



Pacific Agricultural Certification Society

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Guide to the *Organic Plan* – Preparation

Introduction

Use this guide to assist in completing the **PACS *Organic Plan* – Preparation**. Numbers in this guide correspond to numbers in the Preparation Plan form. Provide as much information as possible.

You may or should use this form if:

- You are a new client certifying a processing/handling or packaging and labelling operation, or
- You are an existing client who has had a major change in your operation (i.e. new facility location, new processing procedures), or
- The standards have changed, and you must report new information for a determination of compliance, as directed by PACS, or
- You have purchased an organic operation from a PACS certified member, and you are not already a PACS certified member, or it is a new scope of operation for which you have not been certified before.

REQUIRED FORMS:

- **Every processing/handling or packaging and labelling operation must complete an *Organic Plan: Preparation (Formerly FPP)*.**
- **Packer Sheet:** This form is used to report products that:
 - have previously been certified organic **and**
 - your company does any of the following:
 - washes and grades,
 - cuts (but does not blend or process) and packages (using no added ingredients or processing aids),
 - re-packages without adding any ingredients or using a processing aid (may heat the product in the packaging process but does not use processing aids)
 - freezes or dries without blending or adding ingredients or processing aids.
- **Organic Product Profile (OPP):** Use this form to report product recipes when your enterprise:
 - blends together multiple ingredients
 - adds new ingredients or processing aids to an already certified product
 - uses processing aids
- **Label Addendum:** Complete this form as a summary sheet for products which your enterprise is responsible for labelling (either with your own branding or custom (private) branding).

NECESSARY WHEN APPLICABLE

- **Non-Organic Ingredient Declarations:** To be completed by the manufacturer of each non-organic ingredient, including flavours, listed on an OPP.
- **Third Party Service Provider Verification:** To be used by processors or handlers who do not hold organic certification, but who will undertake one or more steps in the processing of a certified organic product on behalf of a PACS member. **This form is to be completed by authorized persons from BOTH enterprises having full knowledge of the product and processes.** Without this form, the presence of a Verification Officer is mandatory during the processing run of every batch of organic products at any facility in order for the final product to make an organic claim.
- **Independent Storage Statement:** To be completed by the operator of each off-site storage facility where organic incoming/outgoing goods are stored.

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- **Transport Affidavit:** To be completed by operators of transport vehicles to attest that they will protect and ensure integrity for organic products.

If you have any questions, contact the PACS office.

How to complete the form:

In efforts to reduce our ecological footprint and increase efficiency, PACS operates as a paperless office. We ask if possible, to submit ALL documents electronically (via email). We understand that this may not be possible for everyone. PACS will continue to accept documents by mail and fax, however, please note that these documents will be saved electronically and then destroyed

This Plan is available in Microsoft Word and PDF format. **Do not complete using Google Docs.**

- To fill it in on the computer:
 - First: save the form to your hard drive. Fill it in then save the file again before you send it to PACS.
 - Type into the grey coloured areas: Use your mouse, arrows or tab keys to move around the form. If this form is not compatible with your computer system or you experience any problems, contact the PACS office for immediate assistance. If you need more space than is provided add additional sheets.
- **Note** – the charts expand when data is filled in, so the page numbers change from the original blank form as it is filled in. Therefore, **question** number references are given below, but page number references are not.
- **Note** – If you work with a Mac computer, you may have to print documents and fill them in manually.
- If you are unable to complete the form electronically, you may print the form, fill it in with black or blue ink and mail it to the PACS office. Be sure to keep a copy of the completed form. If you need more space than is provided, add additional sheets.

Abbreviations used:

- VO - **Verification Officer** – an independent contractor who inspects your farm at the request of your Certification Body (CB). The VO makes a report to the Certification Committee of the CB. A copy of this report is sent to you along with the Certification Review Report. Remember, the VO does **not** certify your farm, nor set conditions for certification.
- CC - **Certification Committee** - the group authorized by your Certification Body to make decisions. The PACS Certification Committee examines your Crop Plan/Renewal and the VO's report, then decides whether you qualify for certification. Sometimes the CC sets conditions which you must meet for certification. These are itemized in the "Certification Review Report" and have deadlines for your responses.
- COR – the standards, regulations and PSL which comprise the **Canada Organic Regime**.
- COS – Canadian Organic Standards (CAN/CGSB 32.310-2020).
- PSL – Permitted Substance List (CAN/CGSB 32.311-2020).
- SFCR – Safe Food for Canadians Regulation, Part 13 – Organic Products
- CRR: Certification Review Report. This is the annual report that is created when the PACS Certification Committee reviews your certification (inspection report, organic plan, renewal forms, etc.). It will be sent to you as part of your certification package and is intended to provide a "snapshot" of your operation.

