



CONTROLLED DOCUMENT

CSI ORGANIC CERTIFICATION POLICY MANUAL

CSI
QUALITY SYSTEM PROCEDURE

ORG-QSP 10.1.0

Centre for Systems Integration
200 - 240 Catherine Street
Ottawa, Ontario
K2P 2G8

February 27, 2008

Revision 7.1

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REVIEW

This CSI Quality System Procedure (QSP) is subject to periodic review to verify the activities described therein in order to; 1) meet the described objectives, and 2) continue to be the best activity to achieve the described objectives. Amendments will be issued to ensure the QSP continues to meet current needs.

ENDORSEMENT

This CSI Quality System Procedure is hereby approved.


Executive Director

Date: February 27, 2008

AMENDMENT RECORD

Amendments to this procedure will be given a consecutive number and will be dated.

This amendment record will be updated by the person responsible for incorporating the amendments.

Amendment No:	Amendment Content and Pages	Entered by:	Date:
1	Updated JAS Fees – Page 18	Jim McCullagh	March 18,2008
2			
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DISTRIBUTION

Executive Director CSI
Eastern Representative/Certification Director CSI
Western Representative/Certification Director CSI
Office Administrator CSI
National Manager Canadian Organic Office
Program Manager NOP, USDA
Managing Director DAP German Accreditation System for Testing
農 林 水 産 大 臣 殿 To: Minister of Agriculture, Forestry and Fisheries
CSI Organic Inspectors

ACRONYMS

CFIA	Canadian Food Inspection Agency
CSI	Canadian Seed Institute doing business as Centre for Systems Integration
IOIA	Independent Organic Inspectors Association
IRCA	International Register of Certified Auditors
JAS	Japanese Agricultural Standards
MAFF	Ministry of Agriculture, Fisheries and Forestry of Japan
NOP	National Organic Program
OECD	Organisation for Economic Co-operation and Development
QMS	Quality Management System
QSP	Quality System Procedure
QSR	Quality System Representative
RAB	Registrar Accreditation Board
RSE	Registered Seed Establishment
SWI	Specific Work Instruction
USDA	United States Department of Agriculture

1 INTRODUCTION

The Organic Certification program of the CSI is a natural extension of the third-party quality assurance accreditation activities regularly performed for seed conditioners, seed testing laboratories, seed importers and seed exporters. The Organic Certification program is designed to provide an unbiased third-party inspection process for organic certification of farms and processors/handlers under: the CSI Canadian Organic Standard, the National Organic Program (NOP) Rule 7 CFR, Part 205 of the United States Department of Agriculture, the EEC Regulation No. 2092/91 “Organic Production of Agricultural Products” and or the requirements of the Japanese Law Concerning Standardization and Proper Labeling of Agricultural and Forestry Products (JAS Law). The purpose of this policy manual is to define the responsibilities and interfaces which are involved in the certification of organic farm, livestock and processor applicants.

1.1 Scope

This QSP outlines the application and certification procedures for clients who apply to CSI for certification as an organic farm, livestock operator or organic processor/handler under the CSI Canadian Organic Standard, the NOP Rule, the EEC Regulation No. 2092/91 and/or the JAS Organic Law and regulations. This policy manual outlines the inspection procedures carried out by CSI recognized organic inspectors to determine compliance of an applicant’s system with the organic standards(s) to which application was made.

1.2 References

The publications referred to in the development of this CSI policy manual include the CSI Canadian Organic Standard, as well as the National Organic Standards (7 CFR Part 205) and the U.S. Federal Organic Foods Production Act of 1990, the EEC Regulation No. 2092/91 and the JAS Organic Law, the JAS Standard and Technical Criteria.

1.3 Definitions

For the purposes of this CSI Quality System Procedure, the definitions in the CSI Canadian Organic Standard, §205.2 of the NOP Rule, in Article 4 and Annex VI of EEC Regulation No. 2092/91 and in the JAS Organic Law and regulations apply, as well as the following:

Applicant: The entity wishing to participate in and become certified as an organic producer or handler.

Certification: A determination made by a certifying agency that a production or handling operation is in compliance with the USDA Organic Foods Production Act (OFPA), EEC Regulation No. 2092/91 and/or the JAS Organic Law and regulations.

Client: An entity which is certified as meeting an organic standard.

Compliance Evaluator: Person(s) responsible for determining compliance of an applicant’s farm or products to the relevant scheme based on the submitted report of an inspector.

Competent Authority: The Japan Ministry of Agriculture, Forestry and Fisheries; the USDA, the DAP, or the Canadian Food Inspection Agency.

Organic Certification Director: Person(s) responsible for determining certification of an applicant's production or products based on the recommendation of a certification evaluator and the submitted supporting paperwork.

Compliance Committee: Committee consisting of at least one Compliance Evaluator and any other competent individual as may be required who review the submitted inspection report, and make a determination of compliance to the relevant scheme for which the applicant has applied. The inspector(s) that conducted the inspection under review may not be part of the review committee.

Relevant Scheme: The organic program requirements pursuant to a national organic legislation or the European Union organic legislation or the JAS organic legislation to which an applicant is seeking certification.

2 OVERVIEW OF ORGANIC CERTIFICATION AND CSI

2.1 What does “certified organic” mean?

Organic certification is not a guarantee of quality or purity of the product. Rather, it is evidence of the operation's adherence to a prescribed system of agriculture and food production that involves the building and enhancing of the soil through natural means, protection of the environment, humane treatment of animals, and avoidance of synthetic substances.

2.2 About the Centre for Systems Integration

Centre for Systems Integration (CSI) is a division of the Canadian Seed Institute. CSI as an Accredited Service Provider of the Canadian Grain Commission, is recognized as an Organic Certifying Agent by the United States Department of Agriculture, and accredited by DAR to EN 45011 (ISO Guide 65) as an organic certification body for (EEC) 2092/91. CSI is also recognized by the *Conseil des appellations réservées et des termes valorisants (CARTV)* for organic products certified outside of Québec. CSI has made application to the Japan Ministry of Agriculture, Forestry and Fisheries for recognition as a “Registered Overseas Certifying Body” under the JAS organic standards. CSI has also asked for an extension of the CSI EN 45011 accreditation to include the CAN/CGSB-32.310 organic standard.

Our mission is:

To assure the integrity of organic agricultural CSI will:

- Maintain organic certification programs to educate growers, processors and handlers on the requirements for producing organic agricultural products in accordance with applicable organic laws;
- Provide annual independent third-party inspections of growers, processors and handlers of organic agricultural products;
- Support educational activities for growers, producers and consumers that promote learning, understanding and awareness of organic agriculture;

- Certify organic growers, processors, and handlers, meeting the standards and requirements of CSI and applicable laws.

2.2.1 History of CSI Certification Program

The Canadian Seed Institute was established to deliver third-party accreditation and monitoring programs for the Canadian seed industry. Recognized by the Canadian Food Inspection Agency (CFIA <http://www.inspection.gc.ca/english/toce.shtml>) as a Conformity Verification Body, the Canadian Seed Institute has the mandate of being the single point of contact for the auditing of facilities under the Canada Seeds Act and Regulations. The Canadian Seed Institute currently monitors over 1,300 Canadian seed establishments, authorized importers, and accredited seed testing laboratories using the CSI standards approved by the CFIA. Those applicants that comply with the requirements are recommended to the CFIA for registration and can use the CFIA seal and label to package seed. The CSI regularly reviews industry performance through quality system audits and product sampling.

The Canadian Seed Institute created the Centre for Systems Integration to deliver non-regulatory programs, such as organic certification. This division is focused on providing integration of various certification systems and a linkage into value chains; expertise in the agriculture and food sector; and timely, efficient, and approachable service.

