British Columbia Association for Regenerative Agriculture (BCARA)

Procedures Manual
Version 3.0

Approval date: 01.02.18
Effective date: 26.03.18

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Definitions

1. **Accreditation** – The initial and ongoing recognition of the British Columbia Association for Regenerative Agriculture (BCARA) by the COABC Accreditation Board.
2. **Accreditation Board** – The COABC Accreditation Board, appointed by the COABC, operates independently from the COABC Board,. It oversees both regional certification and ISO certification programs. It is designated by the Canadian Food Inspection Agency (CFIA) as a Conformity Verification Bodies (CVB). A CVB is an organization that has an agreement with the CFIA under subsection 14(1) of the Canadian Food Inspection Agency Act to assess, recommend for accreditation and monitor certification bodies ISO accreditation.
3. **AGRI** – BC Ministry of Agriculture
4. **Agri-Food Choice and Quality Act** – An Act of the British Columbia legislature specifying the provincial law governing COABC and BCARA.
5. **Applicant** – A person or enterprise that has applied for organic certification under the BC Certified Organic Program provided by BCARA.
6. **Appeal** – A procedure whereby a certified enterprise or a member of the public requests a review of a certification decision. The appeal may also be filed against BCARA.
7. **Audit** – A systemic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
8. **Audit Committee** – The committee designated by the COABC Accreditation Board for providing evaluation of COABC members.
9. **Auditor** – The official appointed by the the COABC Accreditation Board. The Auditor will provide "on-site" evaluations of the certification programs operated by COABC member bodies.
10. **Audit Trail** – A comprehensive system of documentation, or parts therein, sufficient to determine the source, transfer of ownership, transportation, and protection of integrity of organic products and/or ingredients from production through harvest, storage, transport, processing, handling and sales.
11. **BC Certified Organic Program (BCCOP)** – is a voluntary agri-food quality program sanctioned by the Government of British Columbia through the Organic Agricultural Products Certification Regulation under the Agri-Food Choice and Quality Act.
12. **BCARA** – British Columbia Association for Regenerative Agriculture.
13. **Board** – The Board of Directors of BCARA.
14. **Canadian Organic Regime (COR)** – The documented framework of standardization and control measures necessary for the implementation of the Organic Products Act and Regulations (Canada). In practice, the COR refers to all parts of the national organic program that is managed by the Canadian Food Inspection Agency (CFIA).
15. **Certification Body (CB)** – The body that conducts certification (see 17). May also be referred to as Certifying Body, Certifying Agency, Certification Agency, or Certification Agent.
16. **Certificate** – The document (issued by BCARA) that describes the organic status of an enterprise. May also be called the 'Certificate of Conformity'.
17. **Certification** – The procedure by which an accredited certification body gives written assurance products are organic as defined in CAN/CGSB 32-310 and CAB/CGSB 32-311, and accreditation criteria. Certification of products may be based on a range of inspection activities including verification of management practices, auditing of quality assurance systems, and in/out production balances.
18. **Certification Committee (CC)** – A group of persons approved by the Board of Directors of BCARA and delegated responsibility for assessing applications for certification.

19. **Certification Requirement** - Includes requirements imposed on the supplier by BCARA, COABC, or COR certification e.g. completing the contract agreement, paying fees, providing information and access.
20. **COABC** – The Certified Organic Associations of British Columbia. The administrator of the Organic Agricultural Products Certification Regulations under the Agri-Food Choice and Quality Act (BC). A competent body for accreditation to ISO Guide 17011 compliant standards.
21. **Declaration of Interest** – A declaration of personal and/or commercial interests in the organic industry made by those involved in the certification process and Board of Directors to enable determination of a party's objectivity.
22. **Document Review** – process where BCARA's policies and procedures are compared to Accreditation Requirements.
23. **Document Control** – procedures that ensure that the correct version documents used by BCARA are used and are available for BCARA personnel have access to those they need.
24. **Enterprise** – A production, processing or handling business or establishment. For the purposes of this document, an enterprise is enrolled in, or is an applicant for BCARA's organic certification program
25. **Genetically engineered (GE)/modified organisms (GMO)** – means products produced through techniques in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination.
26. **Handler** – Any operation, or portion of an operation that receives, or otherwise acquires, agricultural products for resale, except that such a term shall not include final retailers of agricultural products, who do not process and substantially transform, repack, or re-label such products.
27. **International Organic Inspectors Association (IOIA)** – The body (recognized by the COABC) responsible for training and upgrading of verification officers under the BC Certified Organic Program. Information regarding the IOIA is available at http://www.ioia.net/.
28. **Inspection** – On-site visit to premises for the verification of compliance with standards.
29. **Inspector** – Synonymous with "Verification Officer" (#52).
30. **Internal Audit** – A systematic periodic review and assessment of the objectives and performance of the certification program that is undertaken by BCARA itself.
31. **ISO** – The International Organization for Standardization – An independent body (with worldwide membership) based in Geneva, Switzerland. Member organizations collaborate in the development and promotion of international standards.
32. **ISO 17011 Compliant Accreditation** – specifies general requirements for accreditation bodies assessing and accrediting conformity assessment bodies. COABC is complaint with ISO 17011.
33. **ISO 17065 Compliant Certification** – Refers to the organic certification program operated by BCARA. BCARA Quality System is compliant to the ISO Guide 17065 General requirements for bodies operating product certification systems.
34. **Licensee** – An operator (or enterprise) that is in possession of a valid certificate.
35. **Operator/Client/Enterprise** –The party that is responsible for ensuring that products meet and, if applicable, continue to meet, the requirements on which the certification is based. For the purposes of this document, the terms operator/enterprise/client are used interchangeably.
36. **Organic** – a method of food production conforming to the standards described by the National Standards of Canada for Organic Agriculture (CAN/CGSB 32-310 and CAN/CGSB 32-311).
37. **Organic Products Regulation (OPR)** – Refers to a federal regulation under the Canada Agricultural Products Act. http://laws-lois.justice.gc.ca/eng/regulations/SOR-2009-176/

38. **Parallel Production** – The simultaneous production, preparation or handling of organic and non-organic (including transitional) crops, livestock and other organic products of the same or similar, visually indistinguishable varieties.
39. **Permitted Substances List** – A list of production and processing materials indicating their acceptance for use in organic food production. This list is contained in CAN/CGSB 32-311.
40. **Production Unit** – An identifiable portion of an enterprise that produces an agricultural product under a specific management plan.
41. **Records** – Forms, journals, reports and minutes that have been completed or created for specific purposes. Uncompleted forms are documents; completed forms are records.
42. **Regulation** – Organic Products Regulations under the Canada Agricultural Products Act
43. **Sanctions** – Measures taken with respect to certified operators who have failed to comply with the standards or other requirements of the certification body.
44. **Service Providers** – only carry out a particular activity (packaging, transportation, slaughtering, etc.) within the production or manufacturing chain, according to specifications provided by the supplier (operator), who maintains legal ownership over the product throughout the entire process.
45. **Society** – A society incorporated in the Province of BC, as is the British Columbia Association for Regenerative Agriculture. (BCARA).
46. **Standards** – Current organic production, processing or handling standards authorized by COABC – CAN/CGSB 32.310 General Principles and Management Standards and CAN/CGSB 32.311 Permitted Substances Lists. Together these documents are the Standards. http://www.certifiedorganic.bc.ca/standards/index.php links are under Canada Organic Standard Documents
47. **Supplier** – The party that is responsible for ensuring that products meet and, if applicable, continue to meet, the requirements on which the certification is based.
    a. Every supplier claiming that the products it markets meet the requirements covering designation "Canada Organic" and "Biologique Canada" and "British Columbia Certified Organic" within the scope of the Organic Products Regulation, and the Organic Products Certification Regulation (BC) must submit an application to certify those products. In this document, the terms "supplier" or "operator" or "client" are used interchangeably and refer to a person or company.
48. **Suspension** - Certification may be suspended if there is non-compliance. Suspension remains in effect until required corrective measures are implemented and verified. The term of suspension will make it clear which products must not be sold until the suspension is lifted.
49. **Third Party** – A decision-maker who has no direct financial interest in the affairs of the enterprise being certified and no direct interest in the marketing of that operator's products.
50. **Transitional Production** – A product from an enterprise under the supervision of a certification body and in the process of completing its transitional period towards becoming a certified enterprise.
51. **Under Review** - Assigned when information gathered at the inspection was insufficient or inconclusive. A letter accompanies the issuing of this status from the Certification Body to the operator stating why the inspection was inconclusive. No products may be labeled as Certified Organic until this designation is lifted. This is a temporary assignment of status, until more information is received or until certification is denied because information is unsatisfactory or is not received, despite requests.
52. **Verification Officer (VO)** – A person (member in good standing of the International Organic Inspectors Association) contracted by the Certifying Body to undertake the inspection of an enterprise for compliance with the standards.
53. **Voluntary Withdrawal** - The withdrawal from the certification program of any production unit or processing facility due to use of a prohibited practice or material.

1 Conflict of Interest

Definition: A conflict of interest is defined as an actual or perceived interest by staff, Board members, volunteers or CC members in an action that results in or has the appearance of resulting in personal, organizational, or professional gain. In other words, a conflict of interest occurs when an individual in a position of authority has the potential to gain (monetarily, or through other means) from a decision they are involved in.

Examples of conflicts include:

- Misappropriation of society property for a director's or officer's personal use, including the taking of a commercial opportunity that properly belongs to the society,
- Disclosure of, or inappropriate reliance, on confidential society information.
- Any transaction or contract between a director or officer and the society which could result in a profit for the director or officer is a breach of the duty.
- Board of Directors, staff, or Certification Committee Members purchasing products used in their own production or processing system from, or otherwise engaged in a formal business relationship with, another BCARA operator
- Family relationships with BCARA operators and Board of Directors, staff, or Certification Committee Members
- Consultancy services provided by Board Members, staff, or Certification Committee Members to a BCARA operator
- Inspection services provided by a Verification Officer (VO) who may also sit on the BCARA Board of Directors or Certification Committee.

1.1 No personnel (employees, contractors, or volunteer) shall be used to inspect, review or make a certification decision for a product or operation where they have provided consultancy, inspected, were employed by, or were a principal, within the previous 2 years.

1.2 All BCARA personnel and any volunteers must, annually, sign a Declaration of Interests statement (F27) that lists their business interests and familial relationships in the organic sector. They also sign a statement that they will notify BCARA immediately of conflict of interest about any issues they are asked to deal with. This would include matters that were not on the Declaration of Interest statement. Persons completing the form must declare the following:

a) Business involvement in the organic sector as it relates to BCARA, including partnerships and informal business relationships
b) Family relationships within BCARA
c) Positions held in the organic sector (Board or other volunteer positions)
d) Consultations (paid or unpaid) in the organic sector
e) Inspections conducted for BCARA operators

1.3 The Certification Administrator reviews all Declaration of Interest statements and records them on the Declaration of Interests spreadsheet (L3). This spreadsheet is available at all Board and CC meetings to ensure that individuals with conflicts are removed from the decision making regarding something they are in conflict with.

1.4 If an inspector or reviewer is found to be involved in a certification decision with an operation with which they have a conflict of interest, the Board of Directors of BCARA will review the circumstance and take appropriate action, such as assigning a new

inspector, and/or transferring the application to another COABC accredited certification body, at no additional cost to the operator.

1.4 Board members should bring any potential conflicts to the attention of the board before any discussion of the issue so steps can be taken to address the conflict and avoid having the board member unfairly influence the decisions of the board. If new interest arises during the course of the year or if the Director perceives a potential conflict of interest in relationship to an issue about to be discussed it will be declared to the President or at the meeting. If an issue is scheduled or arises where a conflict of interest may be perceived the Board will discuss the potential conflict of interest and decide if the conflict is such that the Director involved must not be involved in discussion and decision. The Director will be asked to leave the room for the duration of the discussion and decision. The minutes will record the nature of the potential conflict, the reasons for the decision and the exclusion period.

1.5 Certification Committee members will note any conflict of interest in reviewing files and will remove themselves from any discussion related to the file. Certification Committee members will also remove themselves from the room when a file is being discussed where a conflict of interest exists. All conflicts of interest and removal of a Certification Committee member will be noted in the minutes of the meeting at which the conflict arises.

1.6 If Verification Officers are appointed to the Certification Committee they will be unable to review any files that they have directly worked on or have working knowledge of as a VO for a total of two years. They will also remove themselves from the room during any discussion on files where they have a conflict of interest. All interests will be recorded on the declaration of interests form (F27) annually.

2 Confidentiality

2.1 All BCARA personnel and volunteers, including but not limited to: the Board of Directors, Administrator, Certification Committee members, bookkeeper and contracted inspectors, are required to sign a Confidentiality Agreement (F26) prior to commencement of their position and annually thereafter. The Board and Certification Committee sign confidentiality agreements and declarations of interest at or before the first meeting after the BCARA AGM.

2.2 BCARA's Administrator may release information regarding an enterprise as follows:

a) **Routine Information** – Operation name, address, phone number, categories of operation, effective date of certification and certification status. Additional information may be made public only with the consent of the member.

b) **Proprietary Information** – All information other than that listed above on a BCARA certified enterprise, is considered proprietary, and is confidential. The results of appeals and complaints are a matter of public record, but proceedings are not.

c) **Financial Information** – BCARA will not release any financial information that may be on file with two exceptions:
   i. Data needed to calculate annual COABC fees.
   ii. BCARA Board notification of details of any fees past due.

d) **Certification records** - Operator files and records and information about a particular product or supplier (i.e., application, inspection reports, certification decision letters, supporting documents) are released or disclosed to a third party only when signed permission is given by the operator, except as provided for in this document or by law. Auditors (from BCARA, COABC, COR, AGRI, CFIA) must sign a Confidentiality Agreement before examining records.

2.3 If the law requires information to be disclosed to a third party the certified operation shall be notified in writing.

2.4 An authorized representative of a certified operation may look at the file only when the administrator, VO or certification committee member is present.

2.5 The operator may not remove, add or alter documents in the file. However copies of documents will be provided by BCARA, if requested. This may be subject to a cost recovery fee if a large amount of copying is involved. Any alteration made to documents must be signed and dated.

2.6 Other Certification records, such as Certification Committee minutes, and proceedings of appeals and complaints are to be kept confidential, subject to audit and legal requirements. Decisions on appeals and complaints are a matter of public record.

3 Financial Procedures

3.1 Fees

3.1.1 When initial and renewal applications are sent out to operators, a fee schedule (A3) for the current year will also be distributed. A fee worksheet (F6, F7, and F8) indicating the applicable fees will also be sent to prospective and current operators to fill out in conjunction with the fee schedule and returned to BCARA.

3.1.2 Fees, as indicated on the fee schedule, must be submitted in full with the applications. If fees are not submitted, the application will not be processed. If no payment is received after 60 days then the operation will be suspended.

3.1.3 If the amount in the deposit towards inspection costs does not cover the actual cost of inspection the operation will be invoiced the difference.

3.1.4 New certificates are not issued until fees are completely paid.

4 Documented Structure of BCARA and Job Descriptions

4.1 Board of Directors

4.1.1 **President**

a) Prepares agenda and circulates at least 3 days ahead of meeting
b) Chairs Board meetings
c) Supervises other Board members in the execution of their duties
d) Chairs General meetings
e) Ensures that a quality system is established, implemented and maintained. The President is Responsible for the quality management system and may delegate tasks as needed to the Certification Administrator.
f) Reports on the performance of the quality system to the Board for review and as a basis for improvement of the quality system
g) Ensures that the Internal Audit and Management Review are completed and documented.
h) Supervises Administrative Assistant (if applicable) to the Board.
i) With the Certification Committee chair, ensures that BCARA continues to deliver certification services in the absence of the Certification Administrator
j) Ensures that a Dispute Resolution chair, if needed, is appointed in a timely manner
k) Responsible for hiring, firing and overseeing the work of the Certification Administrator.