About this Guide:

This document highlights areas where there may be pitfalls, or confusion. Not every line is explained. If you have questions that are not covered in this guide, contact the PACS office.

A. OVERVIEW of OPERATIONS:

#3. Identify all the products that you wish to have listed on your organic certificate. Natural Health Products are covered under a special certification program developed by PACS, therefore, these must be identified separately. If

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you provide a SERVICE, identify all the processes which are to be included in your certification program, including packaging and labelling of any organic product.

#7. Special note for coffee roasters – blending beans sourced from different regions/countries of the world constitutes a multi-ingredient product, even though the ingredients are all coffee beans. You will be required to complete and submit a recipe form (OPP) for each product which contains blended beans.

#11. If you contract with another operation for a specific service (i.e. drying and cracking organic nuts; juicing organic fruit; bottling organic wine) provide details in the chart provided.

B. PRODUCT COMPOSITION and PREPARATION:

#16. COR certification accommodates two different product categories. Category 1 (ORGANIC) has an organic content of 95% or higher. Category 2 (XX% Organic Ingredients) may have an organic content that falls between 70 and 95% organic. Different assessment criteria apply to the two categories so be sure to provide accurate lists.

#17. You must have an organic certificate to verify the status of **every organic ingredient** used in your products. These will be reviewed by the VO during each inspection to ensure that they are current or match the date that a specific long-lasting ingredient was purchased. If your records are incomplete or outdated, it will delay your certification and will cost you more for follow-up. Please have current and complete documentation ready for the VO to inspect.

#19 & 20. As the organic sector grows, more and more products are available in organic form. Therefore, you must continually be on the lookout for organic replacements for currently used non-organic ingredients. (Examples, fermentation yeasts; glycerin.) Some ingredients cannot attain organic status because they are mineral in nature (like salt) or originate from non-agricultural commodities (like gellan gum).

C. MAINTAINING ORGANIC INTEGRITY:

#27. Cleaners and additives used to maintain boilers must be scrutinized if culinary steam has direct contact with organic products. Please be sure to submit SDSes and product spec sheets to the PACS office.

#33. The 2020 Standards make it imperative to ensure that recyclable packaging that is used on organic products is **not** derived from GMO cellulose. If you are using or wish to use recyclable packaging, be sure to have written confirmation from the manufacturer that the packaging materials are not made from genetically engineered sources.

#36. The 2020 Standards require that organic operators who utilize or sell at risk organic seeds or grains must implement rigorous measures to prevent accidental commingling or trace amounts of GE contamination at their enterprise. You must ensure that you have a plan to eliminate this risk and that you manage your plan effectively.

All pest control and cleaning & sanitation substances must be identified and support documentation for each one of them must be in your organic records and ready for inspection. (The organic standards only scrutinize cleaning and sanitation products that are used on food-contact surfaces.)

If you are responsible for transportation of organic goods, then you are ALSO responsible to guarantee the organic integrity of the products during transit. If you contract for transportation service, ensure that you have investigated conditions and taken steps to ensure that organic integrity will be maintained during transport.

D. MARKETING & LABELLING:

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#67 & 70. If you process or package organic products on behalf of another organic or conventional operator, PACS still needs to know about it and to list these products on your organic product list, even if we are not responsible for scrutinizing the package labels. Please be sure to list all organic products that you process or package within your facility.

#68. The final destinations of a product label affect the elements that may or must be present on the label. Please ensure that you advise the PACS office exactly where each product will be marketed when you fill in this form **and** when you submit a label to be reviewed.

- E. RECORDKEEPING:** You will need to keep LOTS of records with LOTS of details in order to succeed within an organic certification program. Additionally, records must be maintained for at least 5 years.
- F. ATTACHMENTS:** List the additional documents that you are submitting with the application form.
- G. ORGANIC OPERATOR AFFIRMATION:** Don't forget to indicate the type of certification you are seeking and to sign the form.