

**2nd Revision Draft of the
2002 IFOAM Accreditation Criteria
~~Guidance~~Explanatory Notes**

**DRAFT DOCUMENT
FOR STAKEHOLDER COMMENTS**

III b. IFOAM Accreditation Criteria Guidance Notes

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For an explanation of the purpose of these Guidance Notes Explanatory Notes, see the Introduction to the IFOAM Accreditation Criteria.

Introduction

~~These guidance notes are provided to explain the meaning and purpose of the criteria, and to provide background information to explain the context of a particular section of criteria or a particular criterion. In short that are provided to enhance understanding of the criteria.~~

~~Certification bodies are required to implement the criteria in line with the guidance notes unless the same effect can be shown to have been achieved by alternative methods. The guidance notes do not constitute binding interpretations or remove an accreditation body's rights and responsibilities to exercise its judgment in applying the criteria.~~

~~The criteria require that the certification body has an effective quality system in accordance with the relevant elements of the criteria and which is appropriate for the type, range and volume of work performed. It is recognized that new programs, and programs operating in economically less favored areas may have less developed quality systems. It is also recognized that cultural, traditional and social conditions may result in varying solutions. Regulations or other official demands may also make it difficult or even illegal to fulfill a certain criterion. In such cases it is the prerogative of the accreditation body to determine the acceptability of the certification body's alternative solution, based on whether the integrity of organic production and certification is maintained, and whether the purpose of the specific criterion is met.~~

1 Structure

1.1.3 This refers to the actual day to day management.

1.2 Responsibility

1.2.2 An outside body or person would normally include anybody that is a separate legal entity even if linked in some way. This would not mean that assessment and evaluation cannot be undertaken by a contracted party, but that the formal certification decisions mentioned may not.

1.2.4 This does not preclude the use of individual certification officers, as long as these persons are responsible to a certification committee or the governing board.

1.2.7 An appeals committee can be ad hoc, or the task can be performed by the Board.

1.3 Impartiality and Objectivity

1.3.3 The purpose of this criterion is expressed in 1.3.1. It is meant to ensure by structural means, that vested interests are unable to exert undue influence

This can be provided by a system of participatory democracy where the Board is elected by a broad based constituency of stakeholders. Stakeholders would generally be understood to mean more than only the certified operators- in the case of organic certification consumers, environmentalists, researchers and the like would also be considered stakeholders.

In the absence of a Board elected by stakeholders the certification body would need to institute some other method of ensuring sufficient influence of the stakeholders over the certification system. An Advisory Board with sufficient powers to achieve the purpose would be one such method.

~~1.3.5 The procedure should specify the nature of the information that may be supplied, limiting this to information related to the certification of the product as opposed to the marketing of the product. If the policy is that no information will be supplied then no procedure is necessary. Remark: First sentence is now guidance note to IAC 1.3.5~~

1.3.6 Related bodies would mean any separate entity that is structurally linked to the certification body by, for example, common ownership, shared directors etc. In the case of organic certification bodies this could be a producer association or other association responsible for establishing the certification body. The criterion does not prohibit the relationship but requires analysis of whether the other body may exert influence in manner that compromises the impartiality and objectivity of the certification decisions. If so, measures must be taken to ensure this does not occur.

~~1.3.7 A structure where members are chosen to provide a balance of diverse stakeholder interests and where no single interest predominates shall be deemed to satisfy this provision; Such diversity shall include that at least one general interest is represented such as consumers, scientists or environmentalists.~~

~~Furthermore, Tt~~This does not mean that individuals on the Board or committee (the decision making body) cannot have commercial, financial or other interests. It means that the committee as a whole may not. To ensure this a balance of interests is necessary. First sentence now guidance note to IAC 1.3.7.

~~1.3.8 The criterion requires the reduction of risk to compromising integrity. Risk reduction includes avoiding at least the following: direct payment of fees to inspectors, incurring significant costs such as inspections that are not readily reimbursed, and a fee structure/function that results in high leverage of certification body finances by only one or a few clients. is not referring to future income which is clearly effected by a decision to not certify. The criterion means that costs already incurred, such as the inspection, should have been charged and not be linked to whether the applicant is certified or not. Now guidance note to IAC 1.3.8.~~

~~1.3.9 The certification body shall establish a policy on what are/are not substantial gifts. Substantial gifts are those that have a value that could potentially affect opinion, attitude, or decision of the certification body, including any of its inspectors, employees or officers. Remark: First sentence now part of IAC 1.3.9~~

~~1.3.10 This does not preclude a procedure where the decision is first referred back to the certification committee for review prior to enacting the formal appeals procedure.~~

1.3.12-11 This ~~does not~~ means that the certification committee or personnel that made the decision being appealed may ~~not~~ be heard at the appeal, but ~~they~~ may not sit on the appeal committee.

