

POLICIES FOR ORGANIC FOOD PRODUCTION



2nd Edition
Updated Fall 2021

Islands Organic Producers Association (IOPA)

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British Columbia
Certified Organic

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Part 1: Water Policy

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1.1 Policy Objective

The purposes of this document are to:

- Highlight the requirements in the organic standards regarding water quality for all on farm uses
- Ensure consistency in IOPA's requirements and recommendations regarding water quality and testing
- Improve understanding of the requirements and recommendations for irrigation, livestock and other water practices, including applicable federal/provincial standards and guidelines

1.2 Summary Table

Use	Water Quality Standard	Testing Schedule	Req'd By	CC Approval Req'd
Livestock	All toxins: Refer to BC Approved Water Quality Guidelines. Bacterial:: CFU <100/100mL	Initial test for all potential toxins; Annual test for bacterial contamination	COS 6.4.5	Yes.
Sprouts, shoots, Microgreens	Potable	Every 6 months	COS 7.4.1.2 / 7.4.1.3	Yes.
Wash (Rinse) Water	Potable	Source dependent * <i>Municipal potable water source exempt.</i>	COABC Book 2 8.1.1 / Standards Interpretation Committee question 128	Yes.
Irrigation	Refer to BC Approved Water Quality Guidelines	Source dependent		No.
*note: VO's will be instructed to assess water source risk factors at annual inspections.				

1.3 Water Quality Key Points

- Water quality refers to the presence of both chemical and biological contaminants
 - Chemical contaminants may include heavy metals, pesticides, chemical fertilizers
 - Biological contaminants refer mainly to bacteria indicating risk of disease
- Operators are responsible for ensuring their own compliance with all applicable provincial and federal water quality standards for irrigation, livestock, washing and processing
- Operators must ensure that water used on the farm is not a source of contamination by non-permitted substances
- Operators must work to minimize risks based on their own farm system, and inform IOPA in a timely manner of potential or known contamination and subsequent management
- Risk of water contamination is directly related to water source
 - E.g. water coming from open ponds or streams has much higher level of risk than deep wells or municipal water
- Risk levels are dependent on the type of irrigation, and the crops being irrigated
 - E.g. orchards on drip irrigation are at significantly less risk than leafy greens with overhead irrigation
- Failure to minimize risk of contamination threatens the health of consumers, livestock, and farm workers, and threatens the integrity of the operator, IOPA, and the organic movement

1.4 Applicable Certification Standards

This section highlights direct references to water quality in the organic standards as they apply to IOPA operators:

- CAN-CGSB-32.310 2015 (COS)
- CAN-CGSB-32.311 2015 (PSL)
- COABC Book 2
- IOPA Guidelines 2017

1.4.1 Livestock cos 6.4.5

Livestock of all ages shall be given clean, fresh water on demand. The main water source shall be tested initially for potential livestock toxins, for example, heavy metals, ions and bacteria, according to livestock drinking water quality guidelines. Thereafter, the water source shall be tested annually for bacterial contamination. If colony forming unit (CFU) levels are higher than 100/100 mL, remedial action shall be taken.

1.4.2 Crops – Irrigation cos 5.7 Irrigation

The irrigation of organic crops is permitted provided that the operator documents precautions taken to prevent contamination of land and products with substances not included in CAN/CGSB-32.311.

COABC Book 2 8.1. Irrigation Practices and Water Quality

The organic standards cover many of the elements that are critical to a food safety strategy on the farm. However, some elements are covered by regulations and guidelines that are not directly monitored by certification agencies. In those cases, operators and CBs are expected to show due diligence to ensure that organic product is safe for human consumption.

- 1. Operators should make themselves familiar with the Canadian Food Inspection Agency (CFIA) regulations regarding water quality for washing of fruit and vegetables.*
- 2. Irrigation water should be monitored to ensure it is not contaminated with prohibited substances or unacceptable levels of micro-organisms that are a concern for food safety.*

IOPA Guidelines 1.3.7 Organic Crop Management - Irrigation

In many areas, there is legitimate concern about the source and possible contamination of irrigation water. High levels of nitrates, chlorides, selenium and boron can be carried in such water, and its excessive use can salinize the soil. In areas where irrigation is essential to crop production, ongoing analysis of water quality and soil salinization is essential. Signs of soil salinization should indicate the need for an immediate change in agricultural management practices. Irrigation water should be monitored to ensure it is not contaminated with prohibited substances or unacceptable levels of micro-organisms that are a concern for food safety.

