Quality Certification Services (QCS)

QCS is Certification Program of Florida Certified Organic Growers and Consumers, Inc. (FOG)

QCS CERTIFICATION MANUAL

This document contains the certification standards, policies and procedures for the operation of the QCS NOP, International Organic Program and the Canadian Organic Regime Certification offered by Quality Certification Services (QCS). QCS operates in accordance with both the International Organization for Standards (ISO/IEC) 17065 General Requirements for Bodies Operating Product Certification Systems; the National Organic Program (NOP) as recognized by the United States Department of Agriculture (USDA), EU 834/2007 & 889/2008, Canada Organic Regime and USDA NOP Export Arrangements with Japan, Korea and Taiwan.
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Principles of Organic Production and Handling

Holistic Production Management Systems
Organic agriculture is based on holistic production management systems which promote and enhance agro-ecosystem health, including biodiversity, biological cycles, and soil biological activity. Organic agriculture emphasizes the use of management practices in preference to the use of off-farm inputs, taking into account that conditions require locally adapted systems. These goals are met, where possible, through the use of cultural, biological, and mechanical methods, as opposed to using synthetic materials, to fulfill specific functions within the system.

Organic Standards
Organically produced products are identified under specific and precise standards of production based on the use of ecologically sound production practices, which are intrinsic to the identification and labeling of organic products. For a list of these standards, see Standards Manuals.

Organic Certification
Organic certification is a system of institutionalized trust that allows consumers to identify and reward those who meet organic standards. This requires an informed effort on the part of the producer or handler, and careful vigilance with consistent, transparent decision making on the part of the certification agent.
a) Organic production systems strive to achieve agro-ecosystems that are ecologically, socially, and economically sustainable.
b) Organic standards require that each certified organic entity complete and submit for approval by a Certification Coordinator, an Organic Systems Plan (OSP) detailing the management of an organic crop, livestock, wild harvest, processing, or handling operation. The OSP outlines the management system that are used by the operation to comply with the organic standards. QCS provides an Organic System Plan form appropriate for the scope of certification for applications to document their Organic System Plan.

An organic production system is designed to:
1) Maximize biological activity in the soil;
2) Maintain long-term soil fertility;
3) Minimize soil erosion;
4) Maintain or enhance the genetic and biological diversity of the production system and its surroundings;
5) Provide livestock with optimal living conditions for health and wellbeing;
6) Utilize renewable resources in bio-regionally based agricultural systems;
7) Recycle materials of plant and animal origin in order to return nutrients to the land, thus minimizing the use of non-renewable resources;
8) Promote the environmentally responsible use of soil, water, and air, and minimize agricultural pollution; and

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9) Become established on an existing farm or field through a period of conversion, designed to allow the agricultural system to adapt to organic production methods and materials.

Organic handling practices are based on the following principles:
1) Organic processors and handlers must implement organic good manufacturing and handling practices in order to maintain the integrity of organic products through all stages of processing, transport, and storage;
2) Organic products must not be commingled with non-organic products, except when combining organic with non-organic ingredients specifically allowed by an applicable standard;
3) Organic products must not come in contact with prohibited materials;
4) Proper records must be kept to verify that the integrity of organic products is protected;
5) Organic products should be handled with emphasis on careful processing methods with a goal of maintaining the integrity and quality of the products; and
6) Ecologically sound management practices should be a goal of organic handling operations. Efforts should be made to reduce packaging, use recycled materials, and reduce solid, liquid, and airborne emissions produced by handling operations.

Organic production and handling operations must comply with all applicable local, state, and federal laws and address food safety concerns adequately.
1) Organic certification, production, and handling systems serve to educate consumers regarding the source, quality, and content of organic foods and products. Product labels must be truthful regarding product name and contents.
2) Genetically engineered/modified organisms (GEO/GMO’s) or products produced by or through the use of such organisms, are not compatible with the principles of organic production (either growing, manufacturing, or processing) and are not permitted under these standards.
3) Organic standards do not allow the use of synthetic materials such as synthetic fertilizers, pesticides, and genetically engineered organisms, except those specifically allowed by the applicable standards. Organic standards cannot ensure that organic products are completely free of such residues or contaminants, due to background levels of environmental pollutants.

**Principles of Organic Certification**

Quality Certification Services (QCS) provides an impartial third party certification of organic production and handling methods. QCS is the certification program of Florida Certified Organic Growers and Consumers, Inc. (FOG). FOG is a not-for-profit grassroots membership organization committed to environmentally sound production of food and the preservation of natural resources, and the improvement of soil quality and health through organic and sustainable farming practices. QCS is a not-for-profit certification program developed in response to the changing marketplace requirements and the regulatory nature of organic certification.

QCS is committed to providing clear direction and quality certification services to its clients and constituents of the organic food industry. This Certification Manual contains the policies and procedures for those seeking organic or food-related recognition, and/or claim(s) offered by QCS to facilitate exports to foreign countries.
QCS meets federal requirements for operating an organic certification program as required under the United States Department of Agriculture (USDA) National Organic Program (NOP). QCS is International Organization for Standardization (ISO/IEC) 17065 accredited by Committee on Accreditation for Evaluation of Quality (CAEQ). ISO/IEC 17065 specifies requirements to ensure that certification bodies operate third-party certification systems in a consistent and reliable manner. CAEQ also accredits QCS for the Canadian Organic Products Regulation and for the EU Certification to EU 834 and EU 889.

The purpose of the Certification Manual is to provide a basis of communication between clients and QCS, a guideline of the certification process for organic certification programs, overview of the standards, and notification of fees for QCS services.

01 General Provisions

QCS Provisions
QCS offers impartial third-party certification by adhering to provisions of Equality, Objectivity, Confidentiality, and Transparency.

Non-Discriminatory Certification Services
QCS responsibly operates a non-discriminatory certification service. QCS makes its services accessible to all applicants whose activities are as outlined in Sections 02 and 03 (Scope & Programs of Certification). QCS does not make undue financial or other conditions nor discriminates against applicants based on the size or type(s) of operation(s).

QCS grants certification solely on compliance related to the scope of certification being considered. QCS does not certify or issue conditions to its clients based on the number neither of certifications already issued, nor on the basis of any of the clients’ membership affiliations and/or associations to organic and food related industries. QCS does not place any undue financial or other consideration on clients to obtain certification services.

QCS services are also designed not to discriminate against any member because of race, creed, religion, marital status, sex, ancestry, age or national origin, and are administered in a non-discriminatory manner, which does not impede or inhibit applicant(s) access to the certification services of QCS.

Safeguarding Impartiality
QCS has identified that by the nature of this business there are several risks to the impartiality of certification. There may be conflicts that may rise from its relationships, activities and persons responsibly connected to the certification process. To prevent risks from arising that cause conflict with objectivity, QCS has preventive systems in place to safeguard impartiality.

Risk from Type(s) of Service(s) & Scope(s) offered by QCS
QCS provides only those services as outlined in Sections 02 and 03 (Scope and Programs of Certification). QCS cannot design, produce, operate, install, supply, distribute products, process
and provide services of the type(s) it certifies. QCS does not provide products or services that could compromise the confidentiality, objectivity or impartiality of its certification processes. QCS undertakes to remain free from commercial, financial, or other pressures that may influence the results of the certification process. As such, QCS does not provide consultancy services to its applicants or certified clients, pertaining to matters dealing with barriers to overcoming certification; nor does QCS imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used. QCS may direct applicants to resources on good agricultural practices for production and handling, and may answer questions regarding how standards are interpreted or applied.

**Risk from Type(s) of Services & Scope(s) offered by FOG (related entity)**

FOG provides education and marketing resources that are available to the public and not customized for a specific operator. FOG may also direct QCS applicants to resources on good agricultural practices for production and handling.

FOG strives to support and maintain QCS’s provisions by providing products or services that would not compromise the confidentiality, objectivity or impartiality of QCS certification. FOG services prevents impartiality by:

- Not designing, producing, operating, installing, supplying, distributing products, processes and services of the type(s) QCS certifies.
- Not having a direct influence or authority to put pressures on the QCS certification process.
- Not providing consultancy services to QCS applicants or certified clients, pertaining to matters dealing with barriers to overcoming certification.
- Not marketing or offering as linked with the activities of an organization that provides consultancy.
- Not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.

If and when FOG were to offer or produce the certified product (including products to be certified) or offers or provides consultancy, the QCS management, those evaluating (inspection and review) personnel in the review and making certification decisions are not to be involved in the activities of FOG, vice versa, the personnel of FOG are not involved in the management of QCS, the evaluation or the certification decision. The consultancy from the personnel must be well recorded, available upon request by QCS and personnel involved must have agreed to the confidentiality and impartiality requirements.

As FOG is a not-for-profit organization, at times product and cash donations are pursued for educational programs, workshops and project-based initiatives. The QCS program staff does not solicit any donations from certified entities or applicants for certification. The QCS program may not accept donations from certified entities or applicants for certification. If a Certification Coordinator has previously written a letter to request a donation from a certified entity or an
applicant for certification, said Certification Coordinator does not review that entity’s application or reapplication to avoid any potential conflict of interest. The Bookkeeper, Executive Director and Office Manager are the only staff that are to know what donations are received and from whom the donations are received.

**Risks from QCS Certification Programs and Services**

QCS takes full responsibility for the granting, maintaining, extending, suspending or withdrawing of certification, particularly regarding decisions on certification, considering appeals, and handling complaints and disputes. QCS may contract evaluation services to inspectors and may subcontract testing services to approved laboratories.

At all levels of QCS, provisions are taken to ensure that independence is maintained and conflict of interest is avoided.

