</p>
<p>Ingredient Statements</p>	<p>NOP equivalent.</p>	<p>All processing aids and additives must be listed in the ingredients panel unless analytical testing can demonstrate that the additive is not present in the final product.</p> <p>All organic ingredients must be identified in the ingredient statement.</p>

⁶³ EEC 834/2007 Article 23(4)

⁶⁴ EEC 834/2007 Article 24(1)(a) and EEC 271/2010

⁶⁵ COR QMS 5.2.1

⁶⁶ COR QMS 12.1.1

Organic Labeling	European Union Regulation 834/2007	Canadian Organic Regime (COR)
<p>Organic Seal/Logo</p>	<p>EU organic seal may be used on products certified “organic” and exported in accordance with Title III of EEC 1235/2008. Use of the seal on such products is optional.</p> <p>If used, the CCOF’s control number (US-BIO-660) and the term “non-EU agriculture” must appear in the same visual field as the seal.</p> <p>If used, must be used in specific format and colors as defined by EEC 271/2010. The seal is a green (Pantone no. 376) rectangle with white stars in the shape of a leaf. Rectangle must be at least 9mm high by 13.5mm wide and maintain a height to width ratio of 1 to 1.5. Variations, such as modified color schemes (including black and white, different shades of green, delineating borders, etc) or smaller size, may be permissible in certain situations.⁶⁷</p> 	<p>The COR seal may be used by CCOF operations certified under COR/NOP equivalency. The seal can be found at www.ccof.org/canada.php and must be used in the specific format and colors as defined by the COR regulations:</p> <p>“The logo is displayed in either black with a white background (as illustrated), in black with a transparent background or in color. If displayed in color, the background is white or transparent, the outer and inner borders are green (Pantone no. 368), the maple leaf is red (Pantone no. 186) and the lettering is black.”</p> <p>All products imported into Canada using the COR Seal must include the phrase “Imported” or “Imported From (country of origin)”, or “Product of (listed country of origin)” in close vicinity to the seal.</p> 
<p>Private Labels and Brands not owned by CCOF clients.</p>	<p>NOP equivalent.</p>	<p>When packaging products for a private label owner who is not certified by CCOF CS or another COR accredited certifier, the CCOF client must be identified on the label.</p> <p>A list of all private label brands must be submitted to CCOF as part of the certification process and be available for inspection.⁶⁸</p> <p>Clients certified by CCOF CS to COR standards may package private label products or receive private label certification directly. Certified private labelers are not required to identify the co-packer on the label as long as appropriate inspections verify the use of compliant packaging, COR certified co-packers, and complete record keeping/traceability⁶⁹.</p>
<p>Registration of Labels⁷⁰</p>	<p>NOP equivalent.</p>	<p>Certain food labels must be registered by the CFIA Formulation and Label Registration Unit. These include labels originating from: Federally registered Canadian meat, poultry and processed fruit and vegetable establishments; Foreign meat, poultry and processed fruit and vegetable establishments.</p> <p>Label registration requests are to be submitted using form CFIA 1472 accompanied by the appropriate number of labels and recipes. This form is available on the CFIA website: http://www.inspection.gc.ca/english/for/mpppe.shtml</p> <p>Consult the CFIA Fees Notice to determine whether a fee is applicable for your product. Mail completed registration forms to: Clerk, Label Registration Unit, Canada Food Inspection Agency, 1431 Merivale Road, Nepean, ON, K1A 0Y9</p>
<p>Wholesale Containers/ Produce</p>	<p>Non-retail containers/produce boxes or accompanying documents (e.g. invoices, BOLs)</p>	<p>Packaging shall bear the following information, without prejudice to any other indications required by law⁷²:</p>

