



**ADITI**

Organic Certifications Pvt. Ltd.

Bengaluru

14<sup>th</sup> December 2020

Ref. No. Aditi/HO/Circular/2020-2021/08

Dear esteemed clients,

Subject: **Implementation of the revised Canadian Organic Agriculture Standards published on December 11, 2020 – reg**

Greetings from Aditi organic Certifications Pvt. Ltd.!

We hope you; your family and all staff member are keeping safe. We take this opportunity to thank you for the kind support and cooperation that you have extended to us all these years.

With reference to the latest update received from the Committee on Accreditation for Evaluation of Quality (CAEQ), the Canadian General Standards Board published the Canadian Organic Standards - Organic Production Systems. Following are the major changes with immediate effect:

**1. NEW DEFINITIONS ARE ADDED:**

- i. **Geographical proximity (with reference to grower group certification)**  
Access to the same collection or post-harvest handling facilities, and/or common soils, water source, slope, topography, or other physical features.
- ii. **Small farm (with reference to grower group certification)**  
Both: a. farm where the cost of external certification is 2% or more of their annual gross revenue, and b. less than 50 acres.

**2. REGARDING ADDITIONAL INSPECTIONS:**

- i. As per section, C.2.6.1 In addition to the annual inspections the CB shall plan and conduct unannounced inspections representing 5% of the holders of certificates (minimum 1) to which CB grants certificates for products and/or packaging and labelling certificate under the COR

**3. REGARDING CHANGE OF CERTIFICATION BODY BY THE OPERATOR:**

- i. According to section C.10.1.2 The operator, including those who intend to become part of a grower group, shall notify their current CB of their intent to change the CB and shall request a "letter of good standing" to be sent to the new CB (receiving), confirming that all nonconformities (NCs) and any contract conditions (for example, outstanding fees) have been addressed.

**4. UPDATE IN RISK ASSESSMENT:**

- As per section C.12.3.3 The percentage of group members subject to the initial certification inspection shall be based on the results of a risk assessment and the following calculations:
- i. C.12.3.3.1 Factors to define the risk as normal, medium and high shall include:
  - ii. C.12.3.3.1.1 factors related to the magnitude of the grower group
    - a. organisation size and sites' size
    - b. value of the products
    - c. numbers of years the grower group has functioned
    - d. number of new members registered yearly

- e. staff turnover
- f. the management structure of the internal control system
- iii. C.12.3.3.1.2 factors related to the characteristics of the grower group
  - a. variations in the product systems
  - b. risks for intermingling and/or contamination
  - c. geographical dispersion of the sites
  - d. degree of uniformity among the production units, sites or facilities
- iv. C.12.3.3.2 For normal risk situation, the percentage of group members subject to the initial certification inspection shall not be lower than the square root of the total number of units under the responsibility of the group.
- v. C.12.3.3.3 If the risk is medium, the resulting number from C.12.3.3.2 shall be multiplied by 1.2.
- vi. C.12.3.3.4 If the risk is high, the resulting number from C.12.3.3.2 shall be multiplied by 1.4.
- vii. C.12.3.3.5 All calculation totals from C.12.3.3.2 – C.12.3.3.4 ending with decimals are to be rounded up.

**5. MAINTENANCE OF CERTIFICATION**

- i. As per section C.12.4.1 Each year the CB shall define and justify a risk-based sample of members subject to annual inspection to assess the effectiveness of the ICS.
- ii. As per section C.12.4.2 The members visited by the CB shall be predominantly different from 1 year to another.
- iii. In addition to the risk factors defined at C.12.3.3.1, the CBs may consider the following selection criteria when selecting the sites being subject to visits:
  - a. results from internal control system inspection
  - b. complaint files
  - c. significant variations of the sites' size
  - d. modifications since the last certification
- iv. C.12.4.3 In cases of high risk situations the CB may increase the percentage of group members subject to annual inspection to at least 2 times the square root of the number of the members in the grower group (for example, ICS has issued a lot of internal sanctions, or a lot of new grower members).

**6. POLICY ON PESTICIDE RESIDUE INTERPRETATION:**

COS directive (14-01) on residue testing clearly mentioned that the sampling techniques should be based on the specific commodity to be sampled including details on the sample selection, sample size, sampling equipment and sample submission. We would consider referring to Codex Alimentarius Commission (Codex) for information on recommended methods of sampling for the determination of chemical residues as guidance. All the necessary changes are updated on our website, kindly click the link for further details <https://www.aditicert.net/canada-organic-standards.html>:

For any query or concern, please do not hesitate to reach out to us and would be happy to serve with best of our abilities as always.

With regards,

For, Aditi Organic Certifications Pvt. Ltd.

For ADITI ORGANIC CERTIFICATIONS PVT. LTD.

Narayana Upadhyaya  
Managing Director