1.3.15: General information might refer to training, newsletters, seminars, advice concerning regulatory requirements etc.

1.3.14-16 The declaration should be of all interests that relate to the organic sector. The certification body should decide which, if any, of these interests are of sufficient concern to question the individual's ability to be impartial and therefore to warrant the precautionary measure of declaring them to result in a conflict of interest.

1.3.15-17 The certification body's responsibility is not only to determine conflict of interest, but to then use this list in its operation to ensure exclusion of the individual in cases where conflict exists.

1.3.~~18-16~~ to 1.3.2018: In Criteria 1.3.~~18-16~~ and 1.3.~~19-17~~ the certification body takes responsibility for managing any conflict of interest. In 1.3.~~20-18~~ the individual is also required to be responsible. The purpose of the second sentence in 1.3.~~20-18~~ is to prevent an individual from contracting to do future work while engaged in the inspection or certification process (a clear conflict of interest) without this immediately being known to the certification body, so that others may be assigned to the case. The is most likely to occur in the case of contracted inspectors.

1.4 Resources

1.4.4 Procedures can serve as work instructions if detailed enough.

1.4.7 The certification body should ensure that there is competence on all categories for which certification is granted. This may be on the certification committee itself or at staff level.

~~1.4.14 This can be stated in the application documents and be part of what the applicant agrees to in signing the application.~~

~~1.4.16 In the same way that the certification body remains responsible for subcontracted work, it also is responsible when it accepts previous certification. It exercises that responsibility by the measures in 1.4.12 to 1.4.15. The criteria in section 8 have elaborated these requirements for specific forms of acceptance.~~

2 Accessibility and Scope

2.3 Certification scope

2.3.2 to 2.3.875: This section of the criteria regulates the requirements for certification bodies with regard to the whole production chain. The production chain includes the farmers, storage units, processing units, packers, brokers, wholesalers, transport companies and retailers. These criteria establish when either certification or inspection is required. These functions shall either have been carried out by the certification body itself or their certification should be approved in accordance with the criteria in section 89.

~~2.3.3 The certification body is not obliged to have a system for inspection of products that are further handled after being packed in the final consumer package. For certified product not in its final packaging the certification body's responsibility shall extend to the point where the product is sold to an operator certified by a different entity. The certification body shall however take action where there is reason to believe that the certifier's own standards have been or may be violated in later handling stages. An example of such a situation is fumigation in import harbors, etc. Remark: Deleted part now guidance note to IAC 2.3.3~~

~~2.3.5 Any entity that has previously sold the product would normally mean any entity that has issued an invoice.~~

~~2.3.6-4~~ Exceptions to the requirement for inspections may be made if a risk assessment based on the kind of storage, the product, the packaging, the prevailing storage practices (e.g. fumigation) and the period of storage has determined that further inspections are not necessary. Exceptions may also be made in the case of storage by common carriers and storage in customs houses

~~2.3.8 The certification body shall however take action where there is reason to believe that the certifier's own standards have been or may be violated in later handling stages. An example of such a situation is fumigation in import harbors, etc. Now explanatory note to 2.3.3.~~

2.3.9-6 to 2.3.1411: This section establishes criteria applicable when a certified entity (or applicant) has sub-contracted production to an operation which is not certified. (For example, a certified processor subcontracts with a storage, handling, or processing facility which is not certified in its own right.) It also applies to situations where a processor or trader has subcontracted producers.