⁶⁷ EEC 834/2007 Article 24(1)(c) and EEC 271/2010

⁶⁸ CAN QMS 12.1.1.5

⁶⁹ CAN QMS 5.1.1

⁷⁰ COR QMS 10.0

Organic Labeling	European Union Regulation 834/2007	Canadian Organic Regime (COR)
<p>Boxes/ non-retail containers⁷¹</p>	<p>must contain:</p> <ul style="list-style-type: none"> a) the name and address of the certified operation b) the name of the product and its organic status c) CCOF's control number (US-BIO-660) or identify CCOF as the certifier d) and traceability information, such as lot numbers, where applicable <p>(When not in compliance with NOP requirements, containers & shipping documents must be labeled for "export only").</p>	<ul style="list-style-type: none"> a) the name and address of the person or organization responsible for the production, preparation or distribution of the product b) the name of the product c) the organic status of the product d) information that ensures traceability (e.g. lot number) <p>It is strongly advised to identify CCOF on bulk containers, produce boxes and other non-retail containers.</p>
<p>Wine Labels</p>	<p>The EU is currently developing wine production standards. US certified wines should generally meet EU requirements. Specific authorizations may be required from individual certifiers, members states, or other competent authorities.</p>	<p>Wines produced to US NOP standards using Sulfur Dioxide may be labeled "organic" under COR labeling requirements. Master cases or other markings for these products should include the notation "for export only" to meet US NOP requirements for products labeled for other markets. Wines may only utilize the COR seal when they are composed of 95% or more organic ingredients. Operators must identify CCOF as the certifier on the label for all certified retail products. Labels must include the statement "certified organic by CCOF" or a similar statement. There is no limitation or requirement for where this is placed on labels.</p>

⁷² COR CGSB 8.4.2

⁷¹ EEC 889/2008 Article 31 and EEC 834/2007 Article 23

10. LABELING OF ORGANIC PRODUCTS IN QUEBEC

Copies of all labels utilized under the CCOF Global Market Access must be submitted and approved by CCOF CS prior to use.

CARTV Labeling	CARTV (Quebec) Labeling Standards
Produce and product labeling	<p>All produce and products sold as organic in Quebec must identify the name of certified operator and CCOF.</p> <p>CARTV labeling standards specify that⁷³:</p> <ol style="list-style-type: none"> 1. Organic fruit and vegetables, just as conventional fruit and vegetables, must whenever possible be individually labeled. 2. The name of certified operators (grower or handler) must be printed on a sticker affixed to each organic fruit or vegetable. 3. The name of the certifying body that attested the product's organic production mode must also be printed on each sticker. 4. Hydroponic or Aeroponically produced organic products may not be sold in Quebec.

CCOF COR (Canada Organic Regime) COMPLIANCE PROGRAM REQUIREMENTS

The following sections only apply to operations located in Canada and selling their products inter-provincially. NOP/COR Equivalency cannot be applied to operations located in Canada. Operations located in Canada and selling exclusively to the United States or other international markets may not be required to meet these standards or enroll in this program.

11. COR CROP PRODUCTION STANDARDS (WITHIN CANADA ONLY)

The following requirements are only applicable to operations located in Canada and seeking COR Compliance certification. Other operations certified by CCOF to the NOP and enrolled in GMA are not required to meet these specific issues.

Crop Production Standards	Canadian Organic Regime (only applicable to operations located in Canada)
Contamination Prevention, Borders and Buffers	<p>Buffer zones, when necessary or required by CCOF, must be at least 8m wider or wider depending on the risk and nature of potential contamination⁷⁴.</p> <p>However, permanent hedgerows or plant windbreaks or artificial windbreaks, permanent roads or other features may be used instead of buffer zones.</p>
Conversion	<p>All sites, fields, and orchards must not have any prohibited substances applied within 36 months of the first organic harvest. Transition requirements⁷⁵: CCOF CS will report the conversion date as the date of application to CCOF CS or the first date of certification of the operation under another certifier unless there is documentation as described below.</p> <ol style="list-style-type: none"> a) Sites will be considered within the CCOF Global Market Access program from the time of application for certification as either transitional or organic b) CCOF CS reserves the right to determine that an operation has converted where there is documentation of conversion, including but not limited to, registration with the California Department of Food and Agriculture, Organic Program. <p>CCOF reserves the right to require supervision and evaluation by CCOF for 12 months or document 24 months without prohibited materials to meet conversion requirements.</p> <p>Land consisting of natural plants in their natural habitat that has not been cultivated for three or more years can be exempted from the observed transition period.</p> <p>Inspections will cover the entire agricultural production system being managed by the firm, even if only part of the firm's operations are included in the certification application. In general, where non-organic farming, harvesting or storage occurs near by organic production under the management of the same business entity, CCOF inspections may include observations of the non-organic ground, harvesting and storage locations.⁷⁶</p>
Parallel Production⁷⁷	<p>These requirements are similar to EEC standards. The enterprise shall aim at a complete transition of its production. Growing the same crop variety both organically and non-organically (parallel production) is prohibited within the same production unit. An enterprise can be converted one unit at a time, and each converted unit shall respect the requirements of the COR standard.</p> <p>Operations that are able to evidence that organic and conventional production are physically, financially, and operationally separate, will not be considered to be engaged in parallel production and will be considered separate production units. Operations producing identical commodities may be required to separate their business entities or develop full farm conversion plans to meet COR requirements. CCOF will make a determination as to the status with regard</p>

