

# **2nd Revision Draft of the 2002 IFOAM Accreditation Criteria**

**DRAFT DOCUMENT  
FOR STAKEHOLDER COMMENTS**

## III. IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing

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## Introduction

~~This is the 4th edition of the Criteria, which The IFOAM Accreditation Criteria (IAC) were first approved by the General Assembly in 1992. IFOAM seeks to continually improve these criteria. Revision occurs every few years and includes opportunity for input by interested parties. The current edition was distributed for public comment on two occasions. The revision process for these Criteria is described in IFOAM Policies. Generally speaking, the IAC establishes requirements for conduct of organic certification by the certification body, including procedures and practices of the operator that the certification body must verify.~~

In addition to these criteria, IFOAM has established Basic Standards for Organic Production and Processing. First published in 1980 and subsequently subject to continuous review, the IFOAM Basic Standards have been adopted as the basis for national, regional and international organic standards throughout the world.

The IFOAM Criteria together with the IFOAM Basic Standards establish the requirements for certification bodies seeking IFOAM accreditation. IFOAM accreditation is carried out under contract by the International Organic Accreditation Service Inc. (IOAS), a US based company. The structure of the IOAS and procedures for IFOAM accreditation are laid down in the IFOAM Accreditation Program Operating Manual published by the IOAS. More detailed policies and procedures are set down in the IOAS Quality Manual and the IOAS Policy Manual.

The criteria have been ~~strictly~~ based upon the requirements in ISO/IEC GUIDE 65:1996(E) "General requirements for bodies operating product certification systems". However, organic certification is certification of a process and not a product and this has required some adaptation. In addition these criteria include specific requirements concerning issues confronted by a certification body operating within the organic sector.

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.

The criteria include guidance notes and are accompanied followed by guidance-explanatory notes, which provide further explanation of the requirements. Sections with corresponding guidance notes are marked with an asterisk (\*).

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 the criteria or a particular criterion. In short, they are provided aim 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 guidance notes are indicated with "Guidance Note" and are formatted in a font (Times new Roman) that is different from the rest of the text.

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The explanatory notes provide additional explanation of the requirements. In order to facilitate usage of the Guidance Explanatory Notes, Sections sections of the Criteria with corresponding guidance notes Explanatory Notes are marked with the note: \*See also *guidance notes:explanatory notes*.

The current version of the IAC and the guidance explanatory notes can also be found is located on IFOAM's website.

## Definitions

The following definitions apply within the context of these criteria:

**Acceptance of Prior Certification:** The procedure by which a certification body accepts the certification of a product by another certification body, thereby enabling the use of or further processing by the certification body's own operators.

**Accreditation:** Procedure by which an authoritative body gives a formal recognition that a body or person is competent to carry out specific tasks.

**Appeal:** Request by an operator for reconsideration of any adverse decisions made by the certification body related to its desired certification status.

**Certificate of conformity:** Document issued by a certification body, declaring that an operation is in conformity with the organic production or processing standards.

**Certification:** The procedure by which a third party gives written assurance that a clearly identified process has been methodically assessed such that adequate confidence is provided that specified products conform to specified requirements.

**Certification body:** The body that conducts organic certification.

**Certification Mark:** A certification body's sign, symbol or logo which identifies product(s) as being certified to the requirements of a program operated by that certification body.

**Certification Program:** System operated by a certification body with its own defined requirements and procedures and management for carrying out certification of conformity

**Certification Scope:** The parameters defining the certification granted including the product or product types certified, where applicable the acreage and the applicable standards and certification program.

**Chain of Custody:** The concept that all relevant steps in the production chain including the growing, handling, processing and other processes detailed in section 2.3 of these criteria, have been inspected or certified as appropriate.

**Complaint:** An objection to the policies, procedures or performance of the certification body. A complaint may also be an objection to the performance or activities of a certified party lodged with the certification body by a third party.

**Conflict of interest:** The situation where an individual's capacity for objectivity is put at risk by financial or personal interests in conflict with their interest in conducting fair and impartial inspection or certification.

**Contracted Production or Processing:** The utilization of third parties by the operator for performing specific production or processing tasks

**Conversion period:** The time between the start of the organic management and the certification of crops and/or animal husbandry as organic.

**Declaration of interest:** A declaration of personal and/or commercial interests in the organic industry made by those involved in the certification process to enable determination of an individual's objectivity.

**Dual or multiple certification:** Certification of an operation by two (dual) or more (multiple) certification bodies.

**Evaluation:** Systematic assessment based on all relevant information obtained in order to make a decision. With reference to a certification decision this includes, but is not limited to, the inspection.

**Exception:** Permission granted to an operator by a certification body to be excluded from the need- to comply with ~~normal~~ requirements of the standards. Exceptions are granted on the basis of clear criteria, with clear justification and for a limited time period only.

**Genetic Engineering:** A set of techniques from molecular biology (such as recombinant DNA) by which the genetic material of plants, animals, micro-organisms, cells and other biological units may be altered in ways or with results that could not be obtained by methods of natural reproduction or natural recombination.

**IFOAM Basic Standards:** International standards for standards of organic production and processing, established by the International Federation of Organic Agriculture Movements.

~~**Input manufacturing:** Manufacturing of production or processing inputs.~~

**Input/output reconciliation:** An audit that assesses the output of organic product against the supply of ingredients or in the case of trading operations, the volume of sales against the volume of purchases.

**Inspection Body:** Body that performs inspection services on behalf of a certification body.

**Inspection:** Visit on site to verify that the performance of an operation is in accordance with the production or processing standards.

