



## COABC ACCREDITATION BOARD

### BC Certified Organic Program Accreditation Manual

*Manual for Certifying Bodies offering the BCCOP Checkmark*

VERSION 3



*British Columbia  
Certified Organic*

# **COABC Accreditation Board**

## **BCCOP Accreditation Manual**

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### **VERSION 3**

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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 (COABC) is doing business as Organic BC. The terms Organic BC and COABC may be used interchangeably throughout this document.

The Certified Organic Associations of British Columbia (dba Organic BC) is the Administrator of the [Organic Certification Regulation](#) under the [Food and Agricultural Products Classification Act](#). The COABC Accreditation Board (AB) works to maintain a credible set of organic production and processing standards. The COABC AB 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, Food and Fisheries \(AFF\)](#). Under BC's Organic Certification Regulation, the use of the term 'Organic' is limited to those who are accredited under the BCCOP or the Canadian Organic Regime (COR)

The Accreditation Board 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 Accreditation Board manuals and policies are available to interested parties upon request. 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 Organic BC 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 Organic BC membership this refers to bodies accredited by Organic BC 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) dba Organic BC**

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.

**Corrective Action (CA)**

An action taken to eliminate the cause of a detected non-compliance or other undesirable situation. CAs are categorized as responses to NCs. CAs will be received within a specified timeframe after an audit and assessed to be sufficient to resolve the NC.

**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.

**Earmark**

Terminology used to identify areas for further follow-up by the AB to verify full implementation of a CA. The AB can decide when each earmark will be followed up.

**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.

**Internal Standard**

A Certifying Body who is a member of Organic BC can develop their own internal standard which would be for the exclusive use of its members. The internal standard must meet or exceed the Canadian Organic Standard (current version) and can only cover those products which are not part of the British Columbia Certified Organic Program (BCCOP) or the Canadian Organic Regime (COR). This standard must fall within all pertinent regulations, requirements and laws. Prior review and ongoing review when amended or when the COS, COR or BCCOP are updated by the COABC Accreditation Board is required.

A disclaimer must be included on the certificate as follows:

This Internal Standard is not accredited by a regulatory authority.

**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).

**Observation (OBS)**

Terminology used in reports to describe something brought to the attention of the CB which is not specifically a non-compliance or an opportunity for improvement. For example, an explanation that

current procedures meet current rules but will not meet revised rules when they come into effect at a future date.

**Operation**

A production or processing business or establishment.

**Opportunities for improvement (OFI)**

Recommendations for improvements to the program which do not constitute an actual non-compliance e.g. when a CB is using outdated record keeping practices or when improved documentation will help the CB meet its requirements. A CB may choose not to accept the recommendation.

**Records and documents**

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

**Non-conformity (NC)**

Absence or failure to fulfil or maintain a requirement of the reference standard or criteria. This requires corrective actions to resolve the non-conformity within a specific time frame.

**Sanction**

An action taken by the Accreditation Board in response to a failure by the CB to meet any conditions or requirements for accreditation.

**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) Organic BC is named as the Administrator of the *Organic Certification Regulations* under the *Food and Agricultural Products Classification Act*. In this way, Organic BC's mandate to operate the BC Certified Organic Program is described in law. The British Columbia Ministry of Agriculture, Food and Fisheries (AFF) provides oversight of the BC Certified Organic Program by having a permanent ex-officio director position on the Organic BC Board of Directors, 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 Organic BC. The duty of the accreditation board is to provide accreditation services under the BC Certified Organic Program.
- 3) COABC AB has adopted as the management standards of the British Columbia Certified Organic Program, the Canada Organic Standard (COS) as detailed in CAN/CGSB 32-310, CAN/CGSB 32-311 and CAN/CGSB 32.312. 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 on product sold outside of the province by COR operators located in BC. 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 to 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:**  
 AB-PRO-700R BCCOP Regional Accreditation Process Flowchart

### 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 Organic BC 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 including scope of certification;
  - f. A copy of the certification body's Society Act incorporation documents, constitution, and bylaws;
  - g. The name of the person nominated to the Organic BC Board of Directors as well as the name of an alternate representative.
- 3) The receipt of a complete application is acknowledged. If correct application fees are received with the application, a receipt is sent to the applicant.