⁷³ Quebec Organic Reference Standard Section 9

⁷⁴ CAN CGSB 5.1.7

⁷⁵ COR CGSB 5.1.1-5.1.4

⁷⁶ CAN QMS 10.4

⁷⁷ COR CGSB 5.1.2

Crop Production Standards	Canadian Organic Regime (only applicable to operations located in Canada)
	to parallel production based on the client OSP and inspection. Specific exceptions may exist for perennial crops in conversion. Perennial crops may be grown in parallel production if a plan is in place to bring the non-organic production into organic management. Production units shall not be alternated between organic and non-organic production methods.
Records	Inspection must include an estimate of potential yield for the coming year. Operations must be prepared to provide, where applicable, substantiate this estimate based on current conditions, crop health etc. CCOF inspectors will include a yield estimate in their report. ⁷⁸ CCOF clients must be prepared to provide this yield estimate during inspections and/or to begin Canadian compliance reviews.
Sprout Production	Seed or growing sprouts shall not be rinsed or immersed in water with chemicals capable of releasing chlorine in solution, in excess of water quality guidelines. The cleaning and maintenance of equipment and the use of sanitizers and disinfectants shall be limited to substances included in CAN/CGSB-32.311. ⁷⁹
Weed Management & Use of Plastics	Plastic used in crop production or other synthetic mulches or other agricultural plastic must not be burned for disposal and may not be manufactured from polyvinyl chloride.

12. COR COMPLIANCE CROP PRODUCTION MATERIALS (WITHIN CANADA ONLY)

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under CCOF Global Market Access- COR Compliance verification. The following chart lists are those materials that are prohibited and/or restricted on crops for this additional program.

Crop Materials	Canadian Organic Regime (only applicable to operations located in Canada)
Antibiotics (Streptomycin & Tetracycline)	Prohibited
Ethylene for Pineapple Flowering	Prohibited
Lignin Sulfonate	NOP equivalent for chelating and dust suppression. Not allowed as flotation aid.
Manure	Where manure used meets EEC requirements, CCOF will regard it as COR compliant. The operator is required to use all available on-farm manure prior to sourcing manure preferentially from other organic operations. When manure from organic operations is not available in sufficient quantities, the operator may use non-organic manure provided that: a) The non-organic operation is not a full caged system where livestock cannot turn 360 degree. CCOF considers manure from non-caged sources to inherently meet this requirement. b) Livestock is not permanently kept in the dark. c) The operation keeps records identifying the source of manure, livestock type, and available information regarding the criteria above. Informative note: Organic operations <u>should</u> make it a priority to use manure obtained from transitional or extensive livestock operations (grazed, decentralized) and not originating from landless livestock production operations or from livestock operations using GMOs and their derivatives in animal feed. ⁸⁰
Sodium Nitrate (Chilean Nitrate)	Prohibited
Sodium Silicate	NOP equivalent.-For tree fruit and fiber processing.

13. COR LIVESTOCK PRODUCTION REQUIREMENTS (WITHIN CANADA ONLY)

The CCOF GMA program provides verification to EU and Canadian Organic Regime livestock requirements.

Livestock Standards	Canadian Organic Regime (only applicable to operations located in Canada)
Health and Feed	Beak trimming is only allowed when the operator documents unsuccessful efforts to control or eliminate behavior being controlled. ⁸¹ Tail docking of cattle or pigs is prohibited except for veterinary treatment of injured animals. Animals confined in final fattening stage must have a minimum of 23m ² /animal. ⁸² Operators should have plans to address emergency disease or other health outbreaks including, but not limited to, internal parasites ⁸³ .

⁷⁸ CAN QMS 10.3

⁷⁹ CAN CGSB 7.4.4 & 7.4.5

⁸⁰ COR CGSB 5.5.1 balloted language.