**Inspector:** Person appointed by a certification body or by an inspection body to undertake the inspection of an operator.

~~**Internal Control System:** Part of a documented quality assurance system that allows the external certification body to delegate the annual inspection of individual group members to an identified body/unit within the certified operator.~~

**Internal Audit:** A systematic periodic review and assessment of the objectives and performance of a program that is undertaken by the certification body itself.

**License:** An agreement or contract that grants a certified operator the right to use certificates or certification marks in accordance with the ~~rules-requirements~~ of that program.

**Operator:** An individual or business enterprise, responsible for ensuring that ~~products-production~~ meets and, if applicable, continues to meet, the requirements on which the certification is based.

**Parallel Production:** Any production where the same unit is growing, breeding, handling or processing the same products both in a certified organic quality and a not certified or non-organic quality. A situation with “organic and “in conversion“ production of the same product is also parallel production.

**Pre-assessment:** An inspection for the purpose of assessment, that is not intended to result in a certification decision.

**Precedent:** A certification decision concerning a new situation or set of circumstances that may serve to guide future decisions.

~~**Product Category:** A type of production defined in certification scope, such as crop production, input manufacturing, or aquaculture.~~

**Quality System:** Documented procedures which are established, implemented, and periodically audited to assure that production, handling, management, certification, accreditation and other systems meet specified requirements and outcomes by following standardized protocols.

**Sanctions:** Measures taken against ~~certified~~ operators who have failed to comply with the standards or other requirements of the certification body.

**Smallholder Group:** An organized group of small-scale producers with similar farming and production systems. The criteria in section ~~7~~8.3 apply only to such groups when the certification applies to the group as a whole and when special inspection arrangements have been applied.

**Split Production:** Production, breeding, handling or processing of conventional, in conversion and/or organic in the same unit.

**Surveillance:** The measures undertaken to provide ongoing monitoring of an operator’s compliance with standards and certification requirements.

**Traceback audits:** An audit to verify that a product or its ingredients may be traced back to the original suppliers.

**Transaction Certificate:** Document issued by a certification body or by the operator, declaring that the specified lot or consignment of goods is derived from production that has been certified.

**Violation:** Infringement by a licensed operator against the standards, certification procedures or contractual obligations to the certification body

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# 1 Structure

## 1.1 General Requirements

1.1.1 The certification body shall have a documented and effective structure and organization that ~~provides fosters~~ confidence in its certification results.

1.1.2 The certification body shall have documents which demonstrate that it is a legal entity.

1.1.3 The certification body shall identify the management ~~(committee, group or person)~~ which shall have overall responsibility for all of the following: \*See also Explanatory Notes

- a. performance of ~~testing~~, inspection, evaluation and certification as defined in ~~these~~ Guidance criteria,
- b. formulation of policy matters relating to the operation of the certification body,
- c. decisions on certification,
- d. supervision of the implementation of its policies,
- e. supervision of the finances of the body,
- f. delegation of authority to committees or individuals as required to undertake defined activities on its behalf,
- g. ~~technical basis for granting certification.~~

## 1.2 Responsibility

1.2.1 The certification body shall take full responsibility for all activities operated or sub-contracted out and maintain its responsibility for granting, maintaining, extending, suspending or withdrawing certification.

1.2.2 The certification body shall not delegate authority for granting, maintaining, extending, suspending or withdrawing certification to an outside person or body. \*See also guidance notes explanatory notes

1.2.3 ~~The certification body shall have a documented description of its administration, including officers and responsibility.~~ The certification body shall define document clear lines of authority and responsibility and the accountability of staff personnel, officers and committees.

1.2.4 The Governing Board shall remain responsible for certification decisions but may delegate authority for taking certification decisions to one or more certification committees. \*See also explanatory note

1.2.5 Where decisions are delegated to individual certification officers, the certification body shall have reporting and review procedures that enable the Governing Board or the certification committee to exercise control over and responsibility for such decisions.

1.2.56 ~~When activities are delegated to committees, such c~~Committees shall have clear responsibilities and rules of procedures.

~~1.2.6 Where decisions are further delegated to individual certification officers, the certification body shall have reporting and review procedures that enables the Board Governing Board or the certification committee to exercise control over and responsibility for such decisions.~~

1.2.7. An appeals committee shall be established. \*See also explanatory notes

## 1.3 Impartiality and Objectivity

1.3.1 The certification body shall have structures and procedures to enable it to be free to operate without undue influence from vested interests.

1.3.2 The certification body shall be impartial. Inspection and certification shall be based on an objective assessment of relevant factors, following documented procedures.

1.3.3 The certification body structure shall enable the participation of all parties significantly affected by the principles and policies, ~~principles and functioning~~ of the certification system, in their development. \* See also guidance notes explanatory notes

1.3.4 The certification body shall not provide any product or service which could compromise the confidentiality, objectivity or impartiality of its certification process ~~and decision making~~, unless these product/service and certification programs are clearly separated in a manner that ensures that such compromise cannot occur.

