1. INTRODUCTION

1.1. The U.S. Department of Agriculture (USDA) is engaged in an equivalence arrangement with the Canadian Food Inspection Agency (CFIA). This arrangement includes periodic peer review assessments of the USDA/National Organic Program and CFIA/Canada Organic Office.

1.2. On June 20-24, 2011, representatives of the USDA Agricultural Marketing Service (AMS) reviewed organic accreditation and certification activities in the Quebec province of Canada, which represented the Canada Organic Regime (COR) activities. This report is an account of those activities and observations of the review.

1.3. Review team was comprised of:

1.3.1. Miles McEvoy, Deputy Administrator, AMS – NOP

1.3.2. Meg Kuhn, Agricultural Marketing Specialist – Regulatory, AMS – NOP

2. OBJECTIVES OF REVIEW

2.1. The objective of the review was to evaluate the system capabilities and performance of CFIA authorities in controlling the proper application and enforcement of the Organic Products Regulations (OPR) and oversight of the US/CAN equivalency Arrangement (USCOEA) for organic products.

3. LEGAL BASIS FOR THE REVIEW

3.1. The review was conducted based on USCOEA conditions of periodic peer review assessments.
3.2. The following statutes, regulations, and standards were considered in the review:


3.2.3. ISO/IEC 17011:2004(E) Conformity assessment — General requirements for accreditation bodies (identified as Conformity Verification Bodies (CVBs) within the COR) accrediting conformity assessment bodies (identified as Certification Bodies (CB) within the COR).

3.2.4. Canada Organic Product Regime standards on organic production and labeling of organic products.

3.2.5. US/CAN Equivalence Arrangement (USCOEA), Appendices 1 and 2.

4. PROTOCOL

4.1. The review was accomplished by observing the competent authority (Canada Organic Office, COO) a Conformity Verification Body (CVB), certification bodies (CBs), and certified organic operations (CO) in Canada in the province of Quebec. In selecting the CVB, CB, and certified operations to be reviewed, the review team worked with representatives of the COO to select operations representative of organic products produced in Quebec.

4.2. The team reviewed each phase of the organic production, certification, and accreditation system to determine if the responsible authorities had the necessary controls in place to ensure traceability and compliance with the referenced organic standards.

4.3. At the Conformity Verification Body (CVB) office reviewed, the team observed processes used to evaluate the competence of the certifying bodies. The review team observed procedures relating to the certification of organic operations according to OPR
in order to determine how compliance with the referenced organic production and
handling regulations would be carried out. The review team also interviewed personnel
to determine their knowledge of organic production, handling and certification practices
and their qualifications with respect to their duties and responsibilities.

4.4. The team visited two (2) organic handling operations to observe production, handling
and labeling practices in order to determine the level of compliance accomplished by the
certified operations. The review team interviewed responsible parties at each site, and
participated in meetings with the production managers.

4.5. The review team was accompanied by representatives of the COO throughout the
review.

5. SUMMARY OF PREVIOUS REVIEWS

5.1. This was the NOP’s second on site peer review of the COR program for the purpose of
determining implementation and ongoing compliance of the US/CAN Equivalence
Arrangement. There were no previous onsite review observations, from the NOP to
COO, to consider for follow-up response.

6. OBSERVATIONS


The Canada Organic Regime, managed by the COO, is well organized and effective.
The oversight over the CVBs is solid with good communication and regular audits. The
COO conducts regular meetings with the CVBs (every 8 months) to ensure consistent
application of the COR.

6.2. Report Observations from CVB (CAEQ)
CAEQ’s oversight over the CBs is thorough and effective. The audits are regularly conducted; however, there was one audit found for one CB that was not conducted on the prescribed schedule. Documentation demonstrating experience, education, and training was on file for applicable staff.

At the CVB office visit it was found that the CVB was providing COR certification to clients located in the United States (specifically, Miami, FL). This is inappropriate since implementation of the USCOEA.

Two observations were observed at the CVB (please see 8.1 and 8.2 below).

6.3. Report Observations from CB (Quebec Vrai)

One CB was evaluated, Quebec VRAI, which is accredited by CAEQ and operates in Quebec. The certification files were complete and inspection reports were thorough and well documented. Experience, education and training was verified to be current and on file for review and inspection staff, with one exception. Certification records demonstrated timely and thorough certification services provided by the CB. There are multiple management controls in place to ensure effective implementation of accreditation requirements.

One observation was observed at the CB (please see 8.3 below).

6.4. Report Observations from Certified Operations 1 and 2

Two organic processors were selected as a handling operation for observation.

The first operation, a milk plant, provided an overview of organic activities in place, including a thorough tour of the facility and process flow. Some certification documentation was reviewed for incoming suppliers, as well as the facility’s organic certification document from the CVB.
The second operation, a maple syrup processing plant, provided an overview of organic activities in place, including a tour of the facility and process flow; however, the tour was provided by the Director of Sales rather than Production Staff and, as such, particular compliance areas could not be addressed. For example, NOP could not determine if the processor had proper procedures in place from receiving through production for the segregation and identification of NOP organic product vs. EU or JAS organic product.

Two observations were observed at these operation (please see 8.4 and 8.5 below).

6.5. Report Observations from Certified Operation 3

The wild crop operation provided an overview of the organic activities in place, including a tour of the collecting areas and processing facilities.

7. INTRODUCTION TO OBSERVATIONS

7.1. The assessment activities took place in one (1) of Canada’s ten (10) provinces. The assessment included visits to handling and wild crop operations only; crop and livestock operations were not included.

7.2. The NOP would have liked to review organic livestock operations as part of the audit to review the one US critical variance.

8. OBSERVATIONS

8.1. Observation 1. CVB, CAEQ: There was one audit of one CB that had not been conducted according to the prescribed schedule.

8.2. Observation 2. CVB, CAEQ: CAEQ appeared to be scheduling a COR witness audit for Miami, Florida. It is not appropriate for COR certification to be occurring within the US.
8.3. **Observation 3.** CB, Quebec Vrai: One livestock inspection was conducted by an inspector that had ten years of inspection experience; however, there were no indications that this inspector had training or education specific to livestock operations.

8.4. **Observation 4.** CO: The organic certificate stated the operation was certified to the Quebec standard (CARTV), but only equivalent to the COR and NOP equivalence arrangement. The USCOEA applies to COR & NOP certified operations; the CARTV standard is not included in the arrangement.

8.5. **Observation 5.** CO: The processor handles both organic and conventional products. The identification of organic products at receiving is not tightly controlled. The only indication that product received is organic is on the delivery schedule that indicates the time and transport company (approved federation) who delivers the organic product. The BOL does not indicate that the product is organic; there is no tag or identification on the truck to indicate that the product is organic; and the processor does not verify that the product is being received from certified organic farms, only that they ordered organic product from the approved federation.

**9. CLOSING MEETING**

9.1. The review team conducted a closing meeting with COO officials in Quebec City, Quebec, Canada on June 24, 2011. At the meeting, the U.S. review team provided a complete summary and discussion of all observations in this report.

**10. CONCLUSIONS AND RECOMMENDATIONS**

10.1. It was generally observed that the accreditation and certification system implemented through COPR is thorough and sufficiently oversees organic activities at COO, CVB and CB levels.
10.2. The COO should prepare formal responses to the OBSERVATIONS portion of this report, proposing actions to be taken to address any observations identified in this report.

END OF REPORT