

Bengaluru
February 20, 2026

CIRCULAR

Organic Certifications Pvt. Ltd.

Subject: Updates on Canada Organic Regime (COR) Operating Manual (Version 21)

Ref No.: ADITI/HO/2026/Circular/003

Dear Valued Clients,

This circular serves to remind all certified operators of key responsibilities and documentation requirements under the **Canada Organic Regime (COR)**. These requirements must be strictly followed during certification and inspection processes.

Revision history of COR Operating Manual – Version 21

Version	Date	Reason for the revision	Scope of the revision
V21	February 2026	<p>Removed: B.2.2.16, B.15.2.6, C.12.1.4.</p> <p>Updated: Table 2 note A, Table 4 note 1, B.3.7, B.3.18, B.3.18.2.3.2, B.4.2, C.2.2.5, C.2.2.18, C.2.2.22, C.2.6, C.2.6.6, C.12.1.4 (formerly C.12.1.5), C.12.3.2, C.12.3.7 (formerly C.12.3.6), C.13.1, C.13.2, Appendix D.</p> <p>New: B.4.4, C.2.5.4, C.12.3.6, C.12.4.1, C.12.4.2, C.12.4.8.</p>	Parts A, B, C and Appendix D.

During on-site inspections, operators must ensure all required records and systems are in place for Verification officer to verify as per COR Operating Manual – Version 21

● UPDATED CLAUSES:

1. Verification of Prohibited Substances (Clause: C.2.2.18)

Requirement: Affidavits alone are not sufficient as evidence.

Operator Action Points:

- ✓ Maintain complete field history records.
- ✓ Keep land-use / government records (if applicable).
- ✓ Maintain inspection records.
- ✓ Maintain laboratory test reports (if applicable).
- ✓ Ensure documents are organized and readily available during inspection.

2. Mass Balance (Input–Output Reconciliation) Clause: C.2.2.22

Requirement: Quantitative reconciliation of organic inputs and outputs are to be maintained.

Operator Action Points:

- ✓ Maintain accurate purchase records.
- ✓ Maintain production/batch records.
- ✓ Maintain updated stock registers.
- ✓ Maintain sales invoices and dispatch records.

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- ✓ Ensure quantity sold/exported does not exceed quantity produced or purchased.
- ✓ Be prepared for verification of more than one production batch.

3. Implementation of Standard Changes-Clause: C.2.5.5

Requirement: Implementation of changes in organic standards must be verified.

Operator Action Points:

- ✓ Review all circulars issued by ADITI.
- ✓ Implement revised requirements immediately.
- ✓ Update internal SOPs where required.
- ✓ Train staff if procedural changes apply.

4. Corrective Action Verification - Clause: C.2.5.6

Requirement: Corrective actions must be effectively implemented.

Operator Action Points:

- ✓ Maintain corrective action reports.
- ✓ Maintain evidence of implementation (photos, records, revised SOPs).
- ✓ Ensure corrective actions remain effective until next inspection.

5. Twelve Month Inspection Completion - Clause: C.2.5.7

Requirement: Inspection must be completed within 12 months from certificate issue date.

Operator Action Points:

- ✓ Monitor certificate issue date.
- ✓ Ensure renewal application is submitted timely.
- ✓ Keep records ready to avoid inspection delays.

6. Export Documentation Control - Clauses: C.13.1 & C.13.2

Requirement: Export quantity reconciliation before issuance of export certificates are to be maintained.

Operator Action Points:

- ✓ Maintain cumulative production vs sales/export summary.
- ✓ Maintain inventory reconciliation statements.
- ✓ Keep packing lists and dispatch records.
- ✓ Ensure financial reconciliation supports quantities.
- ✓ Do not export more than produced/prepared/traded.

7. Additional Inspections - Clause: C.2.6.6

Requirement: Additional inspections may be conducted when required.

Operator Action Points:

- ✓ Maintain compliance throughout the year.
- ✓ Ensure records are continuously updated.
- ✓ Avoid last-minute documentation preparation.

● NEW CLAUSES:

8. Export Certificate Onsite Verification - Clause: C.2.5.4

Requirement: Onsite verification of export certificate data to be maintained up to date.

Operator Action Points:

- ✓ Ensure export application details match production and stock records.

- ✓ Maintain export summary register.
- ✓ Ensure traceability from raw material to export consignment.

● **GROWER GROUPS (If Applicable)**

9. Risk Assessment & Sampling - Clauses: C.12.3.2, C.12.4.3, C.12.4.4 (Updated/New)

Requirement: Risk-based inspection sampling formula applied.

Operator (Group Management) Action Points:

- ✓ Maintain updated member list.
- ✓ Maintain risk classification of members.
- ✓ Ensure internal inspections are conducted for all members.
- ✓ Prepare for inspection sample:
 - Minimum = $\sqrt{(\text{total members})} \times 1.5$
 - Higher for high-risk groups.

10. Verification of Common Facilities - Clauses: C.12.3.6, C.12.4.2

Requirement: Annual verification of all ICS-managed facilities.

Operator Action Points:

- ✓ Maintain facility cleaning records.
- ✓ Maintain storage segregation records.
- ✓ Maintain facility inspection records annually.

11. Annual Witness Audit of ICS - Clause: C.12.4.8

Requirement: Mandatory annual witness audit of internal inspection.

Operator Action Points:

- ✓ Ensure internal inspectors follow documented procedures.
- ✓ Maintain internal inspection reports.
- ✓ Maintain training records of ICS inspectors.

● **REMOVED CLAUSE**

Clause Removed: C.12.1.4 (Previous wording restructured)

No relaxation of requirement. Structure clarified under updated grower group provisions.

All operators must ensure:

- ✓ Complete documentation for land and inputs
- ✓ Accurate mass balance and inventory control
- ✓ Export reconciliation compliance
- ✓ Effective corrective action implementation
- ✓ Timely renewal and inspection readiness
- ✓ Strengthened ICS (for grower groups)

Reference Access

Operators must refer only to the latest version of the COR Operating Manual as published on the official CFIA website:

🔗 <https://inspection.canada.ca/en/food-labels/organic-products/operating-manual>



Please note that the timeline for implementing the COR Operating Manual revisions is by December 31, 2026.

We request all operators to update their systems accordingly and ensure full compliance. These requirements are essential for maintaining the credibility of your organic certification and continued access to international markets.

Kind regards,

For Aditi Organic Certifications Pvt Ltd

For ADITI ORGANIC CERTIFICATIONS PVT. LTD.

Narayana Upadhyaya

Managing Director