1.3.5 The certification body shall not engage in the marketing of certified products or promotion of individual products and shall have a policy and an appropriate procedure for responding to product inquiries from the trade or consumers. ~~The procedure~~ This shall ensure an equal treatment for all certified product operators. The certification body shall not solicit individual applications based on the needs of individual buyers. **Guidance Note:** 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. \* See also guidance explanatory notes

1.3.6 Certification bodies shall ensure that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications. ~~\*See also guidance explanatory notes~~

1.3.7 The body making or ratifying certification decisions shall be free from any commercial, financial and other pressures that might influence decisions; **Guidance Note:** 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. - \* See guidance explanatory notes

~~1.3.8 Payment of inspection fees and expenses shall be made through the certification body or contracted inspection body and not directly to the inspector by the operator.\*~~

~~1.3.9 The fee structure shall be such that a decision to not grant certification does not result in unreimbursed costs to the certification body~~

1.3.8 Fee structures and other issues related to payment should shall not compromise objectivity. **Guidance Note:** Certification bodies should where practical avoid 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. \*See also guidance notes.

1.3.9 The certification body or its personnel shall not accept a substantial gift or favor. The certification body shall establish a policy on what are/are not substantial gifts. \*See also guidance explanatory notes

~~1.3.10 The certification body shall have procedures for appeals and complaints. See section 3.5 and 7.8.\*~~

#### **Division of function**

1.3.41810 The certification body shall have clear division of the functions of inspection, certification and appeals.

1.3.42911 Persons responsible for a decision that is being appealed may not be involved in the decision on that appeal. \* See also guidance explanatory notes

~~1.3.1310 The certification body shall ensure that each decision on certification is taken by person(s) different from those who carried out the inspection.~~

~~1.3.14 1112 Where pre-assessment of production to identify areas of nonconformity is performed as an optional fee paying part of the certification process, different personnel shall carry out the inspection and the pre-assessment.~~

### **Consulting and advising**

1.3.151213 12 Certification bodies shall not provide consultancy services to operators.

1.3.13 Pre-assessment of production performed by a certification body to identify areas of nonconformity shall not include advice on how to overcome these non-conformities.

1.3.16314 Specific advice given ~~by inspectors~~ to operators shall be limited to explanations of the standards or certification requirements. This information shall not be offered for additional fees and shall not prescribe solutions.

1.3.17 415 Certification bodies may provide general information (~~training, newsletters, seminars, advice concerning regulatory requirements etc.~~) for additional fees, provided that this service shall be offered to all certified operators in a nondiscriminatory manner. \*See also guidance explanatory notes

### **Conflicts of interest of individuals**

1.3.15816 The certification body shall ensure that a A declaration of interest is updated annually by the Board/Governing Board and all persons involved in certification, inspection and appeals as well as by the board. shall be on file at the certification body's (or inspection body's) office. Such declarations shall be on file and take into account both direct and indirect interests, ~~and t~~ The certification body shall review the declarations and identify decide on what constitutes a conflict. \*\*See also guidance explanatory notes

1.3.16917 All persons with a conflict of interest shall be excluded from work, discussion and decisions in all stages of the certification process related to the potential conflict. The exclusion of such persons ~~should~~ shall be recorded in minutes or other records. \*\*See also guidance explanatory notes

1.3.270-18 The certification body shall require persons engaged in inspection or certification to agree in writing to abstain from participating in work ~~for~~ regarding operators with whom they have personal relations or ~~to~~ those with whom they have had business relationships (either trade or advisory) in the past two years. The certification body shall require persons engaged in inspection to report on any new interests regarding the operation for a period of one year after the inspection. The certification body shall determine whether the new relations may have affected the impartiality of any work submitted by inspectors or certification personnel. \*See also guidance explanatory notes

## **1.4 Resources**

### **Financial and Personnel Resources**

1.4.1 The certification body shall have the financial stability and resources required for the operation of a certification system. Guidance note: Financial stability should include provisions to cover liabilities in situations where there is a significant risk of being sued.

~~1.4.2 The certification body shall make adequate provision to cover liabilities which may arise from its operational activities.~~

### **Personnel resources**

~~1.4.3-2~~ The certification body personnel, ~~shall employ or contract a sufficient number of personnel who~~ have the necessary education, training, technical knowledge and experience for performing functions relating to the type, range and volume of work performed. Guidance Note: Assignment of personnel, including contracted inspectors, to inspection and certification work should be appropriate to their skills

~~1.4.4~~ The certification body ~~shall have documented recruitment requirements for senior staff and inspectors regarding necessary education, training, technical knowledge and experience in organic agriculture and/or processing. In the case of~~ For inspectors ~~the certification body shall specify the type of inspections for which the~~ an inspector has been ~~may be employed based on these factors~~1.4.3.

~~1.4.5-3~~ Personnel shall have ~~available clear~~ job descriptions describing their duties and responsibilities.

~~1.4.6-4~~ Personnel shall have ~~the competence and up-to-date,~~ documented work instructions for complex or critical certification and inspection functions. ~~to enable them to perform their various functions.~~ See also explanatory notes

~~1.4.7-5~~ The body ~~or committee~~ responsible for making certification decisions shall ensure that all certification decisions are based on competence in all areas for which certification is granted. \*\*See also guidance explanatory notes.

~~1.4.8-6~~ The certification body shall require all personnel involved in the certification process to sign a contract or other document by which they commit themselves to the rules and procedures of the certification body.

1.4.97 Records of the qualifications and, training and performance reviews of all personnel shall be maintained by the certification body in accordance with the requirements in 5.4.6.

### **Training**

~~1.4.1098~~ The certification body shall have a documented training policy, including initial and ongoing training, for all personnel, including, ~~both employed and contracted~~ contracted inspectors, and committee members, that is sufficient to ensure continued competence.

~~1.4.10-11-9~~ The certification body shall ensure that ~~prior to~~ before undertaking inspection, new inspectors have ~~at least~~ successfully completed a training course in inspection of organic operations and undergone a defined on-site apprenticeship period.