4.1.2 **Vice President**

a) Sits in for the President in their absence
b) Assists the secretary

4.1.3 **Secretary**

a) Drafts Annual Calendar of Events and meetings with the rest of the Board
b) Arranges for meetings and notifies directors
c) Keeps minutes and manages records pertaining to Board functions
d) Sends all minutes to the Certification Administrator to house at the BCARA office
e) Maintains a register of BCARA Society members
f) Ensures the good standing of the Society by complying with annual filing requirements, and ensuring copies of filing is sent to the BCARA office.

4.1.4 **Treasurer**

a) Supervises the bookkeeper
b) Drafts the annual budget with assistance from the bookkeeper
c) Supervises expenditures and ensure bills are paid in a timely manner
d) Ensures adequate financial records are kept and sent to the Certification Administrator to house at the BCARA office
e) Supervises preparation of annual financial statements and interim reports

4.1.5 **Certification Committee Liaison**

a) Maintains communication with the chairperson of the Certification Committee and Certification Administrator

b) Brings issues of certification policy and appeal to the Board
c) Ensures sure that general membership is notified of any changes of policy or Certification Standards
d) Attends Certification Committee meetings as necessary to resolve issues or provide Board input to Certification Committee decisions when needed
e) Helps to recruit and train new Certification Committee members

4.1.6 **COABC Representative**

a) Represents BCARA's interests to COABC
b) Reports to BCARA concerning COABC affairs
c) Keeps BCARA staff and membership informed about COABC's activities.

4.1.7 **COABC Alternate Rep**

a) Fills in when the regular Rep is unavailable.

4.1.8 **Dispute Resolution Chair** (ad hoc appointment)

a) Manage any internal and external disputes as per BCARA policies

4.2 Administrators

4.2.1 **Certification Administrator**

The Certification Administrator is hired by the Board and is accountable to, and works collaboratively with, the Certification Committee and the Board. The Certification Administrator signs BCARA's Confidentiality and Conflict of Interest forms annually and has no vote on final decisions of the committee. The administrator is not authorized to make certification decisions.

Communication:

a) Sends out, receives and reviews all certification applications and renewals and other correspondence in relationship to the certification program.
b) Collects missing information from applicants.
c) Works with the bookkeeper to track expenses associated with each file and outstanding Accounts Receivable.
d) Distributes files for review by Certification Committee members.
e) Returns calls and emails promptly, including inquiries on the certification status of operations in the certification program.
f) Prepares and distributes Certificates of Status.
g) Maintains records and communication as necessary with COABC, including agreements re: use of COABC logo.
h) Is responsible for all reports to accreditors, including quarterly and annual reports to COABC as required.
i) Informs BCARA Board and COABC of any suspensions or non-granting of certification (denial of certification or de-certification) due to non-compliances when they happen and again after all appeals are finished.
j) Reports to participants concerning certification issues.
k) Stays informed on changes to standards, standards interpretations, and regulatory and accreditation requirements and ensures that the Certification Committee, Board, and participants in certification program are informed as appropriate.

l) Informs participants in the Certification Program of comment periods on proposed amendments to the Standards and interpretations by the Standards Interpretation Committee.

Certification Committee:

a) Notifies members, prepares suggested agenda, and attends Certification Committee meetings.
b) Assigns certification files to Certification Committee members based on their qualifications.
c) Records minutes and circulates to members for approval.
d) Keeps a log of any decisions requiring interpretation of the Standards, so as to ensure consistency for precedent setting.
e) Maintains a log of Precedent Setting Decisions (L10) and exceptions
f) Ensures, along with the Certification Committee chair, that Certification Committee deliberations and decisions are free from conflict of interest by examining CC members' Declarations of Interest and deciding what does and does not constitute a conflict of interest. Everything else listed shall be considered a conflict of interest.

Records:

a) Maintains such files as are necessary for running the Certification program.
b) Maintains a list of all operations in the certification program and updates the COABC database regularly.
c) Tracks non-compliances (NCs) and responses to NCs from operators.
d) Produces/revises forms, as necessary, to comply with Standards in cooperation with Certification Committee.
e) Keeps a record of all complaints and appeals and forwards them appropriately within 3 days of receipt.
f) Maintains a contact list, including e-mail addresses, of all operators.
g) Maintains BCARA's information on COABC's website. Records all certification activities related to each operator in the Application Record ((L8) spreadsheet including dates each step in process has been carried out.
h) Co-operates with all audits and ensures that auditors sign BCARA Confidentiality (F26) & Declaration of Interest (F27) forms. Keeps records secure & confidential, as per BCARA policies.
i) Manages and controls all documents and records as per BCARA's policies regarding document and record control.

Inspections:

a) Is delegated by the Board to select and contract with Verification Officers.
b) Schedules inspections with Verification Officers according to approved criteria.
c) Receives and distributes inspection reports to Certification Committee and to the inspected operator.
d) Approves invoices from inspectors and forwards these to the bookkeeper for timely payment.

4.2.2 **Board Administrative Assistant (if appointed)**

a) Files all necessary legal documents with the Corporate Registry in Victoria annually.
b) Arranges location, prepares agenda, notifies members, takes minutes of General Meetings and AGM.
c) Attends to all non-Certification correspondence of the Association.
d) Ensures copies of records are in the official BCARA office in time for audits.

e) Attends to the banking, accounts payable, including COABC fees, record keeping and general finances if assigned to do so by the Board.

4.3 Certification Committee

4.3.1 **Certification Committee (CC) Member Responsibilities:**

a) Reviews assigned renewal and initial applications for certification.
b) Recommends tests and audits to determine compliance with Standards.
c) Reviews Verification Officers' reports.
d) Compares operations with standards.
e) Suggests to the whole committee certification status and non-compliances (NCs), opportunities for improvement (OFI) or reminders/recommendations in relationship to the COABC standards.
f) Participates in evaluation of standards and any information or consultations required to make certification decisions.
g) Participates in internal reviews of BCARA as requested.
h) Participates in orientations or workshops provided by BCARA, as required.
i) Is responsible for ensuring, with the President, that BCARA continues to deliver certification services in the absence of the certification administrator.

4.3.2 **Chairperson or designate - Job Description**

a) Facilitates CC meetings ensuring that they are run in an orderly and effective manner.
b) Oversees agenda for meetings.
c) Arranges for a facilitator for any disputes internal to the committee.
d) Ensures balanced representation on the CC.
e) Ensures that the deliberations and decisions of the CC are free from Conflict of Interests (COI). The CC and the Certification Administrator will examine Declarations of Interests (F27) of the CC and VOs and decide what does and does not constitute a COI.
f) Approves correspondence templates of the CC.
g) Approves changes to certification forms, referring any matters requiring more input either to the Committee or the Board.
h) Notifies the CC Liaison or President of any situation with financial implications that may go over budget.
i) Is responsible for ensuring, with the President, that BCARA continues to deliver certification services in the absence of the Certification Administrator.
j) Reports to the General Meeting concerning certification issues.

5 Recruitment and Training of Personnel

BCARA contracts with an administrator(s), bookkeeper, and verification officers and appoints the members of the Certification Committee. BCARA has many dedicated volunteers who devote a great deal of time and expertise every year to operate the certification program, serve on the board, develop policies, and liaise with COABC.

5.1 Recruitment and Removal of Personnel

5.1.1 The Board of Directors of BCARA are responsible for ensuring that the Society is able to attract competent personnel. When a decision has been made to hire additional employees, the Board may designate a Hiring Committee, as needed, to ensure that competent and well-qualified staff and volunteers are obtained. At the discretion of the President of BCARA, the Hiring Committee may consist of Board members and Certification Committee members to a maximum of three interviewers.

5.1.2 This Hiring Committee will arrange strategic advertising so that the posting will attract significant candidates within the industry. BCARA will offer salaries that are in line with industry norms. The Board will strive to attract at least five applications for each position.

5.1.3 The Hiring Committee will create a short list of at least three applicants and conduct interviews as soon as practical after the closing date for applications. Interviews will be conducted with the appropriate formality and with suitable respect for the applicants.

5.1.4 Applications will be retained in a confidential file in consideration of future postings.

5.1.5 The Board of Directors has the ability and responsibility to remove personnel and volunteers who are not performing their required duties and job descriptions effectively. A three step process will be put in place to remove personnel as needed:

a) Verbal warning regarding the performance of the individual and a description of what needs to be remedied to avoid removal from the organization.
b) Written warning, if performance concerns have not been remedied. and a description of follow-up actions needed to avoid removal.
c) Written dismissal letter to the individual with effective date of removal and procedures to be followed.

5.2 Determining Qualifications and Competency of Personnel

5.2.1 All BCARA personnel, whether employed or volunteer, shall have qualifications that are relevant to the duties required of their position.

5.2.2 Information on the qualifications and subsequent training of all personnel, including volunteers, shall be kept in personnel files. The files shall include:

a) Name and address
b) Position held

c) Current resume or the following evidence of qualifications:
    i. Educational qualification and professional status
    ii. Experience and training in each field of BCARA activities
d) Date of the most recent updating of records
e) Performance appraisals

5.2.3 Personnel files are confidential and for review only by the management and internal and external auditors.

5.2.4 **Board of Directors**

5.2.4.1 Job descriptions and necessary qualifications of Board member can be found in the BCARA Quality Manual Section 3.0. Board members are recruited based on vacancies in Board positions and gaps in expertise as needed. New Board members are elected at each Annual General Meeting (AGM) by the BCARA membership. Board members are informed of the responsibilities of each position before election and roles will be determined for each member at the first Board meeting following the AGM. Training for Board members will also be undertaken by the existing Board members and/or the Certification Administrator and/or the Certification Committee after the AGM of each year.

5.2.4.2 Training for new Board Members will include:
a) Expectations of roles and responsibilities of each Board member as it relates to the Society Act, Bylaws and Constitution, as well as certification
b) The structure of BCARA and how BCARA fits into the Canadian organic certification program (Canada Organic Regime)
c) Explanation of expectations for ISO certifying bodies and the roles of Board members in maintaining ISO accreditation
d) The Certification process throughout the year and the potential areas where Board members may need to provide support and/or make decisions
e) Reporting requirements to COABC and to the Canada Organic Office
f) The Quality Manual and the important policies affecting Board member decision making capabilities
g) The Procedures Manual and how it relates to Board functions

5.2.4.3 The Board names one of its members to chair each Dispute Resolution Committee, which is made up of a minimum of three of the following:
a) The complainant or representative;
b) One BCARA Director;
c) One member of another Certifying Body accredited by COABC;
d) One person with expertise in the topic;
e) One member of BCARA, selected by the Board; and
f) A facilitator with Dispute Resolution skills (non-voting).

5.2.4.4 Each officer has the ultimate responsibility for their respective duties, either by carrying them out or asking the Board to delegate them.

5.2.5 **Certification Committee**

5.2.5.1 Job descriptions of the Certification Committee (CC) can be found in Section 3.5 of the Quality Manual. The Board appoints new members on an as needed basis. The Board of Directors reviews the qualifications of each applicant and approves all members of the CC with recommendations and feedback from

the Certification Administrator. The Certification Administrator matches the skills and expertise of the new applicant to the CC job description and responsibilities and may recommend restrictions for their approval to the Board when the new member is being appointed. Restrictions and approval may change if they receive additional training.

5.2.5.2 The appointment of new members and authorization for carrying out certification functions is recorded in the minutes of the appropriate Board meeting where the appointment was made

5.2.5.3 BCARA will recruit members for the CC by the following methods: advertising (e.g., on the COABC list serve and or to BCARA membership; announcements in meetings or in meeting notices or newsletters; appropriate educational or agricultural institutions) or targeted searches by CC members and/or Board members and/or certified operators looking for experienced persons in areas the CC deems necessary to round out the experience on the committee. To keep experience of the committee varied, searches will include educational institutions, non-profits and consumer groups, where applicable.

5.2.5.4 The CC may be made up of organic operators, certified by BCARA or by other certification bodies; people with production knowledge (academic or practical) of organic and conventional agriculture, food processing & handling, food systems, and related sciences (such as chemistry and biology) and knowledgeable organic consumers

5.2.5.5 The Board of Directors will select candidates that have the appropriate qualifications, skills and demeanor relevant to the position. A partial list of selection criteria includes:

a) Industry experience – knowledge of organic and conventional agriculture, food processing, food wholesaling, retailing, transport or storage, food safety systems, livestock production and animal welfare, food systems and related sciences. This could include experience (work or volunteer) in agricultural or food operations, or an academic background in agriculture and/or food sciences.
b) Proven skill competency in skills required by the position
c) Ability to work independently and as part of a team
d) Experience working with the public and dealing with public inquiries
e) Previous experience working with, or for, non-profit societies
f) Previous experience or training involving quality control, management, paper trails, auditing, and inspection.

5.2.5.6 Training for new CC members occurs when a new member has been appointed by the Board and will include:

a) Expectations of roles and responsibilities of the CC member as it relates to certification
b) The structure of BCARA and how BCARA fits into the Canadian organic certification program (Canada Organic Regime) and international organic programs.
c) Explanation of expectations for ISO certifying bodies and the roles of CC members in maintaining ISO accreditation
d) The Certification process throughout the year
e) Reporting requirements to COABC and to the Canada Organic Office
f) The Quality Manual and the important policies affecting CC members

g) The Procedures Manual – specifically procedures for reviewing files, inspection reports and granting certification
h) Review of the Standards and PSL
i) BCARA certification policies

5.2.5.7 Training will be provided by the existing CC members, the Certification Administrator, the Board Certification Committee Liaison and appropriate third parties. A new Certification Committee member will be mentored by an existing member for the first 3 files they review. New CC members will be appointed on a trial basis and their performance will be evaluated after one year with BCARA. After one year has elapsed, CC members will have a meeting with a member of the Board and the Certification Administrator to identify any additional training needs, goals moving forward and comment on job performance.

5.2.6 **Certification Administrator**

5.2.6.1 Job descriptions and necessary qualifications of the Certification Administrator can be found in Section 3.4.1 of the BCARA Quality Manual. The Board of Directors is responsible for recruiting and training the Certification Administrator. When there is a need to hire a Certification Administrator the position is advertised in the following ways: on the COABC list serve; to BCARA membership; announcements in meetings or in meeting notices or newsletters) or targeted searches by CC members and/or Board members and/or certified operators looking for experienced persons. Searches will include educational institutions, non-profits and consumer groups, where applicable.

