



## **Preparing for Your Processing, Packaging and Labeling or Custom Service Provider Inspection During the Covid-19 Pandemic**

TCO Cert's inspection protocols for conducting inspections during the Covid-19 Pandemic were created to keep our operators and Verification Officers (ie. VOs or Inspectors) as safe as possible while also ensuring compliance to the Canadian Organic Standards. These protocols and practices were developed using a variety of resources. The inspections may vary depending on local requirements and restrictions.

**All physical inspections of Processors, Packaging and Labelling and Custom Service Providers will be done virtually.** This will likely be in conjunction with a virtual meeting to discuss your operation after the VO has conducted your document review. Conducting a virtual inspection may have several challenges, including access to technology and communicating what needs to be viewed. You will need to cooperate with the VO so that compliance can be verified.

### **Steps to the Covid-19 Inspections:**

#### **1. Send inspection documentation**

During previous inspections, a VO would come to your operation and complete a document audit at the on-site inspection. This year the VO will review these documents prior to a virtual inspection of your processing and storage facilities. In order to accommodate this protocol, each operation will need to send documents electronically or by fax at least 2 weeks in advance of your inspection. Please contact your Coordinator or Chapter Administrator to discuss where to send these documents.

#### **A. PROCESSORS**

The documents to send for processors are:

- Documentation for ingredients:**
  - current and complete Supplier List with ingredients listed for each supplier, invoices,
  - organic certificates and addendums for organic ingredients, incl. Canada/US Equivalency verification if applicable,
  - completed Non-GE and Untreated ingredient Affidavits for non-organic ingredients
  - documentation for processing aids
- Sales documents:**
  - Sales documents for any sales made since the last inspection, incl. Bills of Lading, invoices, Settlement statements, Receipts.
- Input documents:**
  - labels and invoices for all inputs for sanitation and pest control being used in this current certification year.
  - Input Review Request forms (IRR)s and MSDS for any new inputs
- Products Information:**
  - current products list with revisions as needed,
  - OPIs for any new products or revised OPIs where applicable
  - Label Approval Request forms (LARs) and labels for any new products or changes to labels
- Cleaning and pest control records**
- Storage Records** – for both ingredients and finished products
- Production records**

- **Additional Documents:** Documents requested for submission from the PIR letter such as revisions of the OSPAU and/or OSP, current water tests, food grade documents for packaging, revised maps and flow charts, if new equipment or facility are used, etc.

## **B. PACKAGING AND LABELING**

The documents to send are:

- **Documents for products packaged and/or labelled:**
  - current and complete Customer List with products and brand names listed for each supplier
  - current organic certificates and addendums for each customer
- **Production records:**
  - Production records for any packaging and labelling done since the last inspection
  - Bills of Lading, invoices, Receipts
  - revised maps and flow charts if changes occurred to facility or equipment
- **Cleaning and pest control records:**
  - Equipment cleanout records/sanitation records
  - Pest control logs
  - current pest control map showing locations of bait stations if applicable
  - labels and invoices for all inputs for sanitation and pest control used in this current certification year
  - Input Review Request forms (IRR)s and MSDS for any new inputs
- **Storage records, incl. incoming /outgoing inventory records**
- **Labels:**
  - Any new labels not submitted yet and revised labels, incl. correlating Label Approval Request forms (LARs)
- **Additional Documents:** documents requested for submission from the PIR letter such as revisions of the OSPAU and/or OSP, food grade documents for packaging, revised maps and flow charts, if new equipment or facility are used, etc.

## **C. CUSTOM SERVICE PROVIDERS (Attestation of Compliance)**

The documents to send are:

- **Documents for products handled:**
  - current and complete Customer List with products listed for each customer
  - current organic certs and addendums for each customer
- **Cleaning and pest control records:**
  - Equipment cleanout records/sanitation records
  - Pest control logs
  - current pest control map showing locations of bait stations
  - labels and invoices for all inputs for sanitation and pest control used in this current certification year
  - Input Review Request forms (IRR)s and MSDS for any new inputs
- **Production records:**
  - Incoming /outgoing inventory records, such as receiving records, scale tickets, audit control register, etc.
  - storage records if applicable
  - revised maps and flow charts if changes occurred to facility or equipment
  - Bills of Lading and Clean Truck Affidavit if applicable
- **Additional Documentation:** Documents requested for submission from the PIR letter such as revisions of the OSPAU and/or OSP, etc.

**2. Phone or virtual interview**

The VO will review the documentation you have sent in and will conduct a short interview with you over the phone or by video to clarify any questions and to discuss the next steps for your virtual inspection of your facility. You may be asked to provide additional documentation at or after the inspection.

**3. Exit Interview**

At the end of the virtual inspection, the VO will go over the key findings in an exit interview. Copies of the Exit Interview and Inspection Affidavit will be emailed to you by the VO or your Coordinator.

**4. Additional Information**

There may be some additional paperwork that needs to be viewed after the inspection. You and the VO can put a time frame on when the documents need to be submitted for the VO to complete the inspection. For documents that need to be submitted later, the VO will have the Coordinator collect it, as would be the case in a previous inspection year.

Please note that these protocols and steps may vary, depending on circumstances specific to your operation. Also, there may be changes over the year, depending on how the Covid-19 pandemic continues. TCO Cert, Chapter Administrators, and the VOs will all try to remain diligent at communicating any changes or updates as they become applicable. Your patience, understanding and cooperation are needed and greatly appreciated in this unprecedented time of this global pandemic.

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