



**CCOF**  
*Certification Services, LLC*



**MANUAL THREE:  
CCOF International  
A Guide to CCOF  
Global Market Access**

July 2008- DRAFT for review, updated 9/25/08.

## Introduction

**NOTE: Recent changes for EU Equivalency designation, IFOAM compliance and Canadian Organic Program development are notated in red.**

CCOF Global Market Access provides verification of organic farmers, livestock operations, handlers and processors in accordance with European Economic Community Regulations 2092/91 (EEC), the Basic Standards of the International Federation of Organic Agricultural Movements (IFOAM), and the standards of Canadian Organic Regime (COR). These regulations differ from the United States Department of Agriculture (USDA), National Organic Program (NOP) standards in specific areas. While CCOF Certification Services, LLC (CCOF CS) believes that the various standards are very similar and share essential core principals and values, the details of the standards are different. CCOF CS has developed this program in order to provide CCOF CS clients with the proper verification that allows them to demonstrate their compliance with various export standards.

The contents of this manual identify areas where CCOF Global Market Access requirements must be met in addition to the USDA NOP Standards.

The contents of this manual also define procedures that CCOF Global Market Access employs for our own compliance to IFOAM Accreditation Criteria, USDA ISO Guide 65 requirements, and Canadian accreditation requirements. For example, the appeal procedures defined under the NOP do not apply to a decision made by CCOF CS under Global Market Access. Separate appeals procedures are defined in this manual.

CCOF CS will update changes to EEC Regulations and member state interpretations of the regulation as they become known. European Union Member States do interpret the EEC regulations in different ways and thus some countries may require additional documentation without prior notice.

CCOF CS will notify producers of the changes to the CCOF Global Market Access Standards and will provide clients with six months notice prior to enforcement of any standard change when possible.

## 1. FREQUENTLY ASKED QUESTIONS

### What Is The CCOF Global Market Access (GMA) Program?

CCOF Global Market Access (GMA) provides additional standards, which were developed to provide clients sufficient access to export markets not accessible with USDA NOP certification alone, and for compliance to European Union Regulation 2092/91, the International Federation of Organic Agriculture (IFOAM), and Canada. The USDA National Organic Program requirements are baseline standards, which must be met by those producing or selling products in the United States. However, for exporting to some other countries, the USDA standards alone do not suffice for the export of U.S. product.

The GMA program screens CCOF clients against a variety of known foreign standards, export arrangements, and other international requirements to provide clients with documentation of compliance or specific requirements that must be met to achieve compliance/equivalency with various international requirements.

As foreign countries develop new mandatory national standards or export requirements change, CCOF CS will continue to modify the GMA program to ensure access to foreign markets.

### Am I eligible for CCOF Global Market Access Certification?

If you are currently certified by or applying for certification with CCOF CS for USDA NOP certification, then you are eligible for CCOF Global Market Access.

### Who needs to be certified to the CCOF Global Market Access program?

Any CCOF CS producer that may export product directly or may sell product to a handler that will export a processed product needs certification. In both situations, CCOF CS clients will need the additional verification provided by the CCOF Global Market Access program in order to demonstrate compliance with various international standards. Producers of the following products should seriously consider obtaining CCOF Global Market Access certification: all nuts, tree fruit, grapes (for wine and raisin production), specialty lettuce, strawberries, dates and dairy (especially if dehydrated for milk powder).

Producers must apply for CCOF Global Market Access in advance of the harvest or production of the product in order to ensure that that compliance can be verified prior to export.

### How do I obtain CCOF Global Market Access Certification?

#### Step 1

Indicate on your application form or annual continuation of certification contract that you request CCOF Global Market Access, and submit directly to CCOF CS.

#### Step 2

Pay the required fees. CCOF CS will invoice you at the time of application or continuation of certification. If you are applying before or after continuation of certification, CCOF CS will invoice you upon review of the application.

#### Step 3

Complete an inspection. After the inspection, CCOF CS will review the inspection and determine compliance.

### What are the additional standards for CCOF Global Market Access?

The additional requirements of CCOF Global Market Access are baseline European Union Standards and IFOAM Basic Standards, in addition to the standards set by the Canadian Organic Regime. Other areas covered include the MAFF/USDA Export Arrangement between the US and Japan and Quebec organic requirements.

The simple answer is that CCOF global market access is a condensed version of the European Union Regulation 2092/91, the IFOAM Basic Standards, and Canadian Organic Regime. It only identifies those standards that are "additional" to the USDA NOP, and often requested for the acceptance of US product being exported.

### Do I have to enter my entire operation or can I enter a portion of my operation?

No, CCOF CS can certify to various CCOF Global Market Access requirements on a field-by-field or product-by-product basis; However, the issues of whole farm conversion and the conversion time associated with various materials prohibited by CCOF Global Market Access may at times make this impractical. All sites, fields and orchards are subject to various conversion rates. The sites will be considered from the time they first apply for certification as either transitional or organic, with intent for full farm conversion to organic. Please

note however, that CCOF CS will consider a separate application from a separate business entity or from a clearly defined division of a parent company as a separate entity.

Handlers and processors are not required to enter as an entire operation. Individual products may be certified under CCOF Global Market Access for handling and processing operations. However, handlers must be able to evidence recordkeeping.

### What are USDA Export Arrangements?

The USDA has mutual agreements with other countries and economic regions that outline their respective standards. Export arrangements thus far include Japan, New Zealand, Quebec, United Kingdom, Denmark and British Columbia. In some cases, such as Japan, additional provisions and standards must be met to export product. CCOF CS monitors these arrangements and other international standards, to ensure access to markets.

### What is the European Union Regulation 2092/91? (EEC 2092/91)

All products sold as "organic" in the European Union must have been grown and processed in accordance with EU Council Regulation No. 2092/91. This regulation provides European members states with the minimum standards to which products must be grown if they are to be sold as "organic." EEC 2092/91 gives individual member states the authority to adopt and enforce stricter regulations within the country, but not to restrict trade among other member states. Organic producers, processors and handlers may need to meet additional requirements established by individual member states or certification agencies in the importing country. CCOF CS cannot anticipate all the demands of each member state, but has a very strong reputation within the EU and can usually resolve questions raised by EU members.

### Who is IFOAM?

The International Federation of Organic Agriculture Movements (IFOAM) is a global organization developed to provide consistency in standards among organic products being traded internationally. The IFOAM Basic Standards and IFOAM Accreditation criteria provide the framework for accredited certification bodies and standard setting organizations worldwide to develop similar international organic standards. Many importers require products to be certified under an IFOAM accredited

program in order to be sold as an organically labeled product. Producers, processors and handlers that sell organic products under an IFOAM accredited program must meet or exceed the requirements of the IFOAM Basic standards. CCOF offers IFOAM certification for crop production and processing only.

### What is Canadian Organic Regime (COR)?

All products sold as "organic" in Canada must meet the requirements of the Canadian Organic Regime (COR) as of December 14, 2008. These standards are required to be met for all products entering Canada or Canadian Provinces. All ingredients in products destined for Canada must also meet COR in order for the final product to receive certification<sup>1</sup>. GMA service for COR compliance is required for all operations located in Canada.

COR is overseen by the Canadian Food Inspection Agency (CFIA) and is composed of several constituent parts. Each part plays a role in defining how operators demonstrate compliance and the administrative and other roles of certifiers, standards setting bodies, and enforcement arms.

- **Regulation establishing COR.**
- **Organic Production Systems General Principles and Management Standards (CAN/CBSB-32.310-2006).** These are the National Standard of Canada which establishes the production practices that must be followed by operators.
- **Organic Production Systems Permitted Substances Lists (PSL).** This list identifies materials that may be used in the production of organic products under COR.
- **Canada Organic Regime Quality Management System Manual (QMS).** Published by the CFIA, this manual identifies the manual for entities involved in administering the COR. These include requirements and procedures for certifiers, accreditors, and the CFIA itself. The QMS includes numerous requirements that affect certifiers accreditation and will result in certification processes or requirements that affect operations seeking certification under COR.

NOTE: These standards and PSL are developed by the organic industry in Canada with the Canadian General Standards Board. As of July, 2008 the Canadian General Standards Board and the Standards Council of Canada

<sup>1</sup> COR QMS 1.3.1

are in process of voting on at least 3 ballots for changes to the CAN/CBSB-32.310-2006 and PSL. These "positive ballots" are widely expected to be integrated into the final standard and are therefore reflected here where they have substantive effect on implementation of the COR.

The Canadian Organic Office has announced in July, 2008 that a fourth ballot for standards revisions will occur in the summer of 2008. Additionally, the **Canadian General Standards board and CFIA will amend the current standard with a new "revised standard" released in time for December 14, 2008.** Where standards issues are under revision or awaiting clarification, CCOF will attempt to identify these and notify clients of potential compliance issues. When standards are finalized, CCOF will notify you of potential compliance issues and require full compliance upon finalization of standards and annual inspection and review process. These areas will be noted below.

The CCOF GMA program combines requirements from all identified constituent parts to provide a convenient and manageable single set of requirements for operators and identifies specific CCOF practices and procedures that must be followed. Where COR requirements differ from baseline NOP or other practices they are identified here.

However, complete copies or links to them are available online at [www.ccof.org/canada.php](http://www.ccof.org/canada.php). A paper copy of any of these components is available on request to CCOF clients enrolled in GMA. Where materials are allowed by the NOP but prohibited or substantively limited under COR, they are identified below. Where NOP compliance, materials use, or other practices result in substantive compliance with COR they are not.

## 2. PARTICIPATION REQUIREMENTS

### 2.0 CCOF USDA NOP Certification

All CCOF CS clients must be certified according to the NOP Standards. Certification with CCOF Global Market

Access is an additional certification and may only be granted simultaneously or after the NOP certification is granted. The NOP program is described in Manual One: A Guide to CCOF NOP Certification, and in Manual Two: A Guide to USDA Requirements for Organic Producers.

The fee for this service is per Manual One: A Guide to CCOF NOP Certification Services.

### 2.1 Certificates of Compliance

CCOF Global Market Access offers verification to a variety of standards, and issues certificates for equivalency to EU 2092-91 and/or compliance to IFOAM Standards and/or Canadian Organic Regime standards. The certificate for those who meet the general requirements as set forth in this Section 2.0 Participation Requirements, and Section 4.0 Additional Standards shall receive:

- CCOF EU 2092/91 Certificate of Equivalency, and/or
- CCOF IFOAM Certificate of Compliance (applicable to grower and processor certification only), and/or
- CCOF Canadian Organic Regime Certificate of Compliance, and/or
- CAAQ (Quebec) compliance, and/or
- MAFF/USDA (Japan) compliance

### 2.2 Complaint Log Standard<sup>2</sup>

CCOF Global Market Access is recognized by the USDA Agriculture Marketing Services (AMS) and the International Organic Accreditation Service (IOAS) for operating in accordance to ISO Guide 65: Guidelines for the operation of a certification body. As such, and to maintain compliance with COR requirements<sup>3</sup>, all CCOF Global Market Access clients must keep a record of all complaints received that relate to a product's compliance with CCOF Global Market Access standards. A record of all complaints must be made available to CCOF CS when requested. The record must show that appropriate action is taken with respect to each received complaint.

### 2.3 Export Certificate (EC) Service

Only those CCOF CS clients granted a *Certificate of Compliance* as per Section 2.1 may receive Export Certificate Service for verification of shipments for domestic and international trade, particularly to the European Union and its member states. The fee for this service is per Manual One: A Guide to CCOF CS. CCOF CS will provide applicable export documentation as follows:

- European Union documentation (for EU member nations) including, but not limited to, Import authorization and Import Certificate for all clients

that meet the *EU 2092/91 Standards of Compliance*.

- IFOAM compliant certificate for any client that meets *CCOF IFOAM Standards of Compliance*. CCOF CS cannot guarantee that the CCOF Global Market Access standards will meet the requirements of other standards that are not yet published, nor can CCOF CS anticipate additional procedures or requirements that may be implemented by various regulatory bodies. However, CCOF CS will seek to provide its clients all complete, accurate, and relevant information available to CCOF CS from a clients file in order to evidence compliance.