5.2.6.2 The Hiring Committee reviews the qualifications of each applicant and will select candidates that have the appropriate qualifications, skills and demeanor relevant to the position. A partial list of selection criteria includes:
a) Industry experience – knowledge of organic and conventional agriculture, food processing, food wholesaling, retailing, transport or storage, food safety systems, livestock production and animal welfare, food systems and related sciences. This could include experience (work or volunteer) in agricultural or food operations, or an academic background in agriculture and/or food sciences.
b) Previous experience or training involving quality control, management, paper trails, auditing, and inspection.
c) Proven skill competency in skills required by the position, such as administrative skills, computer competency, organizational ability, time management and ability to understand complex regulatory systems.
d) Ability to work independently and as part of a team
e) Experience working with the public and dealing with public inquiries
f) Previous experience working with, or for, non-profit societies
g) Knowledge of accreditation and ISO system requirements

5.2.6.3 Training for the new Certification Administrator will occur immediately after this person has been hired and will include:
a) Familiarity with the Job Description of the Certification Administrator
b) The structure of BCARA and how BCARA fits into the Canadian organic certification program (Canada Organic Regime)
c) Explanation of expectations for ISO certifying bodies

d) The Certification process throughout the year
e) Reporting requirements to COABC and to the Canada Organic Office
f) The Quality Manual and the important policies
g) The Procedures Manual in its entirety
h) Audit procedures and protocol
i) Document and record control procedures and protocol

5.2.6.4 Responsibility for arranging training of the new Certification Administrator rests with the Board of Directors. The Certification Administrator will be hired on a trial basis and their performance will be evaluated after six months with BCARA. After six months has elapsed, the Certification Administrator will have a meeting with a member of the Board and a member of the CC to identify any additional training needs, goals moving forward and comment on job performance. There will be an additional performance review after one year has passed.

5.2.7 **Verification Officers**

5.2.7.1 In the BCARA Quality Manual, the hiring of VOs is delegated by the Board of Directors to the Certification Administrator. The CC members fill out VO evaluations each year and recommend which VOs should be re-hired to the Certification Administrator. The Certification Administrator determines whether the VO has the appropriate qualifications for inspecting the BCARA operators they are assigned to, based on a combination of the VO's training and experience as reflected on their resume. The Certification Administrator will note in the personnel file if there are types of operations the VO is not currently qualified to inspect.

5.2.7.2 The selection criteria include:
a) Inspectors shall be chosen from among the membership in the International Organic Inspectors Association (IOIA) and must be listed on their directory. This ensures the necessary level of competency to conduct inspections.
b) Inspectors must have training and relevant experience to understand the operation they are inspecting (i.e. livestock, crops, processing, etc.)

5.2.7.3 BCARA provides training for all VOs each year by providing:
a) A copy of the standards they are to inspect to.
b) Any changes in the standards and directives from COO or COABC.
c) Copies of the BCARA Quality Manual, Procedures Manual and BCARA policies.
d) Special instructions and expectations from BCARA for inspections (i.e. audit procedures, sampling procedures, summary report expectations, checklists, etc.).

6 Internal Audit

6.1 Internal Audit Process

6.1.1 BCARA conducts annual internal audits covering all procedures in a planned and systematic manner, to verify that the management system is implemented and is effective. The audit program shall be planned taking into consideration the importance of the processes and areas to be audited as well as the results of previous audits. These audits normally are performed at least once every 12 months and shall be completed in no more than a 12 month period.

6.1.2 BCARA will ensure:

i. Internal audits are to be conducted by personnel knowledgeable in certification, auditing and the requirements of the BCCO ISO compliant program.
ii. Auditors will not audit their own work.
iii. Personnel responsible for the area audited will be informed of the outcome of the audit.
iv. The Internal Audit report will identify non-compliances (NCs) with accreditation criteria and BCARA's procedures and policies. Opportunities for Improvement (OFIs) will also be identified.
v. Corrective actions will be taken in a timely and appropriate manner in order to correct the non-compliances.
vi. Any opportunities for improvement will be identified.
vii. The results of the audit are documented and kept on file at the BCARA office to be available for examination for follow-up and future audits.

6.1.3 The Internal audit shall cover compliance with all COABC accreditation criteria. In order to track this, the Internal Audit Document Review tracking sheet is maintained. It lists all COABC accreditation criteria and BCARA's policies and/or procedures that fulfill these criteria. It shall be maintained, kept current and reviewed by the Certification Administrator, unless another person is delegated by the Board. The review may be spread over a maximum of 3 years; however portions shall be completed each year. It will be used by the Internal Auditors to guide the audit process as they will check whether the procedures/policies are in place and being followed and comply with accreditation criteria.

6.1.4 Corrective Actions (CA) from previous Internal and External Audits and Management Reviews will be reviewed by the Internal Auditor to see if each has been completed, and assessed to see if new policies and procedures are being used and are effective.

6.1.5 Certification and administration will be reviewed by the Internal Auditor. This review includes: checking if accreditation policies and procedures are implemented and followed; reviewing certification files; examination of minutes of certification committee meetings, decisions, complaints, appeals; and human and financial resource needs.

6.2 Internal Audit Report

6.2.1 The Internal Auditor will complete a report that identifies Corrective Actions (CAs) and Opportunities for Improvement (OFIs) for all areas audited and that covers the entire management system and compliance with accreditation requirements. The report and supporting documents will be kept on file at the BCARA office to be available for examination by future audits and follow-up purposes.

6.2.2 The Internal Audit report and summary is sent to the BCARA Board and Certification Administrator.

6.2.3 The Board considers and adopts Corrective Actions (CAs) and Opportunities for Improvements (OFIs), assigns personnel to deal with them and target dates for completion. The CAs are added to the tracking system with an official copy kept at the BCARA office. This report is also included in the minutes of the Board meeting. The Secretary is responsible for ensuring that the report is sent to the BCARA office and the Certification Administrator.

6.2.4 A copy of the internal audit report or summary shall be sent by the Certification Administrator to each person who is responsible for an area the audit covered. The Internal Auditor is responsible for making sure that this happens.

6.2.5 At every Board meeting the Certification Administrator report to the Board shall include an update on status of CAs.

6.2.6 The next Internal Audit is added to the Calendar/Action Log. Any areas of immediate concern, such as conflicts, complaints and appeals, and significant and chronic, persistent problems receive more timely attention as deemed appropriate.

6.3 Corrective and Preventive Actions

6.3.1 BCARA shall establish procedures for the identification and management of non-compliances and potential non-compliances in its own operations and take action to eliminate the causes and prevent recurrence. These procedures will include results of internal, external audits, management review, complaints and appeals, as well as others identified by staff or others.

6.3.2 The procedures for corrective actions shall define requirements for: identifying the non-compliances; determining their cause; and implementing the actions needed for correction of non-compliances and/or preventing reoccurrence; recording the results of actions taken and reviewing their effectiveness.

6.3.3 BCARA Certification Administrator keeps a track of all non-compliances identified by internal, external audits, management review, complaints and appeals, as well as others identified by staff or other personnel or clients in the Improvements and NCs Identified document (A2). Each is given a reference number to aid in follow-up.

6.3.4 The causes of non-compliances, and actions to be taken to correct them, will be determined by how the non-compliance was identified. Causes and actions to be taken to correct non-compliances identified in:

a) *External audits* - Examined by the Certification Administrator and Board-Certification liaison to determine the cause of the non-compliances and corrective actions to be taken. If needed, they will consult with the Certification Committee or Board.
b) *Internal audits and Management Reviews* - Examined by the management review team, who then determine the cause and corrective actions for each one.
c) *Audits* – Examined by the Certification Administrator along with the Board Certification Committee Liaison to determine the cause of the non-compliance and devise corrective actions for each. If needed, they (or either one) will consult with the Certification Committee or Board.

6.3.5 In all cases a person is assigned to complete the action and a target date is recorded. When the corrective action is completed, the policy, procedure or other action is identified well enough for follow up purposes and it is marked with the date. The Certification Administrator will report on what is outstanding to the Board at each Board meeting

6.3.6 Effectiveness of the actions taken are evaluated by the Certification Administrator on an ongoing basis, as unforeseen problems arise. The Certification Administrator tracks and reports any issues to the Board Certification Committee Liaison and the issue can be re-visited if needed. More formally, the internal auditor and management review team review the completion and effectiveness of actions taken during the next internal audit.

6.3.7 BCARA shall establish procedures for taking preventive actions to eliminate the causes of potential non-compliances. Preventive actions taken shall be appropriate to the probably impact of the potential problems.

6.3.8 The procedures for preventive actions shall define requirements for: identifying potential non-compliances and their causes; evaluation of the need for action to prevent the occurrence of non-compliances; determining and implementing the action needed; recording the results of actions taken; and reviewing the effectiveness of the preventive actions taken.

6.4 Performance Reviews

6.4.1 The Board will decide how they wish to conduct the Performance Reviews, Membership Review, Member Relations and Financial Procedures reviews as part of the Internal Audit process or outside that process.

6.4.2 Performance Reviews will be coordinated under the internal audit process and included in the plan at the intervals suggested below, or more often. Performance reviews do not need to be completed by an Internal Auditor. The completed performance reviews are to be available to an Internal Auditor. In conjunction with performance reviews, training needs, methods of training and programs will be identified.

6.4.3 Performance Review Timelines:
a) Administrator- every year
b) Certification Committee members - every year

c) Bookkeeper - every other year
d) Verification Officers – performance review is to be done by the Certification Administrator with input by the Certification Committee every year. The Internal auditor will report whether this was done and on the results
e) Other Personnel/Volunteers, if any - every year

6.4.4 The Internal Audit process will include a review of these activities:
a) Member Relations – every year. This information is not collected by the Internal Auditor, but is available to the auditor for review.
b) Financial procedures, along with financial resource needs (including adequacy of insurance and reserves), and identification of risk areas – every year. This information is not collected by the Internal Auditor, but is available to the auditor for review

7 Management Review

BCARA shall review its management system at least once a year as a commitment to ensuring its continuing suitability and effectiveness in satisfying the requirements for COABC and COR accreditation and BCARA's stated policies and objectives. This review will be done by the management review committee which is struck each year and can include members of the BCARA Board of Directors, the Certification Committee, the Certification Administrator, and an external interest from outside of BCARA (i.e. academic researcher, client of BCARA, government agency, knowledgeable community member, etc.).

7.1 Preparation for Management Review

7.1.1 The President or Internal Auditor shall ensure that all documents that are needed to complete 7.1.1 to 7.1.3 are sent to those to be present at least one week before the meeting.

7.1.2 The Management Review Report Template (T13) shall be used to report the results of the Management Review, so that it is clearly auditable. The top part of the report form lists the items that are reviewed. The bottom identifies Compliance Actions that are decided by the review committee along with who is assigned to them with target dates for completion. The Corrective Actions decided will be recorded in the Improvements and NCs Identified document (A2) as per section 6.3 of this document.

7.1.3 Action Items that are not compliance issues (such as member development), shall also be recorded in the Improvements and NCs Identified document (A2) solely for the purposes of follow-up. They are also added to any other tracking system as appropriate to their nature such as the Board Plan of Intention.

7.1.4 The review shall include:

a) An analysis of complaints and appeals;
b) The results of external and internal audits;
c) The status of preventive and corrective actions;
d) Feedback from clients and interested parties;
e) Feedback from the Management Review Committee;
f) Follow up actions from previous management reviews;
g) The fulfillment of objectives; and
h) Changes that could affect the CB's management system, (for example changes in internal policy, external regulations, or criteria for accreditation).

7.1.5 Outputs from the management review shall include decisions and actions related to:

a) Improvement of the effectiveness of the management system and its processes.
b) Improvement of the CB related to the fulfillment of requirements of the BCCOP and COR.
c) Resource needs (i.e. human, financial, etc.).

7.1.6 Records of management review decisions and actions shall be part the minutes of the meeting. An action plan shall be included in BCARA's tracking mechanism and may be included in BCARA's Plan of Intention. Actions items will be designated with a reference number, personnel assignment and target date for follow-up. A copy of

the management review shall be kept at the BCARA office. Management review decisions and action plans shall be reviewed by the Board at regular intervals.

8 Record and Document Control

Definitions:
A "Document" – written policies, process descriptions, procedures, and blank forms that are used to communicate information or information needs.

A "record" – information sometimes on an application, or otherwise submitted. So a blank application form is a "document" until it is filled in – then it becomes a "record." Signed contracts, confidentiality agreements, information sent in by producers such as maps, sales records, etc. are records. In other words, a document tells us what to do. A record tells us what was done.

8.1 Controlled Documents

8.1.1 Versions of documents are to be tracked in the *Controlled Document List (L1)*. A controlled document is one where if the wrong version is used it could create a problem. All applications, information sent to applicants, policy and some procedure documents are controlled documents. This list provides an opportunity to track all versions of controlled documents and ensure that only appropriate documentation is being distributed internally and publicly.

8.1.2 In order to further ensure current versions are being used, footers are added to all documents, which include:

a) Document ID: including document type (A-Admin Docs, F-Forms, L-Lists, T-Templates, I-Information Docs, P-Policies) and document number
b) Version number: (in brackets)
c) Date of last approval
d) If this is a draft to be circulated it should say "draft" in footer until approved

Footer Example:
Document ID (version): T3 (1)
Approved: 04.12.14

8.1.3 All policy documents will have an effective date written on the front cover, or in the footer, where appropriate (i.e. Quality Manual, Procedures Manual, etc.) and each document will be entered into the Document Register when revised by personnel.

8.1.4 **Electronic filing protocols** – Documents and records are filed by topic and then by year. Archived versions are kept in past year folders to ensure current documents are being used.

8.1.5 **Backups of Document and Records** – Once per month all BCARA files are transferred to the Administrator's two BCARA flash drives and an online storage system that it is accessible by all personnel.

8.1.6 Changes to controlled documents must be authorized before new versions are used. The Controlled Document List (L1) states who approves the document. Many are changed and approved by the Certification Administrator who will seek another opinion if she/he feels it necessary. The Certification Administrator may make minor corrections and clarifications in any certification form without other approval.

8.1.7 In general, for certification application forms, the chair of the Certification Committee (CC), in consultation with a majority of the CC members, approves changes. The Board will approve the Controlled Document List once per year at a meeting. Approvals of documents are recorded in the minutes of either the Board or the Certification Committee, where appropriate.

8.2 Control for External Documents

8.2.1 External documents include The Standards, directives and memos from COO and COABC, and SIC decisions. These documents are listed in an External Document Control List (L2).

8.2.2 Categories in the External Document Control list:
a) Document Name
b) Date Received
c) Effective Date
d) Follow-up to Operators Needed?
e) Sent to the Certification Committee?
f) Sent to the Board?
g) Sent to other staff?
h) Sent to VOs?
i) Admin Follow-Up Needed

8.3 Record Control

8.3.1 Records have to be kept with reasonable security – from theft, alteration, and fire. Sometimes operators ask to see their files. Copies of records in the files can be sent to the operator who has submitted it, but the operator can only look through the file in the presence of a BCARA employee.

8.3.2 Changes to records should be transparent. Sometimes the administrator, a VO, or an operator changes information on an application. In this case all alterations must be visible (not erased, blacked out, or deleted), and all changes must be signed or initialed, and dated, by the person making the change. Equivalent measures should be taken in the case of electronic records.

8.3.3 **Backup**: BCARA keeps electronic copies of inspection reports, pre- and post-reviews completed by the CC, operator files and applications, and all certification decisions. These back up the hard copies kept in the operator file. Electronic copies of applications, maps, and other information submitted by the operator are also kept as a back up to the hard copies. The same security is needed for electronic copies as hard copies.

8.3.4 **Emails**: Currently emails are printed and added to operator files if they are relevant to making certification decisions or are considered to be additions to the application (such as when an operator answers questions, or submits additional information). Emails are backed up electronically once per month onto two USB flash drives. These are also stored in the cloud through Gmail.