1.4.3 Sprouts, Shoots & Microgreens Production

COS 7.4.1 Sprouts, shoots and micro-greens produced in water

7.4.1.2 Water sources (for example, potable water, distilled or processed by osmosis) shall meet or exceed drinking water guidelines for quality, including microbial and chemical contaminant levels.

7.4.1.3 A water quality monitoring program shall be in place and water shall be analyzed at least twice a year (once every six months).

COS 7.4.2 Shoots and micro-greens produced in soil

Subclauses 7.4.1.1, 7.4.1.2, 7.4.1.3 and 7.4.1.5 also apply to shoots and micro-greens produced in soil.

1.5 IOPA Water Quality & Testing Protocol

All operators are responsible for ensuring that all water sources on the farm meet any applicable government standards for which they are used. IOPA does not accept any liability with regards to the operation's compliance with federal and provincial standards which may require a different testing regime. **IOPA also does not accept any liability for any issues arising from a farm's water quality, regardless of IOPA's approval of any water quality protocols or water test results.**

All operators must do their best to ensure their water sources are not contaminated with substances not on the Permitted Substances List. Operators must inform IOPA immediately of any perceived or confirmed risk of contamination by prohibited substances.

1.5.1 Livestock water

Required

- Initial water testing
 - As per COS 6.4.5, operators must submit an initial water test for potential livestock toxins, such as heavy metals, to IOPA
- As per COS 6.4.5 Initial water testing must also include microbiological testing for bacteria
- If water tests indicate contamination levels above those outlined in the [BC Approved Water Quality Guidelines](#) for livestock, or colony-forming units (also referred to as total coliform) greater than 100/100mL, operator must submit a remedial action plan to IOPA
- Annual water testing
 - As per COS 6.4.5, operators must have subsequent annual livestock water tests for bacteria available during inspection and upon IOPA's request

- If water tests indicate contamination levels for colony-forming units above 100/100mL, operator must immediately notify IOPA and submit a remedial action plan

1.5.2 Sprouts, shoots, and microgreen production water

Required

- Regular water monitoring and analysis
- As per COS 7.4, water must meet Canadian drinking water quality guidelines
- As per COS 7.4, water must be analyzed every six months, and documentation must be available during inspection and upon IOPA's request.
- If water contamination is found, operator must immediately notify IOPA and submit a remedial action plan

1.5.3 Irrigation water

Required

- Operators must work to maintain water quality within their operation and to ensure they follow any applicable government irrigation water quality standards
- Operators must have in place an appropriate testing protocol specific to their farm system to ensure water quality continues to meet these guidelines
- At a minimum the following information must be documented and available during inspections:
 1. All agricultural water sources
 2. Description of irrigation system (such as drip irrigation or overhead watering, types of crops irrigated)
 3. Potential contamination sources and other specific risk factors (adjacent livestock, wildlife, cisterns, local industry etc.)
 4. Prevention measures taken to avoid contamination
 5. A description of the sampling protocol (location, timing etc.)
 6. Testing schedule for bacterial contamination? and records of test results
- Municipal potable water service is not required to be tested.
- IOPA may require additional water testing based on findings made by a Verification Officer during inspections or on other indication of increased risk of contamination
- Where tests for irrigation water are required, they must indicate that the levels of bacterial contaminants do not exceed those listed in the [BC Water Quality Criteria for Microbiological Indicators](#) and/or that chemical contaminants do not exceed those listed in the [British Columbia Approved Water Quality Guidelines: Aquatic Life, Wildlife & Agriculture](#) .
- Tests results should be interpreted by the lab and clearly indicate any values in exceedance of those guidelines. *It is the responsibility of the operator to show IOPA that the tests meet the requirements for irrigation water.*
- If water tests indicate levels of contamination above acceptable levels, a remedial Action plan must be submitted to IOPA

1.5.4 Washing/Processing water

Required

- As per COABC Book 2 8.1.1 it is the responsibility of operators to familiarize themselves with the Canadian Food Inspection Agency regulations regarding water

quality for washing fruits and vegetables, which requires that potable water be used ([Fresh Fruit and Vegetable Regulations 3.1\(4\)\(b\)](#))

- The Standards Interpretation Committee provided the following answer to a question regarding water quality for vegetable rinsing:

What are the requirements for water quality, where the water is used to wash organic vegetables?