## 3. CERTIFICATION

### 3.0 Certification Process

CCOF CS operates additional standards similar to the certification process outlined in Manual One. To make additional certification easy for you, the full context of the certification process is outlined below with specific references to Manual One: A Guide to CCOF Certification, and notations of additional and/or different aspects of the certification process.

#### 3.1 Application<sup>4</sup>

To request Global Market Access, indicate on the CCOF Application your desired scope of certification and expected or planned international markets. Applications are described per Manual One: A Guide to CCOF Certification and can be downloaded at [www.ccof.org](http://www.ccof.org).

All applicants with dual or multiple certifications with the same certification scope must obtain written consent from the applicant to receive from the certifier or certifiers the following upon application:

- Current certification decisions,
- Any major non-compliances,
- Evidence of corrective actions(s),
- Copies of transactions certificates or information regarding sales, and/or
- Any denials or suspension/revocations.

For applicants certified by one or more certification agencies, CCOF CS will make every effort to coordinate the inspection with the certifier(s) to reduce costs to the client.

#### 3.2 Application Review<sup>5</sup>

The Application Review is described per Manual One: A Guide to CCOF Certification, Section 2.2 Application Review and Cost Estimate. The findings of this review will be communicated to the client per Section 3.7 Certification Sanctions.

#### 3.3 On-Site Inspection<sup>6</sup>

The on-site inspection is described per Manual One: A Guide to CCOF Certification, Section 2.3 On-Site Inspection.

CCOF reserves the right to make all inspection assignments. CCOF clients may not influence the choice of inspector or contact inspectors directly to solicit inspection assignments. Operators have the right to be informed about the identity of the inspector before the inspection visit, and may raise objections based on conflicts of interest or other reasons. The certification body shall rule whether the reasons are accepted.<sup>7</sup>

CCOF CS may provide foreign accreditation agencies and/or import authorities with copies of inspection reports when required exclusively for the purpose of gaining import licenses for CCOF clients enrolled in GMA or their customers. When inspection reports etc. are provided CCOF will notify the client of this occurrence.

#### 3.3.1.1 IFOAM On-site Provisions<sup>8</sup>

In addition to the on-site provisions in Section 2.3, Global Market Access inspections for IFOAM clients must also include identification and investigation of areas of risk, review of records and accounts, productions/sales reconciliation on farms, and input/output reconciliation and trace back audits in processing and handling, and verification that changes have taken place per any changes in IFOAM standards.

Furthermore, CCOF CS is required by IFOAM to not schedule inspections on a regular basis to avoid inspections becoming predictable. The same inspector shall not be assigned to an operator for more than 4 consecutive years and under no circumstances for more than 5 consecutive years.

CCOF reserves the right to make all inspection assignments. CCOF clients may not influence the choice of inspector or contact inspectors directly to solicit inspection assignments. Operators have the right to be informed

<sup>2</sup> ISO Guide 65 §15  
<sup>3</sup> CAN QMS 8.1.2.e

<sup>4</sup> ISO/IEC Guide 65 4.1.4, 4.5.3.i.1-4.5.3.i.2, 4.6.1, 4.6.2.a  
<sup>5</sup> ISO/IEC Guide 65 8.1.1, 8.1.3-8.1.4, 8.2.1.a-b, 8.2.2.a-b, 8.1.2.a-h, & IFOAM Accreditation Criteria 6.1.1, 6.1.2.a-c, 6.1.3-6.1.7

<sup>6</sup> ISO/ICE Guide 65 9.2, 9.4, 10 & IFOAM Accreditation Criteria 6.2.4-6.2.7  
<sup>7</sup> CAN QMS 4.5.3.1  
<sup>8</sup> IFOAM 6.3.3.a-h & 6.5-6.6

about the identity of the inspector before the inspection visit, and may raise objections based on conflicts of interest or other reasons. The certification body shall rule whether the reasons are accepted.

### 3.3.1.2 EEC On-Site Provisions

In addition to the on-site provision inspection 2.3, Global Market Access inspections for EEC 2092/91 clients must also include the full inspection of all conventional storage areas, including, but not limited to, conventional input and seed storage facilities.<sup>9</sup>

### 3.3.1.3 Canada On-Site Provisions

In addition to the on-site provisions in Section 2.3, Global Market Access inspections for Canadian Organic Regime clients will take into account the intensity of the production system, production types, company size, previous inspection/review results, complaints, and parallel production.

CCOF will also include identification and investigation of areas of risk, review of records and accounts, productions/sales reconciliation on farms, and input/output reconciliation and trace back audits in processing and handling, and verification that changes have taken place per any changes in COR standards.<sup>10</sup>

Inspections for clients seeking COR compliance may also include the full inspection of all conventional crops and applicable storage areas, including, but not limited to, conventional input and seed storage facilities. This is applicable where there are organic and non-organic fields/farms operated by the same clients in the same area.<sup>11</sup>

Clients must be able to demonstrate during onsite inspections functioning audit trail/record keeping systems that include traceability.

### 3.3.2 Additional (Announced & Unannounced) On-site Inspections<sup>12</sup>

CCOF CS reserves the right to conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the applicable IFOAM and other organic production and handling regulations. The documentation of additional inspections will be deemed necessary by CCOF CS based on risk analysis, taking into account factors such as the type of production, the

operator's record of compliance and complexity of production. The International Organic Accreditation Services (IOAS) may require that additional inspections be performed by CCOF CS for the purpose of determining compliance with the applicable IFOAM organic production and handling regulations. Additional inspections may be announced or unannounced at the discretion of the CCOF CS or as required by IOAS. At minimum, CCOF CS must conduct unannounced inspections of at least 5% of the total IFOAM clients, in addition to 3% of COR primary producer, and 5% of other COR clientele. CCOF CS will assign the inspection based on the following criteria:

- Identification of a possible non-compliance activity;
- Potential for drift;
- Achievement of geographic crop and seasonal diversity;
- Other logical reason(s), including random selection.

### 3.3.3 Residue Testing<sup>13</sup>

The scope of the audit may include sampling for residues, partial compliance inspection and/or investigation of a specific concern.

CCOF CS shall require pre-harvest or post-harvest testing of any agricultural input used or organic product when there is reason to believe that the agricultural input or product has come into contact with a prohibited substance, or has been produced using excluded methods.

An inspector must test for prohibited substances that have not been and are not being applied to the operation through means, which at the discretion of CCOF CS, may include the collection and testing of soil, water, waste, seed, plant tissue, and plant, animal and processed products samples. CCOF CS shall provide the operation's authorized representative with the results and receipt for any samples taken by the inspector. All tests required by CCOF CS will be paid by the applicant.

Sample integrity is maintained throughout the chain of custody, and residue tests are performed by a third-party, accredited laboratory, EMA Laboratories. Chemical analysis is performed in accordance with the methods described in the most current edition of the Official Methods of Analysis. All test results and analysis are provided to CCOF CS and shall not

be made public, unless the testing is part of an ongoing compliance investigation.

If test results indicate a specific agricultural product contains a pesticide residue or environmental contaminants that exceed the Food and Drug Administration's or the Environmental Protection Agency's regulatory tolerances, CCOF CS must promptly report such data to the Federal health agency whose regulatory tolerance or action level has been exceeded.

### 3.4 Granting of Certification<sup>14</sup>

Granting certification is described per Section 2.1 Certificates of Compliance, Section 2.3 Export Certificate Service and per Manual One: A Guide to CCOF Certification, Section 2.4 Granting Certification.

CCOF will inform clients, in writing, when they are affected by a change, modification (Such as reduction, expansion, or extension.), or withdrawal of certification in whole or in part<sup>15</sup>.

### 3.5 Continuation of Certification<sup>16</sup>

Continuation of Certification is per Manual One: A Guide to CCOF Certification, Section 2.5 Continuation of Certification.

### 3.6 Modification of Certification<sup>17</sup>

Modification of Certification is per Manual One: A Guide to CCOF Certification, Section 2.6 Modification of Certification.

### 3.7 Certification Sanctions<sup>18</sup>

Certification Sanctions are per Manual One: A Guide to CCOF Certification, Section 2.7 Certification Sanctions.

#### 3.7.1 Noncompliance Procedure

Noncompliance Procedure is per Manual One: A Guide to CCOF Certification, Section 2.7.1 Noncompliance Procedure.

#### 3.7.2 Denial of Certification (Applicants)<sup>19</sup>

Denial of Certification is per Manual One: A Guide to CCOF Certification, Section 2.7.2 Denial of Certification.

#### 3.7.3 Proposed Suspension or Revocation<sup>20</sup>

Proposed Suspension or Revocation is per Manual One: A Guide to CCOF

<sup>14</sup> ISO/IEC Guide 65 4.2.b, 4.6, 11.b, 12-12.4 & IFOAM AC 7-7.1.4, 7-2.2-7.2.3, 7-2.6, 7-2.4

<sup>15</sup> COR QMS 14.1.3

<sup>16</sup> IFOAM 7-7.1.4 & IFOAM AC 7.5-7.5.1

<sup>17</sup> IFOAM AC 7.5.9-7.5.11, 7-7.1.4, 7.11-7.11.12 ISO/IEC Guide 65 4.6-4.6.2.c, 12.1, 12.4, 13-13.3

<sup>18</sup> IFOAM AC 7-7-7.6

<sup>19</sup> ISO/ICE 4.2.b, IFOAM 7-7.1.4

<sup>20</sup> IFOAM 7-7.1.4,

<sup>9</sup> EEC 2092/91 Annex III A1.3

<sup>10</sup> COR QMS 4.5.3.1

<sup>11</sup> COR QMS 9.2.2.b

<sup>12</sup> IFOAM AC 7.5.4-7.5.8 & 7.5.2, & COR QMS 13.01.a

<sup>13</sup> IFOAM AC 6.4.1

Certification, Section 2.7.3 Proposed Suspension or Revocation.

### 3.7.4 Suspension or Revocation<sup>21</sup>

Suspension or Revocation is per Manual One: A Guide to CCOF Certification, Section 2.7.4 Suspension or Revocation.

### 3.7.5 Discontinuance of Certification<sup>22</sup>

Discontinuance of Certification is per Manual One: A Guide to CCOF

Certification, Section 2.7.5 Discontinuance of Certification. Clients must also cease all claims of the CCOF logo and name, destroy or return all certificates, labeling and marketing materials containing reference to CCOF as per the *General Affidavit and CCOF/IFOAM License Agreement*, and are liable for the costs of services provided up to the point of withdrawal.

### 3.7.6 Willful Violations<sup>23</sup>

At any step of the certification process, including during the inspection, CCOF CS requires all personnel to immediately contact CCOF CS in cases where a manifest noncompliance, fraudulent activity, or willful violation per Section 3.7.6, is observed or documented. CCOF CS reserves the right to act immediately (within 36 hours) on such violations. Immediate action may result in suspension, revocation, or denial of certification with CCOF Global Market Access.

### 3.7.7 Reinstatement

Reinstatement is per Manual One: A Guide to CCOF Certification, Section 2.7.7 Reinstatement.

### 3.7.8 Exemptions and Precedents<sup>24</sup>

CCOF CS reserves the right to issue exemptions to IOAS Basic Standards in the following cases:

- Permitting use of non-organic seed and plant material per Section 5.4 Seeds and Planting Stock.
- In cases where the provisions in Section 3.12 Mutual Certification Agency Recognition Provisions are not met, a limited exemption of conversion requirements in Section 5.5 may be granted following assessment of relevant field histories, and any recent inspection reports.

CCOF CS also reserves the right to set precedents to IFOAM Basic Standards concerning new situations or a set of

circumstances that may serve to guide future decisions.

All exemptions and precedents are managed by CCOF CS.