### **Personnel records**

~~1.4.11~~ Records of the qualifications, training and performance reviews of all personnel shall be maintained by the certification body in accordance with the requirements in 5.4.6. Remark: Moved to 1.4.97

### **Subcontractors**

~~1.4.12-10~~ The integrity, competence and transparency of any sub-contracted components of the certification system remain the responsibility of the certification body.

~~1.4.13-11~~ When a certification body subcontracts work related to certification to an external body, or person, an agreement covering the arrangements shall be drawn up. This shall include the requirement to comply with all relevant aspects of these criteria.

~~1.4.14~~ The certification decision shall not be subcontracted. \*\*See also guidance notes

~~1.4.15~~ The certification body shall ensure that operators are informed of subcontracting arrangements prior to application.

~~1.4.16 The certification body shall apply the requirements in 1.4.12 to 1.4.15 above when it uses, for granting its own certification, work performed by another certification body. Specific criteria for such cases are set down in section 9 of this document.\*~~

## 2 Accessibility and Scope

### 2.1 Non-discrimination

2.1.1 The policies and procedures which govern the operation of the certification body shall be non-discriminatory. ~~The administration of these policies and procedures shall not discriminate in any way against particular applicants~~

### 2.2 Access to Services

2.2.1 The certification body shall make its services accessible for all applicants whose activities fall within its declared field of application. Certification requirements, inspections and decisions shall be confined to the scope of the certification being granted.

2.2.2 Access to certification shall not be conditional upon the size of the supplier or membership of any association or group, nor shall certification be conditional upon the number of certificates already issued by the certification body.

2.2.3 The fee structure shall be standardized and available on request.

~~2.2.4 The certification body shall state under its declared field of application, those languages in which it operates.~~

### 2.3 Certification scope

2.3.1 Organic certification shall be granted solely on the basis of conformity with specified published standards. The standards used by the certification body shall cover all production systems or product categories certified. and these shall at least meet the IFOAM Basic Standards.

#### **Certification Scope and the eChain of custody**

2.3.2 The certification body shall not issue any license to affix-use its certification mark on or issue any certificate for any product unless it is assured of the chain of custody of the product to that that point of certification. Where steps in the production chain have been certified by other certification bodies, the criteria in section 9 shall be applied. \*\*See also guidance explanatory notes

2.3.3 Any entity in the chain of custody that has produced, processed, or packaged or affixed a label referring to the organic production method to a product an organic product shall have been certified. SubContracted production (see below) shall have been inspected. **Guidance Note:** 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. \* See also guidance explanatory notes

~~2.3.4 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. moved to 2.3.3 guidance notes.~~

~~2.3.5 Any entity that has previously sold the product shall have been certified except when the product had been received packaged for final consumer use.\*~~

2.3.46 Certification bodies shall conduct a risk assessment to determine the necessity for, or frequency of, inspection of all storage facilities including port facilities. Where this reveals a need for inspection to protect organic integrity, inspection shall be done. \*See also guidanceexplanatory notes

2.3.57 The certification body shall require that the party owning the product at the point of transport be responsible for maintaining the organic integrity in the transport process, unless transport operations are certified in their own capacity.

~~2.3.8 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.~~

**Certification scope and contracted production or processing** \*See also guidanceexplanatory notes

2.3.9-6 The certification body shall have policies and procedures for regulating contracted production or processing, where the contracted party is not required to be certified in their own right. A certification body may not issue a certificate of any type to the contracted operator. \*

2.3.10-7 The policy shall prescribe the circumstances where the contracted party is not required to be ~~themselvesitself~~ certified ~~itself~~. This shall preclude the contracted party from marketing certified products ~~themselvesitself~~ and require ~~the manufacturing process~~, the raw materials supply, and the sales to be under the control of the certified licensee. This shall normally mean that the contracted party does not take title of the product. \*\* See also explanatory notes

2.3.11-8 The contracted party shall be inspected at least annually according to the certification body's normal inspection procedures; ~~\*by the certifier before the use of the contracted product or service. Subsequent inspections shall be made annually or at a frequency determined on a case by case basis providing that the certifier documents the reasons for the reduced frequency.~~

2.3.12-9 The certification body shall require that the certified operator shall be held fully responsible for the contracted production or processing and be subject to sanctions in the event of noncompliance of the contracted parties. Guidance Note: 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; ~~\*\*See also guidance notes~~

2.3.13-10 The certification body shall require that the contracted party have a contractual relationship with the certification body that includes clauses regarding compliance to the standards, obligation to provide information, and access ~~to~~ the certification body. This may either be achieved through a direct contract between the parties or by an agreement between the operator and the contracted party in which the contracted party binds itself directly to the certification body. Guidance Note: 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. ~~\*\*See also guidance notes~~

2.3.14-11 The certification body shall require that each contracted party ~~has the owns and understands the~~ current version of the applicable standards and a general description of the certification program. \*

## 3 Quality System for Certification

### 3.1 Quality Policy

~~3.1.1 The management of the certification body having executive responsibility for quality systems shall define and document its quality policy for quality and its objectives for, and commitment to, quality.~~

~~3.1.1 The Certification Body shall document its objectives for and commitment to quality in a quality policy.~~

~~3.1.2 The management shall ensure that this policy is understood, implemented and maintained at all levels of the organization. See also explanatory notes.~~

