

Organic Certification Procedures

1 Purpose and Scope

This instruction outlining the steps in the organic certification process, serves as a guide for everyone interested in certification.

2 Responsibility

The following roles are required to complete the certification process:

- a) The Evaluation Officer (EO):
 - 1) reviews the completeness and reasonability of application documents (application and OPDs) and the client's ability to comply with the standard. If applicable, informs the client of the result.
 - 2) after inspection evaluates the inspection reports, and all related documents.
 - 3) will also prepare a plan for surveillance of certification and an inspection assignment for the upcoming year, including the assessment of the operation's risk.
- b) The Inspector:
 - 1) receives and studies the inspection assignments, prepare for the visit and conducts the inspection.
 - 2) determines and describes findings (EU and JAS: non-compliances) and communicates them to the operator and to SRS; gives feedback on the operator's risk.
 - 3) communicate with Evaluation Officer and the client during the correction process.
- c) The Certification Officer (CO) reviews the evaluation process and makes the final decision to grant, deny or maintain certification of an operation based on a review of the documents.

3 Organic Certification Process

The organic certification process includes five steps:

- 1) the operation completes an application and develops an Organic Project Description (OPD);
- 2) SRS reviews the application documents and the OPD, communicates with the client until all questions and doubts are cleared and finally gives feedback to the client. If non-compliances appear, these must be corrected before further progress can be made;
- 3) following successful review of the documents, the SRS inspector conducts an on-site inspection of the operation to evaluate the implementation and the completeness of the OPD and the operation's compliance with the organic regulation(s);

- 4) SRS reviews the inspection report and decides whether to grant certification to the operation;
- 5) while SRS prepares the inspection plan for the upcoming year, the operator will report changes that affect compliance to SRS all through the year.

To continue certification, at the time determined by SRS, the operation submits an annual update of its OPD and pays the annual certification fees to SRS then repeats steps 2 through 5 based on the updated information.

3.1 Step 1 – Application Review, Fees, Contract Signing

3.1.1 An operation which wants to become certified first contacts SRS. SRS provides information about its application process, about requirements of the organic standard they apply for, links to official websites, application forms and certification fee schedule. If the operator sends the completed application to SRS, he/she will be sent a cost estimation for certification. If the review of the application shows that SRS can accept the application, the applicant is informed, and if the operation decides to proceed with SRS, both parties sign the contract and the client makes the pre-payment

3.1.2 We will at least collect the information below:

- 1) the name of the person completing the application;
- 2) the applicant's business name, address, responsible person and telephone number in a way that correctness can be confirmed;
- 3) the name(s) of any CB(s) to which application has previously been made; the year(s) of application; the outcome of the application(s) submission, including, when available, a copy of any notification of non-compliance or denial of certification issued to the applicant for certification; and a description of the actions taken by the applicant to correct the non-compliances noted in the notification of non-compliance, including evidence of such correction.

3.1.3 SRS makes its application forms and fee schedules, readily available. Publishing this information on SRS website allows potential applicants to access it quickly and easily, but documents and information are also provided upon request to individuals without internet access.

3.2 Step 2 – OPD Review and Feedback

3.2.1 Next the client is provided the forms for submitting the operation description (OPD) to SRS. The document will be reviewed within a reasonable time and if the review shows that information is plausible, that the applicant appears to, or

may be able to, comply with the regulations, then SRS schedules an on-site inspection. If the application does not include enough information for SRS to determine whether the operation may be able to comply with the regulations, then SRS is to request more information from the operation before scheduling the on-site inspection. The review of the application must cover at least the following:

- a) all inputs and practices listed and described in the OPD comply with the regulations; preventive practices are in place and adequate;
- b) all locations are well described;
- c) practices for preventing comingling and contamination appear to be adequate;
- d) all multi-ingredient of products that shall be sold, labeled, or represented as organic meets the requirements for the proposed labeling category and all ingredients listed as organic are certified;
- e) verify the use of any non-organic ingredients or processing aids or ingredients to determine that they are allowed by the organic standard;
- f) monitoring practices are in place.

3.2.3 If the applicant fails to submit all required information or minor information is missing prior to the inspection, then SRS may instruct the inspector to collect this information on-site. If the operation fails to provide or willfully withholds significant information, then SRS shall take appropriate compliance actions.

