2024 Evaluation Report on the Canada Organic Regime

1. Purpose

According to the letter "Recognition of Equivalency with Canada" sent by Taiwan to Canada in May 2020, both sides agreed that "Following advance notice from the AFA, CFIA will permit the AFA to conduct evaluations (document reviews or on-site visits) to verify how the CFIA approved certification bodies carry out the requirement of Canadian organic certification program. CFIA will cooperate and assist the AFA, to the extent permitted under domestic law, in carrying out such evaluations."

On that basis, the purpose of this visit was to conduct an on-site evaluation of the level of conformity of CFIA with the regulations specified in the exchanged letter, including Canadian authorities' ability and performance in managing and implementing of COR (including organic import/export control).

2. Taiwan Evaluation Team

(1) Ms. Chen Judia Tung, Section Chief, Organic Agriculture Section, Farming and Soil Support Division, Agriculture and Food Administration (AFA), Ministry of Agriculture

(2) Ms. Pei-Jung Hsu, Specialist, Organic Agriculture Section, Farming and Soil Support Division, Agriculture and Food Administration (AFA), Ministry of Agriculture

(3) Ms. Chiung-Hsuan Huang, Technical Specialist, Organic Agriculture Section, Farming and Soil Support Division, Agriculture and Food Administration (AFA), Ministry of Agriculture

3. Canadian Reception Team

The on-site evaluation was accompanied by the Canadian Food Inspection Agency (CFIA) officials and the official interpreters throughout the entire course.

4. Evaluation Schedule (March 20-27, 2024)

Date	Evaluated Subjects/Locations	Work Items
3/20	CFIA/CFIA Montreal Office	Opening Meeting: CFIA explained the legal basis and

		implementation of the Canada Organic Regime (COR), the establishment and interpretation of organic standards, CFIA organizational structure, personnel training, assignment and evaluation of conformity verification bodies, certification body accreditation, product inspection, and other items related to supervising and managing COR.
3/21	1. Conformity Verification Body A/ Conformity Verification Body A HQ in Montreal	Visiting Conformity Verification Body A to learn its relationship and interaction with CFIA, the procedures for assessing certification bodies, and the overview of accreditation recommendations to CFIA and continuously supervision of the accredited certification bodies.
	2. Certification Body A/ Conformity Verification Body A HQ in Montreal	Visiting Certification Body A to learn about its business scale, organizational structure, personnel training, certification procedures, and implementation details to evaluate its conformity with COR.
3/22	Operator A (an organic processor)/Montreal	Witnessing Certification Body A conducting auditing on Operator A.
3/25	Operator B (an organic maple syrup producer and processor)/Ottawa	Witnessing Certification Body A conducting inspection on Operator B.
3/26	Operator C (an organic mushroom producer and processor)/Ottawa	Witnessing Certification Body B conducting inspection on Operator C.
3/27	CFIA/CFIA HQ in Ottawa	Closing meeting: Taiwan Evaluation Team summarized their evaluation results from the visit, including the positives and findings. Both sides also confirmed the follow-up works on this

		report.

5. Evaluation results

(1) Positives:

i. During this on-site evaluation, it was observed that CFIA closely collaborates with Conformity Verification Bodies (CVBs) and Certification Bodies (CBs) under the Canada Organic Regime Operating Manual (COR OM). This collaboration ensures transparent and efficient implementation of the organic product certification management system, including performance assessment and feedback on the Canadian Organic Standards (COS). This allows timely responses to be incorporated into subsequent revisions of the COR OM.

ii. Corresponding implementation measures and documentation were observed for all COR OM provisions, demonstrating a close connection between regulation and certification, ensuring the correct and effective operation of the COR.

(2) Items to clarify

i. When witnessing the certification audit of Operator A (an organic processor) for organic processing certification, the operator had products produced and packaged by an Italian operator. The Verification Officer (VO) of CB explained that the product is listed on the COR organic certification certificate due to its equivalency. Under which regulations is the processing certification granted to this product?

ii. Under what circumstances would certification bodies issue packaging and labeling certificates under SFCR 348(3)?

(3) On-site findings:

i. The requirements of COR OM A.8.3.1 and B.2.2.12 do not specify that they only apply to the context when COR was formally implemented in 2009. As of now, in 2024, these requirements are no longer applicable. This may lead to confusion in positioning when conducting organic equivalency peer reviews.

ii. Regarding CBs changing their CVB, there are discrepancies in the handling of the previously issued Accreditation letter between COR OM B.12.1.4 and B.12.4.5.

iii. One international CB obtained a CFIA initial accreditation on December 19, 2022. According to COR OM B.3.4 “After the initial accreditation, the CVB shall conduct an on-site surveillance of the CB within 12 months of the initial accreditation date.” However, CFIA requires the CVB to conduct on-site surveillance audits at the CB's location, rather than remotely, resulting in the failure to complete continuous surveillance of the CB within the specified timeframe.

iv. According to the requirements of ISO/IEC 17011, a risk assessment should be conducted on CBs and should be the basis for accreditation activities. The CVB interviewed in this case displayed risk assessment factors and results for CBs, but there are no relevant requirements in COR OM. It is unclear whether other CVBs implementing COR have established and followed relevant procedures based on ISO/IEC 17011.

v. Witnessing certification audits of Operator A (an organic processor) revealed that since 2023, the operator has been engaged in parallel production of conventional products. However, the VO on-site did not track the mass balance of the 25 conventional items or the mass balance of non-organic ingredients that were used for both organic and conventional products to assure organic integrity.

vi. It was observed that two VOs assigned by the same CB differed in their methods and depth of auditing when verifying mass balances and traceability on-site for organic integrity. One directly accepted the statistical data displayed on the operator's computer, while the other used a sampling method and requested the operator to provide original documents for verification, demonstrating different audit approaches and depths between the two VOs.