### 3.8 Appeals<sup>25</sup>

An applicant for certification may appeal a CCOF CS notice of denial of certification, and a certified operation may appeal a CCOF CS notification of proposed suspension or revocation of certification or other adverse action or decision. CCOF CS will carry out the appeal pursuant to the following:

- All written communications between parties involved in appeal proceedings must be sent to the recipient's place of business by a delivery service, which provides dated return receipts.
- An appeal of a noncompliance decision must be filed as required in the notification or within 30 days from receipt of the notification, whichever occurs later. All appeals must include a copy of the adverse decision and a statement of the appellant's reasons for believing that the decision was not proper or made in accordance with EU 2092/91, IFOAM, or COR regulations.
- The appeal will be considered "filed" on the date received by CCOF CS. All appeals shall be reviewed in a timely manner, heard and decided by persons not involved with the decision being appealed. The CCOF CS Ad Hoc Appeals Committee shall render a final and nonappealable decision to sustain, deny, suspend or revoke certification. Alternatively, they may sustain or deny an appeal regarding an adverse action.

### 3.9 Complaints<sup>26</sup>

CCOF CS reserves the right to investigate complaints of noncompliance with applicable to CCOF Global Market Access organic production and handling regulations including EEC, IFOAM, and Canada (COR) or other requirements, and/or complaints against the performance of CCOF CS as a certification body. CCOF CS is committed to investigating complaints that are submitted in writing and that provide evidence that supports the allegation(s). CCOF CS conducts investigations in a timely manner, confidentially and based only on documented evidence. If a certified party or applicant refuses to cooperate in an investigation, CCOF CS may deem this sufficient cause for denial or

suspension and/or revocation of certification. A certified party must also maintain records of such complaints per Section 2.2 Complaint Log Standard.

### 3.10 CCOF Global Market Access Claims

No operation may represent product as organic or in compliance with GMA standards/programs or utilize the CCOF seal or other GMA or COR seals until it has been informed, in writing, by CCOF CS that the products in question have been certified appropriately to the standard represented.<sup>27</sup>

As per OSP requirements in CCOF manuals one and two all clients must disclose all labels and brands manufactured under CCOF NOP and GMA certification(s). This must include any and all organic private labels or other brands not owned by the client.<sup>28</sup>

#### 3.10.1.a EU 2092/91 Claims

CCOF Global Market Access does not issue claim(s) for CCOF EU acceptance, only a certificate per Section 2.1 Certificates of Compliance.

<sup>21</sup> ISO/IEC Guide 65 4.6-4.6.2.a

<sup>22</sup> ISO/IEC Guide 65 4.6.2.a

<sup>23</sup> IFOAM 7-7.1.4 & IFOAM AC 7.5-7.5.1

<sup>24</sup> IFOAM AC 9.4.3-9.4.6, IFOAM BS 4.1.2

<sup>25</sup> IFOAM 7-7.1.4, 7.8-7.8.3, COR QMS 4.2i

<sup>26</sup> ISO/IEC Guide 65 7-7.1, 7.2.b-c.15, IFOAM AC 3.5-3.5.2, 3.5.3 & 3.5.4.a-c, 5.4.10.8, and 7.9-7.9.2. COR QMS

<sup>27</sup> COR QMS 8.1.2.a

<sup>28</sup> COR QMS 8.1.2.b

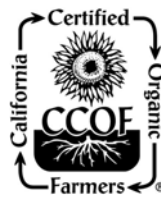
### 3.10.1.b Seal/Logo Use

CCOF will utilize the logos below on GMA certificates to indicate the compliances/equivalencies achieved within the program. On November 17, 2007 CCOF adopted a new seal and logo with broader national appeal for CCOF's nationally-based growers and processors. Both the new logo or the "CCOF Classic" seal may be utilized to indicate CCOF certification within various GMA programs.

#### CCOF Seal



#### CCOF Classic



#### CCOF GMA Seals



#### GMA Classic



All labels used on packaging must be attached to the OSP and pre-approved by CCOF CS, preferably prior to printing.

An operator can only make claims regarding certification which are consistent with the scope of the certification that has been granted and as displayed on their GMA certificate. The CCOF seal may be used on any CCOF certified product

CCOF Global Market Access provides for voluntary use of the IFOAM seal. CCOF CS must approve all uses of the CCOF IFOAM seal prior to labeling product. Approval is final upon completion of the CCOF/IFOAM Seal Use Agreement.

CCOF CS certified clients that withdraw, drop or are decertified from Global Market Access must immediately cease and desist the use of the CCOF name, and any logo or seal.

All labels used on packaging must be attached to the OSP and pre-approved by CCOF CS, preferably prior to printing.

An operator can only make claims regarding certification which are consistent with the scope of the certification that has been granted.

CCOF Global Market Access provides for voluntary use of the IFOAM seal when operations are granted compliance with IFOAM for particular products, parcels, crops etc. CCOF CS must approve all uses of the CCOF IFOAM seal prior to labeling product. Approval is final upon completion of the CCOF/IFOAM Seal Use Agreement.

CCOF CS certified clients that withdraw, drop or are decertified from Global Market Access must immediately cease and desist the use of the CCOF name, logo and seal.

### 3.11 GMO Exclusion Program and Testing Policy<sup>29</sup>

#### 3.11.1 Exclusion Program

The deliberate use or negligent introduction of genetically engineered organisms or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited. Global Market Access incorporates procedures to verify that GMO exclusion is being achieved. This shall include animals, seed, propagation material, pollen and farm inputs such as fertilizers, soil conditioners, vaccines, crop protection or processing materials<sup>30</sup>. This GMO exclusion program is documented and implemented primarily via the Organic System Plan (OSP) and Inspection Report formats. The OSP provides a framework by which organic producers can identify and address GMO critical control points within their system. The Inspection Report form prompts inspectors to verify relevant GMO critical control points. The OSP and Inspection Reports are periodically revised based on the latest available information regarding GMO crops and products. CCOF CS periodically provides updates regarding GMO crops and

<sup>29</sup> ISO/IEC Guide 65 7-7.1, 7.2.b-c.15, IFOAM AC 3.5-3.5.2, 3.5.3 & 3.5.4.a-c, 5.4.10.8, and 7.9-7.9.2  
<sup>30</sup> IFOAM 2.3.3

materials in the marketplace in the CCOF Newsletter.

### 3.11.2 GMO Testing

CCOF CS does not require mandatory GMO testing for verification of organic production. Testing is only performed when there is a specific cause for concern, such as suspected negligence or fraud that may have resulted in GMO presence in organic products or production systems.

### 3.12 Mutual Certification Agency Recognition Provisions<sup>31</sup>

As stated above in Section 2.0, all CCOF CS clients must be certified according to the NOP Standards. Certification with CCOF Global Market Access is an additional certification and may only be granted simultaneously or after the NOP certification is granted. CCOF CS recognizes certification agencies accredited by the USDA for NOP, as listed on the formal register on the USDA/NOP website.

#### 3.12.1 The Ministry of Agriculture, Forestry and Fisheries of Japan (MAFF) Export Arrangement

CCOF CS operates in accordance to the USDA/MAFF-Japan Export Arrangement as published on the USDA website. Clients must meet NOP regulations and the relevant requirements of Section 6.0 Crop Materials.

#### 3.12.2 The Conseil des Applications Agroalimentaires du Quebec (CAAQ)

CCOF CS operates in accordance to the CAAQ Export Arrangement as recognized by the CAAQ website. Clients must meet NOP regulations and the relevant requirements of Section 10 Quebec Labeling Requirements.

#### 3.12.3 EEC 2092/91 Accredited Certification Agencies and Other Agencies Providing Certification to EEC Regulations

CCOF CS will only recognize an ingredient certificate from other certification agencies for EEC 2092/91 where those programs are accredited to the NOP and ISO Guide 65 or EEC 45011 under:

- USDA ISO Guide 65 Accreditation (Required for suppliers located in the U.S.)
- EN 45011 Accreditation (Required for suppliers affected by EN45011)

<sup>31</sup> IOAS AC 7.10.1-7.10.2, 9.3.1-9.3.4, and IOAS BS 2.3.5

- IFOAM ISO Guide 65 Accreditation (Required for suppliers located outside the U.S.)
- ANSI ISO Guide 65 Accreditation (Required for suppliers located outside the U.S.)

### 3.12.4 IFOAM Recognition & Certification Transference

CCOF CS will only recognize a certificate from other certification agencies for IFOAM where those programs are accredited to the NOP and are signatories of the IFOAM Multi-Lateral Agreement (MLA), except in cases where Section 8.2 applies to the products purchased to be used as an ingredient, or purchased and re-labeled for export purposes.

The list of MLA signatories is available on the ACB website or can be obtained from the ACB administrator.

## 4. GLOBAL MARKET ACCESS STANDARDS

This section outlines the additional standards that CCOF Global Market Access enforces to comply with all applicable standards, based on European Union (EU) 2092/91 Regulations, International Federation Organic Agriculture Movement (IFOAM) Basic Standards and other standards as applicable, per the following scopes

of certification: Crop Production, Livestock, and Processing/Handling.

Based on the Global Market Access information and scope of certification indicated in the client's Organic System Plan, CCOF CS will determine the client's compliance to one or both, EU 2092/91, IFOAM Standards, COR, and other standards as applicable. If the standard is "Determined to be equivalent to NOP", CCOF CS has already assessed this standard as part of the entry-level NOP organic certification, and no additional compliance measures are required.

### 5.0 Production Terms

**Biological Diversity-** the existence of complex ecological systems as indicated by the presence of varied species of plants, animals and other organisms such as are found in natural systems.

**Factory Farm-** a farm in which the animal spends its entire life indoors and there is a high stocking rate of animals in the facility.

**Handle** To sell, process, or package agricultural products, except such term shall not include the sale, transportation, or delivery of crops or livestock by the producer thereof to a handler. A handling scope certification is required for anyone engaged in processing.

**Handler-** Any person engaged in the business of handling agricultural products, including producers who handle crops or livestock of their own production, except such term shall not include final retailers of agricultural products that do not process

agricultural products. A handling scope certification is required for anyone engaged in processing.

**Handling operation-** Any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products. A handling scope certification is required for anyone engaged in processing.

**Primary Ecosystems-** land that is in its natural state and has not been cultivated within the last 100 years.

**Conversion** - the act of certification to organic standards of a conventional operation. The practices and requirements for certification are defined within each regulation.

**Parallel Production-**growing the same crop variety both organically and non-organically. Prohibited under EU standards, with specific exceptions for perennial crops in conversion. Substantial separation of business operations and business identities may be required to ensure compliance. Alternately, full farm conversion of the business may be required.

Permitted under IFOAM standards, only with an approved management plan to prevent both commingling and contamination that is verified with additional inspection measures by CCOF CS.

Crop Production Standards	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime
<b>Biological Diversity</b> <sup>32</sup>	NOP equivalent.	Clearance of primary ecosystems for establishment of organic food production is prohibited <sup>33</sup> .	NOP equivalent.
<b>Contamination Prevention, Borders and Buffers</b>	NOP equivalent.	Producers must have a plan in place to prevent contamination of organic crops by genetically modified crops and crop varieties. <sup>34</sup>  All equipment from conventional farming systems shall be thoroughly cleaned of potentially contaminating materials before being used on organically managed areas. <sup>35</sup>	Buffer zones, when necessary or required by CCOF, must be at least 8m wider or wider depending on the risk and nature of potential contamination <sup>36</sup> . However, permanent hedgerows or plant windbreaks or artificial windbreaks, permanent roads or other features may be used instead of buffer zones.