### 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. BCCOP 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 BCCOP 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 AB-PRO-702R – BCCOP 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 3.3.4.

### 3.3.4. Appeals of COABC Accreditation Decision of a CB

- 1) If the AB refuses accreditation of a CB, it will send a notice to the CB stating the reason for the decision and advising the applicant of their right to appeal the decision within 30 working days as per the COABC Appeals policy.

- **See Additional Policy & Procedure:**  
AB-POL-801 Appeals  
AB-PRO-801 Appeals

### 3.3.5. Notification of Decision

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

### 3.3.6. 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.

### 3.3.7. 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 3 years following the document review.

### 3.3.8. Accreditation Certificates

- 1) BCCOP 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 (which can include accreditation of BCCOP and BCCOP Low-Risk programs that are offered to operators within BC only):
- 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 Organic BC Board of Directors with any pertinent information or documentation. Following a study of the case, the Organic BC 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 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. This report will be utilized by the AB as a surveillance activity to ensure Certification Bodies are remaining compliant to BCCOP requirements. 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). This includes all CB's internal standards;
  - 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 scope of certification, organic status and contact information for each member;
  - e. The name of the director appointed to Organic BC as well as an alternate representative;
  - f. Organic BC membership fees, in the amounts determined by the membership of Organic BC;
  - 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 at a minimum 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 Maintaining Accreditation

An audit will be conducted at a minimum every 36 months. In most instances, the Two-Step Audit process will be conducted. In extenuating circumstances as laid in Section 2 below, a remote audit will be considered. The AB will have the sole responsibility to determine which audit format will be utilized.

#### 1. Two-Step Audit Process

- a. Certification Bodies will be subject to an on-site evaluation visit at least once in every 36 months, as determined by the Accreditation Board;
- b. Additional visits may be scheduled to ensure compliance with conditions for accreditation based on risk assessments performed by the Accreditation Board;
- c. On-site audits will follow a two-step process:
  - i. 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;
  - ii. On-site review.

#### 2. Remote Audit Process

- a. A full remote audit may be conducted in the following possible situations:
  - i. The CB has the capacity and technical resources (good internet connection) to be assessed remotely and secure access to the CB intranet for reviewing documentation can be granted;
  - ii. The CB has a good certification system in the previous 3 years based on information provided in Annual Reports such as complaints, appeals, number of operators etc.;
  - iii. The climatic or socio-economic conditions are unfavourable and/or make the audit impossible (e.g. Safety reasons: pandemics, country at war, conflict or instability, extreme weather condition);
  - iv. Low number of clients for its accreditation scope;
  - v. This is not an initial audit.
- b. There shall be no more than 2 consecutive remote audits;
- c. All requests for documentation MUST be available during the audit appointment. All personnel that may be requested for interviews will be available as specified;
- d. The COABC will determine the format of the remote audit. I.e. whether the CB must be online or whether the auditor works alone in the audit plan;
- e. The audit scope will be the same as documented in the Two-Step Audit process.

➤ **See AB-PRO-702R Two-Step Process for On-Site BCCOP Audits**

### 3.6.5 Corrective Actions and Non-Compliance

- 1) Following the finalization by the AB of NCs or other findings identified during an audit or surveillance activity, the CB will be provided with a decision letter requesting submission of a Corrective Action response within 30 working days.

- 2) The CA response must include the proposed corrective actions, preventative action to prevent it from happening again, and evidence of the implementation of the CAs.
- 3) CA responses are tracked cooperatively with the CB using the F783C-R CA Tracking Spreadsheet. Upon receipt of the decision by the AB, the CB shall complete the CB response column of the spreadsheet. If additional documentation/evidence is included within a response, the CB will ensure that the document is listed on the spreadsheet within the appropriate section.
- 4) The AB will review CA responses to determine compliance with BCCOP requirements. Further request for CAs by the AB may be requested through a following letter if the response submitted is incomplete or continues to be non-compliant.
- 5) Once all NCs have been satisfactorily addressed, the AB will send a final decision letter to the CB. The AB shall also send the final tracking spreadsheet as record. Findings may be earmarked for further review at a later specified time (e.g. the following audit or annual renewal).
- 6) NCs, OFIs, and CAs are additionally tracked by the AB through maintaining an Audit Log for each CB.
- 7) Failure to comply by taking appropriate corrective actions shall result in sanctions, including suspension or withdrawal of accreditation