### 3.2 Quality System

3.2.1 The certification body shall operate an effective quality system in accordance with the relevant elements of these criteria and appropriate for the type, range and volume of work performed. This quality system shall be documented and the documentation shall be available to, and understood by, the certification body ~~staff~~ personnel. **Guidance Note:** The quality system shall include a system for continuous quality improvement. The certification body shall demonstrate effective implementation of the quality system, including competency and consistency in the application of policies and procedures. <sup>\*\*</sup>See also guidance notes

~~3.2.2 The certification body shall ensure effective implementation of the documented quality system, procedures and instructions. Certification bodies shall demonstrate a high degree of competency and consistency in the practical application of their policies and procedures.~~

~~3.2.3 The certification body shall designate a person having direct access to its highest executive level who, irrespective of other responsibilities, shall have defined authority for ensuring that a quality system is established, implemented and maintained in accordance with these criteria, and reporting on the performance of the quality system to the body's management for review and as a basis for improvement of the quality system.~~

~~3.2.4 The certification body shall demonstrate adequate arrangements for continuous quality improvement~~

### ~~3.3 Quality Manual~~ 3.3 Quality Documentation

~~3.3.1 The quality system shall be documented in a comprehensive Quality Manual and associated quality procedures, and the manual which shall contain or refer to at least the following:~~ The quality documentation shall include at least the following:

~~a) a quality policy statement;~~

~~b) a brief description of the legal status of the certification body, including the names of its owners and, if different, names of the persons who control it;~~

~~c) the names, qualifications, experience and terms of reference of the Board/Governing Board of Directors, senior executive and other certification personnel, both internal and external;~~

~~d) an organization chart showing lines of authority, responsibility and allocation of functions stemming from the senior executive;~~

~~e) a description of the organization of the certification body, including ~~details of~~ the management (committee, group or person) identified in 1.1.3;~~

~~f) the policy and procedures for conducting management reviews;~~

~~g) administrative procedures including document control;~~

~~h) the operational and functional duties and services ~~pertaining to quality~~, so that the extent and limits of each person's responsibility are known to all concerned;~~

~~i) the procedure for the recruitment, ~~selection~~ and training of certification body personnel and monitoring of their performance;~~

- ~~h)~~ i) a list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence;
- ~~k)~~ j) its procedures for handling nonconformities and for assuring the effectiveness of any corrective and preventive actions taken;
- ~~l)~~ k) the procedures for evaluating products and implementing the certification process, including the conditions for issue, retention and withdrawal of certification documents, and the controls over the use and application of documents employed in the certification of products;
- ~~m)~~ l) the policy and procedure for dealing with appeals and complaints;
- ~~n)~~ its procedures for conducting internal audits.

### 3.4 Internal Audits

3.4.1 The certification body shall conduct periodic internal audits ~~such that covering~~ all procedures are covered in a planned and systematic manner over time, to verify that the certification system is implemented and ~~is~~ effective.

The certification body shall ensure that: \* See also explanatory notes

- a. personnel responsible for the audited functions are informed of the outcome of the audit;
- b. corrective actions are taken in a timely and appropriate manner;
- c. the results of the audit are documented. \*\*See also guidance notes

3.4.2 The program's management shall review its system at defined intervals. Records of such reviews shall be maintained. \*\*See also guidance explanatory notes

3.4.3 The certification body shall conduct performance reviews of ~~all inspection and certification~~ personnel including employed inspectors at least annually. Records of the outcome shall be maintained. \* See also guidance explanatory notes

3.4.4 In the case of frequently used contracted inspectors the inspector shall be given periodic feedback on performance

### 3.5 Complaints

3.5.1 The certification body shall have procedures for consideration of complaints brought by operators or third parties concerning its own performance or concerning the compliance of certified operators with the standards.

3.5.2 Complaints shall be dealt with in a timely and efficient manner

3.5.3 When a complaint is resolved, ~~a~~ documented resolution shall be made. The complainant shall be informed of the general outcome of the complaint in a way which does not prejudice the confidentiality of the party concerned."

3.5.4 The certification body shall \*See also guidance explanatory notes

- a. keep a record of all complaints and resulting corrective actions related to certification;
- b. take appropriate subsequent action including possible corrections of the system; \*
- c. document the action taken and its effectiveness. \*

## 4 Confidentiality provisions

### 4.1 General

4.1.1 The certification body shall have adequate arrangements to ensure confidentiality of the information regarding specific operators obtained in the course of its certification activities at all levels of its organization, including committees, contracted bodies and individuals. \*\*See also guidance explanatory notes

4.1.2 This shall include the establishment of a confidentiality policy and the requirement for all personnel to sign a confidentiality agreement. This policy shall specify the type of information

that is not covered by confidentiality, such as name and address of operators, and third parties that may have access to the information such as accreditation bodies.

4.1.3 Except as required in these criteria or by law, or otherwise permitted in the certifier's published ~~rule~~requirements, information gained in the course of certification activities about a particular product or supplier shall not be disclosed to a third-party without the written consent of the supplier. ~~Where the law requires information to be disclosed to a third-party, the supplier shall be informed of the information provided as permitted by the law.~~ **Guidance Note: 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.** ~~\*\*See also guidance notes~~

## 5 Documentation and Document Control

### 5.1 General

5.1.1 The certification body shall document its certification system, make ~~appropriate-relevant~~ documents available to the public on request and demonstrate control over all documents issued.