<sup>32</sup> IFOAM BS §4.3

<sup>33</sup> IFOAM BS §2.1.2

<sup>34</sup> IFOAM 2.3.6

<sup>35</sup> IFOAM 4.6.4

<sup>36</sup> CAN CGSB 5.1.7



Crop Production Standards	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime
<p><b>Conversion</b><sup>37</sup></p>	<p>All sites, fields, and orchards must not have any prohibited substances applied within 36 months of the first organic harvest. CCOF CS will report the conversion date as the date of application to CCOF CS or the first date of certification of the operation under another certifier unless there is documentation as described below.</p> <p>a) Sites will be considered within the CCOF Global Market Access program from the time of application for certification as either transitional or organic<sup>38</sup></p> <p>b) CCOF CS reserves the right to determine that an operation has converted according to EEC Annex 1 Section 1.2 (a) and (b) where there is documentation of conversion, including but not limited to, registration with the California Department of Food and Agriculture, Organic Program.</p> <p>c) All CCOF CS Clients should note that Switzerland is not a member of the EU and thus may require additional conversion requirements. Clients seeking to export to Switzerland should ensure that product is from an operation that has been certified by CCOF CS or another agency for at least three years.</p>	<p>Acreage that is documented to the satisfaction of CCOF CS to have no use of prohibited materials/practices according to these standards 36 months prior to harvest, and at least one-year for annual crops and at least 18 months for perennial crops of active organic management with full compliance to these standards may be certified upon completion of the certification process.</p> <p>For land removed from organic production, see also, 5.5 Parallel Production</p>	<p>Current COR Conversion, parallel production and requirements for full farm conversion are similar to EEC requirements. However, these standards are under revision and balloting within the COR. CCOF will notify you of potential compliance issues and require full compliance upon finalization of standards.</p> <p>All sites, fields, and orchards must not have any prohibited substances applied within 36 months of the first organic harvest. Transition requirements<sup>39</sup>: CCOF CS will report the conversion date as the date of application to CCOF CS or the first date of certification of the operation under another certifier unless there is documentation as described below.</p> <p>a) Sites will be considered within the CCOF Global Market Access program from the time of application for certification as either transitional or organic</p> <p>b) CCOF CS reserves the right to determine that an operation has converted where there is documentation of conversion, including but not limited to, registration with the California Department of Food and Agriculture, Organic Program.</p> <p>Operations who have been under supervision and evaluation by CCOF for 12 months and can document 24 months without prohibited materials will meet conversion requirements.</p> <p>Land consisting of natural plants in their natural habitat that has not been cultivate for three or more years can be exempted from the observed transition period.</p> <p>Inspections will cover the entire agricultural production system being managed by the firm, even if only part of the firm's operations are included in the certification application. In general, where non-organic farming, harvesting or storage occurs near by organic production under the management of the same business entity, CCOF inspections may include observations of the non-organic ground, harvesting and storage locations.<sup>40</sup></p>

<sup>37</sup> IFOAM BS §4.2.1 & CCOF Global Market Access Manual Three, Standard 5.1.2 (Jan 2004 Addendum) & IFOAM BS 6.7

<sup>38</sup> EEC 2092/91 Annex I Sections 1.1 and 1.2

<sup>39</sup> COR CGSB 5.1.1-5.1.4

<sup>40</sup> CAN QMS 10.4

Crop Production Standards	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime
<p><b>Crop Rotation for the Production of Annual Crops.</b></p>	<p>Organic and/or mineral fertilizers, compliant with Annex II, may be used by exception when adequate crop nutrition cannot be provided through use of legume cultivation, deep rooting plants, green or livestock manures or the incorporation of organic materials<sup>41</sup>.</p>	<p>A soil building crop rotation, including but not limited to sod, legumes, other nitrogen-fixing plants and green manure crops, shall be established to provide biodiversity, weed, insect and disease cycles, and improve soil fertility and organic matter content (determined to be NOP-equivalent). Other means of maintaining biodiversity and improving soil organic matter and fertility may include:</p> <p>Establishment or preservation of non-agricultural areas, such as hedgerows, native prairies, wetlands and woodlands, adjacent to or adjoining the field or farm parcel;</p> <p>The planting of species, adjacent to or between cropped areas, that provide habitat for beneficial organisms;</p> <p>The use of rotational or intensive grazing methods on areas maintained as pasture, grazing land or farm lot areas;</p> <p>Introduction of diverse species into any field or farm parcel planted with a perennial crop;</p> <p>Cover cropping; and</p> <p>Soil building practices.</p> <p>Mineral fertilizers shall only be used in a program addressing long-term fertility needs together with other techniques such as organic matter additions, green manures, rotations and nitrogen fixation by plants.<sup>42</sup></p>	<p>NOP equivalent.</p>
<p><b>Genetically Modified Organisms (GMOs)</b><sup>43</sup></p>	<p>NOP equivalent.</p>	<p>The following organic and non-organic crops grown or handled on an operation must be evaluated for the potential for GMO contamination from pollen drift, and producers must have documentation pertaining to purchase and planting, including brand and variety name:</p> <p>Corn                      Potato                      Tomato                      Rape Seed/Canola Oil                      Soybean                      Zucchini                      Alfalfa (including rhizobium inoculant Dormal Plus)                      Cotton                      Other(s) TBA</p> <p>The deliberate use, or negligent introduction, of genetically engineered organisms or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited. This shall include animals, seed, propagation material, pollen and farm inputs such as fertilizers, soil conditioners, vaccines or crop protection materials<sup>44</sup>.</p>	<p>NOP equivalent.</p>

<sup>41</sup> EEC 2092/91 Annex I, A 2.2

<sup>42</sup> IFOAM 4.4.5

<sup>43</sup> IFOAM 2.3.1

<sup>44</sup> IFOAM 2.3.3

Crop Production Standards	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime
		Contamination by GMOs may alter the organic status of an operation, even if circumstances are beyond the control of the operator.	
<b>Parallel Production</b> <sup>45</sup>	<p>Growing the same crop variety both organically and non-organically (parallel production) is prohibited.</p> <p>Operations that are able to evidence that organic and conventional production are physically, financially, and operationally separate, will not be considered to be engaged in parallel production. CCOF will make a determination as to the status with regard to parallel production based on the client OSP and inspection.</p> <p>Specific exceptions may exist for perennial crops in conversion. Perennial crops may be grown in parallel production if a plan is in place to bring the non-organic production into organic management.</p> <p>An exception can be made for seed production if the following is met:</p> <ol style="list-style-type: none"> <li>1) Measures are taken to ensure permanent separation of the seed;</li> <li>2) CCOF is notified at least hours prior to harvest of seed;</li> <li>3) Upon harvest completion, the exact quantities, and other distinguishing features and confirmation of segregation activities are reported to CCOF.<sup>46</sup></li> </ol>	<p>Parallel Production is only permitted with an approved management plan to prevent both commingling and contamination with prohibited materials, which at minimum must abide by the following: Please note, a-d are equivalent to the NOP.</p> <ol style="list-style-type: none"> <li>a) Materials used in organic production must not be stored in the same areas as material applications made to organic sites and material applications made to conventional sites<sup>47</sup>;</li> <li>b) Material application records must clearly distinguish material applications made to organic sites and material applications made to conventional sites<sup>48</sup>;</li> <li>c) Farming operations must maintain harvest records that clearly indicate yields from organic sites and yields from conventional sites<sup>49</sup>;</li> <li>d) Farming operations must maintain sales records that clearly describe sales of organic and sales of conventional food products. The volume of products sold must correspond to the volume of organic and conventional production harvested<sup>50</sup>;</li> <li>e) If a certified organic site is removed from organic production, it may not be returned to organic production at a later time<sup>51</sup>;</li> <li>f) Land may not be converted from conventional to organic, taken out of organic and put back in conventional production, and later returned to organic status;</li> <li>g) The use of genetically engineered organism is not permitted in any production activity on the farm (including conventional).<sup>52</sup></li> </ol>	<p>Current COR Conversion, parallel production and requirements for full farm conversion are similar to EEC requirements. However, these standards are under revision and balloting within the COR. CCOF will notify you of potential compliance issues and require full compliance upon finalization of standards.</p> <p>Growing the same crop variety both organically and non-organically (parallel production) is prohibited.</p> <p>Operations that are able to evidence that organic and conventional production are physically, financially, and operationally separate, will not be considered to be engaged in parallel production. Operations producing identical commodities may be required to separate their business entities or develop full farm conversion plans to meet COR requirements. CCOF will make a determination as to the status with regard to parallel production based on the client OSP and inspection.</p> <p>Specific exceptions may exist for perennial crops in conversion. Perennial crops may be grown in parallel production if a plan is in place to bring the non-organic production into organic management.</p>

<sup>45</sup> EEC 2092/91 Annex 11, Part A<sup>46</sup> EEC 2092/91 Annex III A1. 3.c<sup>47</sup> IFOAM BS §3.2.1<sup>48</sup> IFOAM BS §3.2.2<sup>49</sup> IFOAM BS §3.2.2<sup>50</sup> IFOAM BS §3.2.2<sup>51</sup> IFOAM BS §3.3.1<sup>52</sup> CCOF Global Market Access Manual Three, Standard 5.14.6 (Jan 2004 Addendum)

Crop Production Standards	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime
		Exceptions may be granted under the following conditions: 1. Additional Inspection measures are provided, such as inspection at harvest or production verification audit after harvest. 2. Varieties are "visually distinguishable".	
<b>Records</b>	Quantities sold directly to the final consumer shall be accounted for on a daily basis <sup>53</sup> . Includes web sales, farmers market operations or other direct retail sales. Can be met with farmers market load sheets, farm stand stocking records, or other harvest and sales records.	NOP equivalent.	Inspection must include an estimate of potential yield for the coming year. Operations must be prepared to provide, where applicable, substantiate this estimate based on current conditions, crop health etc. CCOF inspectors will include a yield estimate in their report. <sup>54</sup> CCOF clients must be prepared to provide this yield estimate during inspections and/or to begin Canadian compliance reviews.
<b>Seeds and Planting Stock</b> <sup>55,56</sup>	Producers must use organically grown seeds, annual seedlings, and planting stock as required by the NOP Regulation. CCOF CS has the authority to determine if equivalent organic varieties are available and thus require their use. CCOF CS may be required to use seed databases that are developed by EU member nations in accordance with Article 6 Section 3.a as amended.	Producers must use organically grown seeds, annual seedlings, and planting stock: Except, That for a period ending on December 31, 2009, untreated non-organically grown seeds and planting stock may be used to produce an organic crop, only if an equivalent organically grown variety is not commercially available with the exception of seed used for sprouts, which must be organic [IFOAM 4.1.1 and EEC 2092/91 Article 6, Section 3(a)].	NOP equivalent

<sup>53</sup> EU 2092/91 Annex 3.A

<sup>54</sup> CAN QMS 10.3

<sup>55</sup> IFOAM BS §4.1.1-4.1.2

<sup>56</sup> EEC 2092/91 Article 6, Section 3(a) as of August 14, 2003, no. 1452

Crop Production Standards	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime
<b>Social Justice</b> <sup>57</sup>	NOP equivalent.	<p>Farm operations employing ten or more persons must maintain a written policy on farm labor that addresses the requirements of this section. Written policy or applicable labor regulations must address the following:</p> <p>a) The use of forced labor or involuntary labor is grounds for denial of certification to these standards.</p> <p>b) Equal opportunity employment without discrimination.</p> <p>Operators shall not hire child labor with the exception that if the children are allowed to experience work on their family's farm or a neighboring farm provided that:</p> <p>a. such work is not dangerous or hazardous to their health and safety;</p> <p>b. it does not jeopardize the children's educational, moral, social, and physical development; and</p> <p>c. children are supervised by adults or have authorization from a legal guardian.</p> <p>c) Employees and contractors of organic operations must have the freedom to associate, the right to organize and the right to bargain collectively.</p> <p>d) Where an operation complies with all State and Federal labor laws within the United States, CCOF CS will consider the operation in compliance with this Section of the standard. These laws include, but are not limited to:</p> <p>The National Labor Relations Act, Fair Labor Standards Act/ Child Labor Rules and California State minimum wage (rate exceeds Federal minimum wage rate).</p> <p>Operations outside of the United States must evidence by a written policy that all practices meet the applicable regulations of the country of operation as described above in 5.13.d.</p> <p>CCOF CS reserves the right to deny CCOF CS Global Market Access where production practices deny basic human rights and social injustice.</p>	NOP equivalent.
<b>Soil</b> <sup>58</sup>	NOP equivalent.	Soil pasteurization (sterilizing soil with steam) is prohibited. (Solarization is not considered applicable).	NOP equivalent.
<b>Soil Conservation</b>	NOP equivalent.	Relevant measures shall be taken to prevent or remedy soil salinization. <sup>59</sup>	NOP equivalent.
<b>Sprout Production</b>	NOP equivalent.	NOP equivalent.	Seed or growing sprouts shall not be rinsed or immersed in water with chemicals capable of releasing chlorine in solution, in excess of water quality guidelines. The cleaning and maintenance of