- **See Additional Procedure:**  
AB-PRO-703R BCCOP CB Management of NCs & Findings

### 3.6.6 Suspension of Accreditation

- 1) In severe cases of non-conformity, the Accreditation Board may suspension CB accreditation under the BC Certified Organic Program. Such action may be triggered by findings at on on-site audit, repeated failure to fulfil conditions within the specified time, or findings resulting from complaints.
- 2) The Accreditation Board must first issue a warning with a time frame for a response by the CB and ensure it has been received. The warning shall include:
  - a. A full explanation of reasons for the proposed suspension and necessary action to prevent it;
  - b. An invitation to the CB to explain why the suspension should not be imposed.
- 3) The warning period shall normally be 30 working days. It may be extended or reduced at discretion of the AB. At the end of the period the suspension can be implemented, lifted, or more time allowed for further corrective action before a decision is made. Only one extension period may be granted.
- 4) During the period of warning the suspension is not in force and is not made public.
- 5) The AB will provide CBs with written notice of suspension including:
  - a. The effective date of suspension;
  - b. The corrective actions that must be undertaken for reinstatement of accreditation;
  - c. The timeframe for such actions;
  - d. The method by which corrective actions will be evaluated by the AB.

- 6) Suspended CBs lose their right to provide certification under the BC Certified Organic Program. This restriction exists as long as suspension is in effect.
- 7) When suspension is a result of failure to comply with conditions, the suspension may only be lifted when all conditions have been complied with.
- 8) The maximum period for suspension is one year, after which accreditation shall be withdrawn.

### **3.6.7 Withdrawal of Accreditation**

- 1) For serious non-conformities and failure to take appropriate corrective actions the COABC Accreditation Board may withdraw accreditation from the BC Certified Organic Program. See also BCCOP Accreditation Manual Part A, section 3.4.3.
- 2) Withdrawal of accreditation will result in cancellation and recall of the CB accreditation certificate and agreement. The CB must surrender the certificate and agreement or file a written appeal within 30 working days from receipt of the COABC AB decision.
- 3) A CB, which has had its accreditation withdrawn, must recall all certificates referencing the BC Certified Organic Program. See also BCCOP Accreditation Manual Part A, section 3.4.4.

### **3.7. Extension of Accreditation Category**

The CB must be in good standing to request an addition of accreditation category. There must be no outstanding non-compliances.

The CB can request an application for additions to scope from the COABC.

#### **3.7.1 Application**

- 1) A CB can apply for an extension of scope or addition of accreditation category of the BCCOP Accreditation Program through the COABC by submitting the duly completed application form together with the review fee. The certification body must forward all the required documentation. At a minimum, the documents should include all policies, procedures and forms that support the extension of scope/category.
- 2) A CB requesting the extension must submit a completed Application Form, accompanied by a non-refundable initial application fee of \$ 300. Or as determined from time to time by the Organic BC Board of Directors. Applications forms are available upon request from the Organic BC office.
- 3) Organic BC shall acknowledge receipt of the application within 10 working days.

##### **3.7.1.1 Preliminary Review of Application**

- 1) Upon receipt of the application, the Director 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 applying certification body, specifying the missing documents.