8.3.5 **What can't be disposed of**: Though BCARA is only required to keep records for 5 years it also has to have complete operator files and keep enough information to operate. The following records must be kept:

a) Contract (Agreement between Operator and BCARA) that was signed by the operator. This contract is required under accreditation criteria. If the content of the contract changes a new one must be sent to operators (including renewing operators).
b) Initial Applications
c) Land Use History forms
d) Maps - maps should be updated each year by the VO or signed and dated as being accurate as of date of inspection. Only the most current maps should be kept in the current file.
e) File transfer forms when an operator withdraws from certification and requests that their file be transferred to another agency. File transfer only needs to be kept for 5 years.
f) Whatever else BCARA Board and administrator consider to be base documents that should not be thrown out (i.e. member lists from each year, personnel files for administrator, Board of Directors, subcontractors, VOs, Certification Committee members, volunteers, and other personnel.

8.3.6 **Record Disposal**: All information pertinent to a specific operator, or that has names and addresses, or that is marked "confidential" or "proprietary", or is considered confidential by BCARA policies, is to be shredded before disposal.

8.3.7 **Records with Past Employees:** Documents and records kept with past employees and volunteers no longer covered under confidentiality agreements will be transferred to their replacement or appropriate BCARA representative immediately upon the end of their affiliation with BCARA.

8.4 Operator Files

8.4.1 Operator files are confidential. Members of the Certification Committee, the Certification Administrator, contracted VOs and auditors (COR, COABC, AGRI, BCARA internal audit, BCARA Management Audit) have access to producer files, complaint logs, appeals records and Certification Committee minutes. Each person who has access to operator files must have a signed confidentiality agreement. Resolutions of complaints and appeals are public.

8.4.2 Operator files are kept in files under the operation name. File numbers are assigned consecutively and recorded in a log that includes date application is received and also lists any operation that leaves the program along with the official date they leave. Applications, decisions, letters, inspection reports and correspondence are included in the file. All shall be marked with date received. BCARA QM states what information is confidential, and what is public. Operator files include, at a minimum:

a) Applications (plans) and supporting documents submitted by the operator.
b) Input reports plus supporting documents
c) VO reports
d) Letters/emails relevant to certification issues. This includes conditions letters from BCARA and the operator's answers.
e) Copy of BCARA Certificates
f) Maps (fields and locations)

g) If certification business is conducted by telephone notes of the telephone conversation must be kept.
h) Suspension or cancellation letters.
i) Transfer requests and correspondence.

8.5 Other Records

8.5.1 Other records include, at minimum:

a) Personnel files - including confidentiality agreements; contracts; resumes; VO training information, etc.
b) Audit reports and responses, reports BCARA makes to COABC or COR, Certificate(s) of accreditation.
c) Internal Audits – records of reports, supporting documents, decisions and plans of action.
d) Management review reports
e) Log of non-conformities and corrective actions
f) Minutes - of Board, Certification Committee, General Meetings, AGM
g) Financial reports as presented at AGM
h) Society Act - registration, filings, and certificates of good standing, constitution, by-laws.
i) Notices of standards changes, newsletters with certification information sent to operators.

9 Review of Applications – Certification Administrator

9.1 When the application comes in:

a) Make sure to note the date the application was received.
b) Check the fee worksheet against the cheque to make sure they are the same amount, and that the calculations are correct. Note the cheque number on the fee worksheet. If any fees have been forgotten note it on the worksheet.
c) Find the operator on the BCARA Application Record (L8) - fill in when the application was received.
d) Stamp each application form, all attachments and correspondence with the date received (use the "Received" stamp and adjust date accordingly).
e) Find the operator file in the filling cabinet and put the application in the file.
f) Check the envelope (before you throw it away) to make sure there is nothing in it.
g) Scan Fee Worksheets and email to the bookkeeper. Keep the originals.
h) All the fee worksheet originals go into a separate file (Fee Worksheets file).
i) Update the COABC database with any new information (name, address, email, etc.) using the private COABC URL for CBs: http://certifiedorganic.bc.ca/cbdata/
j) Make sure all of the proper forms are in the file
k) Scan a copy of the application and attachments for the electronic file
l) Log the payment in the Operator Payment spreadsheet

9.2 Opening Initial Applications:

a) Same process as a renewal application, but a certification file number must be assigned
b) Send a notice to the applicant to let them know the application has been received, but not reviewed yet.
c) Enter info into the COABC Database online. Their certification status is "pending".
d) In the File Number Log assign them the next cert number in the list.
    - The first two numbers stay the same (CB number - 03).
    - The next two numbers are the year application was received (i.e. 11 (2011), 12 (2012), 13 (2013), etc.).
    - The last three numbers are in order of numbers issued.
    - Also note the date the application was received in the appropriate column.
e) Create an operator file – name of operation & certification number (file number) on the tab of the file.

9.3 Deposits (Bookkeeper):

a) Create a spreadsheet to add up cheques – name of operation & amount of cheque – total for each deposit – put date of deposit.
b) Stamp cheques with FOR DEPOSIT ONLY stamp.
c) File the cheque (for deposit later, when more cheques come in)
d) Deposit in a credit union using the BCARA member card

9.4 Review the Application and all attachments:

a) Look for information that has not been filled out correctly or at all, and follow-up on the missing info (Have they submitted all applications that are necessary?)
b) If not complete, return the application and ask them to fill out missing info (keep a copy on file though). If anything really alarms you, put a note 4 on the BCARA Certification Checklist (F36). Fill out the Administrators Review section in the

BCARA Certification Checklist, so the CC can review these comments when reviewing the file.

c) Use the BCARA Certification Checklist and review form to help with reviewing the file.
d) Applicant Name = Enterprise Name.
e) Review only one file at a time – make sure surfaces are clear of papers before you start the review – you will have lots of paper on the surface & it must not get mixed up.
f) Remove everything from two years previous (not current, and not previous year, but the year prior to the previous year), and archive that info in their archive file. Make notes on archived files as necessary.
g) Before files are archived check to make sure that no information that will be needed this year is moved. Sometimes there is information attached to the VO report that needs to stay with current file.
h) The current file should include this year's application and all parts of the file from the previous year (applications & attachments, inputs report, VO report, CC reviews, correspondence, conditions letters, certificates). Keep maps if still relevant, test results (soil, water), specification sheets for products and inputs (if still current), approved labels, Organic Product Profiles, anything you think the CC or VO might need to refer to. You can go through maps & remove any that are out dated if not needed for reference.
i) On the BCARA Certification Checklist - check off everything received, then look for the forms that you think should be there (maps could be on file from previous year), test results (if required), responses to conditions, supplementary information, etc. Renewal applicants don't have to submit new maps or Land Use History forms if there have been no changes. We require water tests every 5 years if they are washing with non-municipal water. Soil tests are required for land coming into certification.
j) Look for responses to the previous year's NCs if they were requested to be submitted with the application.
k) Also fill in date of last prohibited material (see the Land Use History form) (for INITIALs and new land for a RENEWAL).
l) Fill in the Date the Complete Application was received for INITIAL APP'S – VERY IMPORTANT). This means all information and attachments and payment.
m) Follow up by requesting missing information from operator. Record this in the administrative review section of the BCARA Certification Checklist & keep a copy of emails or notes of phone calls in the file.

9.5 When the application is complete:

a) Mail, email, or hand-deliver the file to a qualified Certification Committee member for review. They are reviewing to see if the plan seems to be compliant with the standards. This includes examining all inputs used & planned for use. The CC member will report about the file & bring their concerns to a certification committee meeting. They may also make notes for things they want the VO to follow up on.
b) BCARA Certification Checklist:
    - Used as a working sheet when reviewing a file. CC members sign it and put the meeting date at the bottom, for easy reference on where in the meeting minutes the decisions are recorded.
    - On the BCARA Certification Checklist are notes to the VO from the CC (this needs to printed clearly and concisely or the administrator has to re-type them and make them clear).

9.6 File Order (the order the forms should be in the file, from top to bottom):

a) BCARA Certification Checklist
b) Last year's Certificate.
c) Last year's NC Letter with responses behind it (paper clipped)
d) VO report with attachments (if dual certified, the Regional certifier is in charge of getting inspection done, etc.). Sometimes the VO attachments need to be forwarded into the next year's report, so check the previous year's VO report to check the attachments included.
e) Application forms (with any Dual Certification certificates) (including attachments such as relevant land use history, OPPs, labels, etc.)
f) Correspondence with operator or from VO (in chronological order throughout the files, as is appropriate).
g) Maps – in envelope
h) Test Results – in envelope
i) Previously Approved labels – in envelope
j) Contract between BCARA and Producer

10 Pre-Inspection Review – Certification Committee

BCARA Procedures for Certification Committee Member file review –Before Inspection

AIM:
- Compare the information on the application (the Organic Plan) with the Standards and Permitted Substances Lists to see if it can be accepted.
- Bring any areas where you have questions about compliance to the attention of the CC, Administrator and VO
- The operator can be asked to make changes to come into compliance before the application is accepted.

10.1 Initial Applications

10.1.1 **Find BCARA Certification Checklist (F36)** - you can either use this to make notes, or make notes separately and fill in the review sheet at the end.

10.1.2 **Re-read standards** relating to type of production.

10.1.3 Read **Application** and any other submissions from this year. Compare information given in the application to the requirements of the standards. Make notes of incomplete, missing or non-compliant information.

10.1.4 Carefully check **the Land Use History (LUH)** (F11) and any accompanying documentation (such as letters from previous owners).
a) Is more back up documentation needed? If so make a note.
b) Determine the date of the last use of a prohibited material. Please note it down. This will be important to decide what level of status they will get after inspection.
c) Make notes of anything you might want the VO to check to verify the land use history (such as checking the operator's past records, asking to see the section of tax return from previous year where purchases are reported (this is unusual), checking with neighbours or employees, local suppliers, looking for signs or use of prohibited inputs.)

10.1.5 Review inputs as per Section 10.3

10.1.6 **Make notes** of any areas that are not allowed under the standards or where you don't have enough information to tell if the operation's plan complies. You will bring these to the committee.

10.1.7 **Fill in the BCARA Certification Checklist (F36)** –**sign and date it**.

10.1.8 **Bring file and BCARA Certification Checklist** to the next meeting. Bring forward any questions you have.

10.1.9 **On Initial applications** it is a really good idea to ask as many questions as we need to before sending the VO, so make lots of notes of additional information you may need.

10.2 Renewal Applications

10.2.1 **Find BCARA Certification Checklist (F36)** in file - you can either use this to make notes, or make notes separately and fill in the BCARA Certification Checklist after.

10.2.2 **Re-read standards** relating to the type of production.

10.2.3 Read **last year's VO report** to get background information.

10.2.4 Read last year's **conditions (NC) letter**. The administrator will have checked things off, but double check to see if, in your opinion, conditions have been satisfactorily addressed. There may be documents or letters that the operator submitted in response to the conditions letter. They should be clipped to the letter. Conditions and NCs must have been addressed prior to receipt of a certificate, but there may have been requests to submit information with the current year's application forms that will need to be reviewed.

10.2.5 Read **Application** and any other submissions from this year. Compare information given in the application to the requirements of the standards. Make notes of incomplete, missing or non-compliant information. Check that any conditions of certification set out last year have been complied with.

10.2.6 **Make notes** of any areas that are not allowed under the standards or where you don't have enough information to tell if the operation's plan complies. You will bring these to the next committee meeting.

10.2.7 Check for:

a) Inputs Report (F10) – is it present? Does it appear to be complete (Consistent with the type of crops grown)? Does it appear to be consistent with the outputs (yield)? Are all inputs listed in the PSL?
b) Compost source and manure source – do they comply with the standards and are they consistent with the crop nutrient management plan?
c) Is any manure applied according to the required time constraints for edible produce (i.e. 90-120 day rule)?
d) Is there a suitable crop rotation plan outlined?
e) Does livestock have access to outside grazing (may need to refer to site map to check)?

10.2.8 You may want to look further back in the file at (i.e. maps, Land Use History, certificates) for more information.

10.2.9 **Fill in the BCARA Certification Checklist** (fill in any questions on review sheet) –**sign and date.**

10.2.10 **Bring file and review sheet** to the next meeting. Bring forward any questions or concerns you have.

10.3 Input Review Procedure

10.3.1 All certification committee members are responsible for input reviews. Input review procedures are as follows:

a) Read **Inputs list** and compare to Permitted Substances Lists (PSL). Make sure you are looking at the correct section within the PSL for the use of the input (for instance something may be allowed for use as a soil amendment, but not as a pest control product). Be sure to look at the usage and origins column in the PSL.

b) **Check OMRI** (Organic Materials Review Institute) **Canada List** (http://www.omri.org/canada-list) or the Canadian Organic Inputs Brand Name Directory (http://www.organicinputs.ca/en/list/). If the product is listed on the OMRI Canada List then we can allow it as OMRI has been designated as a third party input verifier by BCARA.

c) If the product is not listed on the OMRI Canada List then we must evaluate the product and all of the ingredients within the input. Pesticides must have a PCP number and must be allowed for use on that particular crop. You can check this through the pesticide label search at the Pesticide Management Regulatory Agency (PMRA) at http://pr-rp.hc-sc.gc.ca/ls-re/index-eng.php. Also, chemicals have a Chemical Abstract Service (CAS) number that can be looked up.

d) If necessary, contact the supplier/formulator/manufacturer to obtain full disclosure of the ingredients in the input material and the processes used to produce the ingredients and the input material.

e) If necessary, contact OMRI about the difference in the formulations between US and Canada if the product is approved for use in the US.

f) If necessary, contract another CFIA-accredited CB or input evaluation program (i.e. who has evaluated the input material). Ensure that input evaluation programs are accredited to ISO 17065.

g) Consult with a third party to obtain technical information necessary to make a compliance determination on the input. These parties must be accredited to ISO 17065.

h) Periodically confirm that product formulations and processes have not changed. This will generally be annually, but where a longer interval can be justified, must be at least once every three years.

i) In cases of dispute between BCARA, BCARA will inform COABC. COABC shall come to a collective decision about the status of the input material.

10.4 Label Review Procedure

10.4.1 Check to see which logos are being used on the label. Ensure that they comply with the restrictions posed for each label (i.e. BCARA seal instructions, BCARA logo use, COABC checkmark conditions, Canada Organic Logo restrictions)

10.4.2 Ensure that the label identifies BCARA as the Certifying Body (i.e. "Certified by BCARA", BCARA name and number, etc.). Operator is not allowed to say Certified "Organic" BCARA, just Certified by BCARA

10.4.3 The term "Certified Organic" cannot be linked to the product. E.g: Must say "Organic Onions" **NOT** "Certified Organic Onions".

10.4.4 The claim "100% Organic" cannot be on the label.

10.4.5 Imported products must be identified as such. (eg: "Imported from", "Product of", "Made from Imported Products"), if the Canada Organic Logo is used.

10.4.6 Products processed or packed in a certified facility, must state the processors name or the responsible brand holder's name.

10.4.7 **French** Requirements for bilingual organic claims on labels are to be enforced by the certifier. This requirement is in the OPR section 21. There are exemptions for products sold "locally", in an area where French is the mother tongue of less than 10% of the residents. Locally has a very narrow definition: "*local government unit"* means sold only in the local government unit in which it is manufactured, processed or packaged and/or one or more local government units that are immediately adjacent to the one in which it is manufactured, processed, produced or packaged. The wording on the COABC checkmark does not need to be translated. BCARA can inform operations that there are other bilingual labelling requirements and that they can get information from CFIA about them at: http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/bilingual/eng/1328121549968/1328121616816

10.4.8 If the word organic is included on a Price Look-Up (PLU) sticker then the name of the certification body must also appear on the PLU sticker (label). If the Organic Logo is on the PLU sticker, the statement "Product of" immediately preceding the country of origin or the statement "Imported from" must be in close proximity to the logo.