### 5.2 Public access to information

5.2.1 The certification body shall make publicly available, through print and or electronic media, ~~up-to-date~~current information on the following: \* See also guidance notes

- a. information, where relevant, describing the authority under which the certification body provides its certification service ; \*\*See also guidance notes
- b. the ~~rule~~requirements and procedures, or a description of the procedures for evaluation of the inspection report and approval, continuation or extension of certification;
- c. the ~~rule~~requirements and procedures for suspension and withdrawal of certification
- d. the standards to which certification is granted;
- e. a description of the certification body's sources of income and clear indications of the fees charged to applicants and current licensed operators;
- f. a description of the rights and duties of applicants and suppliers of certified products, including requirements, restrictions or limitations on the use of the certification body's logo and on the ways of referring to the certification granted;
- g. procedures for handling complaints and appeals;
- h. a current list of certified operators, including name and location ~~and~~ the scope of the certification; if an operator is certified as a group it shall be identified as such
- i. a current listing of contracted ~~production parties, shall also be available~~ although this may be a general list without linkage to the certified operator. ~~—\*\*See also guidance notes.~~

### 5.3 Document control

5.3.1 The certification body shall maintain a documented system for the control of all documentation relating to the certification system and shall ensure that: \*See also guidance notes

- a. the current issues of the appropriate documentation are available at relevant locations;
- b. all changes of documents are covered by the correct authorization;
- c. all changes are processed in a manner which will ensure direct and speedy action;
- d. superseded documents are removed from use throughout the organization and its agencies;
- e. all affected parties are notified of changes;
- f. there is a register of all appropriate documents with the respective issue identified;
- g. there is a determination of which documents are available to the public and which are not;
- h. ~~h~~documentation clearly indicates its date of implementation. \*

Guidance Note: A procedural document would normally need to be in place in order to ensure these requirements are met.

## **5.4 Records** \*See also explanatory notes

5.4.1 The certification body shall maintain a records system and have policies and procedures governing their management. The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information.

~~5.4.2 The certification body shall produce and make publicly available an annual report summarizing the certification activities of the previous year including elements such as the extent of the certification activities.~~

~~5.4.3-2~~ Operator files shall be up to date and contain all relevant information, including history, and product specifications. \*See also guidance notes **Guidance Note:** The certification body shall have available relevant data for all certified production units, including any contracted parties and members of grower groups.

~~5.4.4-3~~ The records shall be sufficiently comprehensive so as to demonstrate that the procedures for certification decision were properly applied. demonstrate the way in which each certification procedure was applied, including inspection reports and outcome of imposed sanctions.

~~5.4.5-4~~ Separate records shall be kept for major violations and resulting sanctions, precedents, exceptions, appeals, and complaints, in a way that enables easy retrieval of data. \*See also guidance explanatory notes

~~5.4.6-5~~ All records shall be safely stored and held secure and in confidence to the operator, for a period not less than five years , or for the period stipulated in relevant governmental and regional regulations where this exceeds five years. Computerized records shall regularly be backed-up. \*See also guidance explanatory notes

~~5.4.7-6~~ Inspection reports, certification decisions, certificates and other relevant records shall be signed by the authorized person. \*See also guidance explanatory notes

~~5.4.8 The certification body shall have a policy and procedures concerning access to these records consistent with its confidentiality requirements.~~

~~5.4.9-7~~ The record keeping system shall be transparent and enable easy retrieval of information

~~5.4.10-8~~ Operators shall have the right to have copies of inspection findings and other documentation related to the certification of their production, unless the documents are confidential (i.e. filed complaints, confidential section of inspection reports). **Guidance Note:** This right should be communicated to operators\*See also guidance notes.

## **6 Application and Inspection Procedures**

### **6.1 Application procedures**

#### **Information for applicants**

6.1.1 The certification body shall ensure that each applicant or ~~re-applicant~~certified operator has ~~at the time of application:~~

- a. a current version of the applicable standards;
- b. an adequate description of the inspection, certification and appeals procedures;
- c. a ~~contract or~~ sample copy of the contract or ~~license agreement~~ a description of the contractual conditions;

- d. a copy of the fee schedule;

### Application form

6.1.2 The certification body shall require completion of an official application form, signed by the applicant ~~or a duly authorized representative of the applicant~~. This shall determine at least the following information:

- a. the scope of the desired certification ~~on including 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. \*\*See also guidance explanatory notes.~~
- b. Sufficient information about the production system to enable appropriate assignment of the inspector and proper preparation by the inspector
- c. ~~A statement as to whether If Where relevant, if they have been denied organic certification by another certification body, and reasons therefore, and the requirement to submit information regarding actions taken to correct the deficiencies leading to the denial. (Alternatively this information may be obtained during the inspection process)~~

### Operator obligations

6.1.3 The certification system shall be based on written agreements and clear responsibilities with all parties involved in the chain of production of a certified product.

6.1.4 The certification body shall require ~~the operators~~ to sign statements in the application form or elsewhere, obliging them to:

- a. agree to comply with the requirements for certification including a commitment to comply with the standards, and to supply any information needed for evaluation of the production to be certified;
- b. provide the right of access to all appropriate facilities including any non-organic production in the unit, or related (by ownership or management) units in ~~the proximity~~, to both certification and accreditation personnel. ; \*\*See also guidance explanatory notes
- c. provide access to all relevant documentation, including financial records, to both certification and accreditation personnel. See also explanatory notes.\*

### Operator documentation

6.1.5 The certification body shall specify, ~~in application documentation or elsewhere,~~ the documentation to be maintained by the operator to enable verification of compliance. ~~This~~ and shall specify which records shall be available and ~~require that they be~~ held in a form that enables verification to take place. \*\*See also guidance explanatory notes

6.1.6 The certification body shall require documented procedures defining the manner of production or processing where the absence of such procedures could adversely affect the organic quality. \*\*See also guidance explanatory notes

~~6.1.7 Documents required by 6.1.5 and 6.1.6 shall be kept for a minimum of five years.~~

## 6.2 Preparation for inspection

### Review

6.2.1 ~~Before proceeding with the evaluation, t~~The certification body shall conduct a review of the application for certification to ensure that the requirements for certification are clearly understood and that the scope of certification sought is appropriate to the applicant. \*\*See also guidance explanatory note.