Programs operating under the Centre for Systems Integration include:

- United States Department of Agriculture (USDA) National Organic Program (NOP) certifications;
- Japan Agricultural Standards (JAS) certification – applied to Japan Ministry of Agriculture, Forestry and Fisheries ;
- European Union Regulation (EEC) 2092/91 organic certifications under the ISO Guide 65 accreditation from DAP;
- The Canadian CSI Organic Standard;
- Food Safety Certification inspections;
- Post-Farm Food Safety Modules implementation and audits for grain;
- Canadian Identity Preserved Recognition System (CIPRS) audits;
- Six Sigma Implementation assistance;
- ISO Registration audits.

2.2.2 Finances

The financial affairs of the organization are managed by the Executive Director in consultation with the CSI Board of Directors. The Executive Director contracts with an accountant, who prepares tax returns, financial reports and budget analyses as needed. The Executive Director also hires a bookkeeper to perform general bookkeeping.

2.2.3 Legal Structure

The Centre for Systems Integration is a division of the Canadian Seed Institute. CSI is organized as a federal not-for-profit corporation in Canada.

2.3 Services not provided by CSI

- We do not provide consultation on overcoming identified barriers to certification.
- We do not provide counseling or consultation on organic production.
- We do not provide referrals to commercial providers of products or services.
- We do not engage in buying, selling, brokering or marketing of products.
- We do not release confidential information.

2.4 Contacting CSI

CSI invites comments and questions on organic topics from consumers, growers and anyone interested in organic agriculture. All inquiries should be directed to one of the Centre for Systems Integration offices:

Jennifer Scott
Centre for Systems Integration
P.O. Box 25026
London, ON N6C 6A8
(800) 979-9015

Ken Stoner
Centre for Systems Integration
P.O. Box 96
Nipawin, SK S0E 1E0
(877) 439-9674

3 ORGANIC CERTIFICATION GENERAL REQUIREMENTS

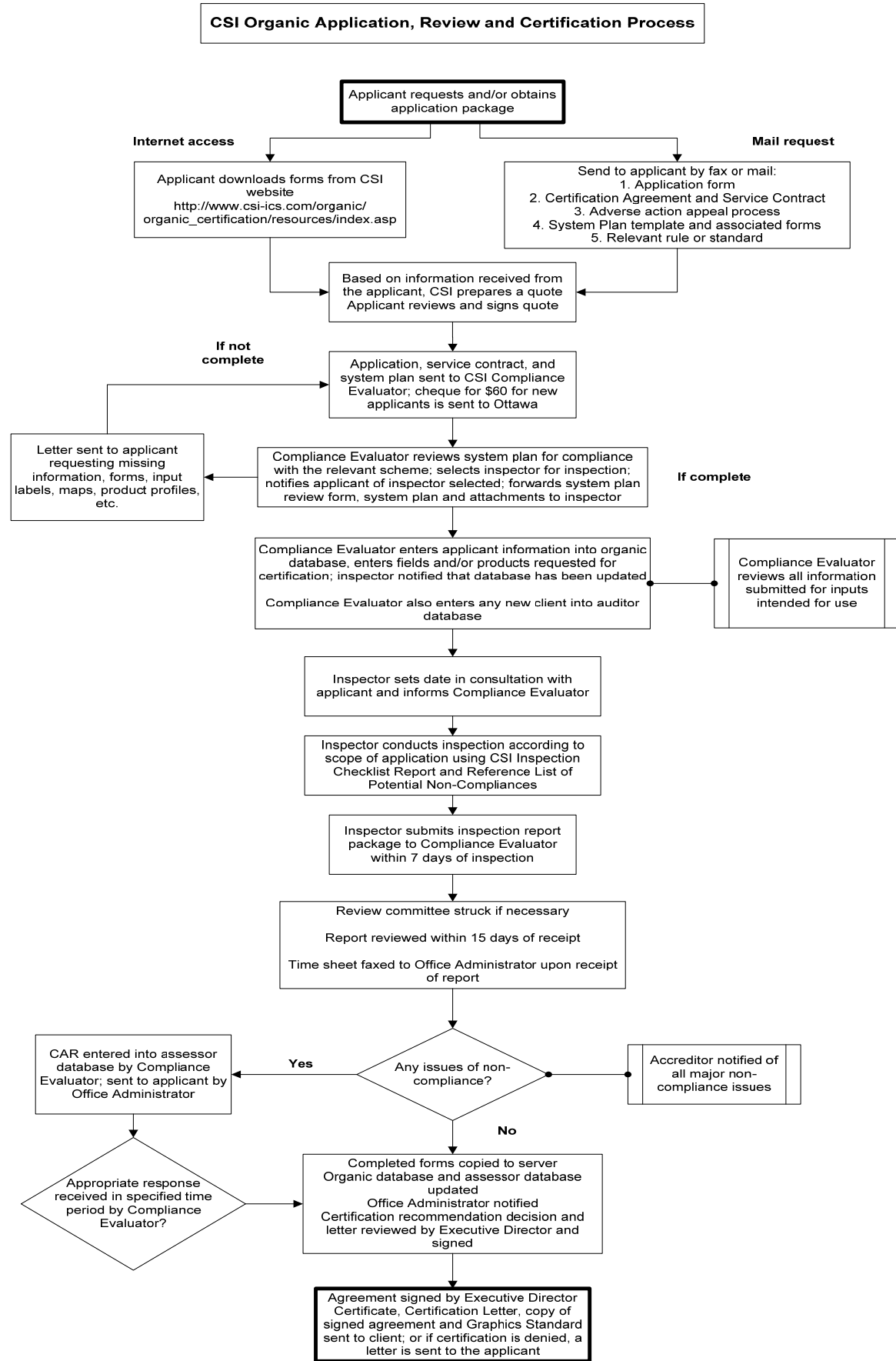
This section sets forth the general requirements with which production and handling operations must comply in order to sell, label, or represent agricultural products as “certified organic”. Any production practice implemented in accordance with general organic principles must maintain or improve the natural resources, including soil and water quality, of the operation.

Most organic standards require the applicant to supply information that provides a detailed description of how an operation will achieve, document, and sustain compliance with all applicable requirements of the organic standard in question. This submitted information is often called the organic plan or the organic system plan. The necessary information may be contained in a quality manual.

Certification bodies (CBs) must agree that the submitted information (the organic system plan) fulfills the requirements of the organic standard to which the applicant is seeking certification. Any subsequent modification to the original organic plan by the producer or handler must receive the approval of the CB. The organic system plan permits the collaboration between the producer or handler and the CB to define, on a site-specific basis, how to achieve and document compliance with the requirements of certification. The organic system plan commits the producer or handler to a sequence of practices and procedures resulting in an operation that complies with every applicable provision in the regulations.

Accreditation by the competent authorities of the various organic standards qualifies the CB to attest to whether an organic plan comports with the organic standard. The organic plan must be negotiated, enacted, and amended through an informed dialogue between CB and producer or handler, and it must be responsive to the unique characteristics of each operation.

4 ORGANIC APPLICATION FOR CERTIFICATION PROCESS



4.1 Application

4.1.1 Initial Application

The above flow chart describes the initial application and certification process.

New farm applicants will receive an application package of forms comprised of the forms listed in the table entitled “ORG_FAR_15A_Forms list farm new applicants”. New processor applicants will receive an application package of forms comprised of the forms listed in the table entitled “ORG_PRO_15A_Forms list processor new applicants”.

Applicants that are already certified with another CB should contact:

Jennifer Scott
Centre for Systems Integration
P.O. Box 25026
London, ON N6C 6A8
(800) 979-9015

Ken Stoner
Centre for Systems Integration
P.O. Box 96
Ottawa, ON S0E 1E0
(877) 439-9674

An explanation of the necessary paperwork that must be submitted from the current CB will be explained. Sufficient information must be submitted so that CSI can confirm the current organic certification status of the applicant.