2.3.7 These provisions do not prohibit the contracted party from applying for certification in their own right.

~~2.3.12 The contract between the certification body and the operator should specify the liability with respect to sanctions, unless this is already stated in the general sanctions policies. Now guidance to IAC 2.3.9~~

~~2.3.13 Where the certification body chooses not to have a direct contract with the contracted party it should ensure that the contract between the operator and contracted party legally binds the contracted party to the certification body and the specified requirements. This shall mean that the contracts between the operator and the subcontractor shall be obtained in order to verify these points. Now guidance to IAC 2.3.10~~

3 3 — Quality System for Certification

3.1 Quality Policy

3.1.1 A Quality policy can consist of a simple statement to adhere to the IFOAM accreditation System

3.2 — Quality System

~~The quality system must include a system for continuous quality improvement. The certification body must demonstrate effective implementation of the quality system, including competency and consistency in the application of policies and procedures. Now guidance to IAC 3.2.1~~

~~3.2.3 This may be the Executive Director or other senior personnel provided this responsibility is clearly stated.~~

3.4 Internal Audits

~~3.4.1 Periodic would normally mean at least annual. In a planned and systematic manner would mean according to a procedure similar to that used by external bodies in evaluating an organization. Examples would be the evaluation process used in IFOAM Accreditation, ISO 10011-1 etc.~~

3.4.1 and 3.4.2: The first of these criteria requires auditing to check that the system is being implemented. The second calls for review of whether the policies and procedures are effective in achieving the goals.

3.4.3 Where work is organized in teams this may be team review

3.5 Complaints

3.5.4b&c These criteria require that complaints should not merely be resolved but that the certification body should review the complaint to determine whether the complaint indicates a structural or procedure fault and, if so, to remedy it. 3.5.4b requires the certification body to review whether the corrective action taken has solved the identified problem.

4 Confidentiality provisions

4.1 Confidentiality provisionsGeneral

4.1.1 The system shall be transparent while records pertaining to operators remain confidential

~~4.1.3 Certification bodies subject to voluntary (non regulatory) accreditation should specify in their policy and in papers signed by the operator (such as the application form) that the accreditation body shall have access to their documentation. Now guidance note to IAC 4.1.3~~

5 Documentation and Document Control

5.2 Public access to information

5.2.1 Make available does not mean these have to be distributed only that they should be supplied if requested. It also ~~does not means~~ that a reasonable charge may ~~not~~ be levied. ~~Note that p~~ Point b, e, f and g refer to descriptions or summaries and not necessarily the formal policies or procedures themselves

5.2.1a This authority may be regulatory where a certification body has been approved under a government regulation. Authority may also be derived from the voluntary nature of the program or from linked producer or trader associations.

~~5.3 Document control~~

~~5.3.1 A procedural document would normally need to be in place in order to ensure these requirements are met.~~

5.4 Records

Requirements for records also apply to computerized systems.

~~5.4.2 The certification body shall have available relevant data for all certified production units, including any contracted parties and members of grower groups. Now guidance note to IAC 5.4.2~~

5.4.~~5-4~~ Such information should be available both in the producer's file as well in a separate record, or registered in a database system. (8.4.2). The purpose of this criteria is for those involved in certification to have access to the file in order to ensure consistency in decision making.

5.4.~~6-5~~ The records that should be maintained for the specified period would include not only the operator's records, but also records of the certification body's personnel and relevant activities such as internal audits.

5.4.~~7-6~~ This may be an electronic signature.

~~5.4.10-8 This right should be communicated to operators.~~

6 Application and Inspection Procedures

6.1 Application procedures

6.1.2 a. This also includes the production and area to be certified, and in cases where the certification body offers more than one certification program, the standards against which the product is to be certified

6.1.4b The criterion requires the right of access, but does not require that this right be exercised in all cases. Certification bodies should be able to inspect any part of an operation whether organic or not if they have reason to do. The criteria requires that the right be fully exercised in cases of parallel production.

6.1.4.c Regions where there is only one certifier are not considered relevant.

6.1.5 These criteria refer not only to the required documentation but also to the way in which it is kept. This must allow for the specified audits to be carried out within the timeframe of an inspection.

6.1.6 Although this is more likely to apply in processing operations it may also apply to farming operations. An example would be a procedure to ensure cleaning out of equipment in a split production situation. Conversion plans, farm plans and management plans to reduce dependence on restricted products would constitute such procedural documents

6.2 Preparation for inspection

6.2.1 An example of assessment of the scope of certification sought is that an application for group certification is from an applicant that meets the criteria in 8.3.2.