- QCS’s main method for preventing a conflict of interest from occurring is requiring all persons responsibly connected to the certification services of QCS; including: Board members, committee members, personnel, contractors, subcontractors, to annually complete a conflict of interest disclosure. The Conflict of Interest Agreement describes the commitment to objectivity and by which persons disclose any perceived conflicts that could directly affect the objectivity of an operation’s certification (i.e. commercial, financial, family or relationship, or other pressures that could be perceived to compromise impartiality; including any consultancy provided within the last 24 months to an operation. Also, any bias that could indirectly create conflict to arise (i.e. over-familiarity, pressures, advocacy, intimidation, competition). QCS reviews all declarations and identify(s) any risk(s) to the impartiality of its evaluation, review and certification decision.

- Employees, inspectors, contractors and other personnel are not permitted to accept payment, gifts or favors of any kind, other than prescribe fees, from any business inspected.²

- The Administrative Manager then reviews these disclosures and reports them to the COO and/or QCS Administrative Manager, so as not to assign conflicting files.

- Inspectors are obligated to refuse work beyond their realm of competence.

- Inspectors may not inspect anyone with whom they have a declared conflict of interest.

- Inspectors are assigned by designated personnel usually based on scope of the audit, qualification of the inspector/auditor, proximity to operation and/or availability, cost and assessing any potential COI.

- In the event a conflict of interest is identified with a file, the personnel must immediately notify(s) the Chief Operating Officer, Administrative Manager and/or designee and excuse(s) him/herself from the file review. The operator is then appointed a temporary alternative qualified auditor and/or QCS may reconsider a certified operation’s or applicant’s application for certification and if necessary perform a new on-site inspection. All costs associated with a reconsideration of application, including on-site inspection costs shall be borne by QCS. QCS may refer a certified operation or applicant to a different accredited certifying agent for
recertification and reimburse the operation for the cost for the recertification when it is determined that any responsibly connected person involved in the certification decision had a conflict of interest involving the applicant at the time of certification.

- QCS does not allow Inspectors to inspect anyone with whom they have a declared a conflict of interest(s);
- QCS generally rotates inspectors every 3-4 years to prevent over-familiarity with the operator and/or operation;
- QCS ensures that persons who make certification decisions are different from those who carried out the evaluation of the operation (i.e. inspection, closing noncompliance(s)).

Confidentiality
At all levels of QCS, provisions are taken to ensure that confidentiality is maintained. QCS safeguards the confidentiality of all information obtained in the course of certification activities by ensuring that all persons responsibly connected to QCS sign confidential agreements prior to any performance of certification activities.

QCS releases routine client information as required or as available as Public Information. All other information (i.e., inspection report, financial information, certification review, information from complaint investigations) is considered proprietary, used only for the purpose of certification and must have the written consent of the client prior to making it public or available to an outside body.

Required Public Information
Information is routinely made available to the public that includes:
- Certificates issued during the current and preceding 3 years;
- QCS Client Directory, which is a list of producers and handlers including the name of each operation, the type of operation, products produced and the effective date of certification during the current and 3 preceding calendar years. The QCS website offers any interested party access to a list of QCS certified clients listed by the relevant scope and program of certification on www.qcsinfo.org;
- The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years;
- Other business information as provided in writing by the producer or handler;
- A copy of the procedures to be used for sampling and residue testing.

General Certification Requirements
The operator and QCS must comply with QCS Certification and Mark License Agreement, requirements in the OSP, renewals, manuals and other documents; including the following:
  - If the certification applies to ongoing production, the certified product continues to fulfil the product requirements;
  - Operator make all necessary arrangements for the conduct of the evaluation and surveillance (if required), including provision for examining documentation and records, and access to the relevant equipment, location(s), area(s), personnel, and client's subcontractors; investigation of complaints; the participation of observers, if applicable;
  - Operator make claims regarding certification consistent with the scope of certification;
• Operator does not use its product certification in such a manner as to bring the certification body into disrepute and does not make any statement regarding its product certification that the certification body may consider misleading or unauthorized;
• Operator upon suspension, withdrawal, or termination of certification, the client discontinues its use of all advertising matter that contains any reference thereto and takes action as required by the certification scheme (e.g. the return of certification documents) and takes any other required measure;
• Operator must provide copies of the certification documents to others, the documents shall be reproduced in their entirety or as specified in the certification scheme;
• Operator in making reference to its product certification in communication media such as documents, brochures or advertising, the client complies with the requirements of the certification body or as specified by the certification scheme;
• Operator complies with any requirements that may be prescribed in the certification scheme relating to the use of marks of conformity, and on information related to the product;
• Operator keeps a record of all complaints made known to it relating to compliance with certification requirements and makes these records available to the certification body when requested, and takes appropriate action with respect to such complaints and any deficiencies found in products that affect compliance with the requirements for certification; documents the actions taken;
• Operator informs the certification body, without delay, of changes that may affect its ability to conform with the certification requirements. NOTE Examples of changes can include the following: the legal, commercial, organizational status or ownership, organization and management (e.g. key managerial, decision-making or technical staff), modifications to the product or the production method, contact address and production sites, major changes to the quality management system.
• Operator to accept, in cases where the operator and/or the subcontractors of that operator are checked by different control authorities or control bodies to allow the exchange of information between those authorities or bodies.
• Operator to accept, cases where the operator and/or the subcontractors of that operator change their control authority or certification body, the transmission of files to the subsequent control authority or certification body.
• Operator to inform ICS without delay of any irregularity or infringement affecting the organic status of their product or organic products received from other operators or subcontractors.
• Operations certifying to QCS EU 834-2007 Certification Requirements or the Canadian Organic Standards must keep a record of any complaints made known relating to a product's compliance with regulations and these records must be made available to QCS upon request. Appropriate action must be taken with respect to such complaints and any deficiencies found in products or services that affect compliance with the requirements for certification. The actions taken must be documented.

**Transparency**
The QCS certification program is transparent to all persons internally and externally. Publications and other documents are published or made available upon request to the public electronically or by other means. At a minimum, QCS publications include the following:
QCS Certification Manual & Standards Manuals
The QCS Certification Manual is designed to outline QCS policies related to all organic certification programs. This manual includes a description of the relevant standards and information on the certification procedures for those programs operated by QCS to facilitate organic product sales in the United States and export to foreign countries.

The QCS Certification Manual and the relevant standards are made available to the public on the QCS website, [www.qcsinfo.org](http://www.qcsinfo.org) and upon application to QCS.

QCS NOP Certification Standards Manual
The NOP Certification Standards Manual contains the USDA National Organic Program Standards. Compliance to these standards is required for the sale of organic products in the United States. The NOP Standards also serve as the base standards for all export certifications.

QCS EU 834-2007 Certification Requirements

Canadian Organic Standards (COS) (Organic Production System General Principles and Management Systems and the Organic Production System Permitted Substances Lists.)
QCS performs its Canadian Organic Regime (COR) certification activities in accordance to the requirements set forth in CAN/CGSB-32.310 and CAN/CGSB-32.311.

Quality Certification Services Client Directory
The QCS website also offers any interested party access to a list of QCS certified clients listed by the relevant scope and program of certification. If not found on the website, please request a directory from QCS.

02 Certification Categories
QCS specializes in determining organic certification and organic export recognition for the following agriculture-based operations.

Farm
A farm is an operation who engages in the business of growing or producing food, fiber and other agricultural-based consumer products.

Livestock
Livestock is any cattle, sheep, goat, swine, poultry or equine animals used for food or in the production of food, fiber, feed or other agricultural-based consumer products; wild or domesticated game; or other non-plant life, except such term anot include aquatic animals or bees for the production of food, fiber, feed or other agricultural-based consumer products.
Wild Cropping
Wild Cropping is any plant or portion of a plant that is collected or harvested from a site that is not maintained under cultivation or other agricultural management.

Handler
A Handler is any operation engaged in the business of handling agricultural products, including producers who handle crops or livestock of their own production, except such term do not include final retailers of agricultural products who do not process agricultural products.

Processor
A Processor is any operation or entity involved with cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling or otherwise manufacturing, and includes the packaging, canning, jarring or otherwise enclosing goods in a container.

Grower Group
A grower group is defined as a group of producers that meet the following conditions:
- The crops and farming practices of the producers must be uniform and reflect a consistent process or methodology, using the same inputs;
- The group must be managed as a legal entity under one central administration that is uniform and consistent;
- Participation in the group is limited to producers who sell all of their organic production through the group;
- Producers who are certified as part of a grower group do not possess individual certificates. Rather, the grower group is certified as a unit;
- Grower groups must establish and implement an internal control system (quality system), with supervision and documentation of production practices and inputs used at each producer's operation to ensure compliance to relevant standards;
- Grower groups must ensure that all members understand the US National Organic Standard and how it applies to their specific operations;
- Grower groups must utilize centralized processing, distribution, and marketing facilities and systems.
- Grower groups must be owned by the members of the group and not by an individual

QCS determines how many growers must be inspected by consideration of the following:
- The number of operations participating in the grower group;
- The size of the average operation in the grower group;
- The degree of uniformity between the group’s operations;
- The complexity of the group’s production system(s); and
- The management structure of the group’s internal control system.

For more information on grower groups, please contact the QCS office.

Aquaculture
Aquaculture is an operation who engages in the business of growing or producing aquatic animals or plants. Operations for this category may only certify under the QCS EU 834-2007 Certification Requirements Program.
03 Scope of Certification

QCS applicants must certify to the QCS NOP Regulations (with the exception of Canadian operations). All other certification options are available to those operations that wish to extend their organic markets.