10.4.9 Ensure that product names on the labels coincide with the products in the Organic Product Profiles (OPPs) (F15). Product names must match to ensure traceability.

10.4.10 Information regarding general Canadian labelling requirements can be found here: http://www.inspection.gc.ca/english/fssa/labeti/guide/toce.shtml. Information about organic labelling requirements are in the OPR Part 3. See also fact sheets on the CFIA Organic Products website

10.5 Processing Applications

10.5.1 When reviewing processing applications make sure to check that Processing or Handling Organic Product Profiles (OPPs) (F15) are completely filled out and that percentages of each ingredient are included. Also ensure that the supplier for each ingredient and certification status is included on the OPP. Also ensure all products listed on the organic certificate have a completed OPP.

10.5.2 Ensure that all certifying bodies have been listed for all ingredients in the Organic Product Profiles. Ensure VOs check that all certificates are current and that all ingredients are certified to the Canada Organic Regime (COR) and not just the National Organic Program (NOP).

10.5.3 Review sanitation procedures to ensure that clean-out is being conducted appropriately, particularly if a split operation.

10.5.4 Check all pest control procedures and inputs to ensure all products used for pest control are listed on the PSL.

11 Verification Inspections

11.1 Regular and Unannounced Inspection Frequency

Also see QM section 10.5.

11.1.1 **Minimum -** A minimum of one inspection is required annually for all operations in order to verify the operation's compliance with the standards.

11.1.2 **Unannounced** - A minimum of 3% of primary operators (minimum 1), and 5% of other operators (minimum 1) shall have unannounced inspections each year. BCARA covers the cost of these inspections.

a) The criteria used for choosing the operations shall be recorded in the minutes of the Certification Committee.
b) Unannounced inspections may be limited in scope and may cover only portions of the operation.
c) In cases where it is not possible to conduct an unannounced inspection (e.g. for reasons related to site access or other factors supported by a justification), advance notice may be given, providing that this notice period does not allow time to cover up non-compliances that might exist. In any case it shall not be more than 24 hours. BCARA will document the reasons for any advance notice.
d) The certification administrator shall keep a record of unannounced inspections.
e) BCARA will comply with requests that we do an unannounced inspection at COO or COABC requests if the compliance of the operation is in question.

11.1.3 **Period between inspections -** No more than 12 months can pass between inspections. If an inspection must occur on a date beyond a period of 12 months from the previous inspection this postponement must be no longer than 6 months. The reason for the postponement must be documented. If an interval between inspections is greater than 12 months there must be subsequent inspection that restores the parity between number of calendar year and regular inspections over a given time. This does not apply to inactive status.

11.1.4 **Processors** - If the CB determines it is not possible to conduct the inspection while organic product is being processed, the CB shall record the reason(s) supporting this determination. The CB shall then arrange for the inspection to be conducted at a time when the facilities and activities that demonstrate compliance or capacity to comply can be assessed. There shall be no more than two consecutive years without an inspection when organic product is being processed.

11.2 Hiring Verification Officers (VOs)

11.2.1 VO hiring is delegated to the Certification Administrator who seeks recommendations, approval, and/or direction from the Certification Committee.

11.2.2 VOs MUST be members of IOIA. This means that they must be on listed in the IOIA online directory as an inspector - http://www.organicweb.org/ioia/. BCARA accepts the information about IOIA training that appears on that list. BCARA has an additional training record (F37) for inspectors to fill out, which identifies areas of training outside of IOIA.

11.2.3 VOs must have enough training and relevant experience to understand the operation they are inspecting. The Certification Administrator is responsible for evaluating the VOs qualifications based on training and experience (listed on IOIA membership site and in their resume and BCARA's experiences with the VO) and matching this to the type of operation being inspected.

11.2.4 Contact inspectors early in the season (or even previous fall) to check availability. Until the deadline for renewals has passed you will not know exactly how many inspections you have but you can discuss an approximate number with the VO. You also won't know exactly when you will be able to send the files because the applications will have to be reviewed, but try to sketch in some reasonable time frames. BCARA Board of Directors sets the remuneration rates – they are included in the contract. The Certification Administrator may bring forward to the Board suggestions for changes in remuneration rates.

11.2.5 When you assign an inspector to a file:

a) Let the operator know who has been assigned and tell them that they will hear from the inspector to set up a time for the scheduled inspection.
b) The operator may not request an inspector, but may object to the VO who has been assigned, based on conflict of interests. If this happens let the Certification Committee know the operator's reasons and they will have to decide if it is reasonable.

11.2.6 **The following items must be collected each year and kept on file for each VO** who is used, or who another certifier under Dual Certification policy uses. Each of these items has to be renewed annually.

a) **IOIA membership** information that include the VOs training. Date retrieved and printed should be included.
b) **Current resume** of the VO. Each year we need a new resume because that is what the auditors ask for. Note date it was received.
c) **Current contract** signed by the VO.
d) BCARA **Confidentiality Statement (F26)**
e) BCARA **Declaration of Interests Statement (F27).** The administrator is to ensure the VO is not assigned any files that may be a conflict of interest. VOs shall not be assigned if they have been previously involved in, or been employed by a body engaged in, the design, supply, installation or maintenance of such products in a manner and within the previous two years, which could conflict with their impartiality. Where BCARA does not have specific guidelines refer to IOIA code of conduct and code of ethics http://www.ioia.net/ethics.html.
f) BCARA **Record of Training (F37)**

11.2.7 **Instructions to the VO** – The BCARA Certification Administrator is responsible for telling the VOs what they need to know. They need to be told:

a) **The standards** they are to inspect to and which version of the standards. This is particularly important when standards change.

b) About **requirements or policies set by COABC or BCARA** for inspection reports.
c) About any particular policies that would affect inspections. This includes details of audits required.
d) About any particular things that the Certification Committee wants them to check during an inspection.
e) The VO also should see the evaluation forms BCARA will be using to evaluate them.
f) A copy of special instructions given to VO must be on file.

11.2.8 **Documentation to be provided for VOs for each operation they are to inspect:** To ensure that a comprehensive and correct evaluation is carried out, the VO shall be provided with the appropriate working documents. They must include, among others:

a) **BCARA application form**, including any attachments and any amendments - this represents the Organic Systems Plan. The Organic Systems Plan must include a list of products for which certification is requested as well as the production and/or handling specifications for those products.
b) **Inputs Report** (ingredients and agricultural substances); For processors current Organic Product Profiles and Packer/Re-packer list (if relevant).
c) **BCARA Conditions (NC) letter** and other documents that require remedial actions (conditions, opportunities for improvement, requests for additional information) by the certifying body during the previous certification cycle
d) **Any corrective measures** implemented by the operator concerning these requests. (Operations responses to the conditions (NC) letter)
e) **Maps and plans;**
f) **Labels –** most recently submitted and most recent approved labels used on products.
g) **Most recent certificate** (if applicable)
h) **Previous year's VO report** and application
i) **Instructions** to the VO specific to the file, including any special instructions about audits.
j) Blank **Exit interview** form.
k) Blank **complain**t form so they have it to give to operators who forgot about them.

11.2.9 **Rotating verification officers:** Under BCARA's rules the same VO may not inspect an operation more than 3 years in a row; therefore, a history of which inspector is used for each inspection for each operation is to be kept by the Certification Administrator. The selection of VO is also to be recorded on the BCARA Application Record.

11.2.10 During inspection, the VO shall:

a) Conduct an introductory meeting with a representative of the operation explaining the scope and focus of the inspection and the role of the VO, as well as confirming jurisdictions of product sales.
b) Observe each production unit and each location, building or site (including vehicles) where production or preparation is carried out. This includes non-organic production units on the same site, adjacent or in close proximity to the organic production unit. If there is reason to think that there is a high risk of contamination or parallel production, or fraudulent

records, or the Certification Committee has requested it, the records of the non-organic sites are also verified. Typically for farms this would be: each site, fields, facilities, barns, pasture areas, storage units, equipment, materials and property perimeters, and packing and labeling facilities used for the products covered by the certification application. For processors and handlers this would typically include: each processing facility where production or preparation takes place, storage facilities, packaging and labeling areas, plus any other areas where production operations take place to confirm that they properly correspond to the information and specifications submitted in the application.

c) Examine records related to production (e.g. production records, inventory, sales, purchases, etc.) and management (e.g. accounting, complaints, etc.).
d) Identify and investigate areas of risk.
e) Verify that prohibited substances have not been, and are not being applied to the operation.
f) Observe the application of the standards through active management at a given point in time.
g) For producers:
    i. Report an estimate of the potential yield for the coming year.
    ii. Conduct an audit of the balance of quantities produced and sold during the previous year, including amounts still in inventory.
    iii. Trace back audits applying to certain products taken from the producer's inventory or from a commercial outlet where products have to be placed for sale.
h) For handlers, processors and packagers:
    i. Conduct trace back audits applying to a certain product taken from supplier's inventory or from commercial outlets.
    ii. Conduct an in–out audit where commodities acquired are compared to corresponding products sold and in inventory. The calculation sample shall include the most prominent commodities for at least 10% of all commodities used in all products with a minimum of one and maximum of 5. (for example: if 10 different types of grains are used to produce a variety of products, the most prominent one shall be used for the calculation; if there are 20 different ingredients used by the facility to produce a variety of different products then the calculation is done on the two commodities used most often). However, if justified, the VO may include a different or additional commodity in the calculation. This justification shall be recorded in the inspection report. Some examples for choosing different commodities to audit might be to add to the variety of products audited over a number of years of inspection, or a choice based on risk assessment The VO is authorized to collect samples including, but not limited to: soil, water, waste, seeds, plant or animal tissue, ingredients, processed product, labels, and packaging. When taking soil, water, tissue or other product samples the BCARA Sampling Procedures shall be followed. VO's must take samples of the following:
        i. Copies of labels with organic claim that are not on file with BCARA
        ii. Copies of labels of inputs where it is unclear whether the input is allowed, samples of inputs if VO has serious reason to believe that the inputs have been misrepresented

iii. Relevant or appropriate product or vegetative samples when they have serious reason to suspect contamination (e.g. GMO, pesticide, etc.) or when confusion of the products may have taken place. They shall report these concerns to the BCARA administrator as soon as possible.
iv. Product samples, if parallel production on a farm is an issue and the physical identity of the product is in question, or at other times as instructed by the Certification Committee

i) The inspector will give a receipt to the operator for each sample collected and will keep a chain of custody report to keep track of samples taken
j) Testing of soil, water, or products will be undertaken when there is reason to suspect that an agricultural input or product has come into contact with a prohibited substance, method, or ingredient in the production and handling of organic products.
k) Decisions to conduct testing shall be documented. If tests are conducted, results will be forwarded to the operator within 30 days. The producer is responsible for the cost of tests.
l) Interviews will be conducted with people knowledgeable about the current operation.
m) At the end of the inspection the VO will also conduct a closing (exit) interview with the authorized representative of the operation to confirm the accuracy and completeness of observations and information gathered during the inspection. The VO will also tell the producer about matters that appear to be in non-compliance with certification requirements. Any areas that require more information to assess compliance will be mentioned and recorded. A copy of a written summary of the closing interview will be left with the operator. VOs do not make decisions about corrective actions required, or whether the applicant will be certified by BCARA. The Certification Committee has the overall authority and responsibility for certification decisions.
n) Check that corrective action in response to previously imposed certification requirements and changes in standards have been effectively implemented.

11.3 Reviewing Inspection Reports – Certification Administrator

11.3.1 **Review the Inspection Report and BCARA Certification Checklist to see if they are adequate and complete -** Both an electronic version & hardcopy version of the inspection report are required. The hardcopy comes back with the file. When you receive an inspection report, check that it contains all the required information. The Certification Checklist is meant to act as a guide for the CC and the VOs and may be filled out or referred to in the inspection report. The list below is included in file "Special Instructions to VOs". It reflects requirements in the BCARA Quality Manual. There are additional requirements in the VO instructions. Reports are due 2 weeks after inspection.

11.3.2 **Inspection and Reports must** include:
a) **Names** of interviewed parties,
b) **Date** and **time** (in and out) of inspection

c) **Sites** visited
d) Possible **contamination** from off-farm
e) **Buffer** zones – are they adequate? Is there crop?
f) **Include section numbers of relevant standards** when describing possible non-compliances including. Non-compliances must be explained in enough detail so the committee can understand the issue and be able to assess whether the operator subsequently addresses it.
g) **New Land -** Information that might impact the status assigned (**verification of land use history**, standards that might affect standards assignment).
h) **Previous conditions** – verification that previous non-compliances have been corrected, and whether they have implemented BCARA recommendations (if there were any).
i) VO comments addressing Certification Committee comments and questions on the last page of the BCARA Pre-Inspection Checklist and Review.
j) **Documentation Audits** –summary of audits done (in/out balance sheet, yields/sales, audit trails by batches, etc.). This summary requires enough detail that someone could reproduce the audit.
k) **Exit interview**
l) **Land Base Summary** – in table format – fields, acreage, crops, status they are eligible for and the **dates of last prohibited materials** for each field.
m) **Report signed and dated**
n) **Attachments**

11.3.3 **In the BCARA Application Record** note date report was received & the date of inspection.

11.3.4 **Review the report to see if it makes sense to you -** If the report is missing any of the required information, or if you have any questions about content, ask the VO as quickly as you can. Details fade in memory as time passes. If required information is missing they should re-submit ASAP.

11.3.5 **Check the Invoice -** Does the invoice look reasonable? Enter it in the invoice sheet – if it is 15% more than the average invoices you will want to examine it more closely. If you think that the VO has made a mistake – ask them about it ASAP and politely. If the invoice seems okay forward it to the Bookkeeper.

11.3.6 **Be sure that the electronic copy is filed electronically -** File in Files and Correspondence Folder under the Operator name for the current year.

11.3.7 **Send copy of the report to operator:**
a) **Send the electronic** version of the report and the **VO Feedback Form** (F22) to the operator with a covering email that says that the CC has not reviewed it yet and that they need to tell BCARA within 2 weeks if there are any inaccuracies in the report, or the report will be considered correct.
b) **Note date it was sent** in the BCARA Application Record.

11.3.8 **File Copy & CC review**

a) Make sure the hardcopy version of the report is in the file and that the file is in a reasonable order (the same order as detailed in *Instructions for Reviewing Files*).
b) Ensure that the BCARA Certification Checklist is included in the file along with the signed VO report & attachments.
c) The file then goes to the Certification Committee Member for review. Be sure the CC member does not have a conflict of interest with the file (ask them before sending).
d) You can send the file by mail (express post, bus or courier) or give out at the next meeting. If possible give it to the same CC member as conducted the pre-review of the application.
e) Note date & name of CC member you sent or gave the file to in the Application Record (L8).

12 BCARA Residue Sampling Procedures

12.1 Purpose:

This document outlines the sampling procedures for parties conducting residue testing of organically produced agricultural products under the requirements of BCARA Quality Manual and give guidance to those making decision about the results of laboratory tests for pesticide residues.