Water must meet the requirements for potability as per local, provincial, or federal authorities.

IOPA interprets this to mean that all vegetable rinsing and washing operations must be done with potable water.

1.6 Government Guidelines and Regulations

The following links provide further information on agricultural water quality.

[Canadian Food Inspection Agency Fresh Fruit and Vegetable Regulations](#)

Includes requirements for produce wash water

[Good Agricultural Practices BC](#) , specifically [Water Quality](#)

Describes best practices to minimize risks associated with on farm water use

[CanadaGAP Food Safety Manual for Fresh Fruits and Vegetables](#)

Provides example procedures for assessing agricultural water sources and monitoring quality.

[CanadaGAP Food Safety Manual for Fresh Fruits and Vegetables - Appendices](#)

Provides details and forms for the procedures described in the manual above.

[Good Agricultural Practices, federal](#) , particularly ***Agricultural Water***

Describes best practices to minimize risks associated with on farm water use

[BC Water Quality Criteria for Microbiological Indicators](#)

Lists microbiological quality standards for irrigation, livestock and processing water

[British Columbia Approved Water Quality Guidelines: Aquatic Life, Wildlife & Agriculture](#)

Lists chemical contaminant quality standards for irrigation and livestock use

Updates to the guidelines may be available on the [provincial website](#)

[Guidelines for Canadian Drinking Water](#)

Lists quality standards for potable water.

1.7 Additional Information

Water testing labs on Vancouver island

MB Labs (Sidney)*

BC Aquifer (Duncan) (sends samples to MB Labs in Sydney)

Maxxam (Courtenay, Nanaimo, Victoria)

Coastal Water Systems

*have confirmed they can interpret test results against “BC Irrigation water standards”

Other Information

[How To Take A Water Sample](#) (MB Labs)

[Guide to Well Water Treatment](#)

Part 2: Non-food Crop Policy

Health, Wellness and Personal Care Products

Last updated: January 31, 2019

Cannabis, Hydrosols and herbal remedies may be labeled as Certified Organic by IOPA for sale within BC. They may show the IOPA label and the BC checkmark logo.

IOPA is certifying that the plant has been grown in accordance with CAN/CGSB-32.310, CAN/CGSB-32.311, COABC BOOK 2 Certified Organic Management Standards and the IOPA Guidelines. Additionally, the processing of the plant product into its final saleable state has been inspected for organic management integrity as per the requirements in CAN/CGSB-32.310, CAN/CGSB-32.311.

IOPA makes no claim on the legal status of the products nor the efficacy of their stated health benefits. IOPA is simply certifying that the plant and processing complies with the current organic management standards as listed above.

The intention of this standard is to support on-farm value-added production using farm-produced ingredients, and it is expected that a reasonable percentage of the ingredients used are produced by the farm operator, on the farm.

Required:

- 1) Must contain agricultural ingredients produced on-farm
- 2) Must conform to Canadian Organic Standards
 - CAN/CGSB 32.310 – General Principles and Management Standards
 - CAN/CGSB 32.311 – Permitted Substances Lists
- 3) Must meet the COABC Book 2: 5.0 Processing and Handling standards
- 4) Must conform to IOPA Guidelines
- 5) Once Certified, products are eligible for the same three Organic Labeling categories as all other agricultural products based on Organic Content and other factors. • “Organic” = product must contain at least 95% Organic ingredients
 - “x% Organic” = product contains between 70%-90% Organic ingredients
 - Products containing less than 70% Organic Ingredients may list specific ingredients as Organic.

Note #1: Operators are required to submit labels to IOPA for approval prior to use.

Note #2: As a point of interest, non-food products are outside the scope of the federal Organic Products Regulations (OPR) and hence are not certifiable under the Canadian Organic Regime (COR) program.

Part 3: Inactive Status Policy

Last Updated: February 25, 2020

IOPA offers members the opportunity to maintain their certification status on their land for a maximum of 3 years when a situation occurs such that they are unable to market a crop. For all operations, when Inactive Status is granted, the enterprise will not be issued a certificate, the production system is currently inactive and products are not sold with an organic claim.

