



# Pacific Agricultural Certification Society

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## Organic Plan: Trader (or Distributor)

This form is to be used for initial applications and renewals for certification of trading or distributing organic products. The **Organic Plan: Trader (or Distributor)** is for completion by traders or distributors who are defined as follows:

**Traders** (Domestic or Exporter) or **Distributors** purchase and sell organic products that are not altered or repackaged. Traders may apply for product certification to sell organic products. Their organic product certificate will list products by brand names. If the trader or distributor is applying their own brand, certification under Section 345 of the *Safe Food for Canadians Regulations* applies. In this circumstance, the trader or distributor should **NOT** complete this Organic Plan. Please complete the **Organic Plan: Simple Preparation**.

**Distributors and Storage Facilities** who do not take ownership of product **and** who store only packaged organic product without undertaking re-packaging and/or labelling activities may use this plan to apply for an Attestation of Compliance.

**Brokers** do not purchase organic products. They act as agents for others in negotiating sales contracts among organic operators. The service of brokerage can be certified as compliant to the Canada Organic Regime by issuance of an Attestation of Compliance. Brokers who wish to be certified organic shall complete the **Organic Plan: Trader (or Distributor)**.

**Handlers** should **NOT** complete this Organic Plan. The term "handling" describes a variety of activities such as cleaning, packaging, and labelling which are covered in the **Organic Plan: Simple Preparation**. Handlers may be:

- Purchasers of organic products from multiple vendors who perform minor activities such as wash, repack, relabel for re-sales
- Operations that offer contract packaging and labelling (Section 348 certification under *Safe Food for Canadians Regulations*)
- Retailers who repack and/or relabel bulk products into their own retail packaging *OR* who purchase bulk product that is physically handled such as with bulk fruit

Operators involved in food processing, preparation (including washing), and packaging should complete an **Organic Plan: Preparation**, not this one.

**Form instructions: This form can be completed on a computer**, (save the form onto your hard drive before filling it in; to fill in, place cursor in grey boxes) **or printed and completed with a black ink pen**. Do not use pencil. **If you run out of room, attach another file or sheet of paper**. Keep a copy of this form for your records.

Enterprise Name	PACS Client #: 16-	Date (dd/mm/yyyy):	<b>Office only: Date:</b> Reviewed by:
Primary Contact Information Name: Position: Tel: Email: Webpage:	Additional Contact(s) (if applicable) Name: Position: Email/ phone (if different): <input type="checkbox"/> Copy on all correspondence? Name: Position: Email/ phone (if different): <input type="checkbox"/> Copy on all correspondence?		
Mailing address, including municipality:	Inspection Site Location(s): <input type="checkbox"/> Same as mailing address <input type="checkbox"/> Different (please specify): <input type="checkbox"/> Multiple Locations ( <i>list inspection sites below</i> )		
<p><b>My products will be sold, or used as <u>ingredients</u>* in a product that will be sold, in the following jurisdictions:</b></p> <p><input type="checkbox"/> My own regional area <b>only</b> (will not cross any provincial/territorial border – includes Low Risk enterprises)</p> <p><input type="checkbox"/> Canada <input type="checkbox"/> USA <input type="checkbox"/> EU <input type="checkbox"/> International destinations:</p> <p><i>*Ingredients such as grapes used to make wine that is sold out of province, or grain sold to a distributor with final sales outside of the province/territory.</i></p>			

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Please note the primary contact name, email, phone, & physical address provided above will be posted to our website and COABC's website unless otherwise specified. You give consent to PACS to send forms, certification documents, periodic newsletters and other notifications electronically (via email):     Yes    No    Do not have email

## A. CERTIFICATION INFORMATION

1.	List current organic certification by <u>other</u> agencies. <span style="float: right;"><input type="checkbox"/> not applicable</span> Are you planning to keep concurrent certifications? <input type="checkbox"/> yes <input type="checkbox"/> no
2.	Have you previously applied for, or been granted organic certification? <input type="checkbox"/> yes <input type="checkbox"/> no <b>If yes</b> , please list certification agency, year of application and outcome of the application.
3.	Have you ever been denied certification or had your certification suspended or revoked? <input type="checkbox"/> no <input type="checkbox"/> yes – indicate certification agency and year: Describe the corrective measures taken:
4.	Have you reviewed the 2020 revisions of the National Standards and Permitted Substances List ( <b>CAN/CGSB-32.310 and 311</b> ) while filling in this Plan? <input type="checkbox"/> yes <input type="checkbox"/> no   These documents can be found on on the PACS website: <a href="http://www.pacscertifiedorganic.ca">www.pacscertifiedorganic.ca</a>
5.	Do you train your staff about the requirements of the Canadian Organic Standards? <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> have no staff <b>If no</b> , explain how you plan to rectify this situation.
6.	Will your company want to use the Canadian organic legend (logo), if qualified? <input type="checkbox"/> yes <input type="checkbox"/> no
7.	Is your company the owner of the organic product(s)? <input type="checkbox"/> yes (trader/distributor) <input type="checkbox"/> no (broker)

