IOAS Inc.

IOAS COR Operating Manual

Information and requirements specific to surveillance under the

Canada Organic Regime

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1. Introduction

This operating manual contains specific information and requirements of the assessment and surveillance programme implemented by IOAS in its role as Conformity Verification Body (CVB) as assigned by the Canadian Food Inspection Agency (CFIA) under the Canada Organic Regime (COR). It should always be read in conjunction with IOAS General Operating Manual which contains a full description of IOAS and its overall approach to conducting accreditation and surveillance of certification bodies working in the field of organic and sustainable agriculture and related fields which is performed in line with ISO/IEC 17011.

It is IOAS' approach to harmonise the assessment processes for the increasing range of schemes offered to reduce the burden of accreditation to all certification bodies. IOAS is also continually working to gain recognition of our work with scheme owners and government authorities such that we can offer 'one assessment, many accreditations'.

The Canadian Food Inspection Agency maintains an informative web site from where the various normative documents may be obtained and developments of the system can be followed.
See CFIA website

2. Authority

2.1 The Safe Food for Canadians Regulation (SOR/2018-108) of the Government of Canada (SFCR) was implemented on January 15th, 2019.

2.2 The SFCR sets out the framework for a conformity assessment system for products labelled as organic and its mode of operation in Part 13.

2.3 There are three main players in the implementation of the regulation:

- Domestic and international Certification Bodies (CBs) – responsible for the organic certification of agricultural products and organic product packaging and labelling certification. Only COR accredited CBs may carry out such certification.
- Domestic and international Conformity Verification Bodies (CVBs) – designated by the CFIA to assess, recommend for accreditation and subsequently monitor certification bodies (CBs) meeting the applicable

accreditation criteria as set out in the SFCR. Only CFIA approved CVBs may perform this work.

- The Canadian Food Inspection Agency – the CFIA is the competent authority for the COR. The CFIA approves existing private and public sector CVBs and CBs inside the regime provided they meet criteria established by the Government of Canada. The CFIA shall accredit CBs based upon the recommendation of its designated CVBs. The CFIA shall also provide a level of oversight and a level of compliance assurance integrated with existing CFIA compliance programs.

3. COR Accreditation

3.1 Any CB with operators in Canada or which proposes to certify operators active inside Canada must be recommended by a CVB designated by CFIA.
See CFIA web site

3.2 Any CB which has operators outside Canada who wish to export organic products within the scope of the COR to Canada must be accredited by a CVB unless the CB is supervised by another country system with which the Government of Canada has an equivalency arrangement. Please refer to the CFIA web site

3.3 There is no restriction on which CVB may be chosen by the CB so IOAS can accept applications for accreditation under the COR from CBs active in any country in the world including Canada.

3.4 The SFCR applies to the following food commodities:

- Food or drink products for human consumption, wholly or partly derived from livestock or plants. This includes fresh and processed fruits and vegetables, processed foods regulated under the Food and Drugs Act (FDA) (including alcoholic beverages), maple products, dairy products, honey, eggs and eggs products, meat and meat products;
- Livestock and livestock products; plants and plant products. This includes seed and planting stock and nursery products
- Livestock feed.
- Aquaculture and aquaponic products; unprocessed or processed crop and livestock products intend for human or animal consumption.

3.5 CBs shall only be accredited for product classes covered by the SFCR. Please see the IOAS application form for the current categories that can be applied for.

3.6 Services, such as landscaping, and non-food products containing organic agricultural ingredients such as body care products, cosmetics, pet food, pet treats and nutritional supplements do not fall under the scope of the COR.

3.7 Any product not included in the scope of the regulations may continue to make organic claims but shall not make reference to the Canada Organic Regime or use the COR logo. Such products shall meet all relevant federal legislation.

4. Requirements for accreditation

4.1 There are five main documents that provide the mandate and policies for the Canada Organic Regime. Updated versions are available from the CFIA web site. These are:

- The Safe Food for Canadians Regulation, 2018.
- Organic Production Systems - General Principles and Management Standards (CAN/CGSB-32.310) developed by the organic industry and the Canadian General Standards Board;
- Organic Production Systems - Permitted Substances List, CAN/CGSB-32.311 developed by the organic industry and the Canadian General Standards Board;
- Organic Production Systems -Aquaculture – General principles, management standards and permitted substances lists, CAN/CGSB-32.312 developed by the organic industry and the Canadian General Standards Board;
- The Canada Organic Regime (COR) Operating Manual.

In addition to these main documents the CFIA, from time to time, issues directives and memos which are important sources of information for CBs and CVBs. All such documents are distributed to CBs by IOAS but can also be found on the CFIA web site

4.2 The general requirements of the Canada Organic Regime against which CBs are evaluated are those of ISO/IEC 17065. In addition, the CFIA has established its own requirements which are described in the Canada Organic Regime Operating Manual, Section C.

4.3 CBs requesting accreditation must be familiar with, and have adapted their quality system to comply with, the documents at 4.1 and 4.2 and in particular must provide their operators with the most recent version of applicable Standards to verify their correct application.