6.2.2 ~~In some circumstances (e.g. operation of multiple certification programs, international operations located in regions not usually covered by the certifier),~~ For complex operations and foreign operations located in regions not usually covered by the certifier -the certification body shall assess whether it has the capability to perform the certification service with respect to the scope of the certification sought and, if applicable, the location of the applicant's operations and any special requirements such as the language used by the applicant.

6.2.3 The certification body shall provide the inspector with sufficient information to properly prepare for the inspection. **Guidance Note:** This includes at least an application form, and/or previous inspection findings, a description of activities/processes, maps/plans, product specifications, and used inputs, previous conditions and sanctions.  
\*See also guidance notes

### **Assignment of inspector**

~~6.2.4 The certification body, or the sub-contracted inspection body shall assign personnel appropriately qualified to perform the tasks for the specific inspection. Operators shall have neither the right to choose nor to recommend inspectors.~~

~~6.2.5-4~~ The assignment of the inspector shall take into account any possible conflict of interest ~~in line with criterion 1.3.19.~~

~~6.2.6-5~~ The assignment of the inspector shall ensure that the same inspector shall as a rule not be assigned to an operator for more than ~~3-4~~ consecutive years and under no circumstances for more than ~~4-5~~ years.

~~6.2.7-6 Operators shall have neither the right to choose nor to recommend inspectors. Except for cases of unannounced visits, Operators shall have the right to be informed about the identity of the inspector before the inspection visit. Operators shall in any case have the right, and to raise objections related to any potential conflict of interest. This shall not apply to unannounced inspections.~~

## **6.3 Visit procedures.**

6.3.1 The management systems of the ~~applicant-operator~~ shall be evaluated against the ~~specified~~ standards and certification requirements.

6.3.2 Inspection procedure shall follow a ~~decided-specific~~ protocol to facilitate a nondiscriminatory and objective inspection procedure.

6.3.3 The routine inspection procedure shall be documented and shall at least include: \*\*See also guidance explanatory notes

- a. assessment of production or processing system of operator by means of visits to facilities, fields, and storage units;
- b. identification and investigation of areas of risk;
- c. review of records and accounts;
- d. at least once every 3 years production/sales reconciliation on farms;
- e. input/output reconciliation and trace back audits in processing and handling;
- e.f. interviews with responsible persons including an exit interview;
- f.g. verification that changes that have taken place in the standards and ~~rule~~requirements of the certification body have been effectively implemented by the operator;
- g.h. residue sampling in accordance with the certification body's sampling policy;
- h.i. verification that previously imposed conditions have been fulfilled.

6.3.4 The inspection, including document review, shall include non organic units where there is reason for so doing. \*See also guidance explanatory note

## **6.4 Sampling and testing** \*\*See also guidance explanatory notes

6.4.1 The certification body shall have documented policies and procedures on residue testing, ~~genetic testing (see 6.7.11)~~ and other analysis that shall at least include:

- a. indication of the cases in which samples shall be taken;

- b. the requirement that where use of a substance prohibited by the standards is suspected and samples may provide corroborating supporting evidence, then samples may shall be taken for analysis; \*\*See also guidance explanatory notes
- c. the requirement that where standards set limits on residues or contamination in products, inputs or soil, analysis shall be made as appropriate; See also explanatory notes
- d. instructions to inspectors on sampling requirements and methods;
- e. post-sampling procedures;
- f. indication of responsibility for payment of sampling.

~~6.4.2 Analyses shall be done by competent laboratories, (accredited laboratories, where official accreditation exists).~~

~~6.4.3 If laboratory procedures are employed, the certification body shall document the following:~~

- ~~a. the sampling protocol;~~
- ~~b. the testing procedures;~~
- ~~c. acceptable labs used to conduct such analysis.~~

## **6.5 Inspection Report**

6.5.1 Inspection reports shall cover relevant aspects of the ~~production~~ standards, adequately validate the information provided by the operator and indicate any non-conformities.

6.5.2 Inspection reports and written documentation shall indicate the applicable standard(s) and provide sufficiently comprehensive information for the certification body to make competent and objective decisions.

6.5.3 Inspection reports shall follow a decided format to facilitate a non-discriminatory, objective and comprehensive analysis of the production system.

6.5.4 Reports shall be designed to allow for elaboration and analysis by the inspector ~~in cases of partial compliance or lack of clarity in the standards.~~ See also explanatory notes

6.5.5 ~~The r~~Reports shall contain an assessment of risk of losing organic integrity as well as the inspector's observations regarding conformity with standards. Inspectors shall be able to make recommendations regarding nonconformities but shall not be required to make an overall judgment of whether the operator should be certified. \*\*See also guidance explanatory notes

6.5.6 The operator shall be informed of the findings of nonconformities by the inspector certification body in the inspection report. See also explanatory note

## **6.6 Record of Inspection**

6.6.1 The certification body shall require inspectors to record what occurred during the inspection visit. This shall at least include:

- a. date and duration of inspection;
- b. persons interviewed;
- c. fields and facilities visited;
- d. Type of document audits conducted (input/output; yield/sales; traceback etc).