6.2.8 This includes at least the application form, previous inspection findings, a description of activities/processes, maps/plans, product specifications, and used inputs, previous conditions and sanctions. Now guidance note to IAC 6.2.3

6.3 Visit procedures

6.3.3 An exception to this may be made in the case of unannounced visits that are made in addition to the scheduled visit. Such visits may be targeted to specific concerns or to check compliance with conditions of the certification.

6.3.4 Examples are: Parallel production and systems that are so similar that there might be undeclared parallel production, and any situation revealing high risk of cross-contamination.

6.4 Sampling and testing

Testing is not the basis of organic certification as it is certification of process not products. However testing is of value and the certification body shall have documented policies and procedures on residue testing, genetic testing and other analyses that meet these requirements

6.4.1b The "use of" means the deliberate utilization of a substance. For issues related to unintentional contamination, refer to the IFOAM BS as well as criteria 6.4.1c and 6.7.4, 6.7.5 and 6.7.12.

6.4.1c This refers to claims made in standards used by the certifying body regarding limits on contamination. For example claims on limits on heavy metals in soil. In such cases certifiers must verify the standard by means of residue testing.

6.5 Inspection Report

6.5.4 An example would be: In cases of partial compliance or lack of clarity in the standards the inspector being required elaborate.

6.5.5 The criterion prohibits requiring an inspector to make an overall judgment of whether the unit should be certified or not. The overall judgment is a function of certification and not

of inspection and would contravene criterion 1.3.~~44-10~~ if it was required of the inspector. The criterion does not prohibit the inspectors from providing an overall recommendation but does prohibit the certification body from requiring this of them. The actions in 6.7.~~5-4~~ are an exception based on the emergency nature of the case and the overriding need to prevent fraud.

6.5.6 This is not the final decision on non-conformities, but the observations of the inspector. As such it may be overturned by the Certification decision.

6.7 Additional requirements and inspection regime for particular circumstances standards

These criteria apply to situations, where product is being sold as organic.

6.7.1 Full application of standards should normally mean active organic management not just absence of use of prohibited materials. Full application shall as a rule require active management.

~~6.7.2~~The IFOAM Basic Standards define organic as a management system. Certification should not occur unless this organic management system is fully in place. In order to verify this the certification body should normally not grant retrospective conversion prior to the application for certification and should require the conversion period stated in the standards to monitor the system.

~~6.7.43 If exceptions to the criterion 6.7.2 1 are granted it shall be on the basis of sound and incontrovertible evidence that full application of the standards has occurred for a period at least as long as the minimum conversion period specified in the IFOAM Basic Standards. Sound evidence shall, in addition to documentation, include an inspection visit prior to certification in which the existing and prior management system is evaluated. Affidavits and other documentary evidence shall not on their own be considered sufficient evidence. Now guidance note to IAC 6.7.3~~

6.7.~~5-4~~ to 6.7.~~8-7~~ Split production and parallel production.

The criteria includes requirements for two situations that may occur in organic operations. Split production is the term used when a unit is not fully dedicated to organic production processing or handling and is also producing, processing or handling conversion or non organic produce. This is regardless of whether these are the same product or different product. If they are the same product this is termed parallel production. Parallel production is a particular form of split production. As parallel production is a higher risk situation when a product is sold as organic, specific criteria in addition to those for split production have been specified. The requirements for parallel production are in addition to those for split operations. These criteria apply to situations where product is being sold as organic.

6.7.~~7-6~~ and 6.7.~~8-7~~ In all parallel production on farms 6.7.~~7-6~~ b and c shall be required. In addition ~~5.7.7a~~6.7.6a must be enforced or - if an exception is granted to this provision - then the operator must be subject to the requirements in 6.7.~~8-7~~.

6.7.8 This includes the conventional ingredients in a multi ingredient product. The risk assessment is for the possibility of usage of GM products or their derivatives and would therefore look at whether GM versions of the ingredients exist.

7 ~~7~~ — Certification Procedures

7.1 General requirements

7.1.2.a The text refers to “if practiced” because certifiers may choose to not have a suspension policy and instead simply withdraw certification for serious infringements. The exception is found in 7.7.5 where suspension is the only possibility.