4.4 CBs requesting COR accreditation from IOAS follow the process outlined in the IOAS General Operating Manual including the signing of a surveillance contract which provides a framework for the relationship. However as indicated above, it is the CFIA which takes the decision to accredit based on an IOAS recommendation. Similarly, the decision to suspend or withdraw accreditation is the responsibility of the CFIA based on a recommendation from IOAS.

4.5 To avoid confusion, the CBs' normal line of communication is to IOAS who may, if necessary pass on issues to the CFIA. Similarly, it is IOAS' responsibility to communicate issues from the CFIA to accredited CBs. The CFIA also facilitates the CB Working Group which meets quarterly by teleconference and attendance at these meetings is considered beneficial for all CBs under COR accreditation.

5. Accreditation procedures

5.1 Acknowledgement of Application: Within 10 working days after receiving the CB Application profile and the Application form completed, IOAS will send acknowledge receipt to the applicant and will notify the CFIA before starting with the assessment.

5.2 **Transfer of accreditation:** A COR accredited CB wishing to transfer oversight from another CVB to IOAS may do so according to a procedure described in the COR Operating Manual. IOAS shall accept the compliance status of the CB and take over monitoring at the point in the accreditation cycle reached with the other CVB. On receipt of an application IOAS shall send an official letter to the CFIA to request modification of the CB Accreditation letter to change the name of the CVB. If the CB already holds another accreditation with IOAS it may be necessary to adapt the accreditation cycle length in order to synchronise the assessments.

5.3 **Site visits:** In circumstances where the applicant CB has more than three offices, including its main office, IOAS shall use a sampling process in order to determine which offices will be visited, based on the following criteria:

- an obligatory visit to the main office, then
- the two offices handling most of the applicant's clients, or
- the two offices carrying out the key activities concerning the certification process.

5.4 **CFIA right to accompany:** The COR Lead Auditor may accompany IOAS assessor(s) to observe any aspect of the CB accreditation process.

5.5 **IOAS recommendations:** On completion of the assessment process, IOAS sends a recommendation to the CFIA. IOAS shall advise the CFIA of the recommendation decision in writing and will provide a copy of the relevant evaluation report. The recommendation options are:

- accreditation granted or renewed,
- accreditation to be suspended or cancelled,
- accreditation scope amendment

5.6 **CFIA review and accreditation:** The CFIA shall review IOAS recommendation. If the CFIA decides to confirm the recommendation, they will issue an accreditation letter.

5.7 **Refusal of accreditation:** If IOAS considers the CB does not meet the accreditation requirements, will send a notice to the applicant CB by email (and request a confirmation of receipt from the applicant), stating the reason for the decision of not recommending accreditation. The applicant CB has the right to request that the CFIA reviews IOAS decision within 30 working days after receipt of the notice.
5.7.1 The CFIA shall review IOAS decision on not accrediting the applicant. If the CFIA decides to confirm IOAS decision, IOAS and the applicant CB will receive copy of the decision with the reason, in writing.
5.7.2 If the CFIA does not confirm IOAS decision, the CFIA shall follow-up with IOAS to discuss it.
5.7.3 The CFIA shall review the applicant CB documentation and conduct its own assessment, if necessary.
5.7.4 The CFIA shall inform the applicant CB and IOAS on its decision to accredit or not to accredit.

5.8 **Duration of accreditation:** The CFIA shall grant accreditation for five years from the date the accreditation number is granted by the CFIA.
The CB shall be re-assessed, recommended by IOAS or any other CVB and accredited by the CFIA for another 5 years before the end of the accreditation cycle in order to have its accreditation renewed once this period has ended.

5.9 **Accreditation number:** A CB is assigned an accreditation number by the CFIA no later than 14 working days after a positive decision to accredit is made by them. The CB shall keep the same accreditation member irrespective of whether or not it changes CVB and so long as the accreditation remains valid.

5.10 **Acceptance of prior certification:** Accredited Certification Bodies shall automatically and unconditionally accept certification decisions made by any other accredited certification body under the COR.

5.11 **Initial surveillance:** IOAS conducts the first on-site surveillance of the CB within twelve months of the initial accreditation date.

5.12 **Ongoing surveillance:** IOAS shall determine the frequency of surveillance visits during the accreditation cycle. Over the length of the cycle a number of files shall be examined, and witness and verification audits undertaken based on the numbers contained in the COR Operating Manual which are proportional to the number of active operators registered with the CB. After completion of each annual surveillance, IOAS will notify CFIA of the results.

5.13 **Reporting on changes:** IOAS surveillance contract specifies that CBs are obliged to report to IOAS any substantial changes which may affect their accreditation status at the time they are being made.