<sup>57</sup> IFOAM 8.1

<sup>58</sup> IFOAM BS §4.5.3

<sup>59</sup> IFOAM 2.2.5

Crop Production Standards	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime
			equipment and the use of sanitizers and disinfectants shall be limited to substances included in CAN/CGSB-32.311. <sup>60</sup>
<b>Transportation</b>	NOP equivalent.	The party owning the product at the point of transport shall be responsible for maintaining the organic integrity in the transport process, unless transport operations are certified in their own capacity <sup>61</sup> .	NOP equivalent.
<b>Water Conservation</b> <sup>62</sup>	NOP equivalent.	Reasonable water conservation measures must be taken to avoid excessive exploitation and depletion of water resources. Relevant measures shall be taken to prevent or remedy water salinization. <sup>63</sup>	NOP equivalent.
<b>Weed Management &amp; Use of Plastics</b> <sup>64</sup>	NOP equivalent.	Plastic used in crop production or other synthetic mulches or other agricultural plastic must not be burned for disposal and may not be manufactured from polyvinyl chloride. Only products based on polyethylene and polypropylene or other polycarbonates are permitted. These shall be removed after use and shall not be burned on the farmland.	Plastic used in crop production or other synthetic mulches or other agricultural plastic must not be burned for disposal and may not be manufactured from polyvinyl chloride.

## 6. CROP PRODUCTION MATERIALS

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under CCOF Global Market Access. The following chart lists are those materials that are prohibited and/or restricted on crops for each export program.

Crop Materials	MAFF-JAPAN	EU 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Ammonium Carbonate</b>	NOP equivalent.	Restricted to use as a processing aid/food ingredient.	NOP equivalent.	NOP equivalent.
<b>Antibiotics (Streptomycin &amp; Tetracycline)</b>	NOP equivalent.	Prohibited	Prohibited	Prohibited
<b>Boric Acid</b>	NOP equivalent.	Prohibited	NOP equivalent.	NOP equivalent.
<b>Compost</b>	NOP equivalent.	NOP equivalent.	NOP equivalent.	NOP equivalent.
<b>Copper Salts and copper sulfate</b>	NOP equivalent.	Restricted to a maximum of 6 <sup>65</sup> kg/ha per year of elemental copper.	Restricted to a maximum of 8 kg/ha per year of elemental copper	NOP equivalent.
<b>Ethylene for Pineapple Flowering</b>	NOP equivalent.	NOP equivalent.	Prohibited	Prohibited

<sup>60</sup> CAN CGSB 7.4.4 & 7.4.5

<sup>61</sup> IFOAM BS 2.3.5

<sup>62</sup> CCOF Global Market Access Standards §5.4.4, IFOAM BS§2.2.6

<sup>63</sup> IFOAM 2.2.5

<sup>64</sup> IFOAM BS §4.6.3

<sup>65</sup> As of January of 2006

Crop Materials	MAFF-JAPAN	EU 2092/91	IFOAM	Canadian Organic Regime (COR)																
<b>Gibberillic Acid</b>	NOP equivalent.	Prohibited	NOP equivalent.	NOP equivalent.																
<b>Humic Acids</b>	Prohibited (only alkali-extracted versions are prohibited).	Determined to be NOP-equivalent and no additional requirements necessary	NOP equivalent.	NOP equivalent.																
<b>Hydrated Lime-Part of Bordeaux Mix</b>	NOP equivalent.	Restricted to use as a cleaning agent in livestock buildings an installations (Milk of lime)	NOP equivalent.	NOP equivalent.																
<b>Hydrogen Peroxide</b>	NOP equivalent.	Restricted to use as a cleaning agent in livestock buildings an installations	NOP equivalent.	NOP equivalent.																
<b>Lignin Sulfonate</b>	Prohibited	NOP equivalent for chelating and dust suppression. Restricted for use by processor and handlers; may not be used for flotation of tree fruit.	NOP equivalent.	NOP equivalent for chelating and dust suppression. Not allowed as flotation aid.																
<b>Manure<sup>66</sup></b>	NOP equivalent.	<p>Factory Farmed Manure is prohibited under EEC 2092/91 regulation.</p> <p>Factory farmed manure includes:</p> <ul style="list-style-type: none"> <li>a) Manure from animals treated with genetically modified Bovine Growth Hormone.</li> <li>b) Manure from caged poultry (or other caged animals), as well as manure from poultry held at a stocking density in excess of 12 birds per square meter.</li> </ul> <p>CCOF CS requires that all manure sources be<sup>67</sup> documented.</p> <p>Animal manures may be applied to organic land at a rate of no more than 156 lbs of nitrogen per acre/per year on a rolling average basis.</p> <p>Calculation</p> <table border="1"> <tbody> <tr> <td>170</td> <td>kg of N</td> <td>1</td> <td>Hectare</td> </tr> <tr> <td>170</td> <td>kg of N</td> <td>2.4</td> <td>Acres</td> </tr> <tr> <td>374</td> <td>lbs of N</td> <td>2.4</td> <td>Acres</td> </tr> <tr> <td>156</td> <td>lbs of N</td> <td>1</td> <td>Acres</td> </tr> </tbody> </table>	170	kg of N	1	Hectare	170	kg of N	2.4	Acres	374	lbs of N	2.4	Acres	156	lbs of N	1	Acres	NOP equivalent.	<p>Standard below reflects potential standards revision. Current and balloted COR manure selection standards are markedly similar in intent and results to EEC requirements. Where manure used meets EEC requirements, CCOF will regard it as COR compliant.</p> <p>However, please note that these standards are under revision and balloting within the COR. CCOF will notify you of potential compliance issues and require full compliance upon finalization of standards.</p> <p>The operator is required to use all available on-farm manure prior to sourcing manure preferentially from other organic operations. When manure from organic operations is not available in sufficient quantities, the operator may use non-organic manure provided that:</p> <ul style="list-style-type: none"> <li>a) the non-organic operation is not a full caged system where livestock cannot turn 360 degree.</li> <li>b) livestock is not permanently kept in the dark. CCOF considers manure from non-caged sources to inherently meet this requirement.</li> <li>c) the operation keeps records identifying the source of manure, livestock type, and available information regarding</li> </ul>
170	kg of N	1	Hectare																	
170	kg of N	2.4	Acres																	
374	lbs of N	2.4	Acres																	
156	lbs of N	1	Acres																	

<sup>66</sup> Inspection procedure per IFOAM criteria 6.7.4-7<sup>67</sup> EEC 2092/91 Annex I a. 2.2.

Crop Materials	MAFF-JAPAN	EU 2092/91	IFOAM	Canadian Organic Regime (COR)
				the criteria above. Informative note: Organic operations <i>should</i> make it a priority to use manure obtained from transitional or extensive livestock operations (grazed, decentralized) and not originating from landless livestock production operations or from livestock operations using GMOs and their derivatives in animal feed. <sup>68</sup>
<b>Peracetic Acid</b>	NOP equivalent.	Restricted to use as a cleaning agent in livestock buildings an installations	NOP equivalent.	NOP equivalent.
<b>Peat</b>	NOP equivalent.	Use limited to horticulture/nursery production	Prohibited for soil conditioning; may be used in potting mixes where compliant with NOP regulation.	NOP equivalent.
<b>Polyethylene, polypropylene or polycarbonates</b>	NOP equivalent.	NOP equivalent.	Permitted for synthetic structure coverings, mulches, fleeces, insect netting and silage wrapping, as long as it is removed from the soil after use and is not burned. <sup>69</sup>	NOP equivalent.
<b>Potassium Bicarbonate</b>	Prohibited	NOP equivalent.	NOP equivalent.	NOP equivalent.
<b>Sodium Nitrate (Chilean Nitrate)</b>	NOP equivalent.	Prohibited	Prohibited	Prohibited
<b>Sodium Silicate</b>	NOP equivalent.	NOP equivalent.	Prohibited	NOP equivalent.-For tree fruit and fiber processing.
<b>Spinosad</b>	NOP equivalent.	Restricted use only if produced by strains not genetically modified and used only when measures are taken to minimize the risk to key parasitoids and to minimize the risk of development of resistance	NOP equivalent.	NOP equivalent.
<b>Vitamins B<sub>1</sub>, C, &amp; E</b>	NOP equivalent.	Prohibited	Prohibited	NOP equivalent.

## 7. LIVESTOCK

The CCOF GMA program provides verification to EU and Canadian Organic Regime livestock requirements only. Due to lack of demand and necessity, CCOF does not provide IFOAM Basic Standards certification for livestock operations.

Livestock Standards	European Union Regulation 2092/91	Canadian Organic Regime (COR)
<b>Animal Identification</b>	Livestock must be identified permanently using techniques adapted to each species, in the case of large mammals, individually or in the case of poultry and small animals, individually or by batch. <sup>70</sup>	NOP Equivalent.

<sup>68</sup> COR CGSB 5.5.1 balloted language.

<sup>69</sup> IFOAM BS 4.6.3

<sup>70</sup> EEC 2092/91 Annex III A.2.2



Livestock Standards	European Union Regulation 2092/91	Canadian Organic Regime (COR)
<b>Conversion</b>	Animals brought onto the farm from non-organic sources should not exceed 10%, based on approval from CCOF CS. Conversion may be up to 40% of the herd if there is a breed change or an extension of the farm.	NOP Equivalent.
<b>Health and Feed</b>	<p>Herbivores daily feed rations must consist of at least 60% roughage, fresh or dried fodder or silage. However, CCOF may permit a reduction to 50% for dairy animals for a maximum period of three months in early lactation<sup>71</sup></p> <p>Only products composed of substances mentioned in Annex I or II may be used as feed, feed additives and/or animal nutrition substances (as per 82/471/EEC)<sup>72</sup>.</p>	<p>Beak trimming is only allowed when the operator documents unsuccessful efforts to control or eliminate behavior being controlled.<sup>73</sup></p> <p>Tail docking of cattle or pigs is prohibited except for veterinary treatment of injured animals.</p> <p>Animals confined in final fattening stage must have a minimum of 23m<sup>2</sup>/animal.<sup>74</sup></p> <p>Operators should have plans to address emergency disease or other health outbreaks including, but not limited to, internal parasites<sup>75</sup>.</p>
<b>Housing/Herd Management</b>	<p>Landless operations are not allowed. Animal production must be an integrated part of the soil and land management associated with the farm.</p> <p>Use of pasture must be maximized.</p> <p>Livestock grazed on Bureau of Land Management (BLM) land must be segregated from conventional animals. Stocking rates must take any conventional livestock grazing on the same land in account and meet the requirements of Annex VII.<sup>76</sup></p> <p>Livestock housing must have smooth, non-slippery floor. At least half of the total floor area must be solid and not slatted or grid flooring.<sup>77</sup></p> <p>Livestock housing must be provided with comfortable, clean, and dry laying/rest are of sufficient size, consisting of a construction which is not slatted.<sup>78</sup></p> <p>The housing of calves in boxes is forbidden after the age of one week.<sup>79</sup></p> <p>Buildings housing poultry must be emptied, cleaned and disinfected between flocks. Runs should be left empty to allow for grass to re-grow. Exceptions to this rule are free range poultry.<sup>80</sup></p> <p>Housing, pens, equipment and utensils must be properly cleaned and disinfected to prevent cross-infection and the build up of disease carrying organisms. Only the following products and be used for the cleaning and disinfecting buildings.<sup>81</sup></p> <ul style="list-style-type: none"> <li>Potassium and sodium soap</li> <li>Water and steam</li> <li>Milk of lime (Hydrated Lime)</li> <li>Lime</li> <li>Quicklime (calcium oxide)</li> <li>Sodium Hypochlorite (e.g. as liquid bleach)</li> <li>Caustic soda (Sodium hydroxide)</li> </ul>	<p>Similar to EEC requirements: Livestock housing must have smooth, non-slippery floor that are not entirely slatted or grid construction.<sup>83</sup></p> <p>Calves may be only be housed in individual pens for up to 3 months. And, must be given access to pasture at six months of age.<sup>84</sup></p> <p>Poultry: Open air poultry runs must be covered with vegetation and periodically left empty to allow vegetation to re-grow to prevent disease build up. Where necessary, re-seeding must occur. Does not functionally apply to free range poultry operations.<sup>85</sup></p> <p>Where necessary and not already standard practice poultry buildings and runs must be emptied and cleaned between flocks.<sup>86</sup></p>