The applicant may withdraw their application at any time. An applicant who withdraws their application shall be liable for the costs of services provided up to the time of withdrawal. (See sections 6.5 and 6.6)

4.1.2 Renewal Application

To continue certification, a certified operation must annually pay the certification fees and submit the following information, as applicable, to CSI:

- A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year's organic plan during the previous year; and any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year;
- An update on the correction of minor non-compliances previously identified by CSI as requiring correction for continued certification; and
- Other information as deemed necessary by CSI to determine compliance with the applicable organic standards. The renewal package for a certified organic farm is comprised of the forms listed in the table entitled “ORG_FAR_15B_Forms list farms recertification”. The renewal package for a certified organic processor is comprised of the forms listed in the table entitled “ORG_PRO_15B_Forms list processors recertification”.

5 APPLICATION DUE DATES

5.1 New and Continuing Applications

New applications for certification are accepted at any time and will be processed immediately. However, the length of time between application and certification depends on several factors, including the time of year, the completeness of the application, and an inspector's schedule in the producer's area. All on-site inspections must take place when the operation's production practices and compliance with the regulations can be observed (for instance, a crops applicant cannot be inspected when land is covered in snow). For these reasons, **first-time applicants should plan to submit applications at least 6 months prior to the date they hope to sell organic product.**

Once certified, each operation is assigned to one of four certification seasons for subsequent annual updates:

- Spring;
- Summer;
- Fall; and
- Winter.

The winter season is limited to maple producers and indoor operations, such as handlers, mushroom houses, greenhouses, and sprouts. To accommodate reduction in travel expenses clients may be moved from one season to another as needed. Only one movement is permitted per year.

For continuation of certification, the certified operation must submit an annual update by the due date for the season in which the operation was last certified in order to prevent a lapse in certification. CSI will send a notification and annual update forms to clients prior to the annual due date.

5.2 Late Application and Extensions

Applications are processed in batches so they can be assigned to inspectors based on geographic location and type of operation. (When applications arrive late, it is often difficult to schedule the inspections once the inspectors have started their rounds.) Late applications can greatly decrease the efficiency of the certification process. Applicants are encouraged to make every effort to submit their application materials on time.

Applications for continued certification submitted after the due date will be accepted by CSI with the understanding that the inspection fees may be higher. If the late applicant cannot be inspected and certified in the current season, the late application may be placed in the next season's batch. This may result in a suspension of certification for operations applying for continuation of certification. Such operations must submit a written request for an extension of certification with the appropriate fee, explaining the reasons for the late application. If an extension is granted, a new Organic Product List may be issued if needed. (See Administration Fees in section 6.3).

5.3 Surrender of Certification and Re-Application

If a certified operation has surrendered its certification with CSI but decides within one year of surrender to reapply for certification, then the applicant will be treated as a certified operation continuing its certification. What this means is that the applicant may fill out annual update forms instead of new applicant forms and need not pay a new applicant fee. However, if the reapplication is for a completely different operation or products than those that were previously certified, it will be treated as a new application. If a cropping year has passed then a determination will be made as to the transition year that the land will be assigned.

6 CERTIFICATION FEES

CSI's revenue is generated through certification fees.

Certification fees are made up of four components:

- Base Client Fees;
- Client Scope Fees;
- Certification Fees;
- Material Review Fees.

An application fee is due when a **new** applicant submits an Organic System Plan. Once the application is submitted, the applicant may be billed for Material Review fees in advance of the system plan review and the inspection. After the operation is inspected, the applicant will be invoiced for the base client fee, the client scope fee, certification fee and any other applicable fees like material review fees that are still outstanding.

GST is applicable to all fees assessed to the applicant.

6.1 Base Client and Client Scope Fees – Farms and Processors/Re-Packers

Farms

Application Fee

\$ 60.00

Base Farm Fee

\$ 300.00

Crop Acreage Fee (added to the base farm fee)

Fee

50 - 100 acres

\$ 150.00

101 - 300 acres

\$ 300.00

301 - 400 acres

\$ 400.00

401 - 500 acres

\$ 450.00

501 - 600 acres

\$ 500.00

601 - 1000 acres

\$ 675.00

1000 - 2000 acres

\$ 900.00

Greater than 2001 acres

\$ 1,500.00

Livestock/Poultry Additional Farm Scope Fee (Canadian Standard only)

Dairy

\$ 250.00

Layer

\$ 150.00

Other Livestock/Poultry Operations

\$ 80.00

Dairy Herd Transition Monitoring

\$ 525.00

Other Farm Scope Certification Fees

Land Transition Monitoring

\$ 400.00

On-Farm Greenhouse

\$ 250.00

Basic On-Farm Processing

\$ 250.00

Contracted Off-Farm Processing (plus cost of inspection)

\$ 75.00

Processor

Application Fee	\$ 60.00
------------------------	-----------------

Base Processor Fee

Fee

Trader/Broker/Distributor	\$ 550.00
Basic Processing – Re-Packer	\$ 900.00
Complex Processors less than 2 products categories	\$ 1,200.00
Complex Processors with more than 2 products categories	\$ 1,500.00

Ingredient Review for Recipes

Non-Organic Agricultural Ingredient Review (per hour charge)	\$ 30.00
Non-Agricultural Ingredients Review (per hour charge)	\$ 60.00
Supplementary EU or JAS Review of Ingredients Listed Above	\$ 32.00

Recipe and Label Review

Single ingredients - # categories	\$ 9.60
2-3 ingredients	\$ 16.00
greater than 3 ingredients	\$ 32.00
Supplementary EU or JAS Review of Labels Listed Above	\$ 32.00

6.2 Certification Fees – in addition to fees itemized in 6.1

6.2.1 Standards other than JAS

Certification Fees to Standards other than JAS

CDN Certification Fee	\$ 50.00
NOP Certification Fee	\$ 50.00
EU Certification Fee	\$ 500.00
Bio-Suisse Certification Fee	\$ 50.00

6.2.2 JAS Certification Fees

CSI Clients

JAS Certification Fee for Farm Production Process Manager	\$ 500.00
Growers listed by FPPM and are CSI clients – per grower fee	\$ 75.00
Growers listed by FPPM and are not CSI clients, plus cost of inspection – per grower fee	\$ 300.00
Facilities contracted by FPPM and are CSI clients – per facility	\$ 75.00

Facilities contracted by FPPM and are not CSI clients, plus cost of inspection - per facility fee	\$ 900.00
JAS Certification Fee for Processor Production Process Manager – per facility	\$ 500.00
JAS Re-Packer Fee – per facility	\$ 500.00
Inspection fee – per hour	\$ 60.00

Non-CSI Clients at time of application

JAS Certification Fee for Farm Production Process Manager	\$ 2000.00
Growers listed by FPPM and are CSI clients	\$ 75.00
Growers listed by FPPM and are not CSI clients - plus cost of inspection	\$ 300.00
Facilities contracted by FPPM and are CSI clients	\$ 75.00
Facilities contracted by FPPM and are not CSI clients – plus cost of inspection	\$ 300.00
JAS Certification Fee for Processor Production Process Manager	\$ 2000.00
JAS Re-Packer Fee – per facility	\$ 2000.00
Inspection fee – per hour	\$ 60.00

6.3 Material Review Fees

Material Review Fees

OMRI Listed (per product)	\$ 16.00
Input Reviews - Non-OMRI listed (per hour charge)	\$ 60.00
Supplementary EU Review of Inputs Listed Above	\$ 64.00
Supplementary JAS Review of Inputs Listed Above	\$ 64.00

Commercial Material Review and Approval for Use in Certified Organic Operations

Application	\$ 300.00
Inspection fee – per hour	\$ 60.00

6.4 Other Fees

Administration Fees

On-Site JAS Personnel Training	\$ 60.00
Update Certification Certificate	\$ 25.00
Replacement Copy of Certificate	\$ 25.00
Request for Extension of Certificate	\$ 25.00

Inspection Fee in response to a Certificate Extension – per hour	\$ 60.00
EU Export Certificates (after the first 3 issued certificates) - per certificate	\$ 25.00
Private Labelling arrangements	\$ 50.00
Cheque returned for non-sufficient funds	\$ 30.00
Late fee charges (past the due date)	1 1/2 % per month

Complaint Fees

Investigation fee – per hour	\$ 60.00
Inspection fee – per hour	\$ 60.00

Non-Conformance Fees

(Additional Fees will be assessed for each non-conformance issued after the first 2)

Issuance of the Non-Conformance Request (NCR)	\$ 24.00
NCR Follow-up	\$ 16.00
NCR Closure	\$ 16.00

6.5 Inspection Charges

For CSI clients, the cost of the inspection is included in the assessed fees identified above, unless a specific inspection fee is identified for an activity. However, inadequate preparation (incomplete records, undeclared inputs etc.) on the part of the applicant, or unforeseen problems that arise during the inspection or review process, may result in an additional fee of \$ 60/hour being charged/assessed to the applicant over and above this quote. Prior to assessing the fee CSI will establish with the inspector the circumstances around which the inspection took longer than planned for.