5.14 **CB Annual update report:** Prior to the on-site assessment the CBs shall submit an annual report to IOAS containing information specified by the CFIA. At a minimum, these reports shall contain:

- Changes in CB operational information
- Changes to policies, procedures, protocols
- Number of complaints and appeals received during the previous year
- Most recent internal audit and management review reports
- Instances of misuse of the Canada logo
- Changes in personnel
- Complete list of COR certified operations. This list shall contain the name, address, phone number, type of operation. Such information may be submitted via an internet directory provided that the URL is provided.
- Complete list of operators certified to the terms of any Canadian equivalency arrangement

5.15 **IOAS Annual report:** IOAS shall submit an annual report to the CFIA containing information specified by the CFIA. At a minimum, this report shall contain:

- List of CBs under supervision including any transfers with name, address, and a description of the certification services offered
- Total number of re-assessment audits
- Total number of surveillance audits
- Total numbers of witness and verification audits
- Total number of complaints under the COR with a short description of same
- Total number of appeals under the COR and decisions made
- Most recent internal audit report

IOAS shall submit this report to the CFIA together with any other information requested on a date specified by them in the first quarter of the calendar year.

5.16 The CFIA or IOAS may conduct unscheduled assessments of CBs as a result of valid complaints or changes that have affected the CBs.

5.17 **Non-compliance and sanctions:** IOAS may apply one or more of the following sanctions in the event of noncompliance with the accreditation contract, failure to fulfil conditions or breaches of accreditation requirements including the requirements of ISO/IEC 17065:

- Additional conditions and insistence on corrective actions according to a timetable
- Warning
- Recommendation to reduce accreditation scope to the CFIA.
- Recommendation of accreditation suspension to the CFIA.
- Recommendation of accreditation cancellation to the CFIA. Cancellation shall always be preceded by suspension.

5.18 Where there is a breach of IOAS surveillance contract, the CFIA may suspend or cancel the accreditation status and withdraw the accreditation number based on IOAS recommendation.

5.19 In the event of suspension or cancellation of accreditation by the CFIA, IOAS shall communicate with the Certification Body and ensure that the requirements to come back into compliance are understood.

5.20 **Voluntary Withdrawal:** A CFIA Accredited CB who wishes to withdraw from COR accreditation shall send a written notice to IOAS with a list of certified and applicant operators. The CBs shall notify these operators of their intention to withdraw and give them 3 months to find another certification body before surrendering their accreditation letter. The CB shall surrender the CFIA accreditation letter before it expires.

5.21 **Monthly report:** The CBs shall prepare a report for IOAS by the 25th of each month of all operators suspended, cancelled or who have voluntarily withdrawn from certification or have transferred their certification to another CB. This report in turn is forwarded by IOAS to the CFIA at the end of each calendar month. Failure by a CB to provide such information in a timely manner will result in issue of a non-conformity.

5.22 **Appeals from CBs:** Certification bodies may request a hearing on decisions made by the CFIA or IOAS which impact their operations. Appeals are first heard by IOAS.

Appeals of CFIA accreditation decision by a CB

- Any applicant CB has the right to request that the CFIA review the accreditation decision.
- The appeal against the decision shall be made within 30 working days of notification of that decision pursuant of the SFCR.
- The appeal shall be filed in writing along with all the necessary supporting documents.
- The CFIA shall give the final decision on the appeal. The decision of the CFIA in this regard shall be final.

Appeals of IOAS recommendation decision of a CB

- Any appeal to an IOAS decision must be addressed by the CBs following IOAS own appeal policy PL0504 available at IOAS website

5.23 **Interpretation of the Standards:** The Standards Interpretation Committee (SIC) was created by the CFIA as an advisory body to assist in interpretation of the organic standards. Standards interpretations determined by the SIC and accepted by the CFIA may be found here (click). CBs are encouraged to make reference to this resource when interpreting the Canada standards.

6. References to accreditation

6.1 Once accredited and having received the accreditation letter, the accredited CB will appear on the CFIA web site in the list of approved CBs listed by country of activity.

6.2 The accredited certification body may make reference to accreditation by IOAS in accordance with requirements described and referred to in IOAS General Operating Manual.

6.3 Canada Organic Logo may be requested by the operators from accredited CBs (for use in connection with food, feed and seed).

7. Fees

7.1 IOAS fee schedule is available at IOAS website IOAS is able to provide a quotation of fees for the requested services but due to the many variables involved, these can only be used for orientation and do not constitute a firm offer.

End

For specific questions on COR scheme please contact your assigned IOAS Client Manager or COR scheme liaison within IOAS Mr Andres Vasquez Millan (millan@ioas.org)

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Definitions

The following definitions apply within the context of this manual:

Canada Organic Regime (COR): The Government of Canada regulated system for organic agricultural products.

Conformity Verification Body (CVB): An entity meeting the requirements set out in ISO/IEC 17011 which has entered into an agreement with the CFIA under subsection 14(1) of the Canadian Food Inspection Agency Act to assess, recommend accreditation and monitor certification bodies.

Abbreviations

The following abbreviations occur in the text:

CFIA	Canadian Food Inspection Agency
COR	Canada Organic Regime
CVB	Conformity Verification Body
CB	Certification Body
SFCR	Safe Food Canadians Regulations 2018
SIC	Standards Interpretation Committee