(4) Follow-ups:

The Evaluation Team will provide the evaluation report to CFIA within 30 working days after returning to Taiwan. After CFIA reviews the report, provides any necessary supplemental written explanations, and responds to the Taiwan side, the Taiwan side will officially disclose the evaluation report on the AFA website.

Appendix A. Items to clarify

Item No.	Items to clarify	Canadian response
1	When witnessing the certification audit of Operator A (an organic processor) for organic processing certification, the operator had products produced and packaged by an Italian operator. The Verification Officer (VO) of CB explained that the product is listed on the COR organic certification certificate due to its equivalency. Under which regulations is the processing certification granted to this product?	The product is question was imported to Canada under the EU-Canada Organic equivalency arrangement. The operator A is a brand owner. Under the Canada Organic Regime when the brand owner is a certificate holder, it is not necessary to disclose the name and address of the original supplier on the packaging as long as the brand owner's name and address is included
2	Under what circumstances would certification bodies issue packaging and labeling certificates under SFCR 348(3)?	CBs shall issue certificate of packaging or labelling activities to an operator as per subsection 348(2) of the SFCR. Packaging and labelling certificates are issued to contract service providers that package and label organic products on behalf of the organic product certificate holder (as per SFCR paragraph 344 (2) (d))

Appendix B. Findings

Item No.	On-site findings	Canadian response
1	The requirements of COR OM A.8.3.1 and B.2.2.12 do not specify that they only apply to the context when COR was formally	Noted , the COR OM has already been updated to clarify this confusion.

	implemented in 2009. As of now, in 2024, these requirements are no longer applicable. This may lead to confusion in positioning when conducting organic equivalency peer reviews.	
2	Regarding CBs changing their CVB, there are discrepancies in the handling of the previous Accreditation letter between COR OM B.12.1.4 and B.12.4.5.	Noted , the COR OM has already been updated to address this discrepancy.
3	A certain overseas CB obtained CFIA initial accreditation on December 19, 2022. According to COR OM B.3.4 “After the initial accreditation, the CVB shall conduct an on-site surveillance of the CB within 12 months of the initial accreditation date.” However, CFIA requires the CVB to conduct on-site surveillance audits at the CB's location, rather than remotely, resulting in the failure to complete continuous surveillance of the CB within the specified timeframe.	The CFIA as and the CVB discussed this particular situation. Due to unfavorable socio-economic conditions the CFIA allowed the CVB to delay the surveillance audit.
4	According to the requirements of ISO/IEC 17011, a risk assessment should be conducted on CBs and should be the basis for accreditation activities. The CVB interviewed in this case displayed risk assessment factors and results for CBs, but there are no relevant	As per Part 13 of the SFCR, both CFIA designated CVBs are compliant with ISO 17011. As per 7.4.5 of ISO 17011 the CFIA designated CVBs have established documented procedures to describe the manner in which the scope of an applicant or an

	requirements in COR OM. It is unclear whether other CVBs implementing COR have established and followed relevant procedures based on ISO/IEC 17011.	accredited CB is covered through the use of a combination of on-site assessments and other assessment techniques sufficient to provide confidence in the conformity with the relevant accreditation criteria. In selecting the activities to be assessed both of the CVBs consider the risk associated with the activities, locations and personnel covered by the scope of accreditation. The CFIA COR Operating Manual does not repeat requirements that are already coved by the ISO 17011 requirements, unless the CFIA feels that additional requirements need to be added.
5	Witnessing certification audits of Operator A (an organic processor) revealed that since 2023, the operator has been engaged in parallel production of conventional products. However, the VO on-site did not track the mass balance of the 25 conventional items or the mass balance of non-organic ingredients that were used for both organic and conventional products to assure organic integrity.	The current requirements in the COR Operating Manual (C 2.2.22 and C 2.2.24) do not require the VO to calculate the input/output balance for conventional products. However, the CFIA will consider including additional clarification in the COR Operating Manual to ensure that non-organic ingredients that are used for both organic and conventional products are properly verified and traced back
6	It was observed that two VOs assigned by the same CB differed in their methods and depth of auditing when verifying mass	Noted. The CFIA has already began work on a guidance document to be provided to the CFIA CBs regarding performing mass balance and

	balances and traceability on-site for organic integrity. One directly accepted the statistical data displayed on the operator's computer, while the other used a sampling method and requested the operator to provide original documents for verification, demonstrating different audit approaches and depths between the two VOs.	traceability and the use of a standardized tool.