7.1.2.c Rre-evaluation is indicated in the event of changes significantly affecting the product's specification, or changes in the standards to which compliance of the product is certified, or changes in the ownership, structure or management of the supplier, if relevant, or in the case of any other information indicating that the product may no longer comply with the requirements of the certification system.

7.2 Certification Decisions

7.2.2 In a system where the certification is done annually the operator should be informed accordingly. In a system with an ongoing status the communication should assure that at any time the operator is informed about the certification status.

7.3 The certification process

7.3.1 This criteria requires that the current certification status (certified, conversion, non-organic) of all product or production, is stated on all forms and document used through the certification process. ~~Where the certification body operates more than one certification program, the applicable scope should also be stated. Deleted sentence now guidance note to IAC 7.3.1~~

7.4 Certificates

7.4.1d Product categories noted on the certificate should be as specific as the circumstances permit.

~~Certificates are the final and essential results of the certification body's services. Certificates are issued for different purposes, e.g.~~

~~a) confirm conformity of an operation for its production or processing activities (certificates of conformity);~~

~~b) confirm conformity for a defined transaction of products, referring to specified standards. This could be other than the certifiers own standards in the case of export to regulated markets.~~

7.4.2h Transaction certificates

~~Where for logistic or other reason this is not possible at the time of issuance of the certificate, this shall be obtained and integrated into the certification body documentation within six weeks.~~

7.5 Surveillance

~~7.5.1 Annual means the calendar year.~~

~~7.5.2 This could be done on a case by case basis or according to the type of operation. 7.5.2 These requirements do not apply to new applicants or operators wholly in conversion.~~

7.5.2c If a certifier has 5000 operators, the Certifier has to perform at least 5000 inspections per calendar year plus new applications.

7.5.3 This could be done on a case by case basis or according to the type of operation. Annual means the calendar year, which is not every 365 days.

~~7.5.4 This should be at least 5%.~~

~~7.5.5 This should be included in agreements or other documentation signed by the operator. Now guidance note to new IAC 7.5.6~~

~~7.5.10 – 7.5.11 The operator shall not be allowed to release certified products resulting from such changes until the certification body has granted permission. Now guidance note to IAC 7.5.10 and 7.5.11~~

7.7 Sanctions

~~7.7.1 The certification body will make the determination of whether a violation of the regulations is minor. Minor infractions do not, by themselves, preclude the certification or continued certification of an otherwise qualified organic operator. The certification body would be free to modify the time period for correction should it believe it to be appropriate. Infractions of the standards are considered “minor” only if they do not:~~

~~Compromise health or safety of workers, or~~

~~Involve flagrant violation of Standards.~~

~~Typically, minor infractions result from shortcomings in record keeping. Minor infractions may be considered to be flagrant if they are not addressed within a year of being identified. Now guidance note to IAC 7.7.1~~

~~7.7.5 This may include immediate withdrawal by the inspector as an emergency measure especially where fraud is suspected or where this is required by law, provided this is ratified by the certification body at the earliest possibility. The procedure for such withdrawal must be clearly documented. First sentence now guidance note to IAC 7.7.5. Last sentence deleted because already covered by IAC 7.7.2~~

7.8 Appeals

7.8.1 Appeals may be lodged by the operator subject to a decision or by a third party. However in the context of these criteria appeals refers to decisions regarding certification status. Third party statements concerning compliance of operators with the requirements may be considered complaints and dealt with under the complaints procedures.

8 Inspection and Certification for particular circumstances or scope

8.1 Certification of Wild products

8.1.1 ~~dec~~ Middlemen in this context refers to agents or tribal authorities who may act as initial collection or storage points.

8.2 Approval or Certification of inputs

Certification bodies are required under the IFOAM standards to have lists of generic inputs. The criteria 8.2.1 and 8.2.3 apply to certification bodies who have produced lists of branded (proprietary) products to assist their operators in determining whether they meet the generic list. The criterion 8.2.4 and 8.2.5 are additional requirements applicable when the certification body certifies the product, allowing the operator to indicate the certification status on product, and thereby making a claim to the general public.

~~8.2.1e The statement should include the limitations of the approval – for example that it does not imply effectiveness of the product. Now guidance note to IAC 8.2.1e~~

~~8.2.4b The inspection should verify compliance with relevant standards such as those related to separation of product, pollution resulting from the process and contamination. Now guidance note to IAC 8.2.4b~~

8.3 Group Certification ~~of smallholder groups~~

This system of certification is evolving from the need to devise a system of control and certification of small farmer groups towards a system of combined internal and external control which in situations specified in 8.3.2 appear to be more appropriate than external control alone.