## B. OVERVIEW OF OPERATIONS AND CHAIN OF CUSTODY

8.	Briefly summarise the organic activities of your business (i.e. What are you doing with or to organic products and with whom are you dealing?)
9.	Does the company own the organic products that you market? <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> own some <input type="checkbox"/> contract market some
10.	<b>Product List:</b> Submit a list of all products (organic and non-organic) you represent. This can be the company catalogue or a similar document. <u>For each certified product listed which is not produced by your enterprise, provide the name of the enterprise producing the product and a contact name and phone number.</u> <b>Product list submitted</b> <input type="checkbox"/> yes <input type="checkbox"/> no <b>If no</b> , explain: <b>*Note: This is a mandatory submission.*</b>
11.	Does the company represent, or plan to represent, the same product in both organic and conventional forms? <input type="checkbox"/> yes <input type="checkbox"/> no <b>If yes</b> , provide a list of the products that are marketed in both forms.
12.	Does the company have its own marketing label or brand name for organic products? <input type="checkbox"/> yes <input type="checkbox"/> no <b>If yes, see Q.16 below.</b>
13.	Indicate how organic products brokered by the company are marketed/distributed. Check all that apply: <input type="checkbox"/> Bulk sales to Food Processors <input type="checkbox"/> In retail packaging <input type="checkbox"/> In bulk to retailers or food distributors <input type="checkbox"/> Direct sales to consumers

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14. Does the company contract with, or plan to contract with farms or processing facilities to market their organic products?  
 no  yes – **Complete the following table:**

Name of Farm or Company contracted with	Commodities (products) represented	Certification Body of farm or company	Brand Name of products sold

If more space is required, attach a separate page.

15. Fill in the following table for each organic product the company gets manufactured (attach a separate sheet if necessary):

Name of finished product	Brand Name	Name and Phone # of Entity Processing or Handling Product	Certifier of contracted Processor

**C. LABELS and LABELLING**

16. Does your company apply labels that make an organic claim, either to your own products, or to products owned by other organic operators?  
 yes – **If yes, you must NOT complete the remainder of this plan. Please contact PACS to request a Simple Preparation Plan.**  
 no - **go to next question**

**D. PROCEDURES USED FOR VERIFYING CERTIFICATION**

17. What methods do you use to verify the certification status of each organic product you market and/or store?  
 Certificates on file       Transaction certificates on file       Tracking system to update certificates  
 Other (describe):

18. If products are to be shipped out of BC, do you have documentation to show that you have checked that the certifier is ISO 17065 compliant?  
 Only use products sourced from ISO 17065 accredited or recognized certifiers.  
 yes  no  **not applicable** - products are not shipped out of BC.  
 If no, explain how you plan to address this requirement:

19. How often is certification information updated?  
 with each order       monthly       yearly       Other (explain):

**E. HARVEST AND TRANSPORTATION**

20. Does the brokerage ever arrange for the harvest of organic crops?  yes  no  
 Does the brokerage ever arrange for transport of raw, unpackaged organic crops?  yes  no  
**If yes**, how are you able to ensure that outgoing transports are cleaned prior to loading loose, bulk organic products?  
 Clean out records     Clean truck affidavits     Other (specify):

**Note:** If you are involved with either of these activities PACS will require that you have ensured the organic integrity of the harvest – this would include the cleaning or dedication of harvest and transport equipment and bins or totes. Documentation will be necessary for verification purposes.

21. Do you arrange for transportation of organic finished products?  yes  no - **skip to next section**  
**If yes**, have transport companies been notified of organic handling requirements?  yes  no – explain:  
  
 Do the transport documents clearly indicate that the products are organic?  yes  no – explain:

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22. Are organic products shipped in the same transport units as non-organic products? yes no  
**If yes, what steps are taken to segregate organic products? (Check all that apply.)**  
Use of separate pallets  
Organic product sealed in impermeable containers  
Organic products are shrink wrapped  
Separate area in transport unit  
Other (explain):

