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May 11, 2017

Last Revised August 23, 2017

Notice Regarding Imported Grain, Bean, and Seed Shipments from Eastern Europe, Middle East, and Russia

To increase confidence in imported organic grain, beans, and seeds, CCOF is implementing additional control measures at the direction of the USDA Agricultural Marketing Service (AMS) National Organic Program (NOP). Areas of added scrutiny may include, but will not be limited to, volumes, sourcing and potential for noncompliant treatments.

Products of concern include corn, soy, edible dry beans, wheat, flax, and sunflower meal and their derivatives imported from Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine.

Any operation that directly receives imported organic corn, soy, edible dry beans, wheat, flax, and sunflower meal from Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine may be subject to at least one unannounced inspection during the coming months.

Effective immediately, prior notification of incoming shipments is required for at-risk grain, beans, and seeds received directly by CCOF certified operations. CCOF will conduct sampling and verify **each shipment** of organic corn, soy, wheat, flax, dry edible beans, sunflower meal, and their derivatives imported into the U.S. from Turkey, Russia, Ukraine, Kazakhstan, Moldova, and Romania. All product must be identified as organic in the audit trail documentation. Complete audit trail records, including shipping documents, bills of lading, phytosanitary certificates and other documents will be verified at each inspection. Mass balance audits will be performed at inspections.

CCOF will review this information and work with USDA NOP, other agencies, and certifiers as necessary to ensure that volumes are legitimate, product is not treated with prohibited materials in the supply chain, and product meets organic standards.

We strongly encourage importers and receivers of foreign grain, beans, and seeds to implement thorough and effective due diligence and verification of suppliers. Operations that receive any imported goods are strongly advised to consider their suppliers very closely and review, test and/or visit the production locations to verify the legitimacy of products. Operations with grain, beans, or seeds that do not meet organic standards will be notified that that product is not compliant. If an operation knowingly sells noncompliant product as organic it may lead to suspension of organic certification and potential civil penalties.

We appreciate the dedication of CCOF operations and others. It is important that we work together to defend organic standards and ensure the integrity of organic products and continued consumer confidence by applying additional due diligence.

CCOF's formal policy is as follows:



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Imported Grain, Beans, and Seeds Policy

All NOP certified operations who directly receive at-risk grain, beans, and seeds from inbound ships at ports or docks must meet additional compliance requirements per NOP directive.

At-risk grain, beans, and seeds include organic corn, wheat, soy, edible dry beans, flax, sunflower meal, and their derivatives originating or shipped from Kazakhstan, Moldova, Romania, Russia, Turkey, or Ukraine. Commodities originating from other countries are not currently subject to this policy.

- 1) Operations must identify themselves to CCOF as direct receivers of at-risk grain, beans, seeds or their derivatives or any commodity from Kazakhstan, Moldova, Romania, Russia, Turkey, or Ukraine. This includes importers, brokers, transloaders, and any other handler directly receiving shipments.
- 2) CCOF may conduct at least one unannounced inspection for each operation that directly receives high risk grain, beans or seeds, as identified above. The operation will be billed for the inspection, per CCOF Certification Services Program Manual.
- 3) **As of August 24, 2017, at least 2 weeks prior** to receiving an inbound shipment of at-risk grain, beans, or seeds:
 - a. Notify CCOF in writing of the date, time, and location of the expected shipment arrival.
 - b. CCOF will schedule an inspection to collect a sample and review the shipment's audit trail documentation. The operation will be billed for the inspection, per CCOF Certification Services Program Manual.
 - c. Each shipment inspection report and sampling review will be performed at CCOF Technical and other Services rates of \$125/hour, 2 hour minimum.
- 4) Documentation required for all at-risk commodity shipments:
 - a. Shipping manifest, certificate of origin, and phytosanitary certificate (if applicable).
 - b. Transaction certificates and/or NOP Import Certificates for the shipment.
 - c. Any and all residue, GMO, quality, or other analytical testing performed.
 - d. Bill of Lading and invoice(s) from the last certified handler in the supply chain showing volume received.

CCOF will review the inspection report, sampling results, and audit trail documentation to determine if the shipment appears compliant with organic standards. Additional inspections, pesticide residue or GMO testing, or documentation from the grower, supplier, intermediate handlers, and certifiers may be required at CCOF's discretion. Operations that accept organic products without complete verification of organic status are not in compliance. Sales of noncompliant product may lead to proposed adverse action and potential civil penalties if an operation knowingly sells noncompliant product as organic.

CCOF is required to provide shipment information to the USDA National Organic Program and will work directly with other certifiers to verify compliance by sharing information regarding traceability and records.