3.2.4 If an applicant was previously certified by another certification body, then the applicant must provide the previous certification history, including documentation to support the correction of any previous non-compliances, and report possible adverse actions (e.g., Notices of Proposed or Final Suspension or Revocation). In addition, SRS is obliged to contact the previous certification body to receive certification documents directly from them.

3.2.5 An applicant may withdraw its application any time. Payments may be due, respectively parts of the payments made may not be refunded. Information can be found in the fee schedule **ORG-Pol2**.

3.2.6 SRS will review the OPD and send feedback to the applicant, including detected non-compliances and ask for correction if this is possible. The feedback will inform the applicant as to whether the application was accepted

and the inspection can be scheduled.

3.3 Step 3 – Assignment and Inspection

3.3.1 Once the OPD review shows positive, SRS schedules an on-site inspection. An assignment is issued to the tentative inspector. The inspection must be scheduled promptly after receiving of relevant application documents and payment, although it may be delayed for up to six months so that the inspector can observe decisive activities. For example, if SRS receives a crop production application during the winter, the inspection may be delayed until the spring or summer when the production season is underway. The inspection must be assigned to a qualified inspector, who is given an assignment along with the available documentation.

3.3.2 Any announced on-site inspections must be conducted when an authorized representative of the operation who is knowledgeable about the operation is present and at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of regulations can be observed, except that this requirement does not apply to unannounced on-site inspections or to processing operations which do organic processing only few times a season or upon demand. The purpose of the on-site inspection is to:

- 1) assess whether the operation complies or has the ability to comply with the regulations;
- 2) verify that the OPD accurately reflects the operation's activities;
- 3) ensure that prohibited substances have not been applied.

3.3.3 The inspector shall conduct an opening meeting to introduce the inspection plan. This meeting defines the role of the inspector, communicates the confidentiality of all information, and outlines the planned inspection activities. This is the inspector's opportunity to set expectations and answer the applicant's questions.

3.3.4 The inspector will visit **each** production unit, facility, and site where the operation produces, handles or trades/exports organic (including in-conversion), and where applicable non-organic products. The inspection includes, but is not limited to:

- 1) evaluation of the OPD that the operator maintains on-site to ensure that the operator has an updated OPD, is implementing the OPD, and that the

OPD complies with the regulations;

- 2) for crop producers: evaluation of soil and nutrient management, adjoining land use, buffer zones, land use history, production capacity of the land, seeds and planting stock used, crop rotation practices, environmental conservation practices, prevention and pest control activities harvest, labeling, and shipping;
- 3) for wild crop (wild collection) producers: evaluation of designated harvest (collection) areas, sustainable harvest practices, and re-seeding or pruning activities;
- 4) for processors/handlers/traders/exporters: evaluation of product composition, receipt, processing, pest control, storage, labeling and shipping, as well as practices to prevent commingling and contact with prohibited substances;
- 5) verification of the operation's production or handling capacity;
- 6) evaluation of the recordkeeping system and verification of activities through appropriate records and bookkeeping documents;
- 7) reconciliation of the volume of organic products produced or received with the amount of organic products handled and/or sold or shipped, also known as mass balance;
- 8) conduct exercises for tracing sold products back to suppliers through the chain of production;
- 9) sampling of organic agricultural products for residue testing, if applicable. The inspector will provide a receipt for any samples taken.
- 10) examination whether and to what extent complaints, pesticide findings, product rejections occurred and how the client handled any exclusion from organic sales or investigation conducted by SRS. In cases where the organic mark must be taken off a product, the inspector shall assist SRS to control the conventional marketing of batches.

3.3.5 At the end of the inspection, the inspector conducts an exit interview with an authorized representative of the operation. During the exit interview, the inspector communicates findings and potential non-compliance observed, and requests additional information that may be missing from the OPD. If significant information is missing, the inspector should note this in the inspection report

and discuss this as a concern during the exit interview.

- 3.3.6 Inspectors often discover new information or documentation during on-site inspections. The inspector may accept additional OPD updates during the inspection, up until the start of the exit interview, and should provide new information received on-site to SRS. If the inspector and the operator update the OPD during the inspection, then the inspector should provide a copy of the update to both the operator and SRS. Once the inspector finishes the inspection report, he or she sends the report to SRS for review. SRS will evaluate the inspector's findings when making a final certification decision.
- 3.3.7 Inspections are not consulting visits. Inspectors may ask questions, collect and provide information, and explain the regulations or SRS's requirements. Inspectors are prohibited, however, from advising the operator on how to overcome barriers to organic production or to certification.
- 3.3.8 SRS conducts additional on-site inspections of applicants for certification and certified operations to determine compliance with the regulations. Additional inspections may be announced or unannounced. Following risk assessment, SRS shall ensure that additional random inspections are carried out, according to risk classification, in at least 10% of the client companies. Furthermore, SRS shall perform at least 10% of the inspections unannounced.
- 3.3.9 Inspection of sub-contractors are mandatory, as are sites of the operation itself. Such operations must sign an agreement and all activities must be part of the client's OPD (EU and JAS). In the case of NOP, a sub-contracted company must obtain its own certification. Only after application and OPD review may an inspection be conducted.