Inactive Status can be maintained so long as the following conditions are met.

1. The Producer must be a member in good standing with no unresolved Non-compliance issues.
2. The Producer must receive approval from the Certification Committee to be eligible for Inactive Certification Status.
3. During the Producer's inactive period, the Producer will not sell any products with the claim that they are certified organic nor will they use any certification marks.
4. During the Producer's inactive period, they will submit all certification renewal forms.
5. Inactive membership fee is \$120 + 5% GST and the COABC fee category as appropriate for their first year based on the previous year's gross organic sales and category 1 (\$75.18) for subsequent years.
6. Producers will not receive a certificate during the year they are Inactive. They may not sell any products as organic during their period of Inactive Status.
7. After current certificate expires, producers may only sell products produced during organic status that are remaining in inventory as Organic upon written permission from the Certification Committee.
8. After approval by the Certification Committee to apply for Inactive Status, producers must sign the prescribed form acknowledging understanding of the conditions of Inactive Status. Inactive Status will only be official when the signed document has been received by the administrator.

A grower who has entered Inactive Status may reactivate certification at any time by requesting an inspection and paying full IOPA membership fees of \$400 + GST = \$420.00. A certificate may be issued after the inspection report is reviewed. The inspection must take place when the organic production system is active.

During the inactive period when no certificate has been issued, producers may not represent their products as organic. The IOPA mark may not be used, except on an official letter from IOPA attesting to the compliance of the producer's production system. This letter can be presented to prospective clients for its products.

During this inactive period, please ensure that any changes that occur in the operation are noted and records are kept. Please note that "inactive status" still requires organic practices to be upheld.

If you would like to apply to the Certification Committee for inactive status, a written request must be submitted to the Administrator.

Part 4: Grazing Animals Policy

Last updated January 31, 2019

For animals fed certified organic feed, their droppings are considered raw manure and must follow these standards:

1. CAN/CGSB-32.310-2015 5.5.2.4

The seasonal timing, rate and method of application shall ensure that manure does not:

- a. contribute to the contamination of crops by pathogenic bacteria;*
- b. run off, significantly, into ponds, rivers and streams;*
- c. contribute, significantly, to ground and surface water contamination*

and

2. CAN/CGSB-32.310-2015 5.5.2.5

The non-composted solid or liquid manure shall be

- a. incorporated into the soil at least 90 days before the harvest of crops that do not come into contact with soil and are intended for human consumption; or*
- b. incorporated into the soil at least 120 days before the harvest of crops that have edible parts that come into direct contact with the surface of the soil or with soil particles.*

and

3. CAN/CGSB-32.310-2015 5.5.2.6

If livestock is used as part of the cropping or pest control program, a management plan shall be in place to ensure that livestock is controlled and that manure or manure related contamination does not reach the portion of the crop intended for harvest.

Required:

1. To ensure compliance to these standards, producers must keep accurate records to document which animals and the dates they are present in crop areas.
2. If risk of product contamination exists, producers should have a written management plan available to demonstrate how they intend to mitigate that risk.

Use of non-certified organic feed for non-certified organic animals is strongly discouraged as this runs counter to the principles of organic production (COS ii) and to IOPA's philosophy and guiding principles (IOPA 1.2 and 1.3.1).

3. Where non-certified organic animals are used within a certified organic operation and those animals are fed non-certified organic feed, the feed must be third-party verified to contain no genetically modified organisms (GMOs). A written declaration to this effect is required to be submitted to and accepted by IOPA. Grower must ensure that necessary documentation is obtained prior to use.

Part 4: Incubator Policy

Last updated: February 1, 2018

IOPA members are aware of the difficulties faced by farmers in the region who experience challenges in trying to find suitable farm land and/or financial restrictions to purchasing local farmland. In some circumstances, experienced farmers may wish to mentor new, inexperienced farmers, in order to provide a succession plan for the next generation of local farmers. Land sharing provides an opportunity for farmers to work together and learn from one another, without facing financial hardships which may be a barrier preventing new farmers from entering the organic agricultural sector.

The Incubator Farm Structure can be applied to operators looking to mentor new farmers.