Mileage will be billed at \$ 0.42 per kilometer based from the inspector’s home for all inspections carried out. Whenever possible this fee will be pro-rated across a number of clients. Cost of airfare will be agreed upon by the client prior to the inspection.

If necessary, lodging and meals will be billed at cost.

6.6 Non-refundable Fees

Fees are due in full once the certification process is completed. If an application is withdrawn prior to completion of the certification process, a portion of the fee may be waived, depending on the stage at which the withdrawal takes place (see next section.) All fees are due in full even if certification is denied, suspended or revoked.

6.7 Refundable Fees

In all instances mentioned below, a withdrawal will mean that the CSI client has voluntarily surrendered their certification status. CSI will request that any and all certificates be returned to the CSI office.

6.7.1 Withdrawal before Initial Review

No refund for \$60 application fee.

6.7.2 Withdrawal after Initial Review but Prior to On-Site Inspection

The following fees shall apply and be due.

- \$60 application fee;
- \$150 minimum review for continued certification application or a \$175 minimum review for initial application;
- \$75 for a dairy review;
- \$25 for a livestock review;
- \$125 for a handler/processor review;
- \$75 for a broker/distributor review;
- \$25 for a on-farm processing review;
- all fees associated with an input, ingredient or label review;
- \$60 for inspector preparation time, if applicable.

6.7.3 Withdrawal after On-Site Inspection but Prior to Certification Review

The same charges apply as for withdrawal after initial review, plus the cost of inspection.

6.7.4 Withdrawal after Certification Review

No portion of the total certification fees is refundable after the certification review is complete.

6.7.5 Withdrawal after Certification is Granted or Denied

No portion of the total certification fees is refundable after the certification review is complete.

6.8 Fees for On-Farm Processing or Handling/Brokering

Producers wishing to be certified for on-farm processing or handling must pay the processor full fee if the processing, handling or brokering includes products from other producers.

6.9 Fees for Operations That Produce, Process or Handle Product under Contract With A CSI Certified Operation

If a CSI certified client produces the product and has it processed or handled by a contracted operation, the fee will be \$75 plus the cost of inspection of the contracted facility. This exception to the requirement for full processor status of the contracted party is designed to allow a reasonable fee for farm clients to have their own produce, for example livestock, milk or apples, processed at a slaughterhouse, cheese factory or cider press, etc. The organic certificate will be issued in the name of the CSI certified client and no certificate will be issued to the contracted operation.

In the event that two or more CSI certified clients wish to contract with the same facility, the cost of inspection may be divided among the operators involved, but each must pay the \$75 fee. In such cases, it may be advisable (and more economical) for the contracted facility to become certified in its own right.

If the contracted facility is also used by another organic client certified by a different certification body then it is strongly recommended that the contract operation seek its own certification.

Note: It is the responsibility of the CSI client to be present at the time of processing or handling of their organic product to ensure the integrity of the product is maintained. Full control of the operations by the CSI client is expected.

6.10 Fees for Private Label Arrangements

All companies using the Centre for Systems Integration name or logo must be CSI-certified. In certain situations, however, CSI may authorize a CSI client to provide a private label service to another company, allowing the use of the CSI name or logo on that other company's organic brand label. A CSI certified company seeking to offer such service and to enter into such an arrangement must initiate and be responsible for all aspects of the private label situation and will be held legally responsible for the private-label entity and product of the private-label entity, in matters regarding organic certification (see Section 9.2: Labelling). The CSI certified processor will pay the usual certification fee, and inspection costs, for certification of their operation, plus an additional \$50 for each private label arrangement request submitted to CSI.

Note: An individual private label arrangement may cover multiple products produced for the same second party, but an additional \$50 fee for each additional company must accompany each private label arrangement request (see section 9.2.1 for the information requirements).

7 CERTIFICATION POLICIES AND PROCEDURES

7.1 General Conditions for Certification

In order to be certified by (CSI), an applicant shall agree to the conditions set out in the “CSI Organic Inspection and Service Contract”. The contract must be signed and returned to CSI prior to CSI commencing any organic certification activities.

Upon acceptance of an application for certification, CSI agrees to abide by its confidentiality, conflict of interest and non-discrimination policies.

7.2 Initial Certification

7.2.1 Review of Application for Initial Certification

Applications received by CSI are reviewed by a CSI compliance evaluator for completeness and proper enclosures, including the fee quote. Incomplete applications will either be returned or the applicant will be notified with a request to submit the additional materials.

The review consists of:

- Review the application to ensure completeness, including the signed service contract;
- Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of the standards to which the applicant has requested certification;
- Verify that an applicant who previously applied to another certifying agent and received a notification of non-compliance or denial of certification has submitted documentation to support the correction of any non-compliances identified in the notification of non-compliance or denial of certification as required;
- Assign a CSI organic inspector;
- Notify the applicant of the results of the review and name of the inspector assigned. Applicants who object to the inspector must notify CSI within 10 days of receipt of the notice or prior to inspection if the inspection is to take place within 10 days.

An application may be rejected. If so, the applicant will be notified in writing of the reasons.

7.2.2 Granting Initial Certification

An Organic Compliance Committee is scheduled in advance of receiving the report, based on the proposed date of inspection, and CSI conducts a review of the inspection report within 15 days of receipt. The Compliance Committee consists of a Compliance Evaluator, and may also have other competent individuals as part of the committee (other than the inspector who conducted the inspection being reviewed). The Compliance Committee issues any notices of non-compliance necessary to the applicant, and makes the recommendation to the Organic Certification Director for granting or denying certification. CSI reserves the right to require another inspection if deemed necessary to confirm resolution of the non-compliance issues.

- CSI will issue a certification letter. The certification letter contains notification of certification status, non-compliances and conditions, if any, and dates by which corrective actions must be made.
- Applicants for JAS certification must have all non-compliances addressed and corrections agreed to by CSI prior to the granting of CSI JAS certification.
- CSI will issue a certificate of organic operation and organic product verification which specifies the:
 - Name and address of the certified operation;
 - The standard to which the operation has been certified to;
 - Effective date of certification;
 - Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation; and
 - CSI's name, address, and telephone number.
- Once certified, a production or handling operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by the certification body.
- CSI will provide the applicant with a copy of the test results for any samples taken by an inspector.

7.2.3 Denial of Initial Certification

When CSI has reason to believe, based on a review of the submitted information that an applicant for certification is not able to comply or is not in compliance with the applicable organic standard, CSI must provide a written notification of non-compliance to the applicant. When correction of a non-compliance is not possible or is in response to a JAS certification request, a notification of non-compliance and a notification of denial of certification may be combined in one notification. The notification of non-compliance shall provide:

- A description of each non-compliance;
- The facts upon which the notification of non-compliance is based;
- Whether an additional inspection or further testing may be required; and
- The date by which the applicant must rebut or correct each non-compliance and submit supporting documentation of each correction when correction is possible.