~~This system of certification has evolved from the need to devise a system of control in economically disadvantaged regions that takes account of the economic realities and the risk. It should be applied only in cases where production from the individual operations is small and the organizational criteria of 8.3.2 are met.~~

8.3.2a This criterion does not limit the arrangement to farmers. Small scale processing organized collectively may also be included provided the other criteria in 8.3.2 are met. ~~Typical production units shall not be included in the inspection arrangements for such groups and shall be inspected annually by the certification body and be individually certified. Deleted sentence replaced with guidance note to IAC 8.3.2.~~

Atypical means units that are not similar to the rest of the units in size or other attributes.

Large farming units, processing units and traders shall not be included in the inspection arrangements for such groups and shall be inspected annually by the certification body and be individually certified. Simple processing and storage units may be included Now guidance note to IAC 8.3.2 a.

~~8.3.2b This does not mean that these excluded units may not be part of the structure of the group – for example be part of the cooperative. The criterion refers to the way in which they shall be treated by the certification body with respect to inspection and certification. The criteria do not specify what “large” means as this will differ from country to country and depend on the type of production. The certification body must determine this on a case by case basis and whether to establish the limit by acreage or sales.~~

8.3.2c The criterion refers to the ~~two~~ factors that the size of the group should ensure - sufficient resources, transparency and impartiality. The certification body must determine whether the group is large enough to satisfy these factors.

~~8.3.3b The system shall include a documented management structure of the internal control system. Now guidance note to IAC 8.3.3b~~

8.3.3c. This does not mean that those personnel responsible for the internal control must have visited the individual at least once during the year - it means they must have done so with the specific purpose of checking compliance with standards.

~~8.3.6 The following are considered essential requirements, although a certification body may list additional requirements:~~

- ~~There are competent personnel implementing the internal control system.~~
- ~~The core documentation is complete, which includes:~~
 - ~~o complete farm or site maps/sketches~~
 - ~~o a complete list of group members~~
 - ~~o farm/field records~~
 - ~~— signed member agreements~~
 - ~~□ yield estimates~~
- ~~□ The internal inspection protocol is described & implemented.~~
- ~~□ A monitored and documented conversion period is in place.~~
- ~~A mechanism to remove non-compliant farmers from the Growers' List is in place and executed.~~
- ~~There are procedures to accept new members~~

Risk assessment

8.3.10:

The risk assessment identifies the critical aspects to the functioning of the group, from farm level through processing, transporting, etc. that is under responsibility of the group. The critical aspects must be addressed by the internal standards and internal control system. Risk assessment within the internal standards and internal control system must be regularly updated in relation to each other.

For further information reference is made to the IFOAM Group Certification Guidance Manual, March 2004

~~8.3.1012 The IFOAM Accreditation Program accepts the ISO 62 Square root approach, which is based on a simple formula ($x=\sqrt{y}$). The following table is derived from this approach. Note that these are minimum number of re-inspections. Additional inspections may be added and should be added when necessary.~~

| <u>Minimum amount of growers to be inspected by external inspectors</u> | | | |
|---|-----------------------------|------------------------------------|----------------------------------|
| <u>Number of group members</u> | <u>Normal risk factor 1</u> | <u>Medium risk risk factor 1,2</u> | <u>High risk risk factor 1,4</u> |
| <u>Minimum</u> | <u>10</u> | <u>12</u> | <u>14</u> |
| <u>50</u> | <u>10</u> | <u>12</u> | <u>14</u> |
| <u>100</u> | <u>10</u> | <u>12</u> | <u>14</u> |
| <u>200</u> | <u>14</u> | <u>17</u> | <u>20</u> |
| <u>500</u> | <u>22</u> | <u>27</u> | <u>31</u> |
| <u>1000</u> | <u>32</u> | <u>38</u> | <u>44</u> |
| <u>2000</u> | <u>45</u> | <u>54</u> | <u>63</u> |
| <u>5000</u> | <u>71</u> | <u>85</u> | <u>99</u> |

~~Certification bodies must have written rationale for other approaches to calculating re-inspection rate Now guidance note to new IAC 8.3.12.~~

8.3.15 (A) witness audit(s) will depend on seize of the group and the number of internal inspectors.

