



## COABC ACCREDITATION BOARD

### BC Certified Organic Program Accreditation Manual

*Manual for Certifying Bodies offering the BCCOP Checkmark*

VERSION 1



*British Columbia  
Certified Organic*

# COABC Accreditation Board

## BCCOP Accreditation Manual

*Manual for Certifying Bodies offering the BCCOP Checkmark*

### VERSION 1

#### Published by:

#### ***Certified Organic Associations of British Columbia***

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**This manual replaces the one entitled “Book 1 Annex 1 Regional Accreditation Program v11”**

## Preamble

The Certified Organic Associations of British Columbia is the Administrator of the [Organic Certification Regulation](#) under the [Food and Agricultural Products Classification Act](#). The COABC works to maintain a credible set of organic production and processing standards. The COABC ensures compliance with the standards by administering the accreditation and auditing process (the British Columbia Certified Organic Program) in partnership with the [British Columbia Ministry of Agriculture \(BCMA\)](#). Under BC's Organic Certification Regulation, the use of the term 'Organic' is limited to those who are accredited under the BCCOP.

The COABC also acts as a Conformity Verification Body for the [Canadian Food Inspection Agency \(CFIA\)](#) with respect to the [Canadian Organic Regime \(COR\)](#). The CFIA is responsible for administering the COR which follows the [Safe Food for Canadians Regulations](#) under the [Safe Food for Canadians Act](#). It should be noted that operators wishing to market their product outside of BC are required to be certified under COR.

This manual is for Certifying Bodies who are interested in applying for and maintaining accreditation to the British Columbia Certified Organic Program (BCCOP).

## Forward

All COABC manuals and policies are available to all interested parties through the [COABC website](#). The following manuals replace versions published prior to February 2020.

Information in the [COABC Operating Manual](#) covers:

- An introduction to the COABC and the BC Certified Organic Program
- Scope, structure and main policies

Information in the [COABC Accreditation Board Operating Manual](#) covers:

- Scope, structure and main policies of the COABC Accreditation Board
- Quality System administered by the COABC Accreditation Board

Information in the [BCCOP Accreditation Manual](#) covers:

- Application, evaluation, criteria and procedures for BCCOP accreditation
- Information on rights and responsibilities of applicants, accredited CBs and the COABC

Information in the [COR Accreditation Manual](#) covers:

- Application, evaluation, criteria and procedures for accreditation under the COR
- Information on rights and responsibilities of applicants, accredited CBs and the COABC

Information in the [BCCOP Operator's Manual](#) covers:

- Guidance with respect to production standards required under the BCCOP
- Standards which are not covered under the scope of the [Canadian Organic Standards](#)
- Rules for labelling organic product

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## Definitions

### **Accreditation**

Process by which a certification body is approved under the BCCOP.

### **Accreditation Board (AB / COABC AB)**

An independent body appointed by the COABC to carry out accreditation activities.

### **Accreditation Board Director (AB Director)**

Person responsible for overall management of the AB and the COABC Accreditation Program.

### **Accreditation Certificate**

A document issued by the COABC Accreditation Board; used to confirm a certification body's accredited status.

### **Appeal**

A procedure whereby a certified operation or a member of the public requests a review of a certification decision. The appeal may also be filed against a CB or by a CB against the COABC AB.

### **Auditor**

The person appointed by the COABC AB to provide evaluations of the certification programs operated by CBs.

### **British Columbia Certified Organic Program (BCCOP)**

The program of accreditation and certification administered by the COABC using the *Organic Certification Regulation* under the *Food and Agricultural Products Classification Act*.

### **Certificate**

The document (issued by the CB) that describes the organic status of an operation. May also be called the 'Certificate of Conformity'. This document identifies at least the name and address of the enterprise certified, effective date of certification, certification number, categories of organic operation, name and standards to which the enterprise is certified.

### **Certification**

The procedure by which a third party gives written assurance that a clearly identified process has been methodically assessed such that adequate confidence is provided that specific products conform to specific requirements.

### **Certification Body (CB)**

A society incorporated under the Society Act, one of whose functions is to provide a third-party certification process to its members. Within COABC membership this refers to bodies accredited by the COABC according to established criteria, procedures and requirements for administering a certification program in BC.

### **Certification Committee**

A group of persons delegated by the membership of the CB with the responsibility of assessing applications for certification.

### **Certification Program**

A system operated by a CB with its own rules, procedures and management for carrying out certification.

### **Certification Scope**

The parameters defining the certification granted including the product and product types certified, and where applicable the acreage and volumes.

**Certified Organic Associations of British Columbia (COABC)**

The administrator and delegated authority of the BCCOP and Organic Certification Regulations under the *Food and Agricultural Products Classification Act* (BC). A competent body for accreditation under ISO 17011 compliant standards.

**Complaint**

An objection to the policies, procedures, or performance of the CB or the COABC AB. A complaint may also be an objection to the performance or activities of a licensee lodged with the certification body by a third party.

**Conflict of Interest**

The situation where an individual's capacity for objectivity is put at risk by financial or personal interests in conflict with their interest in conducting fair and impartial inspection, certification or accreditation.

**Declaration of Interest**

A declaration of personal and/or commercial interests in the organic industry made by those involved in the certification or accreditation process to enable determination of an individual's objectivity.

**Evaluation**

Systematic assessment based on all relevant information obtained in order to make a decision. With reference to a certification decision this includes, but is not limited to, inspection.

**Food and Agricultural Product Classification Act**

Act of the British Columbia legislature to which the COABC subscribes.

**International Standards Organization (ISO)**

An international standard-setting body composed of representatives from various national standards organizations which publishes the standard which the COABC complies to (ISO 17011, ISO 17065, ISO 19011).

**Operation**

A production or processing business or establishment.

**Records and documents**

In general, documents are uncompleted forms. Records are completed documents, reports, minutes, and other files.

**Verification Officer (VO)**

A person contracted by the certification body to gather information relating to an operator's application for certification. A verification officer must be a member in good standing of the International Organic Inspectors Association.