Upon receipt of such notification of non-compliance, the applicant may:

- Correct non-compliances and submit a description of the corrective actions taken with supporting documentation to CSI;
- Correct non-compliances and submit a new application to CSI or to another certification body: *Provided*, that, the applicant include a complete application, the notification of non-compliance received from CSI, and a description of the corrective actions taken with supporting documentation; or
- Submit written information to CSI to rebut the noncompliance described in the notification of non-compliance.

After issuance of a notification of non-compliance, CSI must:

- Evaluate the applicant's corrective actions taken and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary, and
 - i. When the corrective action or rebuttal is sufficient for the applicant to qualify for certification, issue the applicant an approval of certification; or
 - ii. When the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, issue the applicant a written notice of denial of certification.
- Issue a written notice of denial of certification to an applicant who fails to respond to the notification of non-compliance.
- Provide notice of approval or denial to the respective competent authority of the organic standard.

A notice of denial of certification shall state the reason(s) for denial and the applicant's right to:

- Reapply for certification;
- Request mediation; or
- File an appeal of the denial of certification.

An applicant for certification who has received a written notification of non-compliance or a written notice of denial of certification may apply for certification again at any time with any certification body or again to CSI. When such applicant submits a new application to a certification body other than CSI, the applicant for certification must include a copy of the notification of non-compliance or notice of denial of certification and a description of the actions taken, with supporting documentation, to correct the non-compliances noted in the notification of non-compliance issued by CSI.

When CSI receives a new application from the client for certification, which includes a notification of non-compliance or a notice of denial of certification, CSI must treat the application as a new application and begin a new application process. If CSI has reason to believe that an applicant for certification has willfully made a false statement or otherwise purposefully misrepresented the applicant's operation or its compliance with the certification requirements, CSI may deny certification without first issuing a notification of non-compliance.

7.2.4 Withdrawal of Application for Initial Certification

The initial applicant may withdraw its application at any time by notifying CSI in writing. An initial applicant who withdraws its application shall be liable for the costs of services provided up to the time of withdrawal of its application. An applicant that voluntarily withdraws its application prior to the issuance of a notice of non-compliance will not be issued a notice of non-compliance. Similarly, an applicant that voluntarily withdraws its application prior to the issuance of a notice of certification denial will not be issued a notice of certification denial.

7.3 Renewal and Continued Certification

7.3.1 Renewal Procedure

To continue certification, a certified operation must annually pay the certification fees and submit updated information, as applicable, to CSI.

Following receipt of the required information, CSI shall notify the applicant of the name of the inspector assigned. Applicants who object to the inspector must notify CSI within 10 days of receipt of the notice or prior to inspection if the inspection is to take place within 10 days.

CSI will, within a reasonable time, arrange and conduct an on-site inspection of the certified operation *except* when it is impossible for CSI to conduct the annual on-site inspection following receipt of the certified operation's annual update of information, CSI may allow continuation of certification and issue an updated certificate of organic operation on the basis of the information submitted and the most recent on-site inspection conducted during the previous 12 months. However, the next annual on-site inspection must be conducted within the first 6 months following the certified operation's scheduled date of annual update.

7.3.2 Granting Continued Certification

An Organic Compliance Committee is scheduled in advance of receiving the report, based on the proposed date of inspection, and CSI conducts a review of the inspection report within 15 days of receipt. The Compliance Committee consists of a Compliance Evaluator, and may also have other competent individuals as part of the committee (other than the inspector who conducted the inspection being reviewed). The Compliance Committee issues any notices of non-compliance necessary to the applicant, and makes the recommendation to the Organic Certification Director for granting or denying certification. CSI reserves the right to require another inspection if deemed necessary to confirm resolution of the non-compliance issues.

If CSI determines that the certified operation is complying with the requirements of the organic standards, CSI informs the producer of the continued certification by issuing a certification report, a letter, an updated organic product list and an updated certificate. Other than JAS organic certification, continued certification may be granted with conditions, in which case the certification report specifies the minor non-compliances to be corrected and gives a date by which they must be corrected. If the conditions are not met by deadlines, non-compliance proceedings may be initiated.

7.3.3 Notification of Non-Compliance

If CSI has reason to believe, based on the on-site inspection and a review of the submitted information, that a certified operation is not complying with the requirements of the applicable organic standards, CSI shall provide a written notification of non-compliance to the operation.

Such notification shall provide:

- A description of each non-compliance;
- The facts upon which the notification of non-compliance is based;
- Whether an additional inspection or further testing may be required; and
- The date by which the certified operation must rebut or correct each non-compliance and submit supporting documentation of each such correction when correction is possible.

7.3.4 Resolution

When a certified operation demonstrates that each non-compliance has been resolved, CSI shall send the certified operation a written notification of non-compliance resolution (i.e. a copy of the completed non-compliance form). Continued certification is granted and if necessary, an updated certificate is issued. JAS organic certification will not be granted until all non-compliances have been resolved.

7.3.5 Proposed Suspension or Revocation

When rebuttal is unsuccessful or correction of the non-compliance is not completed within the prescribed time period, CSI shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the non-compliance. When correction of a non-compliance is not possible, the notification of non-compliance and the proposed suspension or revocation of certification may be combined in one notification.

The notification of proposed suspension or revocation of certification shall state:

- The reasons for the proposed suspension or revocation;
- The proposed effective date of such suspension or revocation;
- The impact of a suspension or revocation on future eligibility for certification; and
- The right to request mediation or to file an appeal.

7.3.6 Willful Violations

If CSI has reason to believe that a certified operation has willfully violated the applicable organic standards, CSI shall send the certified operation a notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the non-compliance.

7.3.7 Suspension or Revocation of Certification

If the certified operation fails to correct the non-compliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification, CSI shall send the certified operation a written notification of suspension or revocation. CSI will not send a notification of suspension or revocation to a certified operation that has requested mediation or filed an appeal, while final resolution of either is pending. A certified operation whose certification is suspended or revoked must not sell, label or represent product as “organic” or “organically produced” and must discontinue the use of the CSI logo during the period of suspension or revocation.

7.3.8 Eligibility for Certification after Suspension or Revocation

A certified operation whose certification has been suspended under this section may at any time submit a request to CSI or to the competent authority for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each non-compliance and corrective actions taken to comply with and remain in compliance with the applicable organic standard.

A certified operation or a person responsibly connected with an operation whose certification has been revoked will be ineligible to receive certification for a period of 5 years under the National Organic Program of the USDA following the date of such revocation.

7.4 Minor vs. Major Non-Compliances

Minor non-compliances are those violations of the organic standards that can be corrected within a specified time period. Timely correction of non-compliances is a condition of continued certification. Minor non-compliances can become major if not corrected in a timely fashion.

Major non-compliances are those which:

- Compromise organic integrity and are unable to be corrected within the context of the organic system plan;
- Involve intentional misrepresentation, fraud or intentional violation of organic standards; or
- Compromise health or safety of workers.

Resolution of all non-compliances is a prerequisite for JAS organic certification.

7.5 Suspension vs. Revocation of Certification

7.5.1 Notice of Proposed Suspension or of Suspension

When the client has failed to respond to or satisfactorily correct non-compliances, and all notices and reminders have been sent, CSI will make a determination of proposed suspension. A notification of proposed suspension will be sent via registered mail or other means that provides a confirmation of receipt. If a notification of proposed suspension is used, the period of time for the suspension and the requirements for reinstatement will be included.

The client will have 45 days to respond in writing in one of the following ways:

- request extension of time;
- correct the non-compliances;
- resolve the issue through rebuttal;
- request mediation; or
- file an appeal to the competent authority of the standard.

If there is no response after 45 days, a notice of suspension will be sent to the client via registered mail or other means that provides a confirmation of receipt. A period of time for the suspension will be given along with instructions the operation must follow in order to lift the suspension. A copy will be sent to the competent authority of the standard.