**QCS NOP Regulations**

As a baseline for certification, QCS operates in accordance with U.S. federal law. As such, QCS must ensure that any type of client that wants to sell an agricultural product as organically produced, conforms to the United States Department of Agriculture (USDA) National Organic Program (NOP). All organic agricultural products imported into the United States by foreign programs must have determined equivalent organic program requirements to the NOP.

The Federal Rule became effective February 20, 2001, and fully implemented in October 21, 2002. The intention of this law is to facilitate domestic and international marketing of fresh and processed food that is organically produced and to assure consumers that such products meet consistent, uniform standards. The USDA AMS Federal Register (7 CFR Part 205) National Organic Program’s Final Rule is made available in the QCS NOP Certification Standards Manual and on the USDA website at [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop).

QCS recognizes all agencies, private or state as recognized by the USDA, [www.ams.usda.gov/nop/CertifyingAgents/Application.html](http://www.ams.usda.gov/nop/CertifyingAgents/Application.html). State programs may have additional requirements for operations located or marketing within those states. QCS must verify the client’s compliance with any applicable state program(s) requirements.

In addition to the NOP regulations, QCS offers standards that facilitate trade with foreign countries. QCS offers programs which facilitate organic trade with foreign countries by the Department of Agriculture’s (USDA) Agricultural Marketing Service (AMS) export arrangements, recognition agreements, and import authorizations with foreign programs. All additional standards required for export must meet or exceed the NOP, and be provided in English, unless otherwise required by the country of origin.

**QCS USDA NOP and International Trade and Export Arrangements**

The National Organic Program standards have been recognized as meeting the requirements of several foreign governments, such as Japan, Korea and Taiwan. Under these export arrangements, QCS is authorized to issue export certificates to those operations verified as compliant with any additional standards stipulated in the agreement.

QCS has been granted authorization to issue export certificates under the export arrangements between the USDA and the governments of Japan and Taiwan. As part of the agreements, additional standards must be complied with for product to be eligible for export.

**USDA NOP/Japan Export Arrangement Standards**

Products intended for export to Japan must not be produced with alkali-extracted humic acid or lignin sulfonate as a flotation agent.
USDA NOP/Taiwan Export Arrangements Standards
For Processed Products and Crops: Products intended for export to Taiwan must not be produced or processed using zero prohibited substances
For Livestock and meat products: Organic livestock or meat products must be managed and produced without the use of systemic painkillers or analgesics, including the use of Lidocaine or Procaine.

USDA NOP Recognition Agreements & Equivalency Agreements
Those foreign programs, determined by AMS to conform to the technical standards of USDA’s National Organic Program (NOP), are recognized as organic certification organizations in good standing with agreed upon stipulations or additional standards are listed on the NOP Recognition Agreements webpage. Those bodies recognized by the USDA are allowed to apply the NOP technical standards to certify operations that produce or handle agricultural products to be sold, labeled or represented as organic in the United States.

USDA NOP/Canadian Equivalency Agreement
Under the determination of Equivalence, producers who are certified to the NOP Standards by QCS do not have to become certified to the Canada Organic Standards (COS) in order to have their product enter Canada and be represented as “organic.”3 If operators export products that meet the NOP labeling requirements to Canada, they may be labeled accordingly and shipped to Canada.

Under this agreement, the following standard stipulations must be met by operators and verified as compliant by QCS;
1. Agricultural products produced with the use of sodium nitrate shall not be sold or marketed as organic in Canada.
2. Agricultural products produces by Hydroponic or aeroponic production methods shall not be sold or marketed as organic in Canada.
3. Agricultural products derived from animals (with the exception of ruminants) must be produced according to livestock stocking rates as set out in the COS.
4. The following statement should accompany products that are produced under the terms of the arrangement:4 “Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement.”

USDA NOP/ European Union Equivalency Agreement
Under the determination of Equivalence, producers who are certified to the NOP Standards by QCS do not have to become certified under the European Council Regulation (EEC) No 834/2007 & 889/2008 standards in order to have their product exported to the EU from the United States and be represented as “organic.” If operators export products that meet the NOP labeling requirements to EU, they may be labeled accordingly and shipped to the EU.

Under this agreement, the following stipulations must be met by operators and verified as compliant by QCS;
1. Crops produced using antibiotics (streptomycin for fire blight control in apples and pears) must not be shipped to the EU under the arrangement.

3 Q&A on US Canadian/ Equivalence (USDA-NOP)
4 NOP Memo from Miles McEvoy 11-4-10 Re: Attestation Statement for agricultural products certified under the U.S.-Canadian Equivalence Arrangement
2. This arrangement is limited to organic products of the U.S., either produced within the U.S. or where the final processing or packaging occurs within the U.S.

**USDA NOP/ Korea Equivalency Agreement**

Under the determination of Equivalence, processors who are certified to the NOP Standards by QCS do not have to become certified under the Korean organic standards in order to have their product exported to Korea from the United States and be represented as “organic.” If operators export products that meet the NOP labeling requirements to Korea, they may be labeled accordingly and shipped to Korea.

Producers shipping raw product or processors with processed product that does not meet the Korean Food Code definition of “processed food” must certify to the Korean organic standards to be able to export to Korea.

Under this agreement, the following stipulations must be met by operators and verified as compliant by QCS:

1. Processed product must meet the Korean Food Code definition of “processed food.” “Processed food” refers to a food manufactured, processed and packaged by adding food or food additives to food raw materials (agricultural, forestry, livestock or marine products), transforming food raw materials (such as grinding or cutting) till their original form cannot be recognized, or mixing such transformed ones or adding food or food additives to such mixture. However, where, without the use of food additives or other materials, the agriculture, forestry, livestock, or marine products are simply cut, peeled, salted, ripened, or heated (except the cases where heating is performed for sterilization or heating causes significant changes to those products) till their original forms can be recognized or where sanitary risks from treatment processes are not expected and food raw materials are simply treated so as to allow organoleptic identification of food quality, such food products are excluded from the definition of the processed food.

2. Processed products containing apples or pears produced using antibiotics must not be shipped to Korea under the arrangement.

3. This arrangement is limited to organic products for which the final processing or packaging occurs within the country of export either U.S. or Korea.

4. The Korean “Zero Tolerance” for Excluded Methods (GMO’s) in organic processed goods applies to crops exported from the US under this agreement. Korea may test products to ensure that no GMO contamination has occurred.

5. Products labeled as “100% organic “or “Made with Organic <ingredients>” are excluded from this agreement. Only products coved under 95%+ Organic labeling category are eligible under the agreement. All products covered under this agreement must be labeled with the following:

   “Manufactured by:<final packager>”

   “Packaged in <Country>”

   “<Final Package> Certified Organic by <Organic Certifier>”

Certificate number
Phone number of seller and importer.
U.S. products produced under the arrangement must be labeled according to MAFRA’s organic labeling requirements. See [http://www.enviagro.go.kr/portal/content/html/import/logo.zip](http://www.enviagro.go.kr/portal/content/html/import/logo.zip)
Under the recognition of the CAEQ for compliance to ISO/IEC 17065, QCS provides assessment of a client’s practice(s) in accordance with the European Council Regulation (EEC) No. 834/2007 & 889/2008 and any additional requirements required of EU member states, such as Germany. Products may be accepted (on a case by case review of product in question) for use as an ingredient or for re-labeling or export by an operation that is certified by QCS. Procedures specific to QCS EU 834-2007 Certification Requirements are outlined in this manual. The QCS EU 834-2007 Certification Requirements contains the standards criteria for compliance to this program.

Canadian Organic Standards (COS)
The Canadian Organic Standards covers the production for cultivation of plants, production of livestock, food and drink intended for human consumption and food intended to feed livestock and aquaculture for operations located in Canada. Fertilizer products do not have technical standards within the Canadian Organic Standards, and therefore are not certifiable under this program. Cosmetics, pet food and natural health products are excluded from the scope of application. Although they are included in the Canadian Organic Standards, these products do not fall within the mandate of the Agency. Products that are excluded from the scope, such as these, cannot be certified under the Canadian Standards and cannot bear the Canada Organic Logo.

QCS recognizes decisions made by other certification bodies accredited to administer Canadian Organic Regime. QCS maintains its responsibility for the certification decision resulting from this recognition.

Procedures specific to the Canadian Organic Regime are found in this manual. The Organic Production Systems General Principles and Management Systems Standards and the Organic Production System Permitted Substances contain the standards for compliance to the Canadian Organic Regime.

The Canadian Organic Regime has been recognized as meeting the requirements of several foreign governments, such as United States, European Union, Costa Rica, Japan and Switzerland. Under these export arrangements, QCS is authorized to issue export certificates to those operations verified as compliant with any additional standards stipulated in the agreements.

Additional Market Claims

Marketing Label Claims: Producers may have products certified to standards in addition to organic standards in order to carry an additional marketing label. Examples of upcoming label claims included regional food systems and social stewardship standards. Please contact the office for more information.

Transitional Status: In applicable programs, products that meet the requirements under the definition of transitional organic may be marketed using the words “transitional.” Please contact the QCS office for more information.

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6 Canadian Organic Standards, Regulations Pertaining to the Accreditation Reference Manual, Section 4.4.2
**Hormone and Antibiotic Free Status (Livestock):** All animals slaughtered and sold or labeled as hormone and antibiotic free shall be raised in accordance with all provisions for organic labeling with the exception that the producer need not feed such animals organically produced feed, nor maintain pasture under requirements for organic certification. Please contact the QCS office for more information.

**04 Labeling**

**QCS Certification Logo Use**
Unauthorized or misleading use of the QCS logo, USDA logo, the European Union Logo and/or the Canadian certification mark is prohibited and is treated as an infringement of copyright, and is subject to the penalty provisions of the Governing accreditation body to the full extent of any applicable civil or criminal laws governing fraud. Incorrect references to the certification system or misleading use of licenses, certificates or marks found in advertisements, catalogues, or any other published documents are dealt with by suitable actions. QCS Clients are required to sign and abide by QCS’s Certification and Mark Licensing Contract as found in their Organic System Plans.