# 1. Introduction to BCCOP Accreditation

## 1.1 Overview of the BCCOP

- 1) The COABC is named as the Administrator of the *Organic Certification Regulations* under the *Food and Agricultural Products Classification Act*. In this way, the COABC's mandate to operate the BC Certified Organic Program is described in law. The British Columbia Ministry of Agriculture and Lands provides oversight of the BC Certified Organic Program by having a permanent ex-officio director position on the COABC Board of Directors and on the Accreditation Board, and by having the right to audit the BC Certified Organic Program at any time.
- 2) The COABC Accreditation Board is an arms-length agency of the COABC. The duty of the accreditation board is to provide accreditation services under the BC Certified Organic Program.
- 3) COABC has adopted as the management standards of the British Columbia Certified Organic Program, the Canada Organic Standard as detailed in CAN/CGSB 32-310 and CAN/CGSB 32/311. Additional guidance for operators is provided in the BCCOP Operator's Manual: Organic Production Standards & the Labelling of Organic Products.

## 1.2 BCCOP Accreditation Schemes

- 1) There are three accreditation schemes under the BCCOP:
  - a) BCCOP Regional
  - b) BCCOP Low-Risk
  - c) BCCOP Equivalent
- 2) The COABC Accreditation Board makes the accreditation decision under the BCCOP. Upon payment of accreditation fees, all of the CB's members located in BC who comply with the British Columbia Certified Organic Program will be permitted to use the phrase: "British Columbia Certified Organic" and program symbol once the "Consent to use Official Marks" forms have been signed.

### 1.2.1 BCCOP Regional

- 1) Applicable when producers/processors only wish to market and sell organic product in British Columbia (this includes product sales for inputs).

### 1.2.2 BCCOP Low-Risk

- 1) Applicable when operators in BCCOP meet low risk criteria as outlined in this manual under Part B Accreditation Criteria.

### 1.2.3 BCCOP Equivalent

- 1) The BCCOP Equivalent scheme was developed to permit the use of the BCCOP Checkmark outside of the province. It functions in tandem with the COR Accreditation Program. This program is only applicable to CBs that are accredited by the CFIA to the COR.

- 2) The procedures and criteria relevant to the BCCOP Equivalent program are described in the COR Accreditation Manual, unless specific to the BC Certified Organic Program. BCCOP Equivalent is applicable to all CBs operating in British Columbia that are accredited to the COR and wish to conform the requirements of the BC Certified Organic Program.
- 3) A CB will be evaluated for accreditation to the BCCOP Equivalent scheme concurrently when evaluated for the COR program if applicable.

## Part A: Accreditation Procedures

- 1) The accreditation procedures described in this section are applicable to all certification bodies operating in British Columbia and involved in the certification of agricultural and food products bearing a reserved designation which are produced and sold only within the province of British Columbia.
  - **See Additional Procedure:**  
PR712A-R BCCOP Regional Accreditation Process Flow Chart

### 1. Application

- 1) A certification body applies to the British Columbia Certified Organic accreditation program by submitting the duly completed Regional Application Form together with the registration fee (below).
- 2) A completed Application Form accompanied by a non-refundable application fee of \$1000 (or as determined from time to time by the COABC Board of Directors) must be submitted by a certification body requesting accreditation. Applications must include:
  - a) Accreditation of a CB does not imply accreditation for all programmes operated by the CB if they fall outside the scope of the BC Certified Organic Program. The CBs must clearly define the areas of activity to be included in the accreditation scope and to provide information on any organic certification activities that do not fall within the scope of the BC Certified Organic Program. Information must also be provided regarding region of operation.
  - b) A copy of the certification body standards (if different from the COS), manuals and policy/procedures documents used in the BC Certified Organic certification process.
  - c) A list of names of the directors of the certification body.
  - d) A list of general membership, including operation names and locations.
  - e) A list of currently certified operations.
  - f) A copy of the certification body's Society Act incorporation documents, constitution, and bylaws.
  - g) The name of the person nominated to the COABC Board of Directors as well as the name of an alternate representative.

### 2. Program Analysis

#### 2.1. Review of File

- 1) All applicants for BCCOP accreditation in the BC Certified Organic Program will be assessed according to the Criteria for BCCOP Accreditation (Part B of this manual).

### 2.1.1 Preliminary review of application

- 1) Upon receipt of the application, the Director of the Accreditation Board shall determine whether the documentation submitted is sufficiently complete to proceed to the analysis stage. If this documentation is deemed inadequate, the Director shall so inform the applicant, specifying the missing documents.

### 2.1.2 Application analysis/document review

- 1) The Director, or assigned evaluator, shall review the documentation sent by the applicant and submit a report to the Accreditation Board identifying any points of non-compliance. The Accreditation Board shall determine whether accreditation program criteria have been met. The Accreditation Board shall establish, if applicable, points of non-conformity and write its recommendations within a reasonable period. The report may determine:
  - a) Approval to proceed to the on-site evaluation with no conditions.
  - b) Approval to proceed to the on-site evaluation with conditions to be fulfilled by the time of the visit.
  - c) Refusal to continue the process of accreditation for major non-compliance revealing that the program is unable to monitor organic integrity.

### 2.1.3 Written Report

- 1) The applying certification body shall be advised in writing of any decision made by the Accreditation Board.
- 2) In the case of a refusal, the Accreditation Board shall inform the certification body as to the necessary corrective measures so that it may reapply for the accreditation program.

## 3. Regional Program Implementation Assessment – Office Visit

- 1) The on-site evaluation process is the procedure to determine implementation and compliance of certification standards by a certification body, as indicated to the COABC Accreditation Board.