IOPA will certify the Primary Farm/Society as a whole operation. The Primary farm will be responsible for paying IOPA's annual membership renewal fee. The incubating farms located solely on the Primary Farm land will combine their gross sales in order to determine the COABC fee category due each year. Each incubating farm business must create their own account on the COABC application portal and keep track of their own inputs/outputs etc. Each incubating farm business will be responsible for paying their own annual inspection fee, which will vary depending on the level of complication and time required. This will be determined on a case by case basis by the assigned inspector each year and will be billed directly to the individual farm after inspection. Additionally, each incubating farm operation located solely on the Primary Farm property will be responsible for paying the additional business fee, currently set at \$55 + GST. Each incubating farm operation will be assigned a number hyphenated to the Primary Farm certification number for our administration and when the farm completes their incubation and moves off-site, they will take the last 4 digits of their number with them to continue their Certified Organic operation status and file history. This Incubator Farm Structure requires the Primary Farm operator to act as an overall manager for all farm businesses on their property. This duty includes, but is not limited to, ensuring all inputs are permitted and all records of seed searches, planting dates, amendment applications, compost temperature logs, harvest dates and sales records are accurate and up-to-date as per the Record Keeping requirements in CAN/CGSB-32.310-2015 Section 4.4. All operators must be available during the VO inspections of the whole farm.

Any farm operations beginning to transition off of the Primary Farm by purchasing or leasing land off-site will necessarily become their own farm operation. This means they will drop the certification number of the Primary Farm reference and become completely certified under their own number. Incubator farm operators must adhere to the standard requirement of a minimum of 15 months and 2 inspections of their operation before they can receive their own Organic Certification Status. As soon as they are operating off-site

from the Primary Farm, they will be responsible for submitting their own annual renewal documents and IOPA fee, as well as the COABC fee category based on their gross sales from all land they farm. Their gross sales will no longer be included in the Primary Farm's calculation for their COABC fee category. If an operation continues to farm land at the Primary Farm while farming off-site, the land at the Primary Farm will be considered an extension of their off-site operation and inspected as other operations with multiple plots. Meaning, they may be responsible for additional inspection fees if distance and time are a factor.

Part 5: Low-risk Policy

Last updated January 31, 2019

Overview

IOPA's primary mandate is to administer a fair and strict process to assess the operations of organic producers and to assign "certified organic" status to those who qualify. IOPA's philosophy, guidelines and organizational structure are detailed in the *IOPA Guidelines*. IOPA is an accredited Regional Certification Body of COABC (www.certifiedorganic.bc.ca), which dictates that members may only sell their products as Certified Organic within B.C.

The following operational program is consistent with the IOPA guidelines, COABC standards and National standards. IOPA producers discussed this program and requirements via our internal listserv in 2006 and approved the development of the program at our 2007 AGM, for full implementation beginning in 2008.

The IOPA Low Risk CO Program is for producers who meet the criteria outlined in this document and is fully compliant with, and in certain areas exceeds minimum requirements set out in COABC Book 1 Annex 1 Section 2.7.2 and 2.7.3, and COABC Book 2 Section 3.3.2

IOPA's low-risk producer status is not to be advertised or used in promotional material of any kind. It is not considered a higher tier of certified-organic.

Context

Ensuring producers meet all applicable standards in order to safeguard the integrity of IOPA's "certified organic" certificate is of paramount importance in this process.

Summary of Benefit to Producer

Producers who meet the program requirements can be inspected by a Verification Officer once every three years rather than every year. This will reduce the cost of annual certification substantially and modestly reduce the amount of time producers have to spend on the process of certification.

Note: 5% of producers in this program will be randomly chosen to receive an unannounced inspection each year; the cost of inspection will be billed directly to the producers chosen.

Minimum Requirements

IOPA Certified organic producers who meet the following criteria are eligible for enrolment in the IOPA Low Risk CO Program:

1. Parallel production is not practiced
2. Producer has been certified organic by IOPA for the last three years.
3. Certification Committee (CC) reviews for the last three years prior to enrolment have been positive, with **no instances of significant non-compliance** with the IOPA guidelines or COABC standards.

4. No pending CC requirements
5. No significant changes or additions to the operation or management are anticipated
6. No significant changes to neighboring property that may impact production are anticipated
7. The CC has completed an assessment of risk based on the categories listed below and the enterprise has received a low-risk ranking.