8.3.15-16 The form shall include identification, name, location (at least on an area map), year of entrance into the certification system, date of last internal and external inspection, number of hectares, cash crops, and yield estimates. (from the IAC)

9 Acceptance of prior certification

9.1 General requirements for all methods of acceptance

It is not a requirement of organic certification that all elements of the production chain or that all inputs be certified by the same certification body. Feedstuffs, ingredients in multi-ingredient products, bulk food for prepacking may all have been certified by a certification body different from that determining the certification of the product at the end or in the middle of the food chain. This section of the criteria establishes the acceptable methods for the acceptance of the prior certification, and the requirements for each of these methods.

~~These requirements may also be applicable where a certification body operates more than one organic certification program according to different standards. In such cases, the acceptance of products certified under one program for use by operators under the IFOAM~~

~~accredited program shall be subject to the criteria in so far as a document review to check compliance with the appropriate standards is necessary. Now guidance note to section 9.1~~

The general requirements apply to both acceptance based on recognition of a certification body and acceptance based on document review.

9.1.3 Criteria 9.2 and 9.3 establishes the requirements for permitting use by the certification body's certified operators of a product ~~previously~~ certified by under another certification ~~body~~ program. There is a measure of equivalency of procedures, policies and standards. This does not confer certification rights to the original operator. The criteria in 9.4 establish the requirements when an operator certified by another certification body seeks full certification and the associated rights.

9.2 Acceptance based on recognition of a certification body

~~9.2.2 b Verification of equivalence shall include elements such as the requirements for:~~

- ~~Chain of custody (Section 2.3.2-2.3.8)~~
- ~~Contracted production (Section 2.3.9-2.3.14)~~
- ~~Inspection visit procedures (Section 6.3)~~
- ~~Parallel and split production (Section 6.7)~~
- ~~Genetically engineered products (Section 6.7)~~
- ~~• Group Certification if applicable (Section 8)~~

~~9.2.2b Peer review would mean participation in a formal peer review between accreditation bodies.~~

~~9.2.43. This refers to unilateral, bilateral or multilateral contracts. In addition to the requirements listed, the contract should also contain the right to review the other party's performance; the right to have access to relevant information; regulation of confidentiality and dispute settlement provisions. Deleted sentence now guidance note to IAC 9.2.3~~

~~9.3.2 In conducting document review for the purposes of accepting product previously certified by another certification body (Criteria Section 9.3) all processing and handling inspection reports must be obtained and reviewed. In the case of production inspection reports (farm reports) the certification body must either obtain these reports or conduct a risk analysis. The risk analysis shall be based on the equivalence of the certification body in question and the equivalence of the relevant standards. In addition the analysis must be product specific. The results of the analysis shall determine which reports need be obtained. Replaced with guidance note to IAC 9.3.2~~

~~10 Standards Development~~

~~10.1 General requirements~~

~~10.1.1 Certification bodies may use standards established and published by themselves or by other parties. However, in the case of IFOAM accreditation, it is a requirement that these standards shall meet or exceed the IFOAM Basic Standards. As a consequence, IFOAM accredited certification bodies using standards published by other parties shall have contractual arrangements with the standard setting body, in which the standard setting body agrees to make any necessary amendments to ensure continued compliance. Whether using own standards or third party standards, the standard setting procedure must comply with the requirements of section of these criteria~~

~~10.1.2 The certification body shall make standards and relevant documentation available in these languages and shall itself have sufficient personnel to conduct certification in the same manner in all languages of operation. Certification bodies shall not certify operators who are~~

~~not sufficiently conversant with the languages of operation. Standards shall be presented in a way congruent with the knowledge of the operators. In the case of illiterate operators this may mean tape recordings, illustrations or other non-written forms.~~

~~10.2—Standards Review~~

~~10.2.2 This does not include changes required by law where proposals from interested parties would be of no consequence.~~

~~10.2.5 This criterion requires the certification body to have a documented “normal” period for implementation of new standards by operators. However it is recognized that a specific new or amended standard may require a longer period. If this is the case this additional period must be clearly stated and communicated in the standards themselves.~~