7.5.2 Notice of Proposed Revocation or of Revocation

When a non-compliance is major, deliberate, unable to be corrected, or involves intentional misrepresentation, criminal activity or fraud, CSI will send a notification of proposed revocation by registered mail or other means that provides a confirmation of receipt. .

The client will have 45 days to respond in writing in one of the following ways:

- request extension of time;
- correct the non-compliances;
- resolve the issue through rebuttal;
- request mediation; or
- file an appeal to the competent authority of the standard.

If there is no response after 45 days that does not include the correction of the non-compliance, or resolutions of the issue through rebuttal or mediation, or file an appeal, a notice of revocation will be sent to the client via registered mail or other means that provides a confirmation of receipt. A copy will be sent to the competent authority of the standard.

7.6 Communications with a Competent Authority Regarding Non-Compliances issued to their Standard

CSI will submit to the relevant competent authority a copy of each of the following documents issued, simultaneously with its issuance:

- any notice of denial of certification issued;
- notification of major non-compliance(s);
- notification of major non-compliance correction(s);
- notification of proposed suspension or revocation; and
- notification of suspension or revocation sent.

7.7 Voluntary Surrender of Organic Certification

Once an operation is certified, its certification continues until surrendered by the organic operation or suspended or revoked by the certification body, or the competent authority. An operation may voluntarily withdraw from the certification program by notifying CSI in writing at any time. After voluntary withdrawal from the certification program, the operation is no longer authorized to sell certified organic products or use the CSI logo after the expiration date of its current organic product list or the date it ceases to use organic practices, whichever is earliest. The operation may re-apply for certification at any time, by following the procedures for new applicants. Depending on the time of withdrawal, a portion of fees paid may be refunded in accordance with CSI's fee policy. CSI requests that the certificate(s) issued to the operation be returned if organic certification is voluntarily surrendered.

7.8 Termination of Organic Certification

When an operation voluntarily surrenders its organic certification, CSI will send a letter confirming receipt of the notice of voluntary surrender and any refund due. The operation's organic certification will be terminated.

7.9 Extensions and Revisions to Certification

If the certification process is not completed by the annual renewal date and the delay is not caused either directly or indirectly by the applicant, CSI will issue a new organic products certificate prior to the expiration date of the current organic products certificate. If the delay is caused by the applicant and is not the fault of CSI, the applicant may still receive a new organic field/product list prior to the expiration date of the current organic product verification, but the applicant will be assessed a late fee.

If the applicant wishes to certify additional crops, livestock, products, facilities or acreage after the operation has had its annual inspection, additional information must be submitted along with the appropriate fee (see administration fees). CSI will notify the applicant of the status of the requested revision. The producer must not sell, label and/or represent any product not listed on the new field/product list. If the applicant is adding new fields or new facilities an additional inspection will be necessary and an inspection fee of \$60 per hour will be charged. A fee for a revised certificate will be charged (see administration fees). If the certificate or product list is reissued, the word "Amended" will appear on the certificate, the date of issue will be updated, and the crops, fields and/or products certified will reflect the amendment. CSI will also request that the certified operation return the original certificate.

If the name or address of the certified operation changes after certification, but prior to the next inspection, it is the responsibility of the certified operation to notify CSI. CSI will then re-issue the certificate, and also have the certified operation sign a new certification agreement. CSI's database will be updated in the case of any amendment.

Additional information required varies by type of operation as follows:

7.9.1 Processed Products Made in a Certified Organic Facility

Submit a letter requesting the change, an explanation of the manufacturing process, the product profile, copies of organic certificates and GMO status for ingredients, and sample of label/packaging.

7.9.2 Processed Products Made in a Facility Not Inspected by an Accredited Certifier

An additional inspection may be required. Send the same information listed above for processed products. In addition, include information about the new facility. The certification director will then send processor a fee determination and application forms required.

7.9.3 New Crops on Existing Fields Listed on the System Plan

Submit type of crop, field number, planting and/or harvest date, plus reason it was not included in your organic system plan or update.

7.9.4 Livestock

Submit type of livestock, quantity, certificate, date purchased, housing and pasture information. The certification director will determine whether an additional inspection is required.

7.9.5 New Acreage or Location

Submit a letter with description and directions, map of acreage, adjoining land-use information, and prior land-use information. An additional inspection is required.

7.9.6 Deleting Acreage or Type of Certification

Submit a request in writing to delete acreage, location, products or livestock from your certification, as well as your reason for the request. CSI will make changes needed to your certificate and/or organic product verification and charge applicable fee.

7.10 Committee to Review Organic Certification Processes

CSI has established a committee with the responsibility to verify that the implementation of CSI organic certification services is done in an impartial and non-discriminatory manner. The committee will consider the appropriate organic standards and legislation when forming opinions and recommendations. The committee will operate according to its Terms of Reference. The Executive Director brings decisions of the committee to the Board of Directors for consideration.

7.10.1 Appeals to the CSI Committee to Review Organic Certification Processes

An applicant for certification may appeal CSI's notice of denial of certification, and a certified operation may appeal CSI's notification of proposed suspension or revocation of certification to the CSI Committee to Review Organic Certification Processes.

- If the Committee sustains a certification applicant's or certified operation's appeal of CSI's decision, the applicant will be issued organic certification, or a certified operation will continue its certification, as applicable to the operation. The act of sustaining the appeal shall not be an adverse action subject to appeal by CSI.
- If the Committee denies an appeal, a formal administrative proceeding will be initiated to deny, suspend, or revoke the certification.
- The applicant or certified operation, denied an appeal by the Committee, may make appeal to the competent authority of the relevant scheme.

8 MATERIALS REVIEW AND APPROVAL

All non-agricultural inputs for crop production, livestock production and processing must be reviewed and approved by CSI prior to use. All products used by CSI organic clients must meet any Canadian regulatory requirements associated with that product type.

8.1 OMRI Listed Products

CSI has entered into contract with the Organic Materials Research Institute (OMRI) to provide materials review. For products that have been identified as being listed with OMRI, CSI will verify that the product is still listed with OMRI and meets Canadian regulatory requirements. CSI will enter the results of this review in the CSI database.

8.2 Non-OMRI Listed Products

For products that are not listed with OMRI, CSI will conduct an initial review of the product to determine if the product is listed with any other CB that has a materials review process. This information will be taken into consideration when CSI is making its approval determination. CSI will also determine if the product submitted for review is within the capability of CSI conducting an adequate review. If yes, then CSI will assemble a review team with the appropriate qualifications. If no, then CSI will inform the CSI client that CSI cannot review and approve the submitted product. The results of the review will be entered into the CSI database.

8.3 Approval of Products

CSI may establish conditions with any approval of products submitted for review.

8.4 Commercial Material Review and Approval for Use in Certified Organic Operations

Upon request from a commercial entity, CSI will conduct a review of an input material for use by certified organic operations. The commercial entity must submit an application (ORG_24_Approved Input Submission Checklist), with the appropriate attachments that pertain to the input material for which they are seeking approval. The Service Contract for Input Approval (ORG_25) must also be submitted, along with the fee as specified in section 6 with applicable GST. The submission is reviewed for completeness, and an inspector is assigned. The applicant is notified of the inspector selected, and as per section 7.2.1, may request that another inspector be assigned.

The inspector makes arrangements with the applicant to conduct an inspection of the process and records. Once the inspection is complete, a report is submitted to CSI for review. If approved, a certificate of approval is issued to the commercial entity for the input material in question. CSI clients who have obtained approval for input materials must submit an application annually for renewal of approval.

9 INSPECTION AND TESTING

9.1 On-Site Inspections

CSI conducts an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining whether the certification of the operation should continue. All on-site inspections are conducted according to the CSI specific work instruction ORG-SWI 10.1.1.

