

Input Verification under the Canada Organic Regime

Date: May 7, 2014

To: Certification Bodies accredited by the CFIA

Subject: Input verification under the Canada Organic Regime

As per Section 13(1) of the *Organic Product Regulations*, CFIA-accredited certification bodies (CBs) must verify that all inputs used in the production and processing of organic agricultural products are those permitted, and used in the manner described, in CAN/CGSB 32.311. Producers and processors of organic products must provide a complete list of input materials used in production and/or processing within their Organic System Plan. The inputs materials list includes: fertilizers, soil amendments, planting media, crop production aids and pest control products used in crop production; livestock feed supplements, feed additives, medications and livestock production aids used in livestock production; and ingredients, processing aids, post-harvest handling substances, cleaners, sanitizers and facility pest control products used in processing and handling as defined in Section 3 of the CAN/CGSB-32.310-2006.

It is the role of CFIA-accredited CBs to ensure that inputs in the production of organic products they certify comply with CAN/CGSB 32.311. CBs have three options available for determining compliance:

1. CBs can verify that the input material comply by evaluating the product and all of the ingredients within the input. The CB shall contact the supplier/formulator/manufacture to obtain full disclosure of the ingredients in the input material and the processes used to produce the ingredients and the input material.
2. CBs may consult with another CFIA-accredited CB or input evaluation program who has evaluated the input material and accept that CB's evaluation of the input's compliance with CAN/CGSB 32.311. Input evaluation programs must be accredited to ISO 17065.
3. CBs may consult with a third party to obtain technical information necessary for the CB to make a compliance determination on the input. These parties must be accredited to ISO 17065.

In all cases, the CB shall take responsibility for all activities outsourced to another body. The CB must maintain a procedure and documentation to support its determinations about the status of input compliance. CBs must periodically confirm that product

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

In cases of dispute between CBs regarding input verification, the CBs shall inform their respective CVBs. The CVBs shall come to a collective decision about the status of the input material.

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