3.4 Step 4 – Evaluation of Inspection Report

Within a reasonable time period, the evaluation of the inspection results will be performed by the Evaluation Officer (EO). Possible investigation, as the result of positive test results will be conducted as this stage as well. the EO will inform the operator of possible non-compliances and ask for corrections and contributions to an investigation.

3.5 Step 5 – Certification Decision and Certification

- 3.5.1 When the evaluation process is closed the Certification Officer (CO) conducts a

final review and makes the decision. SRS will provide the applicant with a copy of the on-site inspection report, as approved by SRS, for any on-site inspection performed; provide the applicant with a copy of the test results for any samples taken by an inspector and inform about the certification decision.

- 3.5.2 If the review finds confirmed, that the operation is in compliance with the standard, then SRS will grant the certification. This is also the case when only minor non-compliances are found and conditions are given to the operation to correct a minor non-compliance within a given time. The certificate which is issued to the operation will remain valid until surrendered, suspended or revoked by SRS.
- 3.5.3 If the operation does not comply with the regulations, and the client withdraws its application, no further actions are needed, no notice is sent to the client. If the application is not withdrawn, the EO makes one of the following possible certification decisions:
- 1) notice of Non-compliance for correctable violations. A Notice of Non-compliance allows the operation to submit a response with proposed corrective actions. Upon receipt, SRS reviews the corrective actions to determine whether the operation complies with the regulations. If the operation appears to comply, then SRS recommends certification or certification with conditions. If the operation does not appear to comply, then SRS proceeds to deny the certification;
 - 2) combined Notice of Non-compliance and Denial of Certification for non-correctable violations.
 - 3) SRS may conduct additional on-site inspections to verify continued compliance with the regulations. These inspections may be announced or unannounced, as deemed appropriate by SRS.

When a denial is issued, then SRS sends a notification of non-compliance to the applicant. When correction of a non-compliance is not possible, a notification of non-compliance and a notification of denial of certification we be issued. The notification of non-compliance shall provide:

- (1) a description of each non-compliance;
- (2) the facts upon which the notification of non-compliance is based;
- (3) the date by which the applicant must rebut or correct each non-compliance and submit supporting documentation of each such correction when

correction is possible.

3.5.4 After receipt of such notification of non-compliance, the applicant may:

- (1) correct non-compliances and submit a description of the corrective actions taken with supporting documentation to SRS;
- (2) submit written information to SRS to rebut the non-compliance described in the notification of non-compliance.

3.5.5 After issuance of a notification of non-compliance, SRS must:

- (1) evaluate the applicant's corrective actions taken and supporting documentation submitted or the written rebuttal, conduct an on-site inspection if necessary;
 - (i) when the corrective action or rebuttal is sufficient for the applicant to qualify for certification, issue the applicant an approval of certification;
 - (ii) when the corrective action or rebuttal is not sufficient for the applicant to qualify for certification, issue the applicant a written notice of denial of certification;
- (2) issue a written notice of denial of certification to an applicant who fails to respond to the notification of non-compliance;
- (3) provide notice of approval or denial to the Administrator (depends on specific regulation).

3.5.6 A notice of denial of certification must state the reason(s) for denial and the applicant's right to:

- (1) reapply for certification;
- (2) request mediation;
- (3) file an appeal of the denial of certification or, if applicable, pursuant to a State Organic Program (applicable for NOP).

3.5.7 An applicant for certification who has received a written notification of non-compliance or a written notice of denial of certification may apply for certification again at any time.

3.5.8 When SRS receives a new application for certification, which includes a notification of non-compliance or a denial of certification, we will treat the application as a new application and begin a new application process.

- 3.5.9 If SRS has reason to believe that an applicant for certification has willfully made a false statement or otherwise purposefully misrepresented the applicant's operation or its compliance with the certification requirements, SRS may deny certification without first issuing a notification of non-compliance.