12.2 Background:

Canadian Organic Standards, CAN/CGSB 32-310, section 1.4.1 states substances - "when producing or handling organic products, it is forbidden to use any of the following substances or techniques:" and continues with a list. The use of the term "prohibited substances" means any of the items on that list. These procedures are particularly relevant for paragraph b)

Synthetic pesticides (e.g. defoliants and desiccants, fungicides, insecticides and rodenticides), wood preservatives (e.g. arsenate) or other pesticides, except as specified in CAN/CGSB-32.311, Organic Production Systems — Permitted Substances Lists

The other items that may be most easily tested for are covered under:

a) products of genetic engineering as these items are most easily detected by testing and

f) synthetic allopathic veterinary drugs, except as specified in the standards.

Canada Organic Office Operating Manual version v14 states (Section C 2.3.16):

The CB shall require pre-harvest or post-harvest testing of any agricultural input used or agricultural product to be sold, labelled or represented as being in compliance with the requirements of the Canadian Organic standards when there is a reason to suspect that the agricultural input or product has come into contact with a prohibited substance, method or ingredient in the production and handling of organic products.

C 2.3.18 The CB shall require sampling and testing, in an event of a complaint concerning the use of or contamination with prohibited substance, as part of the investigation of the complaint.

C.2.3.19 The CB shall investigate if it has a suspicion that an organic product contains even a trace amount of a GMO. The CB shall require sampling and testing in an event of suspicion of the presence of GMO.

12.3 Policy:

The Standards (par. 1.4.1) does not prohibit the presence of these items on products, but does prohibit the use by the operation producing the products. The Canadian Standards do not set maximum pesticide levels allowed on organic products, unlike other standards such as the US NOP program. Tests can be used as part of an investigation, but the mere presence of a prohibited material does not, in itself, indicate that the operation has contravened the standards. Substances, such as pesticides, may be in surrounding atmosphere and may drift into organic fields. Substances such as organo-chlorines have a long persistence in certain soils and can be taken up by plants many decades after application.

BCARA Quality Manual allows Verification Officers contracted by BCARA to collect samples of product and institute tests in the following conditions:

QM 4.5.9. g states:

a) The inspector will give a receipt to the operator for each sample collected and will keep a chain of custody report to keep track of samples taken
b) Testing of soil, water, or products will be undertaken only when warranted, such as in cases of suspected fraud, GMO contamination, pesticide contamination osoil or water contamination and for a well-documented complaint. The enterprise will be responsible for any costs associated with testing.

Section 4.61 allows for additional inspections if there is

c) Concern for contamination: If there is a suspicion of pesticide residue contamination or that there may be GEO (GMO) contamination even in a trace amount, an investigation shall take place. Investigations shall include sampling and tests for prohibited substance including GMOs and pesticide residues.

The VO and BCARA Certification committee are to consider the following before submitting samples to lab for analysis:
What are we looking for? Are there other ways to determine whether prohibited products were used (interviewing neighbours or employees, checking with local suppliers, reviewing purchase invoices, collecting evidence such as empty pesticide containers). Is testing the right, or most effective tool?

12.4 Procedures

In order clarify and ensure consistency in sampling the following procedures must be followed. In addition the laboratory used shall be accredited under (ISO/IEC 17025:2005 and be compliant with standards for the type of analysis being done. The BCARA certification administrator shall keep a list of approved labs.

12.4.1 When to collect samples

Samples should be collected when:

1. there is a suspicion that a prohibited substance has been applied
2. it is suspected that contamination from genetically engineered organisms, antibiotics or prohibited substances may have occurred.
3. pesticide drift may have occurred.
4. To gather evidence as part of an investigation.

Suspicion may be based on things such as a written complaint, an open container of prohibited substance that has not previously been recorded, an obvious source of drift, the product on an organic farm being unaffected by pests that are obvious on neighbouring farms, obvious signs of herbicide use, etc.
If the VO initiates samples he/she is to attempt to contact BCARA as soon as possible with an explanation of the situation and reasons for collection. The VO should describe any specifics about the potential contamination (what chemical or class of pesticides are suspected). If the VO is unable to contact BCARA in a timely manner the sample should be collected, but, if possible held before being sent to the laboratory until BCARA is contacted.

Depending on circumstances and the training of the VO BCARA may wish to send another VO with training in sample collection. . The VO collecting the sample, should contact the laboratory to check on sample collection and shipping requirements as well as chain of custody documentation

The VO must include in his or her report details about the reason sampling was deemed

necessary and other evidence collected. As much evidence as possible must be collected, especially if there is a suspicion of operator non-compliance with the standards. Evidence might include interviews with neighbours, photographs of pesticide containers, interviews with pesticide supply companies or advisors, copies of receipts or input logs.

12.4.2 Sample amounts

Sufficient size of sample must be collected to ensure that adequate amounts are present to allow the lab to test and re-test if necessary.

Suggested sample sizes (taken primarily from NOP 2610 which is derived from USDA AMS pesticide Data Program SOPs)

Commodity type	**Recommended sample size**
Most fresh fruit & vegetables	3-5 lbs (1.5-2.5 kg). Be sure to include at least the whole commodity For raw commodities: remove adhering soil, decomposed outer leaves and inedible root and tuber vegetable tops
Blended commodities or those smaller than a strawberry (including: berries, cherries, coffee beans, dried commodities, flours, grains. Herbs, garlic, legumes, mushrooms, nuts, teas, seeds, baby food sizes small jars/packages, spices/.	1 lb (approx 500 grams) Take samples consisting of whole commodities or use a sampling tool. For raw commodities: remove adhering soil, decomposed outer leaves and inedible root and tuber vegetable tops
All liquids and semisolid foods (eg juices, oils) and Canned/jarred foods	16-32 ounces (500ml-1000 ml)/

12.4.3 Choosing the samples:

(From IFOAM EU Group 12 Guideline for Pesticide Residue Contamination for International Trade in Organic Annex)

Samples must be taken from clearly defined lots. A "lot" is an identifiable quantity of goods having common properties or uniform characteristics. In the field, a lot would comprise a crop of a single variety in a clearly defined area which has been treated as a single crop. In post harvest situations, whether in bulk, or packaged goods, the lot should reflect the field lot as near as possible. In processing operations the lot may be a 'batched' delivery of raw materials or a clearly defined production run of goods awaiting dispatch.

In order to arrive at a "laboratory sample" for analysis, a number of primary samples are taken from the lot, which are combined to form the bulk sample. Where possible the bulk sample should be sent for analysis as the laboratory sample. Depending on guidance from the laboratory the bulk sample may need to be reduced in size.
Soil sampling is included here because BCARA may need to carry out investigations of sources of contaminations including investigations on farm, in cooperation with the farmer concerned.

Visually split the field/block up into 4 ha (10 acre) blocks. Walk the field in a W shape avoiding headlands and any unrepresentative areas e.g. gateways and water troughs. Take samples along the arms of the W.

The number of samples to be taken will depend on the size of the block but as a guide the following criteria should be used:

Area of Lot in hectares	Minimum number of primary samples to be taken
Less than 0.5 ha	(4)
0.5 ha to less than 2.5 ha	(4 to 8)
2.5 ha to less than 25 ha	(8 to 20)
25 ha to less than 250 ha	(20 to 70)
Greater than 250 ha	(70+)

12.4.4 Sampling record

The sampling officer must record the nature and origin of the lot; the owner, supplier or carrier of it; the date and place of sampling; and any other relevant information. Any departure from the recommended method of sampling must be recorded. A signed copy of the record must accompany each replicate laboratory sample and a copy should be retained by the sampling officer. A copy of the sampling record should be given to the owner of the lot, or a representative of the owner, whether or not they are to be provided with a laboratory sample. If sampling records are produced in computerized form, these should be distributed to the same recipients and a similar verifiable audit trail maintained.

12.4.5 Sampling Procedures

(taken from: IFOAM EU Group 12 Guideline for Pesticide Residue Contamination for International Trade in Organic Annex)

Because contamination can arise from packaging materials and from incorrect handling procedures, detailed special requirements may be required. If in doubt the sampler should check with the laboratory that will do the analysis as to the sampling method, packaging and handling. Where it is not clear from the sampling procedures outlined below, guidance may also be needed for sample size.

Sampling will normally be done into a clean plastic container or plastic bag.

Samples must be labelled and sealed so that opening the sample breaks the seal.

To avoid sample contamination leading to a misleading result, samplers must comply with the following procedure:

- Hands to be thoroughly washed prior to sampling, or any subsequent sub sampling. Avoid touching or handling the sample. Sampler must either use latex gloves, clean rubber gloves. the sampling bag itself or a clean scoop to obtain the sample..
- Only clean polythene bags or containers must be used (not polypropylene or PVC).
- When taking a sample it is essential that the sample should be representative of the whole lot.
- Samples must be stored in clean and dry conditions.
- It may be necessary to freeze or chill samples as soon after sampling as possible. If samples are taken frozen, or are frozen after sampling they must be kept frozen up to arrival at the laboratory.

The VO or BCARA should normally obtain a consent form. However, a sample may still be taken where an operator refuses to sign the form. A receipt is to be left with or sent to the operation.

12.4.6 Packaging and transmission of the laboratory sample

The laboratory sample must be placed in a clean, inert container which provides secure protection from contamination, damage and leakage. The container should be sealed, securely labelled and the sampling record must be attached. The sample must be delivered to the laboratory as soon as practicable. Spoilage in transit must be avoided, e.g. fresh samples should be kept cool and frozen samples must remain frozen. Samples of meat and poultry should be frozen prior to dispatch, unless transported to the laboratory before spoilage can occur.

12.4.7 Sample Documentation

12.4.7.1 Each sample should be identified by the following information:

a) Certified operation name and address
b) Identification of sampling site (best to include site map or filed map).
c) Sample identification – commodity information, variety brand name and lot number (if applicable), or other ID.
d) Certifiers name
e) Collector's name and signature
f) Date collected & date shipped.

A receipt is to be left with or sent to the operation.

12.4.7.2 Upon arrival at the laboratory the following information is to be recorded by the laboratory and included with the sample results.

1. Date received
2. Name of person receiving sample
3. Explanation for what happened to any sample that is not analyzed (eg chain of custody breached, rotten sample, etc)
4. Internal sample Id

12.5. Decision making

12.5.1 After the analysis is received the producer shall be sent a copy of the analysis along with the inspection report. If there is a result of concern the producer shall be given an opportunity to explain possible reasons.

12.5.2 The results and the inspection report shall be considered by the Certification Committee. The following should be taken into consideration by the Committee:

- Does the Certification have enough expertise to be able to interpret the results? If not they must seek technical help.
- The results are to be interpreted in relationship to background levels of the contaminant, and other evidence to distinguish between fraud and inadvertent sources such as background contamination or actions taken outside of the operation.
- The sample analysis in itself will not be sufficient evidence to prove fraud, as the Standards do not set out maximum residue levels, and sampling procedures outlined here may not be statistically valid.

12.5.2.1 If the results show a level higher than the maximum residue limits regulated under the Pest Control Products Act, appropriate authorities shall be notified and the producer shall withdraw the product from sale pending additional test to confirm the results. If the results are confirmed the producer will be expected to notify recipients of the product and recall the product. Other sanctions as per 5.2.2 and 5.2.3 will be imposed by the Certification Committee.

12.5.2.2 If the operation is deemed to have applied a prohibited substance and thus contravened the standards, the Certification Committee must decide the appropriate sanctions. Based on the particulars of the substance, the levels of residue, and the particulars of the application (did the operation know the substance was prohibited, was this attempted fraud, were they reckless in not checking the substance, or was this an unintentional mistake), the Committee may decide any of, or any combination of the following

- Effected crop cannot be sold as organic
- Effected crop/products must be recalled
- Require that crop grown in that areas not be sold as organic for a period of 36 months as per CAN/CGSB 32-310 par 5.1.1
- Suspend and or decertify the operation. COABC, Canada Organic Office, other BCARA operations, and buyers will be notified as per BCARA suspension and withdrawal of certification policies.

12.5.2.3 If it is found that the results are from an source outside the operations control (such as drift) Certification Committee will require that the operation improve it's plan to reduce the risk and/or improve their protection from the source of contamination as required in CAN/CGSB 32-310 paragraph 5.1.4. This may include written agreements, signage, and other measures as per:

5.1.4 When unintended contact with substances prohibited by par. 1.4.1 is possible, distinct buffer zones or other features sufficient to reasonably prevent contamination are required.

a. Buffer zones shall be at least 8 m wide.

b. Permanent hedgerows or plant windbreaks, artificial windbreaks, permanent roads or other adequate physical barriers may be used instead of buffer zones.

13 Post-Inspection Review - Certification Committee

For Reviewing Files POST-INSPECTION (same for Initials & Renewals)

AIM:
- To compare the information about the operation to the requirements in the standards.
- To determine if any non-compliances are minor (deficiencies) or major (flagrant violations).

13.1 One month before the scheduled post-inspection review session of the Certification Committee, the Certification Administrator will pass the report, the file belonging to the applicant, and any additional supporting information to a member of the Certification Committee deemed to be free of any conflict of interest with that applicant and their business. Before the post-inspection review session, the member of the Certification Committee will:

13.2 **Re-read section of Standards** that apply to that type of operation.

13.3 Read **instructions to VO from CC** and administrator.

13.4 Read **conditions (NC) letter** (if renewal) from last year - Check that all previous "conditions" have been satisfactorily addressed by the operator and verified by the VO during the inspection visit.

13.5 Ensure completeness of the report.

13.6 Based on the application, evaluation, and other information submitted **compare the operation's application along with the verification report to the applicable standards** to see if the operation complies, or if they will be able to comply if they correct minor non-compliances.

13.7 **Decide if you agree with VO's** suggested conditions or non-compliances (sometimes called summary or concerns). You can recommend that some not be conditions for certification or you can add things you think should be conditions. Or you can re-write. You can also: have questions for operator, for VO, for Committee. Anything you are unsure about can be discussed by the committee.

13.8 **Decide** if you think there is a concern about compliance that was not included in the VO's summary. If you just have questions about the operation that were not answered it is not a non-compliance. If you think the information is incomplete you can make notes for the next inspection; you can ask that a section be added to the Certification Review letter that says "further information requested" along with a date for it) and ask the questions or ask the administrator to ask the VO. Missing information is not non-compliance and should not hold up certification, unless the information is critical. These items should be brought forward to the whole committee.

13.9 If new information and documents were collected during the inspection (such as labels that were not sent in with application), new inputs were identified,

or labels for inputs were collected, be sure to review them carefully as per instructions on the pre-review report form.

13.10 **Certificate** - Non-compliances must be cleared before a certificate is issued. Decide whether you think another inspection will be needed to confirm that the non-compliances (conditions) are cleared before a certificate is issued. Make note of your thoughts and recommendations to the committee. See Section 13 for more information

13.11 **If the operation was transitional** last year the committee will need to decide whether next year there can be an automatic issuing of certificate 36 months after last use of prohibited material or if an inspection needs to take place before status is increased.

13.12 Make a **list of recommendations** (under review, decertified, voluntary withdrawal, certified organic, or transitional as appropriate for each parcel of land or product) to the Certification Committee along with any conditions (non-compliances, opportunities for improvements, request for additional information, issue of concern) for certification on the BCARA Certification Checklist. This list should have an attached date by which the conditions have to be corrected and a reference to the standards relevant to the non-compliance. See section 13 for details of what non-compliances and other decisions and for information about timing of responses.

13.13 **Determine which status is to be granted** for each area of operation and any limitation to the scope of certification.

13.14 **Sign and date the list of recommendations** - The recommendation will be discussed and accepted or changed by the Certification Committee at its next meeting.