⁸¹ COR CGSB 6.7.2 a & b balloted

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Livestock Standards	Canadian Organic Regime (only applicable to operations located in Canada)
Housing/Herd Management	<p>Similar to EEC requirements: Livestock housing must have smooth, non-slippery floor that are not entirely slatted or grid construction.⁸⁴</p> <p>Calves may be only be housed in individual pens for up to 3 months. And, must be given access to pasture at six months of age.⁸⁵</p> <p>Poultry: Open air poultry runs must be covered with vegetation and periodically left empty to allow vegetation to re-grow to prevent disease build up. Where necessary, re-seeding must occur. Does not functionally apply to free range poultry operations.⁸⁶</p> <p>Where necessary and not already standard practice poultry buildings and runs must be emptied and cleaned between flocks.⁸⁷</p>
Transport and Slaughter	Electrical stimulation explicitly prohibited during transport and handling. ⁸⁸
Veterinary Allopathic Drugs	Herbal, botanical, homeopathic treatments shall be used in preference to chemical allopathic drugs ⁸⁹ .

14. PROCESSING/HANDLING STANDARDS & MATERIALS- COR COMPLIANCE REQUIREMENTS (WITHIN CANADA ONLY)

Processing/ Handling Regulations	Canadian Organic Regime (only applicable to operations located in Canada)	
Cleaning & Sanitizers ⁹⁰	Largely NOP equivalent. Equipment must be free of prohibited sanitizers prior to processing organic products. Ozone, peracetic acid and hydrogen peroxide are allowed. See below for specific limitations, removal and other requirements.	
Food-Grade Cleaners, Disinfectants and Sanitizers That Are Allowed Without a Mandatory Removal Event.	Common Name(s)	Origin and Usage
	Acetic acid	Non-synthetic and synthetic sources may be used on equipment. Non-synthetic sources only may be used on food and plants.
	Alcohol, ethyl (ethanol)	Non-synthetic and synthetic sources may be used on equipment.
	Alcohol, isopropyl	Non-synthetic and synthetic sources may be used on equipment.
	Ascorbic acid	Non-synthetic sources may be used on equipment.
	Citric acid	Non-synthetic and synthetic sources may be used.
	Hydrogen peroxide	Shall be a hydrogen-peroxide-based solution for food use (hydrogen water).
	Peracetic acid	On equipment.
	Potassium bicarbonate	On equipment.
Sodium bicarbonate	On equipment.	
Vinegar	Organic or non-organic sources.	
Cleaners, Disinfectants and Sanitizers Allowed on Food Contact Surfaces, Equipment and in Facilities Provided That Substances Are Removed From Food-Contact Surfaces Prior to Organic Production.	Common Name(s)	Origin and Usage
	Bleach	a) Calcium hypochlorite, b) chlorine dioxide, c) sodium hypochlorite, d) ozone and e) hydrogen peroxide. Not to exceed 10% solution by volume. Free chlorine levels for wash water in direct contact with crops or food, and in flush water from cleaning irrigation systems, that is applied to crops or fields, shall not exceed the maximum limits under the applicable regulations for safe drinking water.
	Caustic potash (potassium hydroxide)	For growing facilities (e.g. greenhouse) and structures.
	Chlorine	See Bleach.
	Detergents	Biodegradable only (whose biodegraded components are not more harmful than the original components). On equipment.
	Iodine	On equipment. Non-elemental only and not to exceed 5% solution by volume (e.g. iodophors).
	Lime	
	Lye	For greenhouses only.
	Phosphoric acid	On equipment in the dairy industry only.
	Potassium permanganate	Not to exceed 1% solution by volume.
	Soaps	Soaps consisting of fatty acids derived from animal or vegetable oils are allowed.