**QCS Logo**

All organic products certified by QCS, both in the NOP and International programs may be identified by one of the two official QCS logos. Certified entities receive numbered certificates of certification embossed with the official QCS logo. Logos may appear:

a) Where practical, on the individual product (such as with watermelons and cantaloupes).

b) On the individual marketed packaging unit (such as blueberry, strawberry containers, bagged products, juice cartons, and jars.)

c) Where sold in bulk, the display may be identified with the QCS logo.

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7 NOP §205.501 (b) 1 (2)
Use by third parties.
Although only a certified entity has the right to use the logo or name that permission extends to signs and advertisements used to promote QCS certified products for sale by third parties. The certified party must make sure the following conditions are met:

a) Any sign that displays the logo or name must be specific to an item or a group of items that is QCS certified.

b) Any advertisement used by a third party may only use the logo or name in such a way as to clearly refer to items that are QCS certified and only to those items.

Entities certified by QCS may choose to use the logo of Florida Certified Organic Growers and Consumers, Inc. (FOG).

USDA Logo

For labeling and product composition provisions, QCS clients must comply with subpart D Labels, Labeling and Market Information of the USDA AMS Federal Register (7 CFR Part 205) National Organic Program’s Final Rule. Subpart D describes the relevant usages of seals per category of certification and organic product compositions. All clients granted QCS organic certification to the USDA NOP regulation receive the privilege to use the USDA and/or QCS seals. Certified operations may use the USDA logo on certified products.

US/EU Export Arrangement Labeling Labels or retail products must include the code that the EU has assigned to QCS. This code is: US-ORG-051.

Labels or stickers may also include the name of the U.S. certifying agent.

Organic products. Products certified as “organic” in the U.S. and meet the terms of the arrangement listed above may be sold as “organic” in the EU. Products may include the EU organic logo and/or the USDA organic seal

100% Organic Products. The EU does not have a labeling category for 100% organic products. Products meeting the terms of the arrangement listed above may be labeled “organic” and include the EU organic logo and/or the USDA organic seal.

“Made with” organic products. The EU does not have a labeling category for “made with” organic products. For products containing less than 95% organic ingredients, a percentage statement of organic content may be displayed on the label. Products may not be labeled with the EU organic logo or the USDA or organic seal.

Bulk Products Lot number must be present that allows for a complete audit trail to verify the product’s integrity.

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8 NOP §205.300-311
Organic Production Logo of the European Union

The Organic logo of the EU shall only be used if the product concerned is produced in accordance with the requirements of The QCS EU Equivalency Standards. The use of the European organic production logo must adhere to the regulations laid out in Annex XI of the QCS EU 834-2007 Certification Requirements. The logo must appear in the same visual field as QCS’s code number.

Canadian Certification Marks

The use of the “Canada Organic” logo is authorized only if the product concerned is produced in accordance with the requirements of the Organic Production Systems General Principles and Management Systems & the Organic Production System Permitted Substances Lists.

Operators and others may request to use the logo, on their advertising materials, brochures, posters, hand-outs, in newspapers and other publications, on television, etc. CFIA policy is to grant the use of the Logo, provided that certain conditions are met. As per the Canada Organic Office (COO) Operating Manuel, interested parties must apply to COO to obtain permission to use the logo. [http://www.inspection.gc.ca/english/fssa/orgbio/man/appde.shtml](http://www.inspection.gc.ca/english/fssa/orgbio/man/appde.shtml)

05 Certification Steps

QCS certification steps are the overall process by which QCS ensures client’s conformance with applicable standards. Any differences in procedures for EU 834-2007 Certification Requirements or Canadian Standards are noted as such.

**STEP ONE Application Packet**

An initial application packet is supplied to any applicant upon receipt of an application packet fee. The application packet contains a detailed description of the inspection and certification procedures for all category(s) and scopes(s) of certification, including all standards for certification, and the applicant’s rights and duties of the client.

The QCS Certification Packet contains the following:

a) QCS Certification Manual
b) NOP Standards and QCS EU 834-2007 Certification Requirements, and/or Canadian Organic Standards, as appropriate
c) Fees and Costs Packet
d) Application per Category of Certification, including Organic System Plan
e) Inspection Agreement
f) Inspector Evaluation Form
g) Organic Materials Review Institute (OMRI) List

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9 All certified entities may reference the OMRI list for information on generic materials for use in organic production. For information on brand name materials for use in organic production see the OMRI webpage at www.omri.org. It is the responsibility of the applicant or certified entity to ensure that they are using materials compliant with the National List for organic production.
h) Other information as deemed necessary (e.g., brochures, newsletter)

The client is responsible for maintaining these initial documents, which are used throughout the certification steps described in this section.

The Application/Organic System Plan (OSP) per each type of category of certification must be completed and returned to QCS. The applicant must make two copies of the submission including attachments, keeping one copy and sending the other copy along with the original completed application, and fees. Please note that if a copy of the completed application is not received an administrative/copying fee is charged in accordance with the fee structure.

**Application (OSP) /Renewal Provisions**

QCS requires all clients to complete an Application/Organic System Plan (OSP) for each type of category of certification. The application at minimum requires the following: The desired scope of certification and The corporate name and entity, including address and legal status.

The application also serves the purpose of the required NOP Organic System Plan (OSP), which not only describes the activities for compliance with the NOP, but also describes the additional standards required for export.

Annually, QCS requires certified operators to renew their certification by completing updated information.

**QCS Certification and Mark Licensing Contract Provisions**

Included in the OSP is the QCS Certification and Mark License Agreement. QCS requires all clients to complete a formal QCS Certification and Mark License Agreement to be signed by the duly authorized representative of the client.

**Transferring Certification to other Certification Agencies-NOP**

NOP certification is not transferable between certifying agents. Clients wishing to transfer from their existing certifier to QCS or vice versa, must complete a new application and OSP for QCS or their new certifier. QCS or the new certifier conducts a complete review of the client’s OSP and conduct an inspection to ensure compliance with the NOP standards or other applicable standards.  

Certified operations must notify their current Certifier of their intent to certify elsewhere. If a certified operation applies for certification with a new certifying agent but does not maintain or surrender their prior certification in writing and the prior certifying agent issues a notice of noncompliance or proposed adverse action, the certified operation is still bound by the notice of noncompliance or proposed adverse actions of the prior certifying agent.

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**production.** The applicant is responsible for gathering all documentation to ensure that the material is appropriate for organic production. Please contact QCS for further information. Labels for all materials used in organic production must be on file with QCS before use.

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10 Responsibilities of Certified Operations Changing Certifying Agents
If the prior certifying agent issues a notice of suspension or revocation for failure to renew, pay fees, submit an updated OSP or any other technical or administrative noncompliance to the NOP regulations, the certified operation must immediately cease the sale, labeling, and representation of products as organic until all noncompliance’s are resolved and eligibility for reinstatement is granted by the NOP.

Certified operations that change certifying agents voluntarily may not use up existing supplies of labels which identify their prior certifying agent on products they produce or handle.

To change accredited certifying agents, a certified organic operation must:
1. Submit an application for certification and a complete OSP to QCS or another certifying agent as a new applicant;
2. Pay fees to QCS or the new certifying agent.
3. QCS or the new certification agent requests information regarding the operator’s current certification status, including any outstanding notices of noncompliance or proposed adverse actions. Certification may not proceed until outstanding notices and proposed adverse actions are resolved and eligibility for reinstatement has been issued from the NOP, as needed.
4. Operations must maintain their current certification, including submitting annual updates, allowing timely inspections, and payment of all required fees to their current certifying agent until the certification process for the new certifying agent is complete and a new certificate has been issued if they continue to produce or sell products as organic; and
5. Operations must return their prior certificate along with a written notice of surrender to their prior certifying agent or QCS only after the new certification process is complete.

**Transferring Certification to other Certification Agencies—QCS EU 834-2007 Certification Requirements and Canadian Organic Standards**

If a certified operation wishes to transfer their Canadian and EU certification from QCS to another certifying agency or from another certification agency to QCS, the operation must:

1. Submit an application for certification and a complete OSP as a new applicant;
2. Pay fees to QCS, as applicable.
3. QCS requests information from both the requesting certification agency and CFIA regarding the operator’s current certification status, including any outstanding notices of noncompliance or proposed adverse actions. Certification may not proceed until outstanding notices and proposed adverse actions are resolved and QCS has received a confirmation from the CFIA of the date of the certification reinstatement.
4. The first on-site inspection, conducted by the QCS is used to verify if previous nonconformities have been appropriately resolved.
5. The certification previously granted by the QCS or the former certification agent remains valid, until the accepting body issues a new certificate with its name on it to the transferee operator or until a date which may not exceed 12 months from the most recent compliance certificate issuance date, whichever comes first. The operator is responsible for complying to regulations until the new certificate is issued.

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11 ACA 1RF3023 13.4.5
Operators are not allowed to use up existing supplies of labels which identify their current CB on products they produce.

**STEP TWO  Application Review**

Once QCS receives the application, there is an approximate four-month turnaround time for applications. The exact time varies depending on the completeness of the application, responsiveness of the applicant to requests for more information, as well as the availability of the inspector. Each application is reviewed by a Certification Coordinator to ensure its completeness and to determine whether applicant appears to comply or may be able to comply with the NOP and the additional standards required for export. Furthermore, QCS ensures its capability to perform the certification services with respect to the scope of certification requested, the location of the operation and any special requirements such as language used by the applicant.