### 3.1. Evaluation Procedures

- 1) This process requires the sampling of individual operation files, with the sample level determined to be the greater number of three operations, or fifteen percent of the operations enlisted in each certification body selected.
- 2) The COABC Accreditation Board will assess the performance of the certification body by the content of the files and will not determine individual operator compliance. All accreditation personnel will be required to conform to strict rules of confidentiality with respect to operation files.
- 3) This process requires the COABC Accreditation Board Auditor to attend the office of the CB in person and to assess conformity to the Regional Accreditation Criteria. This process does not involve the COABC Accreditation Board Auditor attending individual operations.
- 4) If the assessment to be conducted by the COABC Accreditation Board is a renewal of the Certifying Body's accreditation, the audit process to be followed will be a two-step process (See Procedure PR352R – Two-Step Audit Process). In addition to the process outlined in these documents, the assessment process in 3.2 below is followed as part of the two-step process.

### **3.2. Assessment Process**

- 1) The COABC Accreditation Board Auditor appraises the level of implementation of certification requirements by examining the records of the Certification Bodies being assessed. Emphasis is placed on reviewing the process used in decision-making by the certification committee and the verification officer(s) based on the information in the operations files.
- 2) The assessment process may occur at any time of the year. All files and decisions from the previous calendar year shall be made available for review if requested.
- 3) The COABC Accreditation Board Auditor provides a summary of his or her findings to the COABC Accreditation Board.
- 4) The COABC Accreditation Board is the final arbiter for determining adherence of CB's to the BC Certified Organic Program.
- 5) The COABC Accreditation Board notifies the Certification Body of its decisions and provides recommendations as necessary.

### **3.3. Accreditation Decision and Conditions**

#### **3.3.1. Decision Choices**

- 1) The Accreditation Board may determine:
  - a) Accreditation without conditions, where it has been found that the applicant is capable of managing a certification program according to accreditation criteria.
  - b) Conditional accreditation with specification of deadlines for amending the program when the case submitted has minor points of non-compliance; this measure allows the Board to determine accreditation conditions within a period of time under which the certification applicant might make amendments and conform to requirements. The timeframe set shall take into consideration the level of non-compliance and the ability to make amendments within the time allotted. The Accreditation Board may determine that an evaluation visit relative to monitoring procedures be carried out before the accreditation status is determined. Accreditation should be refused if the number of conditions and the level of non-compliance might compromise the integrity of the certification system.
  - c) Refusal of accreditation for major non-compliance reveals that the program is unable to monitor organic integrity.

#### **3.3.2. Application Status**

- 1) The COABC Accreditation Board shall notify the applicant of their organisation's accreditation status as being:
  - a) Accreditation
  - b) Conditional Accreditation
  - c) Accreditation Refusal
- 2) Such notification shall include relevant information and conditions if applicable.

### 3.3.3. Exclusive Authority

- 1) The COABC Accreditation Board has exclusive responsibility for accreditation decisions.
- 2) The COABC Accreditation Board is the final arbiter of accreditation status, though the applicant may make an appeal of the Accreditation Board ruling according to procedures described in this document.

### 3.3.4. Notification of Decision

- 1) The applying certification body shall be advised in writing of any decision made by the Accreditation Board.

### 3.3.5. Corrective Measures and Conditions

- 1) In the case of a refusal, the Accreditation Board shall inform the certification body not meeting minimum requirements as to the necessary corrective measures so that it may reapply for the accreditation program.
- 2) In cases where an accreditation decision is put off until a later date, with the condition that an additional evaluation visit be carried out, the Accreditation Board might require that certain conditions be met before this evaluation visit takes place.
- 3) In cases of conditional accreditation, the Accreditation Board shall submit to the certification body one or more conditional requirements to which it must conform, as well as a realistic implementation schedule for compliance to these requirements. The Accreditation Board may require that certain conditions be met before releasing its status and the accreditation decision.
- 4) The certification body may accept the conditions as presented or may request the Accreditation Board to reconsider one or more of its decision, or even the timeframe, in light of supplementary information. The Accreditation Board shall have to reassess this information leading to the initial conditions before setting new conditions, or even dropping specific conditions.

### 3.3.6. Agreement

- 1) The COABC Accreditation Board shall send the certification body an accreditation agreement that binds the latter to complying with the conditions submitted and to the timeframe submitted. This agreement shall be renewed annually by the issuance of a certificate of accreditation following the submission, review and the acceptance of the CB's annual report.
- 2) The agreement is signed every 5 years following the document review.

### 3.3.7. Accreditation Certificates

- 1) BCCOP Regional and BCCOP Low-Risk:
  - a) Following a decision to accredit and the signing of the accreditation agreement, a certificate is issued valid for 12 months. It is renewed annually following a decision by the AB confirming ongoing compliance to the BCCOP.
  - b) The certificate shall provide the name and address of the CB, the address of the AB and the date of certificate expiry date.
  - c) Upon withdrawal of accreditation or non-renewal of the certification program for more than six months, the AB will request the surrender of the current accreditation certificate.
- 2) BCCOP Equivalent:

- a) If recommendation for certification by the Accreditation Board continues to be granted by the CFIA throughout the 5-year accreditation agreement, and all requirements have been met for the BCCOP Equivalent scheme, the AB shall issue an annual certificate for BCCOP Equivalent valid for 12 months.
- b) The certificate shall provide the name and address of the CB, the address of the AB and the certificate date of expiry.
- c) Upon withdrawal of accreditation, non-renewal, or suspension of the certification program for more than six months, the AB will request the surrender of the current accreditation certificate.

### **3.4. Disciplinary Measures**

#### **3.4.1 Complaints**

- 1) If an investigation, because of a complaint or other information results in a decision to apply disciplinary measures to an accredited body, the Accreditation Board may, at its discretion, impose the following disciplinary measures:
  - a) Issue a warning letter.
  - b) Impose new conditions and demand specific corrective measures.
  - c) Require that a monitoring procedure be carried out within the next 12 months.
  - d) Initiate a suspension of accreditation until a new evaluation of monitoring procedures is conducted.
  - e) Impose any other disciplinary measure.