#### **3.6.8 Review of File**

##### **3.6.6.1 Application Analysis**

- 1) The Director, or an evaluator assigned by the Director, shall review all documentation and prepare a document review report which indicates any non-conformities (NCs) and opportunities for improvement (OFIs) with the requirements and requests for further information, if necessary. The report will be submitted to the Accreditation Board who shall determine whether the accreditation program criteria have been met for the extension of scope/category applied for. In addition, the application must confirm availability and the training of the verification officers and CB staff involved in the extension processes having the required expertise. The Accreditation Board, shall establish, if applicable, points of non-conformity and write its recommendations within a reasonable period.
- 2) The AB will determine whether to accept the scope/category extension or to deny the scope/category extension for major non-compliances revealing that the CB's program cannot support the extension.
- 3) During the next planned CB office audit, verification of how the new scope/category is managed by the CB will be assessed. This may include interviewing key personnel and a review of the first operator's file.
- 4) At any point in the application, if there is evidence of fraudulent behaviour, the COABC AB shall reject the application or terminate the assessment process.
- 5) In the case of a refusal, the Accreditation Board shall inform the CB as to the necessary corrective measures so that it may reapply for accreditation.
- 6) During the next planned CB office audit, verification of how the new scope/category is managed by the CB will be assessed. This may include interviewing key personnel and a review of the first operator's file.

### **3.8. 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.
  - c. When advised in writing by the Certifying Body
- 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.

#### **3.8.1 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 Organic BC / COABC Accreditation Board.

- 2) If certificates are cancelled, applicants must immediately discontinue use, reference to, or distribution of materials that refer to BC Certified Organic Accreditation. Applicants must effectively recall or arrange for discontinuation of distribution all point-of-purchase materials referencing or implying conformity assessment by Organic BC / COABC AB 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, Organic BC / the COABC AB may take whatever steps necessary to inform the public of the discontinued eligibility of the applicant to reference BC Certified Organic 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.

## 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;
  - 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 including any internal standards.

#### 1.1.1 BCCOP 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. All requirements of both programs must be met to be certified.
- 2) If a CB that is accredited to both COR and BCCOP Equivalent programs and also offers a BC Low Risk program, that Low Risk program must meet all the requirements under 6.2 of this manual.
- 3) 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 32.310, CAN/CGSB 32.311 and CAN/CGSB 32.312 (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. Procedures for amending and updating any internal standards to ensure they remain compliant with updated standards and regulations;
  - 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 and any other requirements that are specific to the BCCOP.

## 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.
- 3) In unfavourable climatic or socio-economic circumstances (such as a global pandemic, extreme weather, country in conflict etc.) the BCCOP CBs will use the **COABC AB Directive – BCCOP Guidelines for Certification under Emergency Measures**, to develop procedures to adjust the certification process as necessary.

#### See Additional Guidelines:

- Guidelines for BCCOP CBs: Certification under Emergency Measures

## 4. Certification Procedures

### 4.1. Requirements of the BCCOP Certification Process for New Applicants

- 1) The operation becomes a certification body member. (Membership fee schedule as determined by certification body. This is in addition to the Organic BC 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) All first time applicants applying for certification status must undergo on site inspection before a CB may grant certification.



- 6) The verification officer conducts an Inspection.
- 7) The verification officer submits the Inspection report to the certification body.
- 8) The Certification Committee provides a feedback checklist to the VO.
- 9) The Certification Committee determines the status of the operation according to minimum criteria documented in the BCCOP Operator's Manual: Organic Production Standards & the Labelling of Organic Product.
10. The Certification Body notifies the operation of the Certification Committee decision and makes a copy of the VO report available upon request to the CB

## **4.2. Information from Operators**

### **4.2.1. 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.

### **4.2.2. 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 e.g., 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 sign off declaration of all potential conflicts of interest.

#### 4.4. Appeals, Complaints and Disputes regarding Certification

- 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 products to point of sale. Audit trail records must be sufficient to confirm organic integrity of all organic products from receipt of inputs and ingredients through all production steps to final sale of finished product. Audit trail records must also demonstrate that quantities produced, purchased or used in production were sufficient to justify organic sales. Audit trail exercises, including traceback as well as input/output mass balance, shall be conducted at inspection to verify the audit trail effectiveness and organic integrity

#### **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 Renewal 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. If there are any issues or outstanding NCs the renewal certificate can not be issued.

#### **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 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.

### 6.1.1 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. The BCCOP Low-Risk Program is not available to operators certified to the CAN/CGSB 32.312 Aquaculture standard.
- 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.
  - f. The operation's neighbouring land-use poses no threat of contamination
  - g. The operation keeps accurate, and current records
- 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.
- 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. VOs are to be instructed that they are to identify the risks and not to determine whether an operation is a candidate for the CBs Low-Risk Program;

- 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. Certification Bodies 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 including keeping the Organic BC database current and will arrange for yearly random and unannounced inspections of at least 5% of all such operations, or at least 1 Low-Risk Operator which ever number is greater. Such inspections will include a risk analysis.
- 6) The CB may decide to undertake extra inspections of operations that are determined to be high risk.