13.15 If the Certification Committee determines that the enterprise complies with all standards and that the applicant is able to conduct operations in accordance to its plan it will direct the administrator to issue a non-compliance letter and certificate once all non-compliances have been cleared.

13.16 Within 30 days of the post-inspection review session, the Certification Administrator sends to the operator a non-compliance letter listing the decisions of the Certification Committee along with the required dates for response. Any limitations to the scope of certification and the right to use certification marks are communicated at this time.

14 Non-Compliance (Conditions) Letters

Background: The words "non-compliance", "non-conformity", and "condition for certification" are all about generally the same thing. The CFIA Operating Manual uses the term "non-conformity" and defines "conformity" to be: Conformance: means adherence with requirements of standards (e.g. Canadian Organic Standard).

Certification Committee Decision – Post-inspection
COO Operating Manual – "The decision to certify a product shall be taken if the CB determines that all procedures and activities contained in the organic plan are in compliance with OPR requirements and that the applicant is able to conduct operations in accordance with this plan and after the correction of all nonconformities. This decision is valid until the results of the next annual evaluation are known and a new decision is made or unless the CB is made aware of information to cause the CB to act (e.g. suspension or withdrawal). This information can come from an external source or from the CB's own efforts."

14.1 If the Certification Committee decides that there is a non-compliance it is to be recorded in the minutes.

14.2 There must be evidence of a non-compliance to the standards– generally this means that it was described in the inspection report.

14.3 If the Committee wants more information or has recommendations these can be requested, but are not non-compliances. **All concerns** brought forward by the VO should be addressed by the Certification Committee at a meeting or via email and decisions recorded in the minutes.

14.4 The Certification Committee should set deadlines for compliance – especially if it is to be different from 30 days from receipt of letter (see **Timeframes** below)

14.5 The Certification Committee should also decide what kind a verification of compliance will be needed – this can vary from receipt of a record, acceptable test results, or a second inspection to verify compliance.

14.6 **Letter to the operator:** When stating a non-compliance it should be clear what we are asking for - it should be something verifiable. We can ask for a document, a record, a plan to bring a procedure into compliance, a test, etc. The non-compliance letter will include:

a) Reference to the VO report that the review was based on.
b) Reference to the date of inspection.
c) The non-compliances and the sections of the standards or PSL to which they do not conform.
d) The time frame for receiving a reply in writing and compliance.
e) If there is other information or comments that the CC wants conveyed to the operator they must be clearly separated and identified as different from the list of non-compliances (i.e. Opportunities for Improvement (OFIs), Reminders or Recommendations).
f) A statement about the right to ask for re-consideration or appeal.
g) Appendix A: Land base and Product Certified:

h) Land base – site addresses and identification, field identification, field sizes, and crops grown that year and the associated certification status.
i) Products certified – lists products that are certified. Non-organic production should be noted here as well.
j) Livestock Operations – list barns with sizes & runs.
k) **Appendix B – Inputs/Sanitizers, etc. Approved**. If particular inputs were approved during the certification process they should be listed here. This is particularly important for livestock operation and processors. It saves lots of time in the future.

14.7 The VO report must accompany the letter or, if has already been sent, the date you emailed it should be noted with the offer to send it again.

14.8 **Timeframes**: The CB shall require from the operator to respond to the non-compliance report issued by the Certification body within 30 days of its receipt. The response shall either provide evidence of completion of corrective action taken to address each NC or present a plan with milestones as to how each NC will be addressed. This plan shall include a completion date not exceeding 90 days from receipt of the NCs. The CB shall accept times greater than those stated for the closure of a non-compliance as long as they are justified and recorded.

14.9 If material was sent in by the operator after the inspection then it should be listed on the letter as it was taken into account when the decision was made. This helps track things & explain differences between what the VO says and what the letter says.

14.10 **Follow-up of NCs:** BCARA will always give them an opportunity to explain themselves and quickly attend to the issue. This opportunity will be in the form of a letter (or telephone call or fax or email) from the Administrator indicating the issues outstanding and the (sufficiently short) period for correction. There will be an extra charge (to the enterprise) for administration in these cases.

14.11 The Administrator shall be responsible to ensure that conditions are responded to and will collaborate with the CC reviewer to follow-up on all conditions imposed. The COO Operating Manual States: "The CB shall ensure that corrective actions aiming to address all nonconformities have been implemented by the operator by conducting on-site visit or other appropriate forms of verification".

14.12 **Procedure for Follow-up of Non-compliances (NCs):**

a) The Administrator will record the date that the Conditions (NC) letter was sent out to the operator in the BCARA Application Record.
b) The date for response from the operator will also be noted as 30 days from receipt of the letter in the spreadsheet.
c) Operators will be sent a reminder after 3 weeks (23 days) has passed that their response to the NCs is required within one week.
d) If a response has not been received within 30 days, certification will be suspended and a suspension letter will be issued to the operator with an opportunity to come into compliance.

e) If a response to the suspension letter has not been received within 30 days then certification will be cancelled and a cancellation will be issued to the operator.
f) Suspension and cancellation will be noted on the online COABC database immediately upon granting of certification status.

14.13 **Evaluating Responses to conditions:** The administrator can evaluate simple, obvious, responses – if a water test showing that the water is potable was required and received and the administrator has enough knowledge to see that the test is showing a pass for potability the administrator can file the test and mark the condition as complete. Anything outside of the administrator's competence and items requiring interpretation should be sent to the Certification Reviewer who handled the file along with the conditions letter. If the reviewer thinks the response should be brought to the attention of the whole committee for a decision they shall let the administrator know who will send it to the committee and put it on the agenda for the next meeting.

14.14 Responses to conditions are to be kept in the operator's file and clearly tracked in the file.

14.15 When questions from operators are received that the CC needs to follow up on, put the questions in the CC's meeting agenda (or send an email, depending on timeframe) so that they can discuss it at the meeting, and record it in the minutes that it was discussed (also any decisions).

14.16 CERTIFICATION MEETING AGENDA SUPPLEMENT: Create a supplement to the CC agenda with the VO's findings (issues) from all the files being reviewed, with a check box for each to say they were discussed. Add these to the minutes as a record of decisions.

14.17 ABOUT ANSWERING INQUIRIES ON STANDARDS: The Administrator is <u>not allowed to</u>:
a) Tell operators how to get around the standards
b) Tell operators how to manage their operation in accordance with the standards
c) Favour operators with special information or with speeding up their application
d) Give advice on the standards

The administrator is allowed to tell operators what the standards say and can explain the standards.

15 Granting of Certification

15.1 Decision Making

15.1.1 Status is granted by issuance of a certificate to the operation. Certification status may include:

a) Certification to the BC Certified Organic Program (BCCOP) – Certified Organic (CO)
b) Certification to the Canada Organic Regime (COR or ISO) – Certified Organic (CO)
c) 1st Year Transitional Certification to BCARA – Transitional 1 (T1)
d) 2nd Year Transitional Certification to BCARA – Transitional 2 (T2)
e) 3rd Year Transitional Certification to BCARA – Transitional 3 (T3)

15.1.2 Newly granted "Organic" status shall be reported to the COABC on a quarterly basis. Certification status will be reported on the COABC website at the time the operation is notified.

Don't forget to update the COABC database when issuing new certificates for a different status or different crops!!

15.2 Operations that have obtained certified organic status:

15.2.1 Operations certified to COR – this is almost all of operations with certified organic status (not transitional status) EXCEPT if we have decided that they can only receive a BCCOP certificate. Operations do not receive COR certificate if:

a) They are certifying only bare land – but no products
b) If their organic production system is not yet operating and they have not been producing organic products. If the producer wants to have an evaluation to see if they have the capacity to make an organic product, BCARA can proceed with the certification process as long as the operator is informed that they will need another inspection when the organic production system is operational before a certificate will be issued. In the interim after the evaluation of the operation's capacity to have an organic production system BCARA may issue a letter or license stating that the operation does have that capacity.
c) If an operation does have an organic production system operating but is not selling their organic products (usually a farm situation) BCARA will not issue a certificate until they start selling products. When the operation informs BCARA that they are selling products and submit harvest and sales records, so BCARA can see they are in place a certificate will be issued.
d) If we institute a low risk policy then all operations in the low risk program are NOT eligible for COR.
e) Things that are considered "services" under COR such as slaughter houses doing custom slaughter, trading or brokering of products where no

packaging or labeling takes place, or other custom operations (like seed cleaning) can only receive an attestation of compliance – see Section 19).

f) Sometimes the CC might say the operation only qualifies for BCCOP
g) Note: COR certificates have to list products. Under COR, only products (& the process used to produce them) are certifiable, not processes. We can issue BCCOP certificates for these.

15.3 Certificate Templates

15.3.1 See annotated templates for specific requirements for certificates.
15.3.2 The following are things that must be included on the certificate:

a) Name of farm/enterprise
b) Address of farm/enterprise
c) Locations of each site of operation (town, province, country)
d) Certification Status
e) The product standards or other normative documents concerning, under which each product or product type is certified
f) The products certified, which shall be identified by type or range of products including their specific name and, if applicable, the one or more trademarks under which they are being marketed. Products must be specific and be included in full (i.e. the term "mixed vegetables" is not allowed, but "carrots" is)
g) Date on which certification was granted
h) Effective date of expiration for BC Organic Program certification and for packaging and labeling certificates under Canadian Organic Regime
i) The date the renewal application for the next round of evaluation is due
j) Certificate number
k) Contact details of BCARA
l) The scope of certification granted as appropriate:
    - The products certified, which must be identified by type or range of products including their specific name and if applicable, the one or more trademarks under which they are being marketed;
    - The product standards under which each product or product type is certified;
    - The applicable certification system with the type(s) of operations and subject of the evaluation by BCARA, among the following: crop production; livestock production; grain production; specialized production (honey production, etc.); food processing; subsequent packaging (labeling modification following an operation of breaking down or regrouping on products already certified); brokerage or handler.
m) Identify any private labels that the certified product is sold under.

15.3.3 The Canadian Organic Office requires specific information to be on the certificate, though it doesn't have to be in the format they suggest – see COO template.

15.3.4 COR plus US/Canada Equivalency written on the certificate - The template has this written on – it must be removed for dairy operations or dairy products – they are not qualified unless the milk used has been inspected & certified on the basis that the dairy did not use antibiotics – "Agricultural products derived

from animals treated with antibiotics shall not be marketed as organic in the United States"
http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5087406&acct=nopgeninfo

15.3.5 Types of Production to include on certificates:

a) Crop production
b) Livestock production
c) Grain production
d) Maple syrup production
e) Specialized production (i.e. bee-keeping, etc.)
f) Food processing
g) Subsequent packaging (labelling modification following an operation of breaking down or regrouping on products already certified)
h) Brokerage

15.3.6 Certificates for Transitional Production

a) COABC policy 15 controls what can be on a transitional certificate and what claims can be made on labels. Certificates can include the BCARA logo, but must be markedly different from organic certificates.
b) Certificates shall state prominently in large letters TRANSITION TO ORGANIC or TRANSITIONAL (or T1, T2, T3).
c) If reference is made to COABC or CAN/CGSB 32-310, CAN/CGSB 32-310 standards the phrase "following the xxx standards" or similar terminology is appropriate, rather than "in compliance with".
d) Transitional/conversional certificates may display the CB logo only—not the BC Certified Organic Program Symbol, or Canada Organic legend or USDA symbol.

15.3.7 Claims allowed on labels of Transitional Products:

a) For product produced and shipped and sold or re-sold only within BC, BCARA may authorize the use of the words "transitional" or Conversional (including diminutives T1, T2, T3 or C1, C2, C3) or the phrases "transition to organic" subject to the following conditions:
    i. Products labels shall prominently state TRANSITIONAL, CONVERSIONAL or TRANSITION TO ORGANIC, or CONVERTION TO ORGANIC The word "certified" shall not be used with the words ''transition'' or "conversion.''
    ii. The label must be approved before use by the BCARA Certification Committee who will refer to COABC policy 15 for guidance.
    iii. BCARA's logo shall not appear on the label, though BCARA's name may.
b) BCARA will not authorize transitional labels for product shipped and sold or re-sold outside of BC, unless BCARA sets up a Transitional Program as per COABC Policy 15.

16 Labels and Official Marks

16.1 **BCARA Seal and Logo:**

a) BCARA has a logo (can be used on business cards, cartons, signage) and a seal (can only be used on appropriate product labels). Electronic versions of logo and appropriate seal and instructions for both to be sent with first certificate issued.
b) Thereafter the seal appropriate to status is to be sent.
c) To be found in folder: LOGOS BCARA

16.2 **COABC official mark use consent forms:**

a) Electronic versions of the consent forms are to be sent when production unit attains certified organic status. It can only be used on product certified as organic with over 95% organic ingredients.
b) To be found in folder: COABC Label & Logos
c) Operator has to sign "Consent Declaration" that says they have read Consent Conditions, before an electronic version of the logo can be sent.
d) Once the Consent Declaration is signed - the COABC database has to be modified, so COABC knows we have it on file.
e) Logos are sent along with "Symbol User's Guide" which contain instructions for use.
f) BCARA Certification Committee must to approve individual product labels that use the COABC symbol (logo), or official phrase before they are used.
g) The symbol (logo) and phrase belong to the Province of BC and is controlled by COABC and the certification body.
h) If advertisers or other non-certified entities want to use the symbol they must apply directly to COABC for permission.

16.3 **Canadian Organic Logo:**

a) CB gives electronic copy – only to operators who are certified organic – only for use as labels on certified products over 95% organic ingredients. BCARA has to approve the label (that it complies with organic requirements for labels in the OPR & Standards).
b) If an operator or BCARA or anyone else wants to use for promotional purposes they must apply to COO office.

16.4 **If use of organic claim, use of official marks (BCARA seals, COABC official marks, or National logo), or label is non-compliant:**

a) If CC determines label that is in use is non-compliant – this becomes a condition for certification with a deadline for corrective action. An explanation of the problem is to be included.
b) If the CC determines that a false claim is being used a cease and desist will be required. The operator should be notified with an explanation of problem. Initial notification can be by phone or email followed up by a letter. A deadline for ceasing to use label and a deadline for reply to BCARA will be included in notifications. Follow-up in these situations is imperative.
c) The operator may ask the CC for reconsideration or may appeal or may use Dispute Resolution mechanism.
d) If the matter is not resolved by the operator and the CC the CC may decide to inform COABC and government authorities. These may include

CFIA, AGRI, COR office. For COR logo misuse alert the Canada Organic Office.

16.5 **Private Labels:** When a product is made by a BCARA certified supplier, but sold as organic under a brand name owned by a non-certified producer, the BCARA certified supplier must provide a list to BCARA of each private label and information about the brand name holder. The label must contain:

a) The name of the BCARA certified supplier. This can be done by printing the name, or with a code that BCARA agrees to. Some examples of a possible code are the certification number, or the plant number of a federal plant. The code must be such that certification authorities can identify the supplier.
b) The phrase "Certified by BCARA" or a similar phrase.
c) Labels must be submitted before use and approved by BCARA.
d) The non-certified brand name holder must agree in writing to keep a registry of all certified products received from the BCARA certified supplier that are distributed and eventually sold along with labels for the products. Records must be kept to allow product movement to be traced from the entry point (reports concerning products obtained from suppliers) up until the products leave the premises (product sales reports and inventory reports).
e) BCARA must be allowed to inspect records of the non-certified brand name holder. Permission of the non-certified brand name holder for this inspection must be given to BCARA before the products are labeled.
f) Non-certified brand name holders must agree to notify BCARA if they stop buying the approved product from the BCARA-certified supplier. Their license to use packaging with BCARA's name on it ceases when they stop using the BCARA-certified supplier. Therefore the non-certified brand name holder must also agree to stop using packaging making an organic claim with BCARA's name on any product purchased from any other supplier.
g) All private labels must be listed on certificates

17 Subcontracting

17.1 BCARA may allow the use of an uncertified sub-contractor to process products if the raw materials supplied, and sales of the product, are under control of the BCARA licensee.