#### **3.4.2 Legal Action & Penalties**

- 1) Whenever a major misdemeanour or fraud occurs, the Director shall supply the COABC Board of Directors with any pertinent information or documentation. Following a study of the case, the COABC Board of Directors shall make recommendations to the COABC Accreditation Board in order carry out effective proceedings.
- 2) Where there is evidence of fraudulent behavior, or the CB intentionally provides false information or conceals information, the AB shall initiate its process for withdrawal of accreditation.

#### **3.4.3 Withdrawal of Accreditation**

- 1) The COABC Accreditation Board may withdraw accreditation of a certification body for any of the following reasons:
  - a) Failure to maintain system in compliance with referenced standards and approved procedures.
  - b) Failure of suspended programs to meet conditions for reinstatement within required timeframes.
- 2) Certification bodies that have had their accreditation suspended or withdrawn will have their names and program information removed from all official lists of accredited programs.

#### **3.4.4 Surrender of Certificates**

- 1) Withdrawal of accreditation will result in cancellation and recall of the applicant's certificate of compliance. Applicants must surrender certificates of compliance or file a written appeal within 10 working days of written request of the COABC Accreditation Board of Directors.

- 2) If certificates are cancelled, applicants must immediately discontinue use, reference to, or distribution of materials that refer to BC Certified Organic Regional Accreditation. Applicants must effectively recall or arrange for discontinuation of distribution all point-of-purchase materials referencing or implying conformity assessment by COABC within 10 working days of written notification by the COABC Accreditation Board.
- 3) If applicants fail to surrender certificates or discontinue use of marks of conformity as required by this instruction, the COABC may take whatever steps necessary to inform the public of the discontinued eligibility of the applicant to reference BC Certified Organic Regional accreditation and the reasons for certificate withdrawal.
- 4) Further misuse of the BC Certified Organic Program will result in prosecutions under the provisions of the BC Food and Agricultural Products Classification Act.

### **3.4.5 Accreditation Status**

- 1) After a Certification Body is accredited and upon payment of the membership and accreditation fees, all of its members who comply with the British Columbia Certified Organic Program will be permitted to use the phrase: "British Columbia Certified Organic."

## **3.5. Amendments to Certification Body Program**

### **3.5.1 Submit for Review**

- 1) Any changes to the certification program of an accredited certification body must be submitted in writing to the COABC Accreditation Board for review at least 60 days before the proposed effective date of the changes. Requests for amendments must include a clear description of the proposed changes. Substantive changes may require additional document and onsite compliance audits as determined by the COABC Accreditation Board.

## **3.6. Maintaining Accreditation Status**

### **3.6.1 Annual Reports**

- 1) To maintain accreditation status, Certification Bodies shall submit an Annual Report to the COABC, in the first quarter of every year. The Annual Report shall at least include:
  - a) A copy of the Certification Body's standards used in the certification process if they differ from the BCCOP Organic Production Standards (if these documents remain unchanged from year to year, it is not necessary to resubmit them).
  - b) A copy of the Certification Body's Procedures (if these documents remain unchanged from year to year, it is not necessary to resubmit them).
  - c) A list of the names of the directors of the Society.
  - d) A list of general membership, including farm, processor or preparation names and locations, noting organic status and contact information for each member.
  - e) The name of the director appointed to the COABC as well as an alternate representative.
  - f) COABC membership fees, in the amounts determined by the membership of the COABC.

- g) Details of any appeals against certification decisions and any complaints from the general public in the previous 12 months.
- h) Documentation required for resolving any outstanding conditions as requested by the Accreditation Board in previous 12 months.

### 3.6.2 Periodic Document Review

- 1) Certification Bodies are subject to a five (5) year renewal cycle and must submit all documentation related to their certification program every five years for review by the accreditation board.

### 3.6.3 Annual Surveillance Visits

- 1) Each year the Accreditation Board will determine which of the Certification Bodies in the BCCOP will be selected for assessment through an on-site evaluation of their operations.

### 3.6.4 On-Site Accreditation Audits

- 1) Certification Bodies will be subject to an on-site evaluation visit at least once in every 36 months, as determined by the Accreditation Board.
- 2) Additional visits may be scheduled to ensure compliance with conditions for accreditation based on risk assessments performed by the Accreditation Board.
- 3) On-site audits will follow a two-step process:
  - a) File review will be completed prior to the on-site portion of the audit which will allow time for the initial findings of the file review to be incorporated into the audit plan
  - b) On-site review

- **See Additional Policy:**  
PR352-R Two-Step Process for On-Site Regional Audits

### 3.6.5 Corrective Actions and Non-Compliance

- 1) If corrective actions are required after a document review or on-site audit, the CB shall ensure that deadlines are met.
- 2) Corrective action for any issued non-compliances must be received within 30 days following receipt of decision from the AB.

- **See Additional Procedure:**  
PR362-R BCCOP Regional CB Timelines for Corrective Actions

## Part B: BCCOP Accreditation Criteria

### 1. Scope

#### 1.1. General Requirements

- 1) Certification Bodies shall comply with all aspects of the BC Certified Organic Program.
- 2) Certification Bodies shall not have a direct financial interest in the affairs of any of its members.
- 3) Certification Bodies shall have a minimum of five operations enrolled in their certification program.
- 4) Certification Bodies shall be societies, incorporated under the Society Act of British Columbia.
- 5) Membership in a certification body shall be open to any person or class of persons wishing to become certified under this program.
- 6) Membership fees and certification fees shall be levied in accordance with a schedule described in the certification body's Certification Manual.
- 7) The constitution of a certification body shall contain a reference to administering an organic certification program for its members.
- 8) The members of a certification body enrolled in the BC Certified Organic certification program must allow verification officers:
  - a) Access, at reasonable times, to their premises and records; both organic and non-organic portions of an operation; and
  - b) to sample, soil, water, and plant, animal tissue or other related products or inputs at the operation; and deliver, as the CB directs, such samples for analysis.
- 9) A certification body must allow the COABC to audit its records pertaining to this program for compliance with the requirements of the Act and BC Certified Organic Program criteria.
- 10) Member certification bodies shall notify COABC any time a change is made to its application of either the policy or standards in the BC Certified Organic Program.