## F. STORAGE

23. Do you store products in a facility that you control? yes no - **skip to next section.**

24. How do you prevent commingling or confusion of organic and non-organic in your storage? (Check all that apply.)  
Separate storage areas for organic and non-organic ingredients/products.  
Organic food or ingredients are stored in sealed food grade containers in storage area.  
All organic products are clearly marked.  
Unique storage containers are dedicated to organic.  
Other (explain):

25. How do you prevent contamination of organic food in storage? (Check all that apply.)  
Non-food items are not stored in food storage areas.  
Storage containers are washed with permitted materials before being used for organic products.  
Storage facilities, compartments, containers and/or bins do not contain and were not treated with any synthetic fungicides, preservatives or fumigants.  
Non-organic food that has been treated with volatile substances is stored separately in rooms having no air exchange with organic storage areas.  
Other (explain):

26. In the chart below, list all cleaning materials used in the storage area. Product labels, product information sheets, or MSDS sheets must be available to the inspector or upon request from PACS.

Brand Name	Active Ingredients	Documentation Attached	Where Used	Frequency
		<input type="checkbox"/> Prod Label / spec sheet <input type="checkbox"/> MSDS <input type="checkbox"/> Ingredients list		
		<input type="checkbox"/> Prod Label / spec sheet <input type="checkbox"/> MSDS <input type="checkbox"/> Ingredients list		
		<input type="checkbox"/> Prod Label / spec sheet <input type="checkbox"/> MSDS <input type="checkbox"/> Ingredients list		
		<input type="checkbox"/> Prod Label / spec sheet <input type="checkbox"/> MSDS <input type="checkbox"/> Ingredients list		

If more space is required, attach a separate sheet.

27. Do you store organic products at any third-party storage facility? yes no - **skip to next section.**

Name	Phone number	Certified Organic?	Certifier, if applicable
		<input type="checkbox"/> yes <input type="checkbox"/> no	
		<input type="checkbox"/> yes <input type="checkbox"/> no	
		<input type="checkbox"/> yes <input type="checkbox"/> no	

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28. For each facility that is **not** certified organic, request an **Independent Storage Information Sheet** from the PACS office and have each non-certified organic facility complete and submit completed forms to PACS.  **not applicable**

I have asked the storage facility(ies) to complete and submit Independent Storage Information Sheet(s).

Independent Storage Information Sheet(s) attached.

Storage facilities that are not certified organic must undergo an inspection.

**G. PEST MANAGEMENT**

**CAN/CGSB-32.310 clause 8.3** requires that preventative pest management strategies be used. Lures, baits and substances on the PSL may be used only if prevention strategies fail. Products contaminated with pesticide product(s) may not be sold as organic. Equipment used for transport of organic products must be free of pests. Exterior traps must be mapped. Records must be kept of application and disposal of pest control products. Only pest control product(s) listed in Section 8.2 of the Permitted Substances List may be used.

29. What type of pest management system do you use (including your storage areas)?  In-house  
 Contract pest control service (name, telephone #):

30. List all pest management materials used (including bait stations outside of the facility) and submit the product data sheets and labels for our review.

Brand or Trade Name	Active Ingredients	Locations where used	Frequency

If additional space is required, attach an extra sheet.

31. Check all pest prevention strategies and mechanical controls used in or on the outer perimeter of each facility used for handling and storage of organic products and ingredients.

<input type="checkbox"/> Removal of exterior habitat/food sources	<input type="checkbox"/> Good sanitation	<input type="checkbox"/> Pest access prevented
<input type="checkbox"/> Clean spilled product promptly	<input type="checkbox"/> Inspect ingredients for pests	<input type="checkbox"/> Air curtains
<input type="checkbox"/> Sealed doors and/or windows	<input type="checkbox"/> Repair of holes, cracks	<input type="checkbox"/> Environmental Management (heat, light, atmosphere)
<input type="checkbox"/> Screened windows, vents	<input type="checkbox"/> Positive air pressure in facility	
<input type="checkbox"/> Carbon dioxide (controlled atmosphere)	<input type="checkbox"/> Inspection zones around interior perimeter	

32. Check all mechanical controls that are used:  **None used**

<input type="checkbox"/> Sticky traps	<input type="checkbox"/> Electrocutions	<input type="checkbox"/> Ultrasound/light devices
<input type="checkbox"/> Vacuum treatments	<input type="checkbox"/> Impermeable packaging	<input type="checkbox"/> Other:

**H. RECORDKEEPING**

**CAN/CGSB-32.310 clause 4.3** requires that the organic plan include a complete description of the record-keeping system. Section 4.4 requires that the operator guarantee the organic integrity of the product through a continuous audit trail, from the receipt of the raw material to release of the product, as well as supporting documents concerning the inputs, production, preparation and handling of crops, livestock and organic products.