17.2 The actual facility and processes used must be inspected and evaluated by BCARA. The subcontractor normally would not take title of the product. The BCARA licensee's batch lots may be processed by a non-certified organic co-processing facility, as long as the requirements of the standards and the necessary procedures are followed (see Section 10.13.2 in the Quality Manual).

17.3 BCARA operators are provided with a Custom Processing Form (F5) to be filled out by the BCARA operator and the subcontracted processor. This must be submitted with the renewal or initial application.

17.4 The BCARA member must take responsibility for the subcontracting and is responsible for submitting an application to the certification body and supplying information for certification, arranging for access to the facility for inspection and paying applicable fees. This arrangement only applies to the products of a particular BCARA member. It does not confer certification on the co-processor to represent itself as certified organic or to label any product (except that covered by the agreement) as organic. If more than one licensee uses a particular co-processor, the plant will need to deal with each licensee's certification separately. Therefore, one plant may require several inspections.

17.5 Subcontracted processors must be inspected each year at the cost of the BCARA operator. A run of the organic product to be processed must be observed at the time.

17.6 The non-organic processor may not use labels with any organic marks that BCARA has authority over except on the products of the BCARA member.

17.7 If independent storage is being subcontracted by the BCARA operator, an Independent Storage Form (F28) will be provided to the BCARA operator to be filled out. This must be submitted with the renewal or initial application.

17.8 The Independent Storage Form (F28) is to be completed by facilities that provide storage services for BC Certified Organic products and:

a) Do not open finished packages and containers;
b) Do not mix organic and non-organic products;
c) Do not alter the original lot codes of the products; and
d) Ensure that no contamination occurs from exposure to pest management or cleaning materials.

18 Dual Certification Procedure

This procedure applies to dual certification where the other CB is a COABC regional accredited CB. The purpose is to facilitate membership and connection to regional CBs while giving authentic organic status to operators that ship outside the province of BC. There may some monetary savings for the operator if both certification bodies co-operate so that a verification visit and report is shared by both CBs.

Background: ISO 17065 is a system which is to be used to create accountability and requires clear procedures necessary for running a certification agency – including the process of making decisions. The outline of what is required is set by COABC Accreditation Board in Book 1, annex 2. Before BCARA can issue a Canada Organic Regime (ISO 17065) certificate, BCARA is required to make its own decision on certification. This is not because we doubt any decision making capability of the regional CB, but because it is an ISO 17065 requirement for BCARA to continue as an ISO accredited CB. This means that not only must we make a decision on certification for the present year, but BCARA must also confirm the transition requirements have met the Organic Products Regulation. In most cases we think we should be able to do that by seeing the previous year's application, inspection report(s) and the associated certification committee decisions, as well as the producer's submissions in relationship to the certification committee decision (as long as the land-use history shows a minimum of 36 months from last use of prohibited material).

18.1 BCARA cannot certify a single crop or product. We also have to certify the process of producing the product.

18.2 **Information Needed from the Regional CB:**

a) A completed current year application form (including inputs used previous year and a land use history form). Usually this will be the BCARA form unless there is substantial equivalency with the other CB's form.
b) The operator will have to give permission to the regional CB to give documents from their file to BCARA.
c) Copies of maps (so the BCARA Certification Committee can understand the situation).
d) The Regional CB will have to supply information from at least one previous year. This would be:
   - The previous year's organic systems plan (application form – if application was a short-form renewal then will also need the full plan (application) the renewal is based on).
   - The previous year's VO report
   - The previous year's certification letter
   - Anything submitted by the operator to comply with conditions set by the regional CB since the certification letter.
   - The land use history or equivalent form.

18.3 **If the regional CB is contracting the VO then:**

a) BCARA will provide instructions for the VO (and for VO report). The regional certifier must let BCARA know what VO is to be used for BCARA's approval.
b) BCARA will need our version of confidentiality & declaration of interest statements signed & returned by the VO to BCARA

c) BCARA has to have on file the VO's resume and IOIA membership information because we need to know that the VO appears to be competent to inspect that type of operations).
d) The verification visit must happen when the operation is in active organic production.

18.4 Fees: Operator to pay BCARA fees (membership, administrative, ISO) except:
a) Deposit against VO fees (presuming that the regional certifier will cover VO payment).
b) COABC fees – only have to be paid once – by the regional CB, so operator does not have to submit COABC fees to BCARA.
c) The operator does not have to pay the "initial application fee" if they were previously certified by the regional CB.

18.5 The operation will have to be included in BCARA's pool of operators that would be subject to random unannounced inspections. Randomly selected unannounced inspections are not billed to the individual operator.

18.6 Because BCARA believes that regional certification is very valuable, BCARA would like to arrange with the regional CBs that both certification agencies exchange the final decisions of the certification committees in relationship to the file. This would require all members of each Certification Committee to sign confidentiality agreements.

19 Certification Transfers

19.1 When an operator certified by another Certification Body (CB) accredited by the Canadian Organic Regime wishes to transfer their certification to BCARA, the operator must submit an application with their production plan to BCARA.

19.2 BCARA must secure the following from the previous CB:
a) The last certificate
b) Last approved production plan (application)
c) Land use history (if applicable)
d) Last inspection report
e) Last decision letter (condition letter)
f) Subsequent submissions from the operator.

19.3 Check the CFIA website to ensure the operator is not under suspicion or decertified.

19.4 Inspection must take place within 12 months (no later than 18 months) of the last inspection of the previous agency. If the inspection takes place in more than 12 months in subsequent years the inspection timing is to be such that the time period of 12 months is restored. This may require more than one inspection in a year.

19.5 The following applies to transfers from BCARA to another certification body:
a) If an operator wishes to transfer from BCARA to another certification body they must:
   - Inform BCARA that they are doing so
   - Make an application to the other certification body
   - Give BCARA permission to release information to the other CB.
   - Continue certification with BCARA until a BCARA is notified by the receiving CB that a compliance certificate has been issued.
b) As soon as BCARA is notified by the other CB that a compliance certificate has been issued BCARA will notify the operation that its certification agreement is terminated and that BCARA is no longer monitoring the operations compliance. Any refunds will be made under the BCARA refund policy.
c) BCARA shall require the operator to return any documents confirming the organic certification (such as certificates and attestations) that were previously issued by BCARA to this operator as per section 13 (2) of OPR and stop immediately the use of any labels or advertising which identify BCARA on products they market. They cannot use up their supply of labels with BCARA's name.
d) BCARA will exchange information with other CBs and/or CFIA to verify the validity of information on an operator in cases where the operator has changed CBs.

20 Attestation of Compliance Requirements

20.1 Only products can be certified under the Canada Organic Regime, but BCARA may provide a formal "Attestation of Compliance" to service providers who perform contractual work for operators with certified product and the service is not eligible for certification under Section 14 of the OPR; for example livestock slaughter facilities, trading or brokering where no packaging or labeling takes place, transportation and custom services such as seed cleaning where the ownership of the product remains with the primary operator.

20.2 It is not mandatory that operators obtain an attestation but if requested the requirements of the COO Manual C.11 apply. In addition to requirements in C.11, BCARA will use the principles and procedures set out in British Columbia Certified Organic Production, Operation Policies and Management Standards, Book 2, Certified Organic Management Standards with special reference to the Processing and Handling section. BC Organic Production Certificates and an "Attestation of Compliance" as per appendix B of the COO Operating Manual will be issued in these cases.

21 Transaction Certificates

21.1 Operations requesting export certification (a transaction certificate) must fill out a Transaction Certificate Request for either Crops (F29) or Processors (F30).

21.2 The operation will complete the forms and BCARA will review the application to ensure the products requested for export are listed on the operations organic certificate.

21.3 BCARA will send the operator the approved Transaction Certificate for Crops (F31) or Processors (F32). One copy of the Transaction Certificate will go to the Buyer, one copy will go to the Seller and one copy will be filed at the BCARA office.

22 Suspensions, Cancellations, and Non-Renewals

22.1 If a certified operation is found to be in non-compliance with the organic standards it will result in the de-certification of all or part of the operation. The following conditions apply:

a) Violations of the standards by an enterprise requesting initial certification or re-certification will result in denial of certification of part, or all, of the operation.
b) Members of the BCARA certification program shall pay fees as described in appropriate documents. Non-payment of fees will result in denial or revocation of certification.
c) A written notice of denial of certification is issued if the operation has not renewed its application by the due date, does not pay its fees, or its plan is not compliant. The notice will state the reasons for denial. The notice will include: an opportunity for the applicant to submit a plan for corrective action, notice of the right to appeal, and the applicant's right to re-apply for certification.
d) Suspension remains in effect until required corrective measures are implemented and verified.

22.2 Possible reasons for denial of certification or decertification:

a) If an operation is non-compliant with certification requirements or regulations;
b) In the case of a multi-ingredient product, less than 70% of its contents are organic;
c) The substances used by the holder of the certification are other than those set out in CAN/CGSB 32.311;
d) The agricultural product comes into contact with substances other than those set out in CAN/CGSB 32.311;
e) The substances used by the holder of the certification are the ones set out in CAN/CGSB 32.311, but are not used in the manner described in that standards;
f) The production, processing, packaging and labelling methods used by the holder of the certification do not comply with the requirements set out in CAN/CGSB 32.310, or with the general principles respecting organic production set out in that standard.
g) Has not responded to the notification of non-compliance (Conditions letter)
h) If BCARA has reason to believe that an applicant for certification has willfully made a false statement regarding its production system and organic operations
i) Has not submitted their renewal application by March 31st
j) Has refused to allow inspection or accreditation auditor reasonable access.

22.3 **Suspension Procedures**: Notify the member that there <u>are</u> grounds for suspension. Provide member with a copy of a report that specifies grounds for suspension, required corrective measures, and the period of time that measures must be implemented to avoid suspension. During the suspension BCARA will require that the member makes no misleading claims as to status or certification and ceases to use the certification mark on products covered

by the suspension. If relevant BCARA may require that no certified product be sold, that labelling be changed, or that a recall of product may be required.

a) If the member has not (or cannot) implement required corrective measures in the time frame given the member may ask for an extension of the period.
b) The suspension remains in effect until corrective measures are implemented and BCARA has verified or until certification is cancelled.

22.4 **Cancellation:** Certification will be **cancelled** if:

a) The application contains false or misleading information OR
b) The corrective action required in 1 has not been implemented within 30 days following suspension or longer as was allowed in 1 or 2.

22.5 **Cancellation Procedures**: In order to cancel certification:

a) The member must be advised that they have an opportunity to be heard (orally or in writing) in regard to the issues of cancellation (appeal). If, after hearing them, BCARA decides against the member then.
b) the member must be notified of the cancellation after the required appeal period has passed.

22.6 Notices of suspension and cancellation will be sent to COABC and other interested parties (BCARA members, other certifiers, marketplace) may be informed.

22.7 The Certification Administrator will inform the COABC Accreditation Board, BCARA Board members and other interested parties of any non-compliance notice that prevents the immediate acceptance of certification. The certification administrator will also advise of any non-compliance once review and appeal deadlines have expired. Copies of non-compliance notices, certification refusal, revocation, suspension or withdrawal notices will be sent to the COABC Accreditation Board.

22.8 After appeal deadlines have passed or if an appeal fails at all levels the enterprise will be required to surrender its certificate

23 Certification Committee Policies

23.1 In the absence of Standards Interpretation Committee (SIC) rulings on a subject the Certification Committee makes rulings which are included in the minutes of the meeting when policies are created.

23.2 Policies are also included in the BCARA Policies document (P3) and sent out to members in the certification program whenever a new policy has been created either in newsletters or as needed.

24 Notifications to COABC

24.1 New Certified Organic (CO) Certificates

24.1.1 Notify accreditor (COABC) quarterly of new certifications (this means Certified Organic certification).

24.1.2 When a new CO certificate is first issued the following must be done:
a) Change status in BCARA database
b) Change status on COABC database

24.2 Non-Compliances – Suspensions/Denial of Certification/De-Certification

24.2.1 If status is not issued due to a non-compliance (for instance if the operator is suspended or de-certified) notify the BCARA Board and COABC Accreditation Committee. Notify them again after all appeals have been finished. If status is subsequently re-instated notify BCARA Board and COABC.

24.3 CC Decision for De-Certification/Suspension

24.3.1 Upon a certification committee decision to de-certify or suspend an operation:
a) Administrator is to notify operator in writing of the non-compliances and decision along with information about appeal including applicable time limits.
b) The letter is to include the demand that the operator return their certificate to BCARA (this is done before the appeal)

25 Meeting Procedures

25.1 BCARA Board, General, and Committee meetings shall be democratic, fair and effective, shall serve the best interests of the Society and shall respect the time, skill and contributions of each member.

25.2 Meetings shall be ideally scheduled a minimum of two weeks in advance at times and places most convenient to all participants. Meetings shall be scheduled as required with the aim of certification being handled in a timely manner.

25.3 The President, or designate, facilitates Board meetings; chairperson or designate facilitates Certification meetings.

25.5 The secretary, or designate, records minutes including a clear log of all decisions and actions to be taken.

25.6 The administrative Assistant, or designate, circulates Proposed Agenda to Board/Committee at least three days in advance of the meeting.

25.7 All decisions shall be made by consensus of everyone present—unless the matter is of an urgent nature when consensus minus one is permitted. In the event of a consensus minus one decision, the member's objection is recorded in the minutes.

25.8 Hear and Clear Guidelines shall be used in the event of disagreements (see Appendix).

25.9 All Board Members, Committee members and staff shall treat all information regarding all individual members with strict confidentiality and sign agreements annually to this effect.

25.10 A conflict of interest must be clearly stated by the party in conflict at the start of each discussion.

25.11 Quorum requirements: Certification Committee: three members. The Board: three members. For the Dispute Resolution Committee, all appointed members shall be present. Any ad hoc committees shall have 60% of members present. General Meetings: a quorum is five members or a greater number that the members may determine at a General Meeting.

25.12 If an in-camera meeting is scheduled, the excluded party or parties shall be notified of decisions within

Appendix A: Hear and Clear Guidelines

Preamble:

1. The purpose is to reach a level of mutual understanding.
2. Understanding does NOT assume agreement.
3. Dialogue that threatens to deteriorate the relationship should not be allowed to continue. When emotions escalate, cognitive abilities ebb.
4. All participants need to be mindful and assertive in managing this process.
5. If either or both people are not willing or able to engage in this process, a later date is scheduled that is agreeable to both.
6. It may be useful to invite a third person, agreeable to both, to help out.
7. Although this model may seem awkward at first, it has a long track record of success!

1. Person A speaks their point of view, using "I" messages	
2. Person B listens without interrupting	
3. Person B acknowledges what Person A has said by summarizing both the emotion and content	3. Acknowledging another's point of view is very difficult, especially when I know I am right. Without showing that I understand their needs and feelings, it is very unlikely that they will be able to listen to me
4. Person B speaks their point of view, using "I" language	
5. Person A listens without interrupting	
6. Person A acknowledges what Person B has said by summarizing both the emotion and content	