#### 1.1.1 BCCOP Regional Accreditation - BC Market Only

- 1) The federal SFCR requires products and inputs to be certified to the Canadian Organic Regime (COR) if being sold nationally or internationally. CBs which are only accredited under the BCCOP must require certified operators to sign a statement agreeing that food and feed products labelled 'certified organic' or 'organic' will only be sold within BC. In addition, these products are not to be sold as inputs for products that are to be COR certified.

#### 1.1.2 BCCOP Low-Risk Accreditation Only

- 1) CBs may alter inspection frequency to a minimum of one inspection in three years for operators meeting the following low-risk criteria:
  - a) Operation must not be exporting organic product out of BC
  - b) Operation must not practice parallel production
  - c) Operation must not have outstanding conditions
  - d) Operation must have received a valid organic certificate in all of the previous three years
  - e) Operation must be assessed for risk and receive a low risk ranking from the CB's certification committee

- 2) This option is only available for operations certified under the BCCOP. Operations certified under BCCOP Equivalent or COR may not partake in this scheme.
- 3) CBs that allow for reduced inspection requirements must develop a Risk Assessment Program. See 6.1.1. of this manual.

### **1.1.3 BCCOP Equivalent Accreditation Only**

- 1) The procedures and criteria relevant to the BCCOP Equivalent program are described in the COR Accreditation Manual. BCCOP Equivalent is applicable to all CBs operating in British Columbia that are accredited to the COR and wish to conform to the requirements of the BC Certified Organic Program.
- 2) The COR logo is not permitted for products that are not covered under the scope of the COR.

## **2. Certification Standards**

### **2.1. Compliant with COABC Standards**

- 1) A certification body must show that their organic management standards are compliant with those specified in:
  - a) CAN/CGSB CAN 32.310 & CAN/CGSB 32.311 (current versions)
  - b) BCCOP Operator's Manual: Organic Production Standards and the Labelling of Organic Product
- 2) CBs shall have certification standards that conform to the minimum standards provided by the BCCOP. When a CB uses its own internal standards which must go beyond minimum standards prescribed by the BC Certified Organic Program or are outside the scope, they shall include
  - a) amending and updating procedures
  - b) time frames for putting amendments into place once adopted.

#### **2.1.1. Statement on Genetic Engineering**

- 1) The use of genetically engineered organisms or their products are prohibited in any form or at any stage in organic production, processing or handling.
- 2) This is specific to the BC Certified Organic Program and is not covered under the COR. For CBs accredited to the BCCOP Equivalent scheme, the BCCOP Checkmark cannot be permitted for use by COR certified operations that do not comply with the BCCOP Statement on Genetic Engineering.

### **2.2. Materials List**

- 1) If a Certification Body maintains a list of brand name inputs used in food production, processing, and handling, it must submit it annually, designating the status of each material.
- 2) A certification body must provide the evaluation criteria used in determining the level of acceptance of each material in a brand name list.

### **3. Policy & Decision Making**

#### **3.1. Procedures for Policy Development**

- 1) A certification body must have a clearly defined process for both the assessment of certification status and the review of certification status.
- 2) A certification body must provide for consultation with its membership where policy development is undertaken with respect to certification matters.

### **4. Certification Procedures**

#### **4.1. Requirements of the BCCOP Regional Certification Process**

- 1) The operation becomes a certification body member. (Membership fee schedule as determined by certification body. This is in addition to the COABC membership fee).
- 2) The operator contacts the certification body for organic certification information and application.
- 3) The operator completes and submits according to the schedule distributed by certification body (see 4.2 below).
- 4) Upon review of the documentation provided and acceptance of the operator's application, the certification body notifies the verification officer and issues all pertinent information.
- 5) The verification officer conducts an Inspection.
- 6) The verification officer submits the Inspection report to the certification body.
- 7) The Certification Committee determines the status of the operation according to minimum criteria documented in the BC Certified Organic Management Standards.
- 8) The Certification Body notifies the operation of the Certification Committee decision and provides a copy of the VO report.

#### **4.2. Information from Operators**

##### **4.6.1. Information required to be submitted to the Accreditation Board**

- 1) A certification body must provide to the COABC Accreditation Board the methods by which the certification information is obtained including but not limited to the following:
  - a) Operation organic plan/updated farm description
  - b) Farm Map
  - c) Land use/ land use history
  - d) Farm inputs/ingredients use report
  - e) Operation inspection report
  - f) Organic Operator statutory declaration, affidavit or contract.

#### 4.6.2. Certification Documents

##### 1) Undertaking

- a) A certification body shall obtain an operator's written promise or undertaking to comply with the certification standards as well as a statement of the truth of the utterances of fact. The CB can choose the level of formality eg a simple signed declaration or a witnessed contract. The document is submitted at the time of the initial application.

##### 2) The Organic Plan

- a) The Organic Plan is part of the initial and renewal applications and it solicits information about every relevant topic addressed in the standards. The plan must be detailed enough to indicate a reasonable level of knowledge about organic production, processing or handling practices and principles, as well as to reveal any problems or concerns in adhering to the standards. For processing facilities, the plan must describe the plant design and the flow of raw product through the plant to the finished product.