The certification staff verifies that an applicant who has previously applied to another certification agency and received a notification of noncompliance or denial of certification has submitted documentation to support the correction of any noncompliance(s) identified by the notification of noncompliance or denial of certification. QCS treats any application that includes a Notification of Noncompliance or a Notice of Denial of Certification as a new applicant.

Applicants are notified of the receipt of their application and are advised of any measures that may be necessary to complete the application. This provides QCS and the applicant an opportunity to clearly define, document and understand the requirements for certification, and to resolve any differences in understanding between QCS and the applicant prior to the assignment of the initial inspection.

Key items for a complete review include:

a) Signed Application/(OSP),

b) Supporting Application/(OSP) information (i.e. farm, facility maps, organic product profiles)

c) The name of the person completing the application, the applicant’s business name, address and telephone number; and when the applicant is a corporation, the name, address and telephone number of the person authorized to act on the applicant’s behalf.

d) The names(s) of any organic certifying agent(s) to which application has previously been submitted; the year(s) of application; the outcome of the application(s) submission, including when available a copy of any notification of non-compliance(s) or denial of certification issued to the applicant, and a description of the actions taken by the applicant to correct the noncompliance(s) noted in the notification of noncompliance, including evidence of such correction.

e) Any other information necessary to determine compliance with the relevant standards.

Unsigned or incomplete applications may be returned to the applicant, and an applicable postage and handling fee may be required for application resubmission.

If the Certification Coordinator finds the operation to be out of compliance, the applicant is notified in writing of the nonconformance(s) and given the opportunity to document corrective action. If documentation of corrective action is not addressed within stated time frame in the notice, the certification staff begins procedures to deny certification, as per Notification of Denial of Certification (Applicants).
Once the completed application and supporting materials have been reviewed and approved, an initial inspection is scheduled to verify the information provided in the application. This process occurs within a reasonable timeframe, except that the initial inspection may be delayed for up to 6 months to comply with the requirement that the operation be inspected when compliance or capacity to comply can be observed.

The applicant may withdraw his or her application at any time. An applicant must inform the office in writing of his or her decision to withdraw an application. An applicant who withdraws his or her application is liable for the costs of services provided up to the time of application withdrawal. An applicant that voluntarily withdraws from the certification process prior to the issuance of a notice of noncompliance is not issued a notice of noncompliance. Likewise, an applicant that voluntarily withdraws his or her application prior to being issued a denial of certification is not issued such notice. Applicants who have been issued a notice of noncompliance or notice of denial, must correct the cited noncompliance’s prior to seeking certification elsewhere or again with QCS. If the client has willfully violated the NOP regulations, QCS reserves the right not to accept the client’s request to withdraw his/her application.\(^\text{12}\)

**STEP THREE Inspection**

An initial on-site inspection is conducted for each operation requesting certification and include the unit, facility and site that produces or handles organic products included in an operation for which certification is requested. Additional standards required for export may require the inspection of non-organic portions of the operation.

An on-site inspection is conducted annually thereafter and take place in no less than 18 months after the last inspection. Inspections for each certified operation that produces or handles organic products are required for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue.

QCS may conduct additional on-site inspections (either announced or unannounced) of first time applicants for certification and currently certified operations to determine compliance with applicable standards, and if necessary to verify export requests.

**Assignment and Scheduling of Inspector(s)**

Once the application review is complete, QCS assigns an Inspector to perform the inspection, based on the following criteria or combination thereof for the specific type of operation to be evaluated:

a) Specification of appropriate education, training and experience (i.e. training policy);

b) Previous experience in the location where an inspection takes place;

c) Knowledge of the language;

d) The local organic context;

e) Logistics for cost effectiveness; and

e) No prior affiliation or business relationship or other potential conflicts with the operation.

The inspector contacts the applicant with an audit plan and both must agree on the inspection logistics and the inspection appointment. The Inspector also provides an Inspection Agreement that must be signed by the operation before proceeding with the inspection. Applicants may

\(^{12}\) NOP §205.204
refuse the selection of an inspector based on a valid argument demonstrating that the inspector would not be able to conduct an objective inspection of the operation in question.\textsuperscript{13}

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 the land and/or facilities demonstrate the operation’s compliance with or capability to comply with the relevant standards. This requirement does not apply to unannounced on-site inspections.

**QCS Inspection Scheduling for Additional Standards – EU 834-2007 Certification Requirements**

Where an operator runs several production units in the same area, the units are also subject to inspection.\textsuperscript{14}

Inspection visits for operations with bivalve mollusk production must take place before and during maximum biomass productions.\textsuperscript{15}

QCS also rotates inspectors, at least after inspecting an operation more than 3 times. This helps to minimize any bias (i.e. overfamiliarity, etc.) that may arise from being inspected by the same inspector year after year.

**QCS Inspection Scheduling for Additional Standards-Canadian Organic Standards\textsuperscript{16}**

Inspections are conducted during a time when grounds, premises, and activities subjected to certification may be observed. Any inspection delays between 12 and 18 months must be justified and documented. The inspection includes non-organic units where there is reason to suspect undeclared split production of similar products, and in any situation revealing high risk of cross-contamination; where agricultural producers carry out split production, inspections allow visual determination of what is being planted in all cultivated fields within the production unit.

**Inspection Plan Requirements\textsuperscript{17}**

**Prior to Inspection**

Before performing an actual on-site inspection, QCS provides inspectors with the QCS Inspectors Manual and guidance necessary for the inspector to complete a successful inspection, including at minimum:

1. The implementation in the field of any checklists, guidance documents, or options for the interpretation of standards;
2. Requirements for opening meetings, closing meetings; communications of results of surveillance audits, and any
3. Requirements for report writing.

\textsuperscript{13}COR Quality Management Systems Manual, Annex 3, 4.5.3.1
\textsuperscript{14}EC No 889/2008: Article 66, paragraph 3
\textsuperscript{15}EC No 889/2008 Article 79 c (via 710/2009)
\textsuperscript{16}CAEQ COO Operation Manual 10.2
\textsuperscript{17}NOP §205.403.b.2, 205.501 (a) (18)
QCS also provides inspector (as appropriate) the following documents for review:
1. The application (OSP)/Renewal;
2. Previous Year’s inspection report, if applicable;
3. Any Minor Non-compliances and corresponding corrective actions from the previous year;
4. Prescribed materials applicable to the applicant’s operation;
5. Additional specific instructions and requirements as directed by QCS;
6. Relevant Certification Standards.

**During the Inspection**

The inspector conducts an Opening Meeting to provide an overview of the inspection plan. The inspector inspects each production unit, facility, and site that produces or handles organic products and that is included in the request for certification.

The Inspector also reviews documents, record-keeping systems, interview personnel, and perform sampling as warranted. Applicants must allow the inspector to have complete access to the production and handling operation, including non-certified production and handling areas, structures and offices.

During the inspection, the inspector verifies and reports on the following information:
1. The operations’ compliance or capability to comply with the NOP, or other additional standards as applicable;
2. The information provided in the application, including that the organic system plan accurately reflects the practices used or to be used by the applicant for certification or by the certified operation;
3. That prohibited substances have not been and are not being utilized in an operation requested for certification. QCS may instruct the inspector to collect and have tested samples of soil, water, waste, seeds, plant tissue, and plant, animal and processed products to verify compliance;
4. That an audit trail is developed and maintained sufficiently to ensure all organic production can be traced back through the system and contamination risk is managed accordingly. Records audited include, but are not limited to; ingredient/seed source records, production, monitoring, storage, transport and sales records.  

**Exit Interview**

The inspector conducts an exit interview with an authorized agent of the operation in order to confirm the accuracy and completeness of the inspection observations and the information gathered during the inspection.

At this time the inspector notifies the applicant or certified operation of any additional information needed or of anything that appears to be out of compliance with relevant standards. The inspector provides the applicant with a receipt for any samples taken during the inspection. Any additional information or items that appear out of compliance is presented in writing in the Exit Interview Form. The applicant is expected to read all items described in the Exit Interview Form and sign this document as acknowledgement that such items have been explained to him.

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18 USDA NOP §205.403.c.1-3, 204.406 (a) 3
19 Canadian Organic Standards, COR Quality Management Systems Manual, Annex 3, section  4.5.3.1
20 USDA NOP §204.402 §205.404.a, §205.403.d, §205.403.e.1-2
From the time of the exit interview, the inspector is allotted 30 days to complete and submit the inspection report to QCS. Within a reasonable time, QCS forwards the inspection report and the results for any samples taken to the client at the same time it sends the decision on certification, as per Granting of Certification.

**Unannounced Inspections**

**QCS NOP Unannounced Inspections**

QCS may conduct additional on-site inspections (either announced or unannounced) of applicants for certification and certified operations to determine compliance with the National Organic Standards or any other applicable standard (for export products). The Administrator or State organic program’s governing official may require QCS to perform additional inspections (announced or unannounced) for the purpose of determining compliance with the National Organic Standards.

**Additional Unannounced Inspection Requirements-QCS EU 834-2007 Certification Requirements & Canadian Organic Standards**

QCS carries out additional inspections, primarily unannounced, based on the general evaluation of the risk of noncompliance with the QCS EU 834-2007 Certification Requirements and Canadian Organic Standards, taking in account at least the results of previous inspection, the quantity of products concerned and the risk of commingling.

Unannounced on-site inspections may be conducted at any time at the discretion of QCS to confirm compliance to the EU-834-2007 Certification Requirements. At the beginning of the year, QCS plans additional unannounced visits, representing 10% of all EU certified operators. QCS also residue samples 5% of all EU certified operators.