<sup>71</sup> EEC 2092/91 Annex 1 B 4.7  
<sup>72</sup> EEC 2092/91 Article 6.1a  
<sup>73</sup> COR CGSB 6.7.2 a & b balloted  
<sup>74</sup> COR CGSB 6.8.2 balloted  
<sup>75</sup> COR CGSB 6.7.9  
<sup>76</sup> EEC 2092/91 Annex I b 1.8 a  
<sup>77</sup> EEC 202/91 Annex I b.8.3.5  
<sup>78</sup> EEC 2029/91 Annex I b.8.3.6  
<sup>79</sup> EEC 2092/91 Annex I b.8.3.7  
<sup>80</sup> EEC 2092/91 Annex I b 8.4.6  
<sup>81</sup> EEC 2092/91 Annex II E.  
<sup>82</sup> EEC 2092/91 Annex I b. 3.4.  
<sup>83</sup> COR CGSB 6.8.1 g  
<sup>84</sup> COR CGSB 6.8.91 & 6.8.9.2  
<sup>85</sup> COR CGSB 6.8.3 b  
<sup>86</sup> COR CGSB 6.8.8

Livestock Standards	European Union Regulation 2092/91	Canadian Organic Regime (COR)
	Caustic potash(Potassium hydroxide) Hydrogen peroxide Natural essences of plants Citric, paracetic acid, formic, lactic, oxalic and acetic acid Alcohol Nitric acid (dairy equipment) Phosphoric acid (dairy equipment) Formaldehyde Cleaning and disinfection products for teats and milking facilities Sodium carbonate.  Indoor finishing of meat (final fattening stage) animals may not exceed 1/5 of the animals' total life or a maximum period of 3 months. <sup>82</sup>	
<b>Manure</b>	Stocking/density rates should not exceed EU annex VII. From the annex: Dairy- there should not be more than .8 adult cows per acre (2.5 animals per hectare). Laying hens should not be more than 93 birds per acre (230 birds per hectare). All land in the organic system can be applied to the ratio.  Storage facilities' capacity for livestock manure must exceed the capacity required for the longest periods of time without any application to land when inappropriate. Facilities must also be of a capacity to which prevents contamination of water and soil from direct discharge. <sup>87</sup>	NOP Equivalent.
<b>Parallel Production</b>	Conventional livestock must be of a different species. The animals must be reared in separate buildings and parcels which are clearly separate from organic livestock  Non-organic livestock may utilize organic pastures as long as animals are not from concentrated animals feeding operations and are segregated from organic livestock. Stocking rates must take any conventional livestock grazing on the same land in account and meet the requirements of Annex VII. <sup>88</sup>	NOP Equivalent.
<b>Records</b>	Quantities sold directly to the final consumer shall be accounted on a daily basis <sup>89</sup>	NOP Equivalent.
<b>Transport and Slaughter</b>	Loading and unloading of livestock must be carried out with caution and without the use of any types of electrical stimulation to coerce the animals The use of any allopathic tranquilizers, prior to and during transport is prohibited <sup>90</sup>  Poultry must be at the following minimum age before slaughter. <sup>91</sup> Chickens-81 days Capon-150 days Peking ducks-49 days Muscovy Ducks (F)-70 days Muscovy Ducks (M) -84 days Mallard Ducks-92 days Guinea fowl- 94 days Turkeys-140 days Geese-140 days	Electrical stimulation explicitly prohibited during transport and handling. <sup>93</sup>

<sup>87</sup> EEC 2092/91 Annex I b.7.6 & 7<sup>88</sup> EEC 2092/91 Annex I B.1.5-8<sup>89</sup> EU 2092/91 Annex 3.A<sup>90</sup> EEC 2092/91 Annex I, b. 6.2.1<sup>91</sup> EEC 2092/91 Annex I, b. 6.1.9.<sup>92</sup> EEC 2092/91 Annex I, b. 6.3.1.<sup>93</sup> COR CGSB 6.6

Livestock Standards	European Union Regulation 2092/91	Canadian Organic Regime (COR)
	<p>Where producers do not apply these minimum slaughter ages, they must use slow-growing strains.</p> <p>Livestock and livestock products are to be identified at all stages of production, preparation, transport and marketing.<sup>92</sup></p>	
<b>Veterinary Allopathic Drugs</b>	<p>Storage of allopathic veterinary medicine and antibiotics is permitted as long as they have been prescribed by a veterinarian in connection with a treatment referred to in Annex I, and stored in a supervised location and are documented.<sup>94</sup></p> <p>Records and documentation for livestock veterinary treatments must include the following information: The active pharmacological ingredient in the treatment, the diagnosis, dosage &amp; duration, method of administration and legal withdrawal period.<sup>95</sup></p>	Herbal, botanical, homeopathic treatments shall be used in preference to chemical allopathic drugs <sup>96</sup> .

## 8. PROCESSING/HANDLING STANDARDS & MATERIALS

Processing/ Handling Regulations	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
<b>Audit Control</b> <sup>97</sup>	All handlers, including importers, must be certified.	NOP equivalent.	NOP equivalent.
<b>Cleaning &amp; Sanitizers</b> <sup>98</sup>	Chlorine, hydrogen peroxide, ozone, and peracetic acid must not be added to water contacting organic products; except, municipal water or water treated with chlorine to meet drinking water standards is allowed.	<p>NOP equivalent.</p> <p>All necessary precautions must be taken to prevent contamination of organic products by prohibited substances. Including, pests, disease-causing organisms, and foreign substances.</p>	<p>NOP equivalent. Equipment must be free of prohibited sanitizers prior to processing organic products.</p> <p>Ozone, peracetic acid and hydrogen peroxide are allowed. Various PSLs and ballots affect this. To be finalized with final COR implementation and materials list.</p>
<b>Extraction</b> <sup>99</sup>	NOP equivalent.	Extraction methods for all ingredients (organic and non-organic) in organic production shall utilize water, ethanol, plant and animal oils, vinegar, carbon dioxide and nitrogen.	NOP equivalent.
<b>Filtration</b> <sup>100</sup>	NOP equivalent.	Filtration equipment shall not contain asbestos, or utilize techniques or substances that may negatively affect the product.	NOP equivalent.

<sup>94</sup> ECC 2092/91 Annex III, a 2.5.

<sup>95</sup> EEC 2092/91 Annex I B.5.6

<sup>96</sup> COR CGSB 6.7.9

<sup>97</sup> EEC 2092/91, Annex 3.c

<sup>98</sup> IFOAM BS 6.3.1, 6.6.1 & EEC 2092/91 Annex VI, Section B

<sup>99</sup> IFOAM BS 6.3.2

<sup>100</sup> IFOAM BS 6.3.4

Processing/ Handling Regulations	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
<b>Genetically Modified Organisms</b> <sup>101</sup>	NOP equivalent.	<p>The deliberate use or negligent introduction of genetically engineered organisms or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited. This shall include ingredients and processing aids.</p> <p>Contamination by GMOs may alter the organic status of an operation even if circumstances are beyond the control of the operator.</p>	NOP equivalent.
<b>Ingredients and processing aids</b> <sup>102</sup>	<p>All ingredients must comply with the EEC regulations</p> <p>8.2.1 All ingredients claimed as organic under CCOF Global Market Access must comply with the European Regulation 2092/91. For certification transference and recognition, call CCOF CS.</p> <p>8.2.2 All processing aids used in processed products must be included in EEC 2092/91, Annex, 6, Section A: Ingredients of Nonagricultural Origin, including Food Additives and Carriers, and Section B: Processing Aids and Other Products.</p> <p>8.2.3 All products with less than 70% organic products, all agricultural products must comply with EEC 2092/91 Annex 6, Section C or be provisionally allowed by a member state. <sup>103</sup></p>	<p>All ingredients claimed as organic to the IFOAM program standards must meet the IFOAM's requirements for Certification Transference, and/or mutual recognition per Section 3.12.4.</p> <p>However, Ingredients that constitute less than 10% of the total weight of the product may be accepted on the basis of being certified by a certification body that has been approved by its government or has been accredited by a national accreditation body for the scope of organic certification. The total of all ingredients accepted on this basis shall not exceed 20% of the total weight of the product.</p> <p>Preparations of micro-organisms and enzymes commonly used in food processing may be used, with the exception of genetically engineered micro-organisms and their products. Processors shall use micro-organisms grown on substrates that consist entirely of organic ingredients and approved substances for organic production, if available. This includes cultures that are prepared or multiplied in-house. Minerals (including trace elements), vitamins and similar isolated ingredients shall not be used unless their use is legally required or where severe dietary or nutritional deficiency can be demonstrated. <sup>104</sup></p> <p>Handlers and processors shall not co-mingle organic products with non-organic products <sup>105</sup></p>	<p>All ingredients in COR certified products must be produced in COR certified facilities and certified to COR standards.</p> <p>All non-organic additives and/or processing aids must be included on the COR PSL. Prohibited and restricted processing aids allowed under the NOP appear below.</p> <p>Food additives and processing aids shall only be used to maintain</p> <ol style="list-style-type: none"> <li>a. nutritional value;</li> <li>b. food quality or stability;</li> <li>c. composition, consistency and appearance, provided that their use does not mislead the consumer concerning the nature, substance and quality of the food; and</li> </ol> <ol style="list-style-type: none"> <li>i. there is no possibility of producing a similar product without the use of additives or processing aids;</li> <li>ii. they are not included in amounts greater than the minimum required to achieve the function for which they are permitted;</li> <li>iii. they contain no other substances prohibited in accordance with this standard.</li> </ol>

<sup>101</sup> IFOAM 2.3.1<sup>102</sup> IFOAM 2.3.5, 6.2.3, 6.2.4, IFOAM Accreditation Criteria 9.3.3 & EEC 2092/91 Article 5 and Annex VI<sup>103</sup> EEC 2092/91 Article 5.5 a & b; Annex IV C<sup>104</sup> IFOAM BS 6.2.3<sup>105</sup> IFOAM BS 6.1.1

Processing/ Handling Regulations	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
<b>Parallel or Split Production</b>	Feed mills for EU compliant feed must use separate equipment for organic and non-organic feed. Derogation in EU may be extended past Dec. 31, 2007.	NOP equivalent.	Processing inspections where certifiable and non-certifiable (non-organic) are manufactured at the same facility must be performed when products requesting certification may be observed. As this is not practical for new operations, CCOF CS can view the facility in operation processing similar or identical non-organic products or products not seeking certification. All systems for organic production, storage, processing and labeling must be observable and observed during initial inspections. <sup>106</sup>
<b>Pest Control</b>	NOP equivalent.	Ionizing Radiation is prohibited as a pest control <sup>107</sup> .	NOP equivalent. <sup>108</sup>
<b>Records</b>	Quantities sold directly to the final consumer shall be accounted on a daily basis <sup>109</sup>	NOP equivalent.	NOP equivalent.
<b>Social Justice<sup>110</sup></b>	NOP equivalent.	Farm operations employing ten or more persons must maintain a written policy on farm labor that addresses the requirements of this section. Written policy or applicable labor regulations must address the following: a) The use of forced labor or involuntary labor is grounds for denial of certification to these standards. b) Equal opportunity employment without discrimination. Operators shall not hire child labor with the exception that if the children are allowed to experience work on their family's farm or a neighboring farm provided that: a. such work is not dangerous or hazardous to their health and safety; b. it does not jeopardize the children's educational, moral, social, and physical development; and c. children are supervised by adults or have authorization from a legal guardian. c) Employees and contractors of organic operations must have the freedom to associate, the right to organize and the right to bargain collectively. d) Where an operation complies with all State and Federal labor laws within the United States, CCOF CS will consider the operation in compliance with this Section of the standard. These	NOP equivalent.