CSI may conduct additional on-site inspections of applicants for certification and certified operations as required to determine compliance with the applicable standards.

The competent authority may require that additional inspections be performed by CSI for the purpose of determining compliance with the applicable standard.

Additional inspections may be announced or unannounced at the discretion of CSI or as required by a competent authority.

9.2 Scheduling Inspections

The initial on-site inspection must be conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the requirements of the applicable standard. The initial inspection may be delayed for up to 6 months to comply with the requirement that the inspection be conducted when the land, facilities, and activities that demonstrate compliance or capacity to comply can be observed. All on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable standard, except that this requirement does not apply to unannounced on-site inspections.

Inspection Dates: (dates may vary slightly due to unforeseen circumstances)

Inspections should be scheduled as follows:

- Spring Session: February through June
- Summer Session: June through August
- Fall Session: August through October
- Winter Session: October through January

9.3 Information Provided to the Inspector

CSI shall attempt to send applicants' files to the inspector on or before the following dates:

- Spring Session: February 28
- Summer Session: June 30
- Fall Session: August 30
- Winter Session: October 15

CSI provides the following information to the inspector, as applicable to the type of operation:

Prior to the inspection:

- i. Initial organic system plan and any annual updates (field list, product list, input list)
- ii. Field history information
- iii. Appropriate field maps
- iv. Product profiles
- v. Previous year's certification letter and non-compliances issued, if applying for continued certification
- vi. Copy of initial system plan review
- vii. Appropriate inspection report forms

After completion of the inspection:

- i. Copy of the certification letter, identifying the outcome of the decision
- ii. Requirements for correction of any non-compliances

9.4 Verification of Information during an Inspection

The purpose of the on-site inspection of an operation is to verify:

- The operation's compliance or capability to comply with the applicable standard;
- That the information, including the organic production or handling system plan, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation;
- That prohibited substances have not been and are not being applied to the operation. At the discretion of CSI, the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples may be warranted.

9.5 Exit Interview

The inspector will conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern.

9.6 Documents Provided to the Inspected Operation

At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector. There shall be no charge to the inspector for the samples taken. A copy of the certification letter and any test results will be sent to the inspected operation by CSI.

9.7 Inspection Report

After the applicant's operation is inspected, the inspector forwards an inspection report to the CSI office for review within 7 days of the inspection. The inspector's job is to report on compliance with organic standards based on the application and his or her examination of the farm or processing facility and record-keeping system. The inspector does not make the decision on whether the applicant will be certified by CSI.

9.8 Inspector Qualifications

Inspectors must meet the requirements of CSI AUD-QSP 3.1.0. Assigned inspectors must be competent in the subject matter of the inspection. In addition, new inspectors who have not previously inspected for another CB must complete at least one apprentice inspections with an experienced inspector.

9.9 Confidentiality during Inspections

Inspectors must abide by the confidentiality policies and procedures described in their inspector agreement.

9.10 Contracting Inspectors

Inspectors are independent contractors and are not employees of CSI.

9.11 Investigation of Certified Operations

CSI has the right and duty to investigate complaints lodged against CSI certified operations. Investigation may include unannounced inspections or testing. Unannounced inspections resulting from complaints received by CSI will be billed at cost to the operation (see complaint fees section 6.4).

9.12 Unannounced Inspections

CSI recognizes that the production and processing of organic goods is an on-going process and that annual inspections can only gather information concerning the client's operation at that moment. Areas of on-going potential risk include:

- contamination or commingling of organic product;
- contamination of the site;
- failure to adhere to standards for production and processing of organic product;
- mislabelling;
- fraud; and/or
- any other major or minor non-compliance with the organic scheme against which the client is certified.

To help mitigate this risk, CSI requires a risk assessment of all clients be completed by the inspector during the inspection. The risk assessment checklists identify the risks associated with the certification of organic farm production and processing and assign a value to specific high risk practices, while requiring the inspector assign values for the remainder.

The resulting Total Risk Value will be used by the inspector and the Compliance Evaluator to determine the sampling requirements and by the CSI Organic Compliance Committee to determine candidates for unannounced inspections, and/or product monitoring.

The CSI risk mitigation tools include the following procedures and activities undertaken during the certification process:

- submission of a system plan by the client and confirmation of adequacy by the inspector;
- completion of an on-site inspection looking at critical areas of investigation by a qualified organic inspector;
- training of inspectors to ensure they have a knowledge of the applicable organic rules and of CSI's procedures and documentation;
- review of inspection documentation (checklists and report) by a qualified Compliance Committee;
- completion of risk assessment checklist(s) by the CSI inspector at the conclusion of the on-site assessment;
- evaluation of risk posed by the certification of a client by the Compliance Committee utilizing information gained from all of the above sources and a recommendation made to the CSI Organic Certification Director; and
- an independent committee that reviews the CSI organic operations and processes for impartiality and fairness in delivery of organic services.

Unannounced inspections will be determined by:

- reviewing the risk assessment checklist;
- identifying clients that have a risk factor of greater than 41 but less than 60 as potential candidates;
- identifying clients that have a risk factor of 60 or greater as mandatory candidates;
- verifying if the mandatory candidates are equal to or greater than 10% of CSI clients. If not, then a random selection of the potential candidates will be added to obtain the 10%. If this is still not sufficient then candidates will be chosen from those that have a risk factor greater than 28.

Unannounced inspections will be coordinated by a Compliance Evaluator over an annual time period of March – April. The Compliance Evaluator will assign an inspector and direct the inspector to verify compliance in areas from the risk assessment checklist pose the greatest risk to organic integrity. This may include the taking of samples for testing.

9.13 Inspection and Testing of Agricultural Product

The purpose of sampling and testing in the CSI organic program is to verify the integrity of the applicant's system in adhering to the relevant scheme to which application for certification is being made. All agricultural products that are to be sold, labelled or represented as being in compliance with the requirements of the CSI Canadian Organic Standard; §205.301 (a), (b) or (c) of the NOP; the EEC Regulation No. 2092/91; or the JAS Organic Standards must be made accessible by the certified organic production or handling operation for examination by representatives of the relevant scheme, or CSI.

The relevant scheme or CSI may require pre-harvest or post-harvest testing of any agricultural input used or agricultural product to be sold, labelled or represented as being in compliance with the requirements of the CSI Canadian Organic Standard; §205.301 (a), (b) or (c) of the NOP; the EEC Regulation No. 2092/91; or the JAS Organic Standards, 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. In the event of a complaint or the submission of information to CSI that substantiates that a product does not meet the requirements of a relevant scheme, CSI may require sampling and testing as part of the investigation of the complaint.

Certified organic production or handling operations must make accessible for examination all agricultural products that are to be sold, labeled, or represented as certified organic. Such tests are conducted at CSI's own expense.

The compliance evaluator will determine if residue testing is required. If so, arrangements will be made for an inspector to obtain a sample of materials in question and forward to the CSI list of approved laboratories.

Sample integrity must be maintained throughout the chain of custody. These tests must be conducted by a laboratory identified by CSI. Samples shall be submitted to a laboratory identified by CSI with the appropriate scope for the testing required. Chemical analysis must be made in accordance with the methods described in the most current edition of the Official Methods of Analysis of the AOAC International or other current applicable validated methodology determining the presence of contaminants in agricultural products.

Laboratories are selected as approved suppliers based on tests offered, accreditation and service. Any laboratory conducting sample and residue testing on behalf of CSI is required to sign the CSI Agreement for Subcontracted Testing Services (ORG_21). The signed agreement is kept on file by CSI for each approved laboratory. The laboratory must be accredited to ISO 17025 for the tests being conducted.