Risk Assessment will include all areas of possible risk including:

1. contamination or commingling of organic product;
2. contamination of site;
3. maintaining organic integrity of the land and facilities through periods of inactivity (no production);
4. mislabeling;
5. fraud;
6. any other non-compliance with the British Columbia Certified Organic Program (BCCOP).

IOPA's Risk Assessment Program Action Flow

1. Operators are informed of the requirements of the risk assessment program before (or during) the yearly renewal - the risk assessment takes place concurrent with the ordinary renewal process.
2. Verification Officers are provided with this risk assessment program, the questionnaire and inspection checklist for risk assessment. Verification Officers (and operators) are reminded that the Verification Officer's task is to verify the potential risk of non-compliance by the enterprise, not to decide if the operator is deserving of a low-risk designation.
3. The inspection occurs as scheduled and the Verification Officer completes and submits the risk assessment checklist.
4. The certification committee reviews the inspection report (including the risk assessment checklist) and determines whether the enterprise qualifies for reduced inspections. The CC will include the entire enterprise file in their deliberation, not just the risk assessment checklist. Historical compliance (or otherwise) with the BC Certified Organic Program will play an important role in determining whether an enterprise qualifies for reduced inspections.
5. The CC will provide the enterprise with a decision (along with the usual certification decision) on the admissibility of the enterprise to the risk assessment program. This program is an option for producers: they can opt in or opt out.
6. IOPA will keep records of enterprises that have qualified for reduced inspection and will provide this information to the COABC.
7. The renewal application process for qualified enterprises will proceed as usual. In order to keep their low-risk status, such enterprises must be current in the certification program - that is, all fees must be paid on time and all forms must be returned by the appropriate deadline.
8. IOPA will assess the renewal applications on an annual basis to determine if any changes in the operation countermand the low-risk designation. If necessary, the CC can require a Verification Officer inspection at this time.
9. The CC can require a Verification Officer report at any reasonable interval. Significant changes in the management, neighbor activity, scale or nature of productivity are all examples of change of circumstance providing a rationale for a newly scheduled inspection.
10. IOPA will randomly draw 5% of all qualified enterprises for unannounced inspections during every calendar year. Cost of inspection will be billed directly to the selected enterprises. If unannounced inspections result in a high-risk assessment of any enterprise, that operation will revert to yearly inspections until a low-risk evaluation is returned.
11. IOPA will ensure that enterprises, which are assessed as low-risk, are inspected at least once in three calendar years.
12. Producers which request and are denied a low-risk assessment will receive a statement indicating why they do not qualify and can appeal this decision by following the appeals process in the IOPA guidelines.

Appendix 1: Additional Guidance for CC when assessing risk

Basic requirements:

Eligibility for assessment will be determined during pre-inspection review of renewals. CC will indicate to Verification Officer that operation is eligible for a Low-Risk review based on the following criteria:

1. The “whole farm” must be certified. No parallel commercial production. See the *IOPA guidelines*
2. Producer has been certified organic by IOPA for the last three years.
3. Certification Committee reviews for the last three years prior to enrolment have been positive, with no instances of significant non-compliance with the IOPA guidelines or COS standards.
4. No pending CC requirements.
5. No known issues regarding compliance with National Standards.
6. No significant changes or additions to management or production are anticipated

Additional notes

1. Verification Officer questionnaire and checklist must be completely reviewed to assess eligibility
2. Review entire file to ensure enterprise has been thoroughly inspected and reviewed for the last three years and no areas of high risk can be identified.
3. Points in Verification Officer checklist provide an ***indication*** of risk rather than a set test for enrollment and is only one tool the CC will use to make their decision.
It must be understood that one point does not determine an enterprises status. For example, an enterprise that attains 15 points on the checklist may still be assessed as a low-risk enterprise by the CC. The decision is dependent on many factors - some risks identified on the checklist are more crucial than other risks. The point system is intended to help the Verification Officer as much as the CC in easily quantifying the potential for mistakes. Inevitably, there are risks that aren't identified that will be encountered by Verification Officers and assessed by CCs. The checklist is expected to evolve over time.
4. A positive low-risk assessment is required before a producer can be enrolled in this program.
5. Enterprises that apply but do not qualify must receive a written explanation.