<sup>106</sup> CAN QMS 9.2.2.c<sup>107</sup> IFOAM BS 6.4.2<sup>108</sup> CAN 8.2.2<sup>109</sup> EU 2092/91 Annex 3.A<sup>110</sup> IFOAM Basic Standards 8

Processing/ Handling Regulations	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
		<p>laws include, but are not limited to:                      The National Labor Relations Act, Fair Labor Standards Act/ Child Labor Rules and California State minimum wage (rate exceeds Federal minimum wage rate).                      Operations outside of the United States must evidence by a written policy that all practices meet the applicable regulations of the country of operation as described above in 5.13.d.                      CCOF CS reserves the right to deny IFOAM compliance and/or CCOF CS Global Market Access where production practices deny basic human rights and social injustice.</p>	
<b>Storage and Warehouse Facilities</b>	All storage and warehouse facilities must be inspected to maintain organic integrity.	<p>All Storage and warehouse facilities must be inspected to maintain organic integrity.<sup>111</sup>                      Inspectors must assess the risk level of operators based on previous inspection results, production quantities and potential for product mixing. This risk analysis should be used to determine frequency of inspections.</p>	NOP equivalent.
<b>Transportation</b>	NOP equivalent.	The party owning the product at the point of transport shall be responsible for maintaining the organic integrity in the transport process, unless transport operations are certified in their own capacity. <sup>112</sup>	NOP equivalent.

<sup>111</sup> IFOAM BS 6.3.3

<sup>112</sup> IFOAM BS 2.3.5

Processing/ Handling Regulations	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
<b>Waste Management and Nutrient Recycling</b> <sup>113</sup>	NOP equivalent.	Crop production, processing and handling systems shall return nutrients, organic matter and other resources that were removed from the soil through harvesting, by the recycling, regeneration and addition of organic materials and nutrients.  Where processors are directly linked to the farm production (such as through vertical integration) they must ensure that farm operations return nutrients to the soil that were removed in harvesting. Other operations should, where feasible, indirectly return processing by products to agricultural/soil or other non-waste uses. Operations are encouraged to utilize processing waste etc. through recycling, regeneration, and use of by products/waste as fertilizer and/or feed.	NOP equivalent.

### 8.1 PROHIBITED & RESTRICTED PROCESSING PRODUCTION MATERIALS<sup>114</sup>

Clients must be careful to avoid use of prohibited substances that are listed on the USDA National Organic Program Materials List, and not allowed under CCOF Global Market Access. The following chart lists ALL approved processing materials under the CCOF Global Market Access program. The following chart lists are those materials that are prohibited and/or restricted for processing for each export program. If a substance appears on the USDA National Organic Program Materials List, but not on this list, it is likely prohibited under the CCOF Global Market Access program unless approved in writing by CCOF. Any restrictions regarding the use of the below listed materials must be followed for compliance to be granted under the program in question.

Processing Materials	NOP Allowance	European Union Regulation 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Activated carbon</b>	Filtration aid only. Must be from vegetative sources.	Allowed as Processing Aid	Allowed as Processing Aid	NOP equivalent-shall be of plant origin.
<b>Agar</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Alginates</b>	Allowed	NOP equivalent.	Alginates are prohibited, except sodium and potassium alginates which are allowed as additives.	NOP equivalent.
<b>Alginic acid</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Ammonium phosphate</b>	Prohibited	Prohibited	Allowed as an additive restricted to 0.3 gm/l in wine -	Prohibited
<b>Ammonium sulfate</b>	Prohibited	Prohibited	Allowed as an additive-only for wine, restricted to 0.3 mg/l	Prohibited

<sup>113</sup> IFOAM 2.2.3 (word for word from IFOAM BS)

<sup>114</sup> IFOAM BS Appendix 4

Processing Materials	NOP Allowance	European Union Regulation 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Arabic gum</b>	Allowed as a nonorganically produced agricultural products (205.606) that may be used as an ingredients in or on processed products labeled as "organic," restricted to water extraction only (arabic, guar, locust bean, carob bean).	NOP equivalent.	Allowed as an additive- only for milk products, fat products, confectionary, sweets, eggs.	NOP equivalent.
<b>Argon</b>	Prohibited	Allowed as additive	Allowed as an additive	Prohibited.
<b>Ascorbic acid</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Beeswax</b>	NOP equivalent.- Agricultural, non-organic allowed in "Made with organic..." products.	Allowed as processing aid-releasing agent	Allowed as Processing Aid	NOP equivalent.
<b>Bentonite</b>	Allowed	NOP equivalent.	Allowed as Processing Aid- only for fruit and vegetable products	NOP equivalent.
<b>Boiler Chemicals:</b> Cyclohexylamine Diethylaminoethanol Octadecylamine	Allowed for boiler water in packaging sterilization.	Prohibited	Prohibited	Under review.
<b>Calcium carbonate</b>	Allowed	NOP equivalent.	Allowed as an additive or processing aid	Allowed for milk products only. Prohibited as a coloring or anti-caking agent.
<b>Calcium citrates</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Calcium Hydroxide</b>	Allowed	Allowed as processing aid	Allowed as an additive or processing aid- Food additive for maize tortilla flour. processing aid for sugar	NOP equivalent.
<b>Calcium Phosphates</b>	Monobasic, Dibasic and Tribasic calcium phosphates are allowed synthetics.	Allowed as monocalciumphosphate	Dibasic and tribasic calcium phosphates are prohibited.	NOP equivalent.
<b>Calcium sulfate</b>	Allowed synthetic restricted to mined sources only.	Allowed as additive carrier and processing aid coagulation agent	Allowed as an additive- for soybean products, confectionery and in bakers' yeast	NOP Equivalent- as a carrier for cakes and biscuits (cookies), soybean products and bakers' yeast.
<b>Carageenan</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Carbon dioxide</b>	Allowed	NOP equivalent.	Allowed as an additive or processing aid	NOP equivalent.
<b>Carnauba wax</b>	Allowed	Allowed as processing aid-releasing agent	Allowed as Processing Aid	NOP equivalent.
<b>Casein</b>	Prohibited	Allowed as processing aid	Allowed as Processing Aid- only for wine	NOP equivalent.



Processing Materials	NOP Allowance	European Union Regulation 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Citric acid</b>	Allowed non-synthetic restricted to produced by microbial fermentation of carbohydrate substances.	NOP equivalent.	Allowed as an additive or processing aid	NOP equivalent.
<b>Colors</b>	Nonsynthetic sources allowed and colors derived from non-organically produced agricultural sources (for list see 205.606.d.)	Must be organic or allowed list of non-organic agricultural products.	Prohibited	NOP equivalent- Must be organic when available.
<b>Cornstarch</b>	Listed as a Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s)).	NOP equivalent.	Prohibited	NOP equivalent.
<b>Diatomaceous earth</b>	Allowed nonsynthetic as a food filtering agent only.	NOP equivalent.	Allowed as Processing Aid- only for sweeteners and wine	NOP equivalent.
<b>Egg white albumen</b>	Allowed	NOP equivalent.	Allowed as Processing Aid- only for wine	Allowed as a clarifying agent. Must use organic source if available.
<b>Ethanol</b>	Prohibited unless organic.	Allowed as processing aid-solvent.	Allowed as Processing Aid	Allowed as processing aid. Alcohol, ethyl (ethanol) as an ingredient must be organic.
<b>Ferrous Sulphate</b>	Allowed for iron enrichment or fortification of foods when required by US regulations or recommended (independent organizations).	Prohibited	Prohibited	NOP equivalent.
<b>Gelatin</b>	Nonorganically produced agricultural products (205.606) allowed as ingredients in or on processed products labeled as "organic."	Allowed, not required to source organic.	Allowed as Processing Aid- only for wine, fruit and vegetable	NOP equivalent.

Processing Materials	NOP Allowance	European Union Regulation 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Glucono delta-lactone</b>	Listed as a Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic" (specified ingredients or food group(s) but prohibited if produced by the oxidation of D-glucose with bromine water.	Prohibited	Prohibited	Prohibited
<b>Glycerides</b>	Glycerides (Mono and di) are allowed synthetics restricted for use only in drum drying of food.	NOP equivalent.	Prohibited	NOP equivalent.
<b>Glycerin</b>	Allowed synthetic restricted to being produced by hydrolysis of fats and oils.	NOP equivalent.	Prohibited	NOP equivalent.
<b>Guar gum</b>	Allowed as a nonorganically produced agricultural products that may be used as an ingredients in or on processed products labeled as "organic," restricted to water extraction only (arabic, guar, locust bean, carob bean).	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Isinglass</b>	Allowed	NOP equivalent.	Allowed as Processing Aid- only for wine	Allowed as a fining agent (fish-based)
<b>Kaolin</b>	Allowed	NOP equivalent.	Allowed as Processing Aid	NOP equivalent.
<b>Kelp</b>	Listed as a Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic" (specified ingredients or food group(s) restricted only for the use as a thickener and diet supplement.	NOP equivalent.	Prohibited	NOP equivalent.
<b>Lactic acid (L-malic acid)</b>	Allowed	NOP equivalent.	Allowed as an additive or processing aid	NOP equivalent.

Processing Materials	NOP Allowance	European Union Regulation 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Lecithin</b>	Allowed as a nonorganically produced agricultural products that may be used as an ingredients in or on processed products labeled as "organic," restricted to unbleached only.	NOP equivalent.	Allowed as an additive or processing aid	Bleached form is allowed when unbleached form is not suitable. From organic sources only. Bleached form may be non-organic.
<b>Lignin sulfonates</b> <sup>115</sup>	Allowed for the flotation of tree fruit.	Lignin sulfonates used for floating tree fruit are prohibited.	NOP Equivalent.	Lignin sulfonates used for floating tree fruit are prohibited.
<b>Locust bean gum</b>	Allowed as a nonorganically produced agricultural products that may be used as an ingredients in or on processed products labeled as "organic," restricted to water extraction only (arabic, guar, locust bean, carob bean).	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Magnesium stearate</b>	Prohibited in agricultural products labeled as organic. Only allowed use in products labeled "made with organic" (specified ingredients or food groups).	Prohibited	Prohibited	For use only in agricultural products labeled "Contains X% organic ingredients"; prohibited in agricultural products labeled "organic."
<b>Magnesium Sulphate</b>	Only nonsynthetic sources allowed.	Prohibited	Prohibited	NOP equivalent.
<b>Metabisulphite</b>	Prohibited	Allowed as Potassium metabisulphite.	Allowed as an additive-only for wine	For use for alcoholic beverages as a preservative only, and labeled "Contains X% organic ingredients."
<b>Mono calcium phosphate</b>	Allowed	NOP equivalent.	Allowed as an additive-only for "raising flour"	NOP equivalent.
<b>Nitrogen</b>	Allowed nonsynthetic restricted to oil free grades only.	NOP equivalent.	Allowed as an additive or processing aid	NOP equivalent.
<b>Oxygen</b>	Allowed nonsynthetic restricted to oil free grades only.	NOP equivalent.	Allowed as an additive or processing aid	NOP equivalent-for controlled atmosphere storage.
<b>Pectin</b>	Allowed as a nonorganically produced agricultural products that may be used as an ingredients in or on processed products labeled as "organic," restricted to high methoxy. Low Methoxy allowed as synthetic non-agricultural product.	NOP equivalent.	Allowed as an additive-unmodified	NOP equivalent.