Unannounced on-site inspections may be conducted at any time at the discretion of QCS to confirm compliance to the Canadian Organic Standards. At the beginning of the year, QCS plans additional unannounced visits, representing 3% of primary producers and 5% of other clients for which it grants certificates for products made in Canada.

**STEP FOUR Determination of Certification**

The QCS Certification Coordinator(s) are the sole delegates of QCS with the authority to grant, maintain, extend, suspend or withdraw certification.

**Certification Review**

The QCS Certification Coordinator conducts a Certification Review of the following information to determine the client’s compliance with standards per category and scope of certification:

a) Inspection Report and supporting documentation,

b) Results of any analysis for substances conducted, and
c) Any additional information requested from or supplied by the applicant.

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21 NOP §205.403(a)(2) (i-iii)
22 EU 889/2008 Title IV, Chapter 1 Article 65.
QCS may at any time of the certification decision process make request(s) for more information to determine compliance with relevant standards. Any requests for more information may prolong the estimated turn-around time. When a decision is reached, the appropriate decision letter(s), certificate(s), results of any tests for samples taken by the inspector, a copy of the on-site inspection report and an invoice for any remaining fees is sent to the client.

**Granting of Certification**

If the organic system plan and all procedures and activities of the applicant’s operation are in compliance with the requirements of the applicable Standards, and QCS determines that the applicant has been and is able to operate in accordance with the organic system plan, then certification is granted. The certification may include requirements for the correction of minor non-compliances within a specified time period; except in the case of COR certifications, in which case, all non-compliances must be corrected prior to granting of certification.

**Certificate**

When certification is granted, QCS issues a certificate to the organic operation that specifies at minimum:

1. The category and scope of the certification, including products for which certification is granted;
2. The name and address of the certified operation;
3. The effective date of certification/ annual renewal date;
4. QCS’s name, address, internet address and telephone number;
5. Label classification for processed products (Organic, Made with Organic, product description).

**Temporal Validity - NOP Regulations**

Once a client is certified in accordance to the NOP, an operation’s certification continues in effect until surrendered by that operation, or suspended or revoked by QCS, and if relevant, the USDA NOP administrator and/or State organic program’s governing official.

Annually, QCS issues Product Verification form(s), not part of the certificate, but a list that states the current products certified by that year of certification.

**Temporal Validity – QCS EU 834-2007 Certification Requirements**

QCS clients certified in accordance to additional standards required for export are issued a certificate, which must be re-issued on an annual basis with an expiration date.

**Temporal Validity - Canadian Organic Standards**

If a company does not produce organic products for sale at the time of certification, either because the production system is not yet operation or the operator is currently inactive, QCS cannot issue a certificate until the firm is operational. QCS may issue a letter to prove the operation has the capacity to produce organic products. The certificate is issued only following an inspection of the system once the operation is processing the product for certification.\(^{24}\) The certification is valid as long as certification is not suspended or cancelled.

\(^{24}\) CAEQ Accreditation Reference Manual for Product Certifiers 12.6
Notice of Noncompliance\textsuperscript{25}

If QCS believes that an applicant or client is not able to comply or has not complied with the requirements of the relevant standards, QCS provides a written \textit{Notification of Noncompliance}. The applicant or client must respond with satisfactory evidence of compliance within the 30 working days of the decision in writing. The \textit{Notification of Noncompliance} must provide:

\begin{itemize}
\item[a)] A description of each noncompliance;
\item[b)] The facts upon which the notification of noncompliance is based; and
\item[c)] The date by which the applicant or client must rebut or correct each noncompliance, and submit supporting documentation of each such correction when correction is possible.
\end{itemize}

Resolution of Notice of Noncompliance\textsuperscript{26}

In response to a Notice of Noncompliance, the applicant or client may:

\begin{itemize}
\item[a)] Correct the noncompliance(s) and submit a description of the corrective actions taken with supporting documentation to QCS;
\item[b)] Correct the noncompliance(s) and submit a new application to another certifying agent: \textit{Provided}, that, the applicant includes a complete application, the notification of noncompliance received from QCS, and a description of the corrective actions taken with supporting documentation; or
\item[c)] Submit written information to QCS to rebut the noncompliance described in the Notification of Noncompliance.
\end{itemize}

Once the corrective actions are received back from the applicant or client, QCS evaluates the corrective actions taken and supporting documentation submitted or the written rebuttal, and conduct an on-site inspection if necessary. QCS may at any time of the certification decision process make request(s) for more information to determine compliance with relevant standards.

When the corrective action or rebuttal is sufficient for the applicant to qualify for certification, QCS issues the applicant an approval of certification pursuant to \textit{Granting of Certification}.

When the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, or if the applicant fails to respond within the stated deadline, QCS issues a Notice of Denial of Certification.

Notice of Denial of Certification for Applicants\textsuperscript{27}

QCS issues an applicant a written \textit{Notice of Denial of Certification}. This may be combined with a \textit{Notification of Noncompliance}.

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

\begin{itemize}
\item[a)] Reapply for certification pursuant to STEP ONE Application Packet;
\item[b)] Request mediation pursuant to Mediation;
\item[c)] File an appeal of the denial of certification pursuant \textit{Appeals}.
\end{itemize}

\begin{footnotes}
\item[25] USDA NOP §205.405.a.1-3 & 205.662
\item[26] USDA NOP §205.405.b.1-3, 205.405.c.1-205.405.c.1.i & 205.662.b
\item[27] USDA NOP §205.405.a, 205.405c.1.ii, 205.405.c.2, 205.405.g & 402.d.1-3, 205.662 (d)
\end{footnotes}
If QCS 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 pursuant to this part, QCS may deny certification without first issuing a notification of noncompliance.

**STEP FIVE: Re-Certification (Continuation of Certification)**

In order for a client to maintain certification with QCS, the certificate holder must:

- a) Maintain compliance to the relevant QCS Standards
- b) Successfully complete an annual on-site surveillance inspection
- c) Annually pay the certification fees, and
- d) Submit the following information, as applicable, to QCS:
  1) An updated organic production or handling system plan that includes:
     a) A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the previous year’s organic system plan during the previous year; and
     b) Any additions or deletions to the previous year’s organic system plan, intended to be undertaken in the coming year;
     c) Any additions to or deletions from the information regarding the name of the person completing the application for certification, the applicant’s business name, address and telephone number and when the applicant is a corporation, the name address and number of the person authorized to act on the applicant’s behalf;
     d) An update on the correction of minor non-compliances previously identified by QCS as requiring correction for continued certification; and
     e) Other information as deemed necessary by QCS to determine compliance with the NOP and additional standards required for export.

Following the receipt of the information, QCS performs the on-site surveillance inspection, and verifies the clients continued compliance with applicable standards.

**Re-Certification On-Site Surveillance Provisions**

As a general rule, no more than 12 months should lapse without having an on-site inspection. In the event that it is impossible for QCS to conduct the annual onsite inspection following receipt of the certified operation’s annual update of information, QCS may allow continuation of certification and may issue an updated Product Verification of organic operation on the basis of the information submitted and the most recent on-site inspection conducted during the previous 12 months: Provided, That, the annual on-site inspection, is conducted within the first 6 months following the certified operation's scheduled date of annual update.

**Re-Certification Decision**

28 USDA NOP §205.403, 205.406.a.1-4, 205.406.b-d
If QCS determines that the certified operation is complying with the relevant standards, and that any of the information specified on the certificate of organic operation has changed, QCS issues an updated certificate of organic operation, as per Granting of Certification.

If QCS has reason to believe, based on the on-site inspection and a review of the information specified in Re-Certification, that a certified operation is not complying with the relevant standards, QCS provides a written Notification of Noncompliance to the operation pursuant to Notice of Major Noncompliance.

**Sanctions Process**

When the corrective action or rebuttal is not sufficient per a written Notification of Noncompliance, the certified operator is processed per the Sanctions Process.

**Notice of Proposed Suspension and/or Revocation* of Certified Client**

When the corrective action is insufficient and/or not completed within the prescribed time period, QCS issues a certified client a written Notification of Proposed Suspension and/or Revocation of Certification (may be combined) of the entire operation or a portion of the operation, as applicable to the noncompliance. The Notification of Proposed Suspension and/or Revocation must include the following:

a) The reasons for the proposed suspension or revocation;
b) The proposed effective date of proposed suspension or revocation;
c) The impact of a suspension or revocation on future eligibility for certification;
d) The right to request mediation and/or

e) File an appeal

If QCS has reason to believe that an applicant for certification has willfully violated the standards, QCS sends the certified client a Notification of Proposed Suspension or Revocation of Certification of the entire operation or a portion of the operation as applicable to the noncompliance.

**Suspension or Revocation***

If the client fails to correct the noncompliance(s) to resolve the issue through rebuttal or mediation or to file an appeal of the proposed suspension or revocation of certification in the timeframe allowed, QCS sends the client a written notification of suspension or revocation. For NOP and COR suspensions/revocations, QCS must simultaneously inform the appropriate regulatory authorities.

QCS does not grant certification to an operator who had its certification previously suspended or discontinued; unless the operator has requested a reinstatement.

**Reinstatement after Suspension/Revocation - NOP**

A certified operation whose certification has been suspended may at any time, unless otherwise stated in the notification of suspension, must submit a request to the Secretary of Agriculture for reinstatement of its NOP certification. The request must be accompanied by evidence

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29 USDA NOP §205.405.205.662.c-d

*Revocation is only applicable to NOP operators*
demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance.

A certified operation or a person responsibly connected with a client whose certification has been revoked is ineligible to receive certification for a period of 5 years following the date of such revocation. Except, that the Secretary may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.