##### 3) Operation Records

- a) A certification body requires operators to keep accurate records of techniques and inputs used in production and processing, amounts produced and sales made, to ensure that a verifiable audit trail exists of products for which organic status is claimed.
- b) Clear records must be kept by the producer for confidential inspection by verification officers. The information from these records may need to be summarized annually by each producer on specific, required forms in the certification body organic certification application packet.
- c) Clear record of all materials (inputs) applied to fields and crops or used in processing is part of the audit trail necessary to validate products for which organic status is claimed. All input substances must be documented. Required information includes:
  - i. Date brought onto the operation
  - ii. Amount brought on
  - iii. Type of materials
  - iv. Source/brand name
  - v. Field location
  - vi. Date applied or used
  - vii. Volume applied or used
  - viii. Crop applied to or product used in.
  - ix. Categories of most likely farm, or handling inputs include but are not limited to:
    - 1) soil amendments, organic matter and mulch
    - 2) fertilizers
    - 3) growth promoters, activators and inoculants
    - 4) seeds, seedlings, transplants, nursery stock
    - 5) stock animals
    - 6) products to control fungi, diseases, insects, mites, nematodes, animal pests, weeds
    - 7) post-harvest inputs
    - 8) packaging materials
  - x. Categories of most likely processing or handling inputs include but are not limited to:
    - 1) ingredients
    - 2) additives and processing aids including lubricants
    - 3) packaging

**4) Sales Records**

- a) Records must be kept, by crop or product and field, production unit, processing or handling facility of the dates, buyers, and amounts of crops or products sold. In the case of processors and preparation operations, precise records of products purchased or acquired from other sources are required, including copies of certificates verifying the certified organic products.
- b) Records of farm gate or product sales need only include total volume by crop or product and date of sale. These records do not need to report the dollar values of the sale. Wherever possible, consistent identification of products and materials within records, by means of invoice numbers, tags or lot numbers, should be maintained.
- c) Such records shall be maintained for at least FIVE (5) years after the crop or product is sold and delivered.

**4.3. Verification Officers**

- 1) A certification body must use verification officers that are members in good standing with IOIA and are qualified for the assignment. Specifically, that they have relevant training and experience for inspecting crops, livestock and processing operations as appropriate.
- 2) Verification Officers must sign a confidentiality agreement and declare all potential conflicts of interest.

**4.4. Appeals, Complaints and Disputes**

- 1) A certification body must have a clearly defined appeal process for certification matters as outlined in 5.2 and must keep records of any appeal, complaint or dispute involving certification.

**4.5. Assignment of Status**

- 1) A certification body must define criteria for the assignment of BC Certified Organic status as well as the use of any seals or logos referring to the term "Certified Organic."

**4.5.1. Certification Status and Categories**

**1) Certified Organic**

- a) Conversion requirements for organic agricultural production are documented in the Canadian Organic Standard (CAN/CGSB 32-310, 5.1, 6.2 and 6.3). Additional guidance is given in the BCCOP Operator's Manual for specific types of production units. When the requirements are met the CB may issue a certificate provided all other requirements of the BC Certified Organic program have been satisfied.

**2) In Conversion or Transitional**

- a) A certification body may issue a Letter of Confirmation of transitional or in conversion status for product that does not yet meet the requirements of the BC Certified Organic Program. If a CB wishes to issue a transitional/in conversion certificate, it must be markedly different to those issued for certified organic production. See COABC policy #15 for further guidance. The program symbol may not be used on transitional product or on the Letter of Confirmation or certificate.

**3) Under Review**

- a) Assigned when information gathered at the inspection was insufficient or inconclusive. The issuing of this status is accompanied by a letter from the Certification Body to the producer stating

why the inspection was inconclusive. There are no rights to label products available under this category.

4) **Inactive**

- a) Assigned when the operation has demonstrated compliance to the standard but is not operational, i.e. not currently producing product for sale. A certificate may not be issued if an operator is currently inactive.

#### 4.6. Audit Trail

- 1) A certification body must demonstrate that the operator has established and maintained an audit trail for all the products to point of sale.

#### 4.7. Record Retention

- 1) Certification Bodies shall retain their records for at least seven years and shall require operators to retain their records for at least five years.

### 5. Certification Committee

#### 5.1 Certification Committee Procedures

- 1) Certification bodies shall establish certification committees for evaluating operator/operation's compliance with the BC Certified Organic Program.
- 2) Certification Committees shall act in a fair and impartial manner and shall maintain confidentiality about the records of the certification body.
- 3) Members of certification committees shall be required to sign an agreement of confidentiality and a Declaration of Interest (DOI). The DOI declares all conflicts of interest that could create a real or perceived bias in those areas of the declared in making certification decisions.
- 4) The Certification committee shall keep minutes of certification decisions (minutes should include names of CC members present and details of all files reviewed).

#### 5.2 Certification Body Appeal Process

##### 5.2.1. Two Step Appeal

- 1) If an operator wishes to appeal their certification status decision, initial appeal is made to the certification body's Certification Committee. If the Certification Body's status recommendation is reviewed and upheld by the Certification Committee, the operation may appeal to the certification body board of directors.
- 2) Ultimately, the certification body's general membership is the final arbiter for all certification processes, procedures, appeals, standards, and material evaluations.

## 6. Inspection & Assignment of Certification Status

- 1) The certification committee shall review all information provided by the operation and the inspection report in order to determine certification status. The decision shall be reviewed annually.

### 6.1 Inspection Frequency

- 1) Unless otherwise prescribed according to Section 6.2.1 (Inspection Frequency Based on Risk Assessment), all operators will have a minimum of one inspection per year. Certification bodies may schedule additional impromptu inspections. More may be required at the discretion of the certification committee and/or the verification officer.
- 2) It is recommended for livestock producers with animals confined to paddocks for winter-feeding, that some of the inspections take place during the winter season.
- 3) On and off farm processing and packing plants need to be inspected yearly by a verification officer who has sufficient knowledge of the process being inspected.
- 4) Slaughterhouse, transport companies and storage facilities do not have to be certificate holders, but organic integrity must be maintained and assessed by the certification body; this may include inspection.

#### 6.2.1. Additional Inspections

- 1) The COABC Accreditation Board can request that additional inspections be conducted by the CB with the intention of verifying the compliance of the operation with regard to certification requirements to any of the BCCOP Accreditation schemes.