<sup>115</sup> EEC 2092/91 Annex VI, Section B

Processing Materials	NOP Allowance	European Union Regulation 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Perlite</b>	Allowed nonsynthetic as a food filtering agent only.	NOP equivalent.	Allowed as Processing Aid	NOP equivalent.
<b>Potassium alginate</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Potassium citrates</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Potassium hydroxide</b>	Allowed synthetic prohibited for use in lye peeling of fruits and vegetables.	Prohibited	Prohibited	NOP equivalent.
<b>Potassium iodide</b>	Prohibited in agricultural products labeled as organic. Only allowed use in products labeled "made with organic" (specified ingredients or food groups).	Prohibited	Prohibited	NOP equivalent. However, allowed under COR in products labeled "organic".
<b>Potassium phosphate</b>	Prohibited in agricultural products labeled as organic. Only allowed use in products labeled "made with organic" (specified ingredients or food groups).	Prohibited	Prohibited	NOP equivalent. For use only in agricultural products labeled "Contains X% organic ingredients"; prohibited in agricultural products labeled "organic."
<b>Potassium tartrate</b>	Allowed	NOP equivalent.	Allowed as an additive or processing aid	Allowed for cereals, cakes, and confectionery. Allowed as a food additive in cider and "several" dairy products.
<b>Preparations of bark</b>	Prohibited	Prohibited	Allowed as Processing Aid- only for sugar	Prohibited.
<b>Sodium Acid Pyrophosphate</b>	Allowed as leavening agent.	Prohibited	Prohibited	Prohibited
<b>Silicon dioxide (amorphous)</b>	Allowed	Allowed as anti-caking agent for herbs and spices	Allowed as Processing Aid- for wine, fruit and vegetable processing	NOP equivalent.
<b>Sodium alginate</b>	Allowed	NOP equivalent.	Allowed as an additive	NOP equivalent.
<b>Sodium carbonates</b>	Allowed	NOP equivalent.	Allowed as an additive or processing aid	For cakes and biscuits or for confectionary.
<b>Sodium citrates</b>	Allowed	Prohibited	Allowed as an additive	For sausages and milk products.
<b>Sodium hydroxide</b>	Allowed synthetic prohibited for use in lye peeling of fruits and vegetables.	Allowed for sugar production and oil production from Brassica rape seed ( <i>Brassica spp</i> )	Allowed as an additive or processing aid- For sugar processing and for the surface treatment of traditional bakery products.	Allowed as a cleaner, including the maintenance of reverse osmosis membranes used in maple syrup production. Prohibited for use in lye peeling of fruits and vegetables.
<b>Sodium phosphate</b>	Allowed synthetic restricted for use only in dairy foods.	Prohibited	Prohibited	NOP equivalent.

Processing Materials	NOP Allowance	European Union Regulation 2092/91	IFOAM	Canadian Organic Regime (COR)
<b>Sodium tartrate</b>	Prohibited	NOP equivalent.	Allowed as an additive or processing aid	Prohibited.
<b>Sulfur dioxide</b>	Allowed Synthetic restricted for use only in wine labeled "made with organic grapes," Provided, That, total sulfite concentration does not exceed 100 ppm.	NOP equivalent.	Allowed as an additive-only for wine	Listed as Sulphurous acid. NOP equivalent. -For use only in wine products labeled "Contains X% organic ingredients," provided that total sulfite concentration does not exceed 100 ppm. For use in winemaking as a preservative only; minimum use of sulphur dioxide (SO <sub>2</sub> ) is recommended. The maximum allowable level of SO <sub>2</sub> is 100 parts per million and 30 parts per million for total sulfites and free sulfites, respectively. The use of sulfites from SO <sub>2</sub> bottled gas or liberated from the ignition of asbestos-free sulfur wicks is acceptable.
<b>Sulfuric acid</b>	Prohibited	Allowed for sugar production	Allowed as Processing Aid- pH adjustment of water during sugar processing	Prohibited.
<b>Talc</b>	Prohibited	Allowed as processing aid.	Allowed as Processing Aid	Allowed as a filtering aid.
<b>Tannic acid</b>	Prohibited	Allowed as processing aid-Filtration aid	Allowed as Processing Aid- filtration aid for wine.	Prohibited.
<b>Tannin</b>	Prohibited	Allowed as processing aid	Allowed as Processing Aid	Prohibited.
<b>Tartaric acid</b>	Allowed	NOP equivalent.	Allowed as an additive or processing aid- only for wine	NOP equivalent.
<b>Tetrasodium Pyrophosphate</b>	Allowed-Texturizer in meat analog products.	Prohibited.	Prohibited.	Prohibited.
<b>Tocopherols, mixed natural concentrates</b>	Allowed synthetic restricted to derivatives from vegetable oil when rosemary extracts are not a suitable alternatives.	NOP equivalent	Allowed as an additive	NOP equivalent.
<b>Tragacanth gum</b>	Prohibited	Prohibited	Allowed as an additive	NOP equivalent.
<b>Xanthan gum</b>	Allowed	NOP equivalent	Allowed as an additive-only fat, fruit and vegetable products and cakes and biscuits	NOP equivalent.

\* Food additives may contain carriers that may be prohibited

## 9. LABELING OF ORGANIC PRODUCTS

Copies of all labels utilized under the CCOF Global Market Access must be submitted and approved by CCOF CS prior to use. For those using the CCOF/IFOAM seal, a CCOF/IFOAM Seal License Agreement must be signed by both parties.

Organic Labeling	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
<b>70% Organic Labeling: Required label statements</b> <sup>116</sup>	NOP equivalent, and CCOF CS authority does not extend to end-user retail products. Labels for products that consist of 70-95% certified organic must indicate the percentage organic ingredients included in the product. Specifically, The percentage statement must appear on the principal display panel and read "X% of the agricultural ingredients were produced in accordance with the rules of organic production."	Labels for products that consist of 70-95% certified organic must indicate the percentage organic ingredients included in the product. Where a certifier is identified, it must appear close to the percentage statement cited above.  For food products in packages sold, labeled or represented as "made with organic ingredients or food group(s)" (contains at least 70% organic ingredients), the indication that an ingredient is organic may appear in the ingredient list. The word organic may appear in the ingredient list, appended to organic ingredients. Such product may not be called "organic".	Labels for products that consist of 70-95% certified organic may only include the statement "Contains X% organic ingredients" to indicate the organic status of the product.
<b>95% Organic Labeling: Required label statements</b> <sup>117</sup>	NOP equivalent, and CCOF CS authority does not extend to end-user retail products.	Products may be labeled as "organic" under CCOF/IFOAM when 95% of the ingredients meet IFOAM standards.	NOP equivalent. Operators must identify CCOF as the certifier on the label for all certified retail products.
<b>GMO-free Labels</b> <sup>118</sup>	NOP equivalent, and CCOF authority does not extend to end-user retail products.	Organic products may not be labeled as GMO-free on product labels. Any reference to genetic engineering on product labels shall be limited to the production and processing methods themselves being GMO-free.	Statements that an organic food products contains not GMO ingredients are prohibited unless the fact is proven by independent tests. <sup>119</sup>
<b>Identification of Responsible Party</b> <sup>120</sup>	NOP equivalent.	The person or company legally responsible for the handling or processing of the product must be identified on the label.	Final processor must be identified if label owner is not certified.
<b>Ingredient Statements</b> <sup>121</sup>	NOP equivalent.	All ingredients in a multi-ingredient product must be listed by their full names in the ingredient statement in order of their weight percentage.	All processing aids and additives must be listed in the ingredients panel unless analytical testing can demonstrate that the additive is not present in the final product. <sup>122</sup>

<sup>116</sup> IFOAM BS 7.1.3.c<sup>117</sup> IFOAM BS 7.1.3<sup>118</sup> IFOAM BS 7.1.7<sup>119</sup> COR QMS 5.2.1<sup>120</sup> IFOAM BS 7.1.1<sup>121</sup> IFOAM BS 7.1.4<sup>122</sup> COR QMS 5.1.3

Organic Labeling	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
<p><b>Private Labels and Brands not owned by CCOF clients.</b></p>	<p>NOP equivalent.</p>	<p>NOP equivalent.</p>	<p>When packaging products for a private label owner who is not certified by CCOF CS or another COR accredited certifier, the CCOF client must be identified on the label.</p> <p>A list of all private label brands must be submitted to CCOF as part of the certification process and be available for inspection.<sup>123</sup></p> <p>Clients certified by CCOF CS to COR standards may package private label products or receive private label certification directly. Certified private labelers are not required to identify the co-packer on the label as long as appropriate inspections verify the use of compliant packaging, COR certified co-packers, and complete record keeping/traceability<sup>124</sup>.</p>
<p><b>Registration of Labels<sup>125</sup></b></p>	<p>NOP equivalent.</p>	<p>NOP equivalent.</p>	<p>Certain food labels <b>must</b> be registered by the CFIA Formulation and Label Registration Unit. These include labels originating from:</p> <p>Federally registered Canadian meat, poultry and processed fruit and vegetable establishments;</p> <p>Foreign meat, poultry and processed fruit and vegetable establishments</p> <p>Label registration requests are to be submitted using form CFIA 1472 accompanied by the appropriate number of labels and recipes. This form is available on the CFIA website:  <a href="http://www.inspection.gc.ca/english/for/mpppe.shtml">http://www.inspection.gc.ca/english/for/mpppe.shtml</a></p> <p>Consult the CFIA Fees Notice to determine whether a fee is applicable for your product. Mail completed registration forms to:                      Clerk, Label Registration Unit,                      Canada Food Inspection Agency,                      1431 Merivale Road,                      Nepean, ON                      K1A 0Y9</p>

<sup>123</sup> CAN QMS 12.1.1.5  
<sup>124</sup> CAN QMS 5.1.1  
<sup>125</sup> COR QMS 10.0

Organic Labeling	European Union Regulation 2092/91	IFOAM Basic Standards	Canadian Organic Regime (COR)
<b>Wholesale Containers/ Produce Boxes/ non-retail containers</b> <sup>126</sup>	NOP equivalent. (Boxes must be labeled for "export only").	Organic products must be clearly identified as "organic" on both retail and wholesale containers.	Packaging shall bear the following information, without prejudice to any other indications required by law <sup>127</sup> : <ul style="list-style-type: none"> <li>a) the name and address of the person or organization responsible for the production, preparation or distribution of the product</li> <li>b) the name of the product</li> <li>c) the organic status of the product</li> <li>d) information that ensures traceability (e.g. lot number)</li> </ul>

**10. LABELING OF ORGANIC PRODUCTS IN QUEBEC**

Copies of all labels utilized under the CCOF Global Market Access must be submitted and approved by CCOF CS prior to use.

CAAQ Labeling	CAAQ Labeling Standards
<b>Produce and product labeling</b>	All produce and products sold as organic in Quebec must identify the name of certified operator and CCOF. <b>CAAQ labeling standards specify that</b> <sup>128</sup> : <ol style="list-style-type: none"> <li>1. Organic fruit and vegetables, just as conventional fruit and vegetables, must whenever possible be individually labeled.</li> <li>2. The name of certified operators (grower or handler) must be printed on a sticker affixed to each organic fruit or vegetable.</li> <li>3. The name of the certifying body that attested the product's organic production mode must also to be printed on each sticker.</li> <li>4. Hydroponic or Aeroponically produced organic products may not be sold in Quebec.</li> </ol>

<sup>126</sup> IFOAM BS 6.1.2

<sup>127</sup> COR CGSB 8.4.2

<sup>128</sup> Quebec Organic Reference Standard Section 9