9.14 Testing Results

Results of all analyses and tests performed under this section will be provided to the certified operation. All results will be available for public access, unless the testing is part of an ongoing compliance investigation. In the event of the detection of the presence or use of a prohibited substance CSI will conduct an investigation of the certified operation to determine the cause of the prohibited substance. The investigation plan will be developed by the Compliance Evaluator and presented to the Organic Certification Director. The Organic Certification Director will contact the applicant and request that all product under investigation not be placed on the market as organic product. The results of the investigation will be reviewed by the Compliance Evaluator who will provide recommendations to the Organic Certification Director on next steps and on the certification status of the applicant. The results of the investigation and sampling will be promptly submitted to the relevant scheme(s) to which the operation is certified. Subsequent to the investigation the Organic Certification Director may require that the applicant inform in writing the buyers of the products to remove all indications that the product is organic.

When a prohibited substance is applied to a certified operation due to a federal emergency pest or disease treatment program, and the certified operation otherwise meets the certification requirements, the certification status of the operation is not affected by the application of the prohibited substance, but organic product that has had contact with the prohibited substance cannot be sold, labeled, or represented as organically produced.

10 LABELLING

10.1 Use of CSI Name and Logo

All operations certified by CSI may use the CSI name and logo in advertising/marketing information and on packaging, with prior approval from the CSI office and as stipulated in the Centre for Systems Integration Graphics Standard and the CSI Organic JAS Mark Graphics and Labelling Standard. Copies of labels must be included with the application and must be approved by CSI prior to use. Operations must discontinue the use of the CSI name and logo upon suspension or revocation of certification.

It is not required by any certified operation that the CSI logo be used on any product sold, labelled or represented as organically produced as a condition of certification by CSI.

CSI does not require compliance with any other production or handling practices other than those required under the certification schemes for which CSI is accredited in order for a certified operation to use the CSI logo.

Organic product shall be labelled as required by the relevant scheme and the intended sales market:

- **NOP** - The term “organic” shall be used and labelled in accordance with the NOP Standard, Subpart D – Labels, Labelling and Market Information. All products shall be labelled in accordance with Subpart D of the NOP.
- **EEC Regulation No. 2092/91** – Product produced in accordance with the rules laid down in Article 6 shall be labelled as stipulated in Article 5.
- **JAS Organic Standards** - including Ministerial Ordinance No. 62 of 1950 and according to the CSI Organic JAS Mark Graphics and Labelling Standard.
- **Canadian Organic Program** – according to the CFIA *Organic Product Regulations*.

All organic products must meet any additional labelling requirements of the country or province in which it is sold. All labels must be approved by CSI prior to use. All advertising and promotional material using the certification seal of the relevant scheme or making reference to the certification status shall be truthful and not misleading.

10.2 CSI Private Labelling Policy

All companies using the Centre for Systems Integration name or logo must be CSI certified. In certain limited situations, however, CSI may authorize a CSI certified company to provide a private label service to a non-CSI certified company, allowing the use of the CSI name or logo seal on a label representing the non-CSI certified company's brand. A CSI-certified company seeking to enter into such an arrangement must initiate and be responsible for all aspects of the private label situation and will be held legally responsible for the private label entity and product of the private label entity, in matters regarding organic certification.

10.2.1 Procedure for Private Label Arrangement

A CSI certified company must submit to CSI, in writing, an application for each private label arrangement providing the following information:

- A clear statement of the details of the private label arrangement, including effective time period;
- Name of the private label company for which the private label arrangement is being requested;
- The name of the person or company legally responsible for the product (also must be identified on the label and on the organic product profile sheet);
- A list of the products that will carry the CSI name or logo under the private label arrangement and an organic product profile sheet for each, including labels for all products;
- Estimated quantity of the product that will carry the CSI name or logo under the private label arrangement;
- Name of the person in the CSI certified company who will be responsible for all necessary communications and representations of the private label product;
- Explanation of the complete audit trail (including labels in compliance with all labeling standards) to be established and maintained by the CSI certified company (the audit trail records will be reviewed annually by a CSI inspector);
- A statement attesting to the legal responsibility of the CSI certified company for all activity involving the use of the CSI seal, product representation of the private company, and collection/payment of the fees for the private-label company signed by both companies;
- A statement from the private-label company permitting CSI to inspect their premises and records relevant to the CSI certified product(s).

No product can be sold under the private label arrangement until the above information has been submitted to and approved by CSI in writing.

10.2.2 Cost of Private Label Arrangement

The CSI certified processor will pay the usual certification fee and inspection costs for certification of their operation, plus an additional administrative fee for each private label arrangement request submitted to CSI.

11 OTHER CERTIFICATION BODIES

CSI certified producers may purchase organic agricultural products certified to a standard for use in their organic systems from producers who are certified either by CSI or another certifier that is accredited by the competent authority to the standard in question. Contact the competent authority for a list of accredited certification bodies.

12 NON-DISCRIMINATION POLICY

CSI shall act effectively to assure it will:

- Provide services without bias toward race, creed, color, national origin, age, religion, ancestry, political beliefs, disability, lifestyle, sex or sexual orientation, or marital or familial status. Services are provided without regard to membership in any organization, and are not contingent upon the number of CSI certification services used.;
- Recruit, hire, and promote for all job classifications based only on the individual's qualifications for and interest in the position being filled without regard to race, creed, color, national origin, age, religion, ancestry, political beliefs, union membership, disability, lifestyle, sex or sexual orientation, or marital or familial status.

13 CONFIDENTIALITY

CSI maintains strict confidentiality with respect to its clients under the certification services it offers and does not disclose to third parties (with the exception of government officials and the relevant competent authorities and their accredited certification bodies) any business-related information concerning any client obtained from the provision of its services. CSI personnel, inspectors and volunteers must agree not to disclose confidential information about an applicant's operation.

The following information about an applicant or certified operation may be made available to the public upon request:

- Organic certificates or field/product lists issued during the current and three preceding calendar years;
- The fact that a certificate or field/product list cannot be provided because a certified operation is in non-compliance proceedings (but not the reason for the noncompliance);
- Other business information as permitted in writing by the producer or handler.

14 CONFLICT OF INTEREST

All persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions, as well as all parties responsibly connected to CSI, are required to complete an annual conflict of interest declaration.

15 COMPLAINTS AND DISPUTES

This policy applies to:

- Complaints and disputes by an applicant or other party pertaining to certification policies, procedures, or decisions, not filed as an appeal; and
- Disputes between CSI and another party that are not filed as a complaint or appeal.

Complaints and disputes concerning CSI must be in writing, signed and submitted to the executive director. In the event that a complaint or dispute personally involves the Executive Director, the complaint or dispute will be submitted to the President of the board. Anonymous complaints will not be accepted. The Executive Director or board president may resolve the complaint or refer it to the board of directors for recommendation or resolution. The decision to refer the complaint or dispute to the board is within the executive director's or president's discretion. All complaints, whether pending or resolved, shall be reported to the board at its next regular meetings. A record of all complaint and dispute proceedings and resolutions is kept in the CSI office. Complaints made directly to a CSI certified operation concerning compliance with certification standards must be documented by the certified operator. The certified operator is responsible for responding to all complaints and must keep a record of its responses and any action taken to correct the cause of the complaints.

16 REPORTING TO COMPETENT AUTHORITIES

CDN Organic Standards

- Submitting an annual report by September 30th of every year.

NOP:

- Submitting an annual report by January 2nd detailing those operations certified by CSI (name, address, telephone number and certification scope).
- Submitting such fees as are necessary according to §205.640 to AMS.
- Submitting an annual report by September 15th of each year according to §205.510 (a).
- Notifying the NOP of all major issues of non-compliance, denials of certification, suspension and/or cancellation of certification.

EEC Regulation No. 2092/91

- Submitting an annual report by January 31st detailing those operations certified in the previous year by CSI (name, address, telephone number and certification scope).
- Notification of all major issues of non-compliance, denials of certification, suspension and/or cancellation of certification.

JAS Organic Standards

- Submitting an annual report by September 30th of every year.
- Notifying Japan MAFF of changes to the status of JAS clients on a monthly basis.