#### **6.2.2. Maintaining the Low-Risk Program**

- 1) CBs that choose to implement a Low-Risk Program must have the capacity to continually monitor and improve their certification program. Operating a Low-Risk Program must not result in a more lenient certification program - the objective is to attain the same or improved outcome as achieved using yearly scheduled inspections.
  - 2) The twin actions of annual risk assessment (based on renewal applications and regular inspections) and unannounced inspections provide CBs with the tools they need to ensure that only those operations that meet low-risk criteria are able to be certified under the CB's Low-Risk program.
  - 3) It is essential that the decision regarding risk assessment remain with the certification committee (CC) and that the CC has the ability and the support to meet BCCOP requirements.
  - 4) Operators have the right of appeal and may decide to appeal a high-risk assessment. CBs must be prepared for appeals and have procedures and appeal committees in place as per BCCOP Accreditation Manual 5.2.
- **See Additional Policy and Documents:**  
AB-GDN Low-Risk Program Guidelines  
AB-POL-801 Appeals  
AB-PRO-801 Appeals

## 7. Requirements of Issued Certificates

### 7.1 Name

#### 7.1.1 The name on the certificate must match the name under which the operation is conducting organic business.

### 7.2 Date of Approval

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

### 7.3 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.

### 7.4 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) BCCOP 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 final sale back to inputs or ingredients, to verify record effectiveness and that an organic integrity has been maintained throughout the entire process.
  - c. Audit trail exercises shall include .
    - i. At least one traceback audit, following organic product beginning at final sale back to (as applicable, but not limited to): harvest records, transplant records and/or seeding records (for crops); shipping, production records, and ingredient purchase records (for preparation & handling); feeding records, harvest, purchase record (for livestock).
    - ii. At least one mass balance audit (input/output balance), examining whether sales records for a particular product and time period can be justified by (as applicable) production, harvest, inventory, and purchases. For crops, the exercise determines whether sales records for a particular product balance with harvest, production capacity, and seed/planting stock/input purchases; for processing & handling, and for preparation & handling, whether amounts of a particular product sold balance with production records, inventory, and organic ingredients received. For livestock, records must show whether the amount of organic feed produced/purchased is sufficient to properly feed the livestock. The verification officer will view all documents related to the organic status of everything that comes onto the establishment regarding the products chosen for mass balance and traceback.
  - 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. The taking of any samples if necessary;
  - g. Discussion of any problems or concerns in the form of a closing meeting where the findings are summarized verbally or 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 written 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 , verification of certification status and permission or denial to use the phrase “British Columbia Certified Organic” and the program symbol to the operator and advises the operator that a copy of the audit report is available upon request to the CB. The CC must also complete written feedback for the VO.
- 4)
- 5) 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 International 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 Organic BC 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 workload and timeline 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. Upon request from the operator, 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 Organic BC 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 Organic BC. This need only be completed initially;

- d. The operator must be in good standing with the Certification Body and have paid the Organic BC fees;
- e. Physical use of the BC Certified Organic Program Symbol is governed by the “Symbol Users Guide”, issued by Organic BC 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 14.2 and 14.3 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 Organic BC website through the Accreditation portal or by request to the Organic BC office.

### 11.1 Additional Policy & Procedure List

AB-POL-800 Complaints against CBs & Operators  
AB-PRO-800 Complaints against CBs & Operators  
PL59B Complaints against the COABC  
AB-POL-801 Appeals  
AB-PRO-801 Appeals  
AB-PRO-701 Annual Report & Renewal of BCCOP Accreditation  
AB-PRO-704R BCCOP CB DR Flowchart  
Policy 10A Fees  
Policy 10B Refunds  
Policy 15 Transitional Labelling  
Policy 16 Conflict of Interest  
Policy 9 Label Use Between CBs  
AB-GDN- Low-Risk Guideline  
AB-GDN Recognition of Accreditation Programs across Border