Reinstatement after Suspension- COR & EU
A certified operation whose certification has been suspended may at any time, unless otherwise stated in the notification of suspension, must submit a request to QCS for reinstatement of it’s COR certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance.

QCS can only reinstate suspended certification after the CFIA has been notified and QCS has received a conformation from the CFIA of the date of the certification reinstatement.

Willful Violation
In addition to suspension or revocation, any client that knowingly sells or labels a product as organic, except in accordance to the NOP, shall be subject to a civil penalty of not more than $10,000 per violation. Clients making false statement under the NOP to the Secretary, State organic program, or QCS is subject to the provisions of section 1001 of title 18, United States Code.

Modification of Certification
Clients are required to inform QCS, in writing, of any modifications, which extend or reduce their scope of certification already granted. These modifications may include, but are not limited to, changes in organizational structure or management and/or significant changes in the organic system plan. The client is not allowed to release products affected by the modification until the Certification Coordinator has reviewed the modification and has found it to be compliant with applicable certification standards.

If changes to the system are minimal and are clearly within QCS Standards, an amended certificate and/or product verification form is issued. If the changes are extensive or are not easily demonstrated, an inspection of the new management or production system may be required before modification is approved.

Modification of Certification—QCS EU 834-2007 Certification Requirements and Canadian Organic Standards
Operations with substantive changes to their production may be required to withhold products produced under these changed procedures, pending review by QCS.

Clients are responsible for the costs incurred for these services. Once the modification is awarded, a notice of the certification decision is sent to the client.

Surrender of Certification
At any time clients may surrender from QCS through written notification. The client must cease all claims of the QCS logo and name, destroy or return all certificates, labeling and marketing
material containing reference of QCS as per the QCS Certification and Mark License Agreement, and are liable for the costs of services provided up to the point of withdrawal. QCS acknowledges the cancellation of certification with a Notification of Surrender.

Operations that fail to respond to renewal requests or that do not notify QCS of their surrender of their certification are issued a Notice of Noncompliance. For NOP and COR surrenders, QCS informs the appropriate regulatory authorities. For COR, QCS can only reinstate surrendered certification after the CFIA has been notified and QCS has received a confirmation from the CFIA of the date of the certification reinstatement.

**Temporary Variances/Derogations**

QCS operations must submit all requests for temporary variances in writing to the QCS office. These requests must include supporting documentation to support the justification for the variance to a specific standard. The temporary variance request is reviewed for completeness by QCS.

**Temporary Variances – NOP**

QCS submits the temporary variance request to the NOP within 10 business days of receiving a complete request. Operations must not make any changes to the related sections of their OSP or practices until the NOP notifies them in writing that the temporary variance has been granted. If the operation is found to have changed their OSP or practices prior to receiving approval of the temporary variance, QCS issues the operation a Notice of Noncompliance.

The NOP does not approve requests for temporary variances for the following requests;

- Variances for the use of materials prohibited under 205.105,
- Variances to feed livestock non-organic feed.

**Temporary Derogations - QCS EU 834-2007 Certification Requirements and Canadian Organic Standards**

QCS reviews the temporary derogation request within 10 business days of receiving a complete request. Operations must not make any changes to the related sections of their OSP or practices until QCS notifies them in writing that the temporary variance has been granted. If the operation is found to have changed their OSP or practices prior to receiving approval of the temporary variance, QCS issues the operation a Notice of Noncompliance.
QCS Certification Process

Applicant requests application from QCS.

QCS sends applicant/client all necessary forms to complete the application/renewal.

Applicant/Client completes the application and attachments. Contract Agreements are signed.

QCS completes an initial review of Organic System Plan.

Applicant/Client complies with standards.

Applicant/Client does not comply with standards.

QCS assigns an Organic Inspector for a site visit. QCS provides the inspector all appropriate documents.

Applicant/Client responds with sufficient corrective actions

Applicant/Client is issued a Notice of Noncompliance.

Applicant/Client does not respond with sufficient corrective action.

Applicant is issued a Notice of Denial.

Inspector performs an on-site inspection.

Any missing documents will be requested from the applicant. Once complete, the Organic System Plan and Inspection report is sent for final review for compliance.

QCS notifies the applicant of their organic Certification Status.

Applicant receives organic certificate from QCS.

The applicant can be visited again throughout the year as warranted.

Annual Recertification-Applicant will submit Re-certification Questionnaire.

QCS completes an initial review of Organic System Plan.

Applicant/Client complies with standards.

Applicant/Client does not comply with standards.

Applicant/Client responds with sufficient corrective actions

Applicant/Client is issued a Notice of noncompliance.

Applicant/Client does not respond with sufficient corrective action.
06 Mediation and Appeals

**QCS NOP Regulations: Mediation**

Any dispute with respect to denial of certification or proposed suspension or revocation of NOP certification may be mediated at the request of the client. Mediation must be requested in writing to QCS.

If QCS rejects the request for mediation, QCS notifies the client and advises the client the right to request an appeal within 30 days of the date of the written notification of rejection.

If QCS accepts the request for mediation, such mediation is conducted per the mediation procedures as established by the Florida State Organic Program, at no cost to the client or QCS. The parties of the mediation have no more than 30 days to reach an agreement following a mediation session. Any agreement reached during or as a result of the mediation process shall be in compliance with the NOP.

If mediation is unsuccessful, the client has 30 days from termination of mediation to appeal.

The Secretary may review any mediated agreement for compliance to the NOP and reject an agreement or provision not in compliance with the NOP.

The service of mediation is not available for resolution of noncompliance(s) to additional standards required for export.

**Appeals**

The appeals process varies according to certification standard. However all appeals must be in writing and a record of all appeals is maintained at QCS. Records of subsequent actions is maintained along with follow-up to ensure the action was effective.

**Appeal - NOP**

Operations may appeal certification decision of denial, proposed suspension or revocation to the NOP Administrator, unless they reside in a state with an organic program as per USDA NOP §205.680.d-e, 205.681.

**Appeal - QCS EU 834-2007 Certification Requirements**

All requests and notices of appeal to decisions for QCS EU 834-2007 Certification Requirements must be made in writing and be accompanied by supporting documentation. The written appeal must provide sufficient detail and describe the operation’s issue. A written appeal must be submitted within 30 days of receipt of notification or public announcement of certification status.

QCS acknowledges receipt of all appeals. QCS then confirms whether the appeal relates to certification activities.

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30 USDA NOP §205.663
31 USDA NOP §205.680.d-e, 205.681
The COO\textsuperscript{32} or their designee conducts an investigation of the appeal. In a confidential and timely manner, the investigator is responsible for gathering and verifying all necessary information (as far as possible) to progress the appeal to a decision. The burden of establishing the invalidity of a certification decision rests with the appellant. If a certified operator refuses to cooperate in an investigation, QCS may deem this sufficient cause for denial of appeal.

The decision resolving the appeal is made by a person who was not involved in the initial certification activities (i.e., pre-review, inspection, previous decision) related to the appeal. If QCS sustains a certification applicant’s or certified operation’s appeal of QCS’s decision, the applicant is issued organic certification, or a certified operation continues its certification, as applicable to the operation. If QCS denies an appeal, a formal administrative proceeding is initiated to:

a) For QCS EU 834-2007 Certification Requirements: deny, suspend, or revoke the certification as appropriate.
b) For Canadian Organic Standards: suspend, revoke and/or cancel the certification as appropriate

QCS maintains a record of all appeals.

\section*{07 Complaints}

QCS must investigate any complaint regarding clients’ activities in relation to the applicable standards and complaints regarding QCS’s certification operations. A complaint may come from either certified operators (e.g., producers, contract producers, processors, handlers, etc.) or from outside parties such as interested stakeholders or the general public. Complaints must be written and accompanied by supporting evidence, including a description of the involvement in the operation or with QCS.

QCS acknowledges receipt of all complaints. QCS then confirms whether the complaint relates to its certification activities or other activities. Depending on the nature of the complaint QCS assigns the complaint accordingly to be investigated. The Program Director/COO\textsuperscript{33} or their designee conducts an investigation of the compliant. In a confidential and timely manner, the investigator is responsible for gathering and verifying all necessary information (as far as possible) to progress the complaint to a decision. The decision resolving the complaint is may be made by the designated investigator or the Program/Director may designate a person qualified for making certification decisions that was not involved in the certification activities related to the complaint.

If a certified operator or applicant refuses to cooperate in an investigation, QCS may deem this sufficient cause for denial of application or suspension of certification.

QCS maintains a record of all complaints.

\textbf{Complaints- NOP certified operations}

QCS may investigate complaints of noncompliance with its NOP certified operators. QCS must notify the USDA NOP Program Manager of all compliance proceedings and actions taken.

\textsuperscript{32} Canadian Organic Standards, COR Quality Management Systems Manual, 2.6.1.6

\textsuperscript{33} Canadian Organic Standards, COR Quality Management Systems Manual, 2.6.1.6
pursuant to the complaint activities. A State organic program’s governing State official may also investigate complaints of noncompliance concerning organic production or handling operations operating in that official’s State.

**Complaints against QCS**
If the complaint is against QCS services, QCS investigates the matter and if found valid, takes appropriate corrective and preventive action and resolution of any deficiencies found in products or services. These actions are taken, documented and the complainant notified of the outcome.

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**08 Sampling & Testing of Agricultural Product(s)**

**Sampling and Testing**
Sampling and testing of agricultural inputs or products (e.g., soil, water, waste, seeds, plant tissue, and plant, animal, and processed products) for pesticide residues or environmental contaminants that exceed the Food and Drug Administration’s or the Environmental Protection Agency’s regulatory tolerances or those of additional certification regulations are required 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.