33. Is your recordkeeping system able to balance organic products purchased against organic products sold?  
 yes  no – explain:

34. Do all invoices you issue identify organic products with their correct organic status?  yes  no – explain:

35. Will you be able to provide an annual summary by commodity group, of total quantities of organic products bought?  
 yes  no – explain:

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36.	Provide an example of your organic lot or product code or lot numbering system(s) with an explanation of the components. <input type="checkbox"/> <b>do not use lot numbers or product codes</b>
37.	<b>Provide an Audit Flow Chart</b> linking documents in your recordkeeping system to the next in the chain. If you use a coding system, please indicate documents on which coding occurs. <span style="float: right;"><input type="checkbox"/> <b>Separate document attached.</b></span>
38.	Do you have a method of tracking and addressing complaints? (This will be assessed by the Verification Officer during your inspection and is an ISO requirement.) <input type="checkbox"/> yes <input type="checkbox"/> no – explain:
39.	Do you have a product recall system in place? <input type="checkbox"/> yes <input type="checkbox"/> no

I. NOTES	
40.	You will be required to submit an application that updates this plan each year. <b>Keep a copy of this Organic Plan as a reference for future updates.</b> This application is part of your records and must be kept with those records. <input type="checkbox"/> A copy of this completed plan is kept in company records.
41.	Use this area to add information that may provide assistance to the Certification Committee who will review this Organic Plan.

J. ATTACHMENTS that I am including with this document:	
Mandatory	Required if applicable
<input type="checkbox"/> Product list/Catalogue	<input type="checkbox"/> Independent Storage Information Sheets (ISIS)
<input type="checkbox"/> Audit Flow Chart	<input type="checkbox"/> MSDS sheets (cleaning or pest control materials)
Any of the following:	<input type="checkbox"/> Product Specification Sheets
<input type="checkbox"/> Organic Product Profile sheets	<input type="checkbox"/> Other (specify):
<input type="checkbox"/> Non-Organic Ingredient Declarations	
<input type="checkbox"/> Product Labels and Label Addendum	

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## K. ORGANIC OPERATOR AFFIRMATION

**I affirm that all statements made in this application are true and correct.**

**I understand that:**

- The applicable transition period of my enterprise does not commence until all documents constituting a complete application have been duly submitted to the PACS office for review, upon which time my enterprise and all its functions are operating under certification body supervision.
- Acceptance of this document in no way implies granting of certification by the Certification Body (CB).
- My operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the Canadian Organic Standards and Permitted Substances Lists.
- Any wilful misrepresentation will result in de-certification.
- Production methods may not alternate between organic and non-organic methods.
- This completed document is confidential information according to the policies of the BC Certified Organic Program. Membership and certification status, however, is public information.

**I agree:**

- To allow the Verification Officer and/or members of the Certification Committee and the COABC Accreditation Board auditors access to all areas of my enterprise and to my records, including but not limited to: inputs, production, processing, handling, sales and products purchased for resale, from both organic and non-organic production.

**I am applying as a [choose all that apply]:**

- COR applicant** - ISO-compliant certification for interprovincial/international trade (permits use of the COR logo).
- PACS Compliant applicant** - certification of agricultural products for sales only within my own province/territory (excluding BC) or certification for Natural Health Products or Cannabis (within Canada).
- BCCOP applicant** - certification of my products for sales only within British Columbia (BC Certified Organic Program – permits use of the BCCOP logo).
- BCCOP applicant** - certification of my products to the BCCOP Low Risk Program. I understand that the eligibility requirements for participation in the Low Risk Program include the following criteria:
- a) Enterprise must not be exporting organic product out of BC
  - b) Enterprise must not practice parallel production
  - c) Enterprise must not have outstanding conditions on its certification
  - d) Enterprise must have received a valid organic certificate in all of the previous three years
  - e) The enterprise must be assessed for risk, and receive a low-risk ranking from the certification committee

Signed: \_\_\_\_\_ Print Name: \_\_\_\_\_ Date: \_\_\_\_\_

## L. VERIFICATION OFFICER AFFIRMATION

All information on this and the accompanying narrative report is accurate, to the best of my knowledge, and is based on my observations, review of documents and operator interview. All compliance assessments are made in reference to the Canadian **Organic Production Systems General Principles and Management Standards** and policies of PACS.

Information contained in the report is confidential between the Verification Officer, the inspected party, and the PACS. This report does not constitute certification or consultation, nor shall it be used for promotional purposes.

Signed: \_\_\_\_\_ Print Name: \_\_\_\_\_ Date: \_\_\_\_\_