⁸² COR CGSB 6.8.2 balloted

⁸³ COR CGSB 6.7.9

⁸⁴ COR CGSB 6.8.1 g

⁸⁵ COR CGSB 6.8.91 & 6.8.9.2

⁸⁶ COR CGSB 6.8.3 b

⁸⁷ COR CGSB 6.8.8

⁸⁸ COR CGSB 6.6

⁸⁹ COR CGSB 6.7.9

⁹⁰ CAN CGSB PSL Section 7

Processing/ Handling Regulations		Canadian Organic Regime (only applicable to operations located in Canada)
	Soap-based algicide (demossers)	On equipment
	Sodium hydroxide	See Lye.
	Sodium borate	
	Surfactants	See Detergents; Soaps.
	Wetting agents	Natural wetting agents, including saponins and microbial wetting agents, allowed. See also Detergents; Soaps.
Ingredients and processing aids	<p>All ingredients in COR certified products must be produced in COR certified facilities and certified to COR standards <u>or must be documented to be produced in compliance with the NOP/COR Equivalency agreement.</u></p> <p>All non-organic additives and/or processing aids must be included on the COR PSL. Prohibited and restricted processing aids allowed under the NOP appear below.</p> <p>Food additives and processing aids shall only be used to maintain</p> <ol style="list-style-type: none"> nutritional value; food quality or stability; composition, consistency and appearance, provided that their use does not mislead the consumer concerning the nature, substance and quality of the food; and <ol style="list-style-type: none"> There is no possibility of producing a similar product without the use of additives or processing aids; They are not included in amounts greater than the minimum required to achieve the function for which they are permitted; They contain no other substances prohibited in accordance with this standard. 	
Parallel or Split Production	<p>Processing inspections where certifiable and non-certifiable (non-organic) are manufactured at the same facility must be performed when products requesting certification may be observed. As this is not practical for new operations, CCOF CS can view the facility in operation processing similar or identical non-organic products or products not seeking certification. All systems for organic production, storage, processing and labeling must observable and observed during initial inspections.⁹¹</p>	

15 PROHIBITED & RESTRICTED PROCESSING PRODUCTION MATERIALS- COR COMPLIANCE REQUIREMENTS (WITHIN CANADA ONLY)

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under CCOF Global Market Access-COR Compliance program. Any restrictions regarding the use of the below listed materials must be followed for compliance to be granted under the program in question.

Processing Materials	Canadian Organic Regime (COR)
Ammonium phosphate	Prohibited
Ammonium sulfate	Prohibited
Boiler Chemicals: Cyclohexylamine Diethylaminoethanol Octadecylamine	Prohibited
Calcium carbonate	Allowed for milk products only. Prohibited as a coloring or anti-caking agent.
Calcium sulfate	NOP Equivalent- as a carrier for cakes and biscuits (cookies), soybean products and bakers' yeast.
Colors	NOP equivalent- Must be organic when available.
Egg white albumen	Allowed as a clarifying agent. Must use organic source if available.
Ethanol	Allowed as processing aid. Alcohol, ethyl (ethanol) as an ingredient must be organic.
Gluono delta-lactone	Prohibited
Isinglass	Allowed as a fining agent (fish-based)
Lecithin	Bleached form is allowed when unbleached form is not suitable. From organic sources only. Bleached form may be non-organic.
Lignin sulfonates	Lignin sulfonates used for floating tree fruit are prohibited.

⁹¹ CAN QMS 9.2.2.c
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Processing Materials	Canadian Organic Regime (COR)
Magnesium stearate	For use only in agricultural products labeled "Contains X% organic ingredients"; prohibited in agricultural products labeled "organic."
Metabisulphite	For use for alcoholic beverages as a preservative only, and labeled "Contains X% organic ingredients."
Potassium Iodide	NOP equivalent. However, allowed under COR in products labeled "organic".
Potassium phosphate	NOP equivalent. For use only in agricultural products labeled "Contains X% organic ingredients"; prohibited in agricultural products labeled "organic."
Potassium tartrate	Allowed for cereals, cakes, and confectionery. Allowed as a food additive in cider and "several" dairy products.
Preparations of bark	Prohibited.
Sodium Acid Pyrophosphate	Prohibited
Sodium carbonates	For cakes and biscuits or for confectionary.
Sodium citrates	For sausages and milk products.
Sodium hydroxide	Allowed as a cleaner, including the maintenance of reverse osmosis membranes used in maple syrup production. Prohibited for use in lye peeling of fruits and vegetables.
Sodium tartrate	Prohibited.
Sulfur dioxide	Listed as Sulphurous acid. NOP equivalent. For use as a preservative only in alcoholic beverages made from grapes or other fruit; minimum use of SO ₂ is recommended. The maximum allowable level of SO ₂ in alcoholic beverages with less than 5% residual sugar is 100 parts per million and 30 parts per million for total sulphites and free sulphites respectively; in alcoholic beverages with 5% or more and less than 10% residual sugar, 150 parts per million and 35 parts per million respectively; and in alcoholic beverages with 10% or more residual sugar, 250 parts per million and 45 parts per million respectively. The use of sulphites from SO ₂ bottled gas, as liquid SO ₂ , or liberated from the ignition of asbestos-free sulphur wicks is acceptable.
Sulfuric acid	Prohibited.
Talc	Allowed as a filtering aid.
Tannic acid	Prohibited.
Tannin	Prohibited.
Tetrasodium Pyrophosphate	Prohibited.