## 6.2 BCCOP Low-Risk Scheme

### 6.2.1. Inspection Frequency Based on Risk Assessment

- 1) The BCCOP Low-Risk scheme is only available for operations that do not wish to participate in the Canada Organic Regime or use the Canada Organic Logo. Operations in the BCCOP Low-Risk scheme are not considered part of the COR even if certified by a CB which offers COR certification.
- 2) Certification Bodies may alter inspection frequency to a minimum of one inspection in three years according to the following criteria:
  - a) Operation must not be exporting organic product out of BC
  - b) Operation must not practice parallel production
  - c) Operation must not have outstanding conditions
  - d) Operation must have received a valid organic certificate in all of the previous three years
  - e) The operation must be assessed for risk and receive a low risk ranking from a certification committee.
- 3) No further risk assessment is required if the operator does not qualify based on (a)-(c)
- 4) Certification Bodies that allow for reduced inspection requirements must develop a Risk Assessment Program. This program must be documented, and it must be provided to all organic operators in the certification program; CBs cannot limit application to the program to classes of producers or methods of production. The COABC Accreditation Board must provide written approval of Risk Assessment Programs before implementation.

➤ **See Additional Policy:**

COABC Policy #6: Guidelines for Implementation of Risk Assessment Criteria

- 5) CBs that choose to implement a Risk Assessment Program will comply with the following criteria:
  - a) VOs will be provided with a risk assessment checklist and will verify the risk of non-compliance with the BC Certified Organic Program by the operation whether by intent, by neighbouring activity, or by neglect
  - b) Risk assessment checklists will be comprehensive and will include all areas of possible risk including:
    - i) contamination or commingling of organic product
    - ii) contamination of site
    - iii) mislabelling
    - iv) fraud
    - v) Any other major or minor non-compliance with the BC Certified Organic Program
  - c) CBs will provide certification committees with guidelines to enable them to rank operations according to risk and to determine which low-risk operations qualify for reduced inspection requirements. CBs will ensure that operations that do not qualify receive a statement indicating why they do not qualify.
  - d) Certification Bodies will keep records of all operations enrolled in risk assessment programs and will arrange for yearly random and unannounced inspections of at least 5% of all such operations. Such inspections will include a risk analysis.
- 3) The CB may decide to undertake extra inspections of operations that are determined to be high risk.

## 7. Requirements of Issued Certificates

### 7.1 Date of Approval

- 1) Certification status begins on the date of approval by the certification body. The date must be indicated on the certificate.

### 7.2 Surrender for Non-compliance

- 1) The certificate is used by the operation for marketing purposes. It must be surrendered to the certification body if the operation no longer meets the certification criteria of the BC Certified Organic Program.

### 7.3 Term of Certificate

- 1) The term of a certificate is 1 year from the date of issue.
- 2) The certificate remains valid until a renewal certificate is issued or the certification body revokes it. Provided a renewal application is received by the Certification Body before the expiration of the previous certificate; and all other policies and standards have been met, the certificate will be renewed.
- 3) If a renewal application is not received, status ends on the expiration date marked on the certificate and the operation must surrender their certificate.

- 4) Products that remain in inventory after the term of a certificate expires may be marketed under that certificate upon written permission of the certification body. A certification body must require appropriate documentation and may require inspection consistent with the requirements for certificates, so long as the product remains in inventory.

### **7.3.1. Yearly Renewal**

- 1) The possession of a certificate is not, by itself, a guarantee of certification. The certification body must issue a new certificate in each year.

### **7.3.2. Revocation of Certificate**

- 1) When a certification body issues a notice of cancellation or revocation, the certificate is by that act, invalidated. A certification body shall inform COABC when a certificate is revoked.

## **8. Withdrawal of Certification Status**

### **8.1 Voluntary withdrawal**

- 1) Operators must inform the certification body of the withdrawal from the certification program of any production unit or processing facility due to use of a prohibited practice or material. If conditions exist for which the producer, processor or preparation operation anticipates the use of prohibited practices or materials, the certification body shall recommend consultations with the appropriate experts and the certification body Certification Committee, close monitoring of the actions and the effects, and detailed documentation.

### **8.2 Decertification**

- 1) Assigned to operations, which were certified, but no longer meet the certification body production or processing standards and the certificate is revoked.

### **8.3 Transference of Certification**

- 1) Regional certification can be transferred from any other CB in the BC Organic Program. Operators from CBs outside of the BC Certified Organic Program must be inspected before a certificate is issued. A transition period is not required.

## **9. Assessment of Operations**

### **9.1 Operation Records**

- 1) Operation records must be complete and must provide information for the purpose intended.
- 2) A Certification Body will identify inadequacies in form entries or completion and ensure appropriate rectification.

## 9.2 Inspection Process

### 9.2.1 Overview of the Inspection Visit

- 1) The inspection visit consists of:
  - a) An interview with the operator to review the application
  - b) Examination of the records pertaining to the application including a complete audit trail from farm to final sale
  - c) Complete visual inspection of the farm, during the production season or in the case of preparation when the products targeted for certification are being processed, packaged or handled;
  - d) If there is split production the inspection must also include observation of the non-organic units of what is being planted in all cultivated fields within the production unit
  - e) If necessary, it must be possible for the inspection to include all premises owned or administered by the responsible managers, and for the VO to take samples of inputs, products etc. when instructed by the CB;
  - f) For preparation, inspections must consist of a technical part, in which the aspects mentioned in the standards are verified, and of an administrative part, in which the amounts of input and output are compared (audit trail).
  - g) The taking of any samples if necessary; and
  - h) Discussion of any problems or concerns. This may take the form of a closing meeting where the findings are summarized and written down providing an opportunity for the operator to confirm the accuracy of information collected during the inspection.