4 Continuation of Certification – Surveillance

- 4.1 From the time an operation is certified, updates in the organic standard or changes in rules of SRS will be send to the operator whenever applicable. The operator on the other hand is obliged to inform SRS immediately, in case of suspected contamination or fraud, or in cases where non-compliance occurred in organic production.
- 4.2 Any time during the year, may an operator notify SRS of plans to add new products, fields, operations, or labels to its organic certification. An update of the OPD will be needed, then SRS will decide whether an additional inspection would be required, e.g. adding of new fields, animal species, or facilities. In other casesan approval of changes may be possible by desk review Afterwards the certificate will be updated, if needed.
- 4.3 Annual inspections are mandatory according to all organic standards. An exception can be made in the case of EU certification, where during three consecutive inspections no non-compliances had been detected. SRS may decide to “skip” an annual inspection and visit again no later than 24 months following the previous inspection.

Annual inspection is due at a time determined by SRS. This may be any time between 6 months and 12 or more months after the previous inspection.

Whether inspection are conducted early in the year or later, in any case will there be one annual inspection. In time SRS sends the last submitted OPD to the client, who is asked to updated it. SRS sends an updated offer respectively an invoice for payment for the renewal fee. If the operation fails to submit its annual update and/or fees, SRS issues a Notice of Non-compliance. The annual update must include any changes to the OPD that were made during the last year, as well as any changes planned for the coming year. If SRS requires supporting documentation to verify these changes, then the operation should provide it.

The annual update does not need to reiterate information that was previously submitted.

- 4.4 If an operation fails to submit an annual update prior to the on-site inspection, SRS will issue a Notice of Non-compliance. However, the failure of an operation to submit an annual update does not relieve SRS of its obligation to conduct an annual inspection. The failure to submit the annual fee however, leads to a Notice of Non-compliance combined with a proposed suspension. SRS will not conduct the annual inspection.
- 4.5 After the annual inspection has taken place SRS will again review both the updated OPD and the inspection report, SRS then communicates the results and decision in writing to the operation. If SRS has reason to believe, based on the on-site inspection and a review of the information, that a certified operation is not complying with the requirements of the related regulations, SRS shall provide a written notification of non-compliance to the operation. As with the initial certification decision, the decision to continue certification may include new conditions for minor, non-violative issues.
- 4.6 Violations of the standards and regulations must, in the case of NOP, be reported to the NOP Administrator.
- 4.7 If SRS determines that the certified operation is complying with the regulations, an updated certificate should be issued.
- 4.8 If it is found that the operation does not comply with the organic standard, non-compliances are found which cannot be corrected or willful violation occurred, adverse action will be imposed, these can be a (temporary) suspension, the cancellation of the certification contract, respectively a revocation of certification.

5 Extension and Reduction of Certification Scope

5.1 Extension of Certification Scope

- 5.1.1 Where an operation wants to include a new certification standard or scope, completed **ORG-F1 Application** must be submitted and the steps as detailed in chapter 3 above will be followed.
- 5.1.2 Where an operation wants to include new sites, an additional inspection must be scheduled before this site can be included in the certification scope.
- 5.1.3 Where an operation wants new products to be added on the certificate, a case-by-case decision will be taken if these can be included based only on a document check or if an additional inspection is needed. In any case an

updated OPD including attachment must be submitted. An additional inspection is required e.g. where the processing steps of new products do significantly differ from those ones already certified.

5.2 Reduction of Certification Scope

5.2.1 Where an operation wants to give up a certification standard a surrender must be submitted to SRS using document **S6-T6 Surrender of Certification**.

Surrenders cannot be granted retroactively, but an operation can surrender only at a future date.

5.2.2 Where an operation wants to give up/exclude certain sites from the scope of certification, an updated OPD including attachment must be submitted as well as a statement by when the amendment shall come into effect. Where fields are affected, SRS needs also information on what is going to happen with them in order to determine if parallel production may apply in the future.

5.2.3 Where an operation wants products to be deleted from the certificate, an updated OPD including attachment must be submitted as well as a statement by when the amendment shall come into effect. As soon as the amendment will have come into effect, the operator is not allowed anymore to sell the affected products as organic.

6 References

NOP Program Handbook: The Organic Certification Process (NOP 2601)

Requirements for certification bodies which certify organic products in third countries according to Reg. (EU) 2018/848 and its supplementing and implementing regulations.