Sample collection must be performed by an inspector representing the Administrator, applicable accreditation body(s), applicable State organic program’s governing State official, or certifying agent. Sample integrity must be maintained throughout the chain of custody, and residue testing must be performed in an ISO/IEC 17025 accredited laboratory. 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.

**Factors for Sampling and Testing**
Sampling and testing may (shall be, in the case of EU certifications) be required as follows:
1) Known environmental data indicates operation is located in an area of high chemical or environmental contamination (i.e., pesticides, hazardous waste, microorganisms of public health significance).
2) Information is received of exposure to prohibited materials through indirect means such as spray, drift, use of contaminated inputs, contaminated water or soil.
3) QCS receives a written complaint.
4) Positive sample test results for an operation are received, or follow up on positive test results from Federal, State, or local government testing.

**Types of Sampling and Testing**
Within the recognized boundaries of analytical limitations, QCS may require the following tests:
 a) Soil sample testing for macronutrients, micronutrients, and agronomic conditions.
 b) Soil sample testing for chlorinated hydrocarbon pesticide, organophosphate, nitrate and PCB residuals.
 c) Raw commodity sample testing for pesticide residues
 d) Processed product sample testing for pesticide residues.
 e) Tissue tests.
f) GMO tests.
In addition to these routine tests, QCS may require additional selective testing when
circumstances and/or conditions deem such action to be appropriate. Most often these tests are
selected from the broad range of either EPA mandated testing procedures for hazardous waste
chemicals and heavy metals, or from Health Department procedures for the identification of
pathogens and other health hazards.

Costs of Testing
In the event that QCS requires testing for a regulatory compliance purpose, the cost of the testing
is borne by QCS. However, when an operation’s organic system plan lists substances to be used
as a production or handling input having a restriction associated with the use of such
substance, then cost of testing associated with meeting the restriction specified in the
regulations is at the operation’s expense.

Test Results from Sampling
The levels of any detected pesticides must not exceed 5% of the Environmental Protection
Agency (EPA) tolerances, FDA action levels if the product in question is to be labeled as organic
and other regulatory requirements34. In areas with lower residue tolerances, those tolerances are
used in determining whether a product can be sold as organic. Products with residues of
prohibited substances in prohibited amounts (such as from unintentional contamination) cannot
be sold or labeled or represented as organic. The Administrator, the applicable State organic
program’s governing State official, applicable accreditation body(s) or QCS may conduct an
investigation of the certified operation to determine the cause of the prohibited substance. Any
person who knowingly violates the 1990 Organic Foods Production Act (OFPA) can be fined up to
the amount specified in 7 CFR205.662(g). A person who is adversely affected by an action of a
Federal or state official or a certifying organization may appeal the action. QCS may monitor for
compliance by on-site inspections, announced or unannounced, and by requiring residue testing
with the cost to be paid by QCS or other regulatory agency. If QCS finds just cause, certification
can be revoked. Regulatory officials may investigate complaints and/or violations of the law
through residue testing or any other appropriate investigation. QCS releases any requested
information to agricultural regulatory officials.

Test results of pre and post-harvest samplings of certified COR clients are processed in
accordance to the CFIA Directive 14-01: Procedure for follow-up to positive chemical residue
testing results in organic products.

Residue Sampling-NOP
QCS must annually sample and test from a minimum of five percent of their NOP certified
operations.

Residue Sampling-- QCS EU 834-2007 Certification Requirements & Canadian
Organic Standards
QCS also annually conducts sampling of, at minimum, 5% of its EU certified operations based
on risk per this standard. QCS may take samples if it has reason to suspect production
techniques are not in compliance with these standards or the inadvertent or intentional use of
prohibited materials.

34 COO 2014 Directive 14
GMO Sampling - Export Canadian Organic Standards
QCS also investigates COR clients if there is suspicion that an organic product contains even a trace amount of a GMO. QCS requires sampling and testing in an event of suspicion of the presence of GMO.\textsuperscript{35}

09 Standards Revisions

Revision of QCS NOP Regulations\textsuperscript{36}
Suggestions for changes to the National Organic Program (NOP) and/or petitions for inclusion of materials on the National List must be directed to the National Organic Standards Board (NOSB) and adopted by the NOP. Please contact them directly. For more information see 7 CFR 205.607. Petitions to amend the list should be submitted to the same address.

Suggested NOP Program Revisions
For the purpose of efficient administration and enforcement of the National Organic Standards, the Certification Coordinator(s) are granted the authority to implement rules and interpret the provisions contained herein, while maintaining consistency with the outlined principles of organic production.

Any interested party may make suggested changed to QCS Policies and Procedures (other than standards) via the Suggested Program Revision Form found on the last page of this manual. This form may also be obtained from the QCS office. Receipt of the form is acknowledged by the QCS office. Submitted forms are reviewed by the Program Director/COO and/or their designate and makes a decision within 60 days of receipt of the form. All certified entities and other parties of interest are notified of any changes in QCS polices or procedures.

Petitions to change accepted industry standards (the American Organic Standards of the Organic Trade Association (OTA)) should be directed to the OTA at (www.ota.com, (413)774-7511, info@ota.com).

Suggested Revision Form
Name:
Designation:  Consumer,   Farmer,   Handler/Processor
Operation’s Name, if applicable:
Phone Number:

Suggested Program Revision
(Please include the document and section number(s) to which the suggested revision(s) applies and explain the suggested revision(s) thoroughly).

Revision of Canadian Organic Standards
QCS notifies all its operators of any amendments to the regulations or the standards within two months after their publication. QCS allows a period of up to 12 months after the publication.

\textsuperscript{35} COO Operations Manual C  2.3.19
\textsuperscript{36} NOP § 205.607.
date of an amendment to CAN/CGSB-32.310 and CAN/CGSB-32.311 for applicant/operator to come into compliance with any changes to the requirements.

If at any point during certification activities, interpretation of an applicable standard is required, it can be sought from the Standards Interpretation Committee (SIC). Refer to Part G for details about this committee and on how to request an interpretation. It is likely that the need for interpretation requests to the SIC will occur during a certification cycle of an operator. In such cases, where both parties agree there is need for interpretation or clarification and the interpretation request is submitted by QCS, the issue that is the subject of the request will be set-aside by QCS (e.g. the nonconformity will be placed on hold) until the response from the SIC is returned. In these cases, between the time when the interpretation request to the SIC is submitted and the response from the committee returned, any certification work affected by the interpretation shall proceed as normal, up to and including the issuance of certification documents. When the response from the SIC is received, the outstanding issue shall be revisited and appropriate actions taken by the CB or the operator or both as required. If changes are required by the operator to comply with the interpretation of the SIC, the QCS will not suspend or withdrawal any certification it has issued that is affected by this interpretation as long as the operator has made the required changes in a time frame that is no less than the time permitted for any other non-conformance issued by QCS. In cases where the QCS and the operator do not agree that the issue needs an interpretation, QCS will rely on CAN/CGSB-32.310, Section II - General Principles of Organic Production and Par. 1.4.1. when interpreting the issue. The operator is still able to make a complaint to the CAEQ about QCS and/or ask the SIC for an interpretation and request a reconsideration of the issue at a later date.

**Revision of Additional Standards**

QCS additional standards required for export are reviewed annually, or as required for compliance by the European Union, and/or other regulatory bodies.

The management team takes all input received in writing, review the input and take into account modifications for the next publication of the standard. The QCS Program Director/COO has final approval.

In the case where the regulatory bodies require QCS to revise standards, the Program Director/COO may act individually to implement the appropriate standard(s). Updates to standards are made and published per the deadlines provided by the accreditation body. If specific dates are not provided, the Program Director/COO at a minimum, must allow a 60-day implementation period for all standards.

QCS verifies that standards are fully implemented. At the first annual on-site audit following the date of standard implementation, the client’s actions to comply with the standard implementation are verified for compliance.
10 Fees

Certification Fees
QCS Fee Schedules appropriate for the certification scope is provided to requesting applicants.

Fee Structure
Fees are evaluated periodically and are subject to change. See QCS Fee Schedule for appropriate fees. Membership for certified entities is included in certification. First time applicants must purchase a certification packet for a fee. If an applicant withdraws their application before the inspector has been assigned, the applicant is refunded half of the certification fee if an applicant withdraws their application after the inspector has been assigned, the applicant is not eligible for a refund. Applicants who are eligible for a refund must direct a written request to the office for the refund.

Certification Assessments
Assessments provide for an equal contribution from certified parties for implementation of QCS operations. Assessments are collected biannually. Please see the QCS Fee Schedule to calculate assessment fees and contact QCS staff with any questions on the current published fee structure. A late fee is imposed on overdue assessments. Recertification is denied to any certified applicant whose assessment payments remain unpaid. A sales statement signed by the certified member covering the assessment period showing gross sales must accompany each payment. QCS reserves the right to audit a certified entity’s records. Please contact the QCS office for the current assessment fee.

Transaction Certificates
Transaction Certificates are available to certified entities exporting certified organic products. Fees for Transaction Certificates are described in the QCS Fee Schedule. Any additional administrative costs (i.e. international phone calls) may be charged to the appropriate party.

Additional Charges
Additional administrative fees may be charged for copying, international calls or postage, international transaction certificates, and any other expense incurred for individual entities. Operations requesting the additional service is charged for the actual cost of reproducing and sending information and international calls as well as an hourly rate, as per the QCS Fee Schedule for completed work.

Collection Policy
Certification fees are due upon receipt of the complete application. Inspection fees are due within 30 days of the invoice being posted. Checks must be made payable to QCS. The inspection fee must be sent to the QCS office. An inspection fee deposit may be required in some cases, for example international inspections. Certificates are not issued until all fees have been paid or other arrangements have been made.

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37 NOP §205.501(a)16