### 9.2.2 Inspection Procedures

- 1) When a certification body (CB) requires an Inspection, the certification body notifies the verification officer (VO), who will contact the operator to set a time for the inspection. The CB is required to provide the VO with the instructions for undertaking the inspection including the scope of the inspection, a list of any outstanding issues of non-compliance with the standard and/or other concerns that pose a risk to organic integrity. The CB is also responsible for providing the VO with an inspection reporting template and access to the operator file, including previous inspection report(s).
- 2) The verification officer conducts the operator visit. A representative of the operator being inspected must be present unless there are extenuating circumstances. The VO records observations on-site and presents a summary of the findings to the operator in an exit interview.
- 3) The verification officer then submits a report for the Inspection to the CB for review. The certification body is responsible for determining the non-compliances and opportunities for improvement and communicating these to the operator. The CB sends a copy of the Verification Officer's report, verification of certification status and permission or denial to use the phrase "British Columbia Certified Organic" and the program symbol to the operator.
- 4) VOs shall be rotated through the operations, in accordance with CB policy

### 9.2.3 Inspection Records

- 1) Inspection records shall:
  - a) Show that contracted Verification Officers were members in good standing with the Independent Organic Inspectors Association.
  - b) Provide a comprehensive report of activities and findings to the certification committee of the certification body.
  - c) Indicate the reasons additional laboratory analysis was required.
  - d) Indicate the rationale for any findings of non-compliance reported to the certification committee.
  - e) The VO shall not provide an opinion or make a recommendation regarding the certification status of an operator.

### 9.2.4 Confidentiality

- 1) An inspection with all its documentation has a highly confidential nature. The verification officers, as well as the certification body and the COABC must maintain the strictest confidence in these matters. It is strictly prohibited for the VO and the Certification Body to transfer technology, product profile recipes, and other know-how from one inspected operation to another.

### 9.2.5 Responsibilities of Verification Officers

- 1) Verification officers are required to meet all applicable deadlines. The inspection schedule for a producer depends on whether the operation is a new applicant or a renewal.
- 2) The Certification Body is responsible for ensuring that a verification officer has an inspection schedule that is reasonable. Verification Officers must keep all information gathered at an inspection visit confidential between themselves and the appropriate officers of the Certification Body.

### 9.2.6 Inspection Report

- 1) A verification officer makes a written report to the certification body, after each inspection. The Certification Body shall send a copy of the Farm/Facility Inspection Report to the operation after each inspection.

## 9.3 Certification Committee Review

- 1) The certification committee must be able to demonstrate that it reviewed all submitted forms and reports. The rationale adopted for a decision relating to the determination of status of individual operation must also be demonstrated. This information must be available in minutes of Certification Committee meetings.
- 2) A certification committee must identify questionable products or practices and advise verification officers and respective organic operators of any finding.
- 3) A certification committee must demonstrate adherence to appropriate timelines for processing certification matters and assigning status.
- 4) All decisions of a certification committee must be clearly conveyed to the affected operator.

- 5) A certification committee must demonstrate that it adhered to Section 8 of the BC Organic Certification Regulation under the BC Food and Agricultural Products Classification Act where decisions have been appealed by the operator.

## 10. Use of Licences, Certificates & Marks of Conformity

### 10.1 CB Authorization

- 1) The CB shall exercise proper control over ownership, use and display of licenses, certificates and marks of conformity and any other means for indicating a product is certified.
- 2) Every firm using the certification mark of the CB for products it has ownership of, shall first get authorization from the CB through a license.
- 3) The CB shall ensure that the certification mark is not affixed on its own or used to imply that a product, process or service (or any part of it) has been certified or approved by the COABC.
- 4) The CB shall advise the COABC when there are changes in certification status of their members and ensure that all public information is updated accordingly.

### 10.2 Use of the COABC Program Name and Symbol

- 1) The descriptive phrase “British Columbia Certified Organic” and the program symbol may only be used by operators operating in the province of British Columbia and certified by member certification bodies.

#### 10.2.1 Rules Governing Use of the Program Symbol

- 1) A Certification Body, which has been accredited by the COABC, may grant the use of the BC Certified Organic Program Symbol to certified organic operators enrolled in its certification program, subject to the following conditions:
  - a) The operator must have a valid ‘certificate’ issued by the Certification Body. This must be re-issued annually.
  - b) The operator must be registered with the COABC. (The CB provides a list of certified operators to COABC annually and updates the list as necessary throughout the year.)
  - c) The operator must sign and return a “Consent to Use Official Marks” form to the certification body who, in turn, has signed an agreement with COABC. This need only be completed initially.
  - d) The operator must be in good standing with the Certification Body and have paid the COABC fees.
  - e) Physical use of the BC Certified Organic Program Symbol is governed by the “Symbol Users Guide”, issued by the COABC and amended from time to time.
  - f) A certified operator who switches from one CB to another may continue to use labelling materials from the previous CB subject to COABC Policy 9.

- **See Additional Policy:**  
COABC Policy #9: Label Use Between Certifiers

#### 10.2.2 Labelling of Certified Products

- 1) Certification Bodies must ensure that any labels affixed to certified products and making an organic claim meet the requirements in 5.3 and 5.4 of the BCCOP Operator’s Manual.

- 2) In situations where the company marketing the product under its own brand name does not manufacture the product or hold a certificate, private label agreements between the certifier and the company are required.
- 3) For labelling of transitional products refer to COABC Policy 15.

- **See Additional Policy:**  
COABC Policy #15: Use of the claim “Transitional” and the BCCOP

## 11. Additional Accreditation Policy & Procedure

- 1) Additional policy and procedure documents are available on the COABC website or by request to the COABC office.

### 11.1 Additional Policy & Procedure List

PL59A Complaints against CBs & Operators  
PR59A Procedure for Complaints against CBs & Operators  
PL59B Complaints against the COABC  
PL710 Appeals Policy  
PR710 Appeals Procedure  
PL7116 Procedures for Annual Reporting and Accreditation Renewal  
PR7116 Procedures for Annual Reporting and Accreditation Renewal  
PR712A-R BCCOP Regional Accreditation Process Flow Chart  
PR76-R BCCOP Regional Document Review Procedure  
PR785 Handling Non-Conformities  
PR352-R BCCOP Regional Two-Step Audit Process  
PR362-R BCCOP CB Timelines for Corrective Actions  
Policy 10A Fees  
Policy 10B Refunds  
Policy 15 Transitional Labelling  
Policy 16 Conflict of Interest  
Policy 3 Recognition of Accreditation/Certification Programs  
Policy 6 Risk Assessment  
Policy 9 Label Use Between CBs