## **6.7 Additional requirements and inspection regime for particular standards/circumstances \* See also guidance explanatory notes**

Conversion period

6.7.1 The certification body shall verify full application of the standards for a period no less than that stated in the IFOAM Basic Standards, ~~prior to certification. Full application shall as a rule require active management~~ 6.7.2 Verification of full application of standards shall normally require that at least the minimum period stated in the IFOAM Basic Standards. This shall take place following the application for certification, ~~except in the case of 6.7.3~~ ~~\*\*See also guidance explanatory notes~~

~~6.7.3-2~~ Inspection shall occur during the conversion period to verify compliance with standards.

~~6.7.4-3~~ Exceptions to ~~6.7.2-1~~ above shall be on the basis of indisputable documented evidence that full application of the standards has occurred. This shall be verified by inspection. **Guidance Note:** If exceptions to the criterion 6.7.1 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.

~~\*\*See also guidance notes~~

#### **Split production ~~\*\*See also guidance explanatory notes~~**

~~6.7.5-4~~ When split production occurs, ~~T~~the certification program shall have additional requirements and inspection regimes ~~when split production occurs~~ to safeguard that the products are not ~~be~~ mixed or contaminated.

~~6.7.6-5~~ In cases of split production ~~T~~the certification body shall require and verify by inspection:

~~a. that prohibited materials are stored in separate locations from those where organic products are handled;~~ ~~Remark: standards, not criteria.~~

~~b. a.~~ that the documentation regarding the production or processing, storage and sales is well managed and makes clear distinctions between certified and ~~not-non~~ certified products;

~~e. b.~~ that the measures taken to safeguard against the risk to the organic integrity is understood at all levels of the operation.

#### **Parallel production ~~\*\*See also guidance explanatory notes~~**

~~6.7.6-7~~ If a farm is engaged in parallel production, the certification body shall require that in addition to the requirements for split production above: ~~\*\*See also guidance notes~~

~~a. a.~~ non organic (or conversion) crops, livestock and produce and organic crops, livestock and produce are of different varieties and are visually distinguishable. Exceptions shall only be granted on a case by case basis in accordance with the requirements in 6.7.8;

~~b. b.~~ accurate production estimates are recorded and shall be checked against sales records;

~~e. c.~~ the inspection includes visits to the non-organic fields and/or processing units

~~6.7.7-8~~ In cases where an exception has been granted to the requirements for producers in "6.7.7a6a": ~~\*\*~~

~~a.~~ Inspections shall occur at more frequently than once a year and at critical times. This shall normally include inspections at the time of harvest or during processing. ~~\*\*See also guidance notes~~

~~a.~~ ~~Inspections shall occur more frequently than once a year whether scheduled or unannounced.~~

#### **Genetically engineered products**

6.7.9-8 Based on risk assessment The certification body shall implement a system to inspect and verify that genetically engineered organisms and their products or derivatives are not used in certified organic production and or/processing as required by the IFOAM Basic Standards. See also explanatory notes

~~6.7.10-9 The certification body shall make available to operators information regarding those products, varieties, species and ingredients known by the certification body to be at risk of being genetically engineered.~~

6.7.11-10 9 For ~~each of these~~ GMO use and contamination -risk areas, the certification body shall adopt one or more of the following measures:

- a. review of supplier's ~~signed~~ statements verifying that the product is not genetically engineered;
- b. and/or analytical testing to defined limits;
- c. and/or ~~inspection documentation and evaluation~~ of suppliers GMO control systems.
- d. and/or other measure(s) determined by the certifier to be more appropriate ~~than a.~~ through c. and as defined in the certifier's policies and procedures, consistent with this criterion

~~6.7.12-11 Where the certification body identifies substantial risk of certain crops contamination with genetically modified organisms, they shall require measures to minimize it.~~

## 7 Certification Procedures

### 7.1 General requirements

7.1.1 The certification body shall specify ~~conditions contractual requirements~~ under which it grants, and the procedures for granting, certification

7.1.2 The certification body shall have procedures to

- a. grant, maintain, withdraw and, if applicable practiced, suspend certification. \*See also explanatory notes,
- b. extend or reduce the scope of certification,
- c. re-evaluate the operation. \*See also guidance explanatory note, 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.

7.1.3 The documented certification policies and procedures shall include all procedural steps in processing the application, until final certification.

7.1.4 The certification body shall execute its certification ~~activities~~ in compliance with all its stated procedures and standards

### 7.2 Certification decisions

7.2.1 All certification decisions including the scope, ~~including those concerning the maintenance of certification~~, shall be objectively and transparent and shall be recorded in such a way as to enable the decision to be traced back.

~~7.2.2 Compliance with standards shall result in the issue of a certification document which provides full information on the nature and validity of the certification.~~

~~7.2.3-2 Following initial inspection the c~~ Certification decisions, ~~including the scope~~, shall be ~~recorded and clearly~~ communicated to the operator. Thereafter, operators shall be kept informed about their certification status. \*See also explanatory notes.

7.2.4-3 When certification is denied, withdrawn or suspended, the reasons shall be clearly stated;

7.2.5-4 If exceptions are granted there shall be criteria and procedures for granting exceptions. Exceptions shall be clearly limited in time and the rationale for any exception shall be properly recorded ~~(see also 5.4.5)~~.

7.2.6-5 The certification body shall have the right to impose conditions. Where conditions require corrective actions subsequent to certification, timelines shall be imposed. Mechanisms for monitoring compliance with conditions ~~and restrictions~~ shall be in place.

~~7.2.7 In cases where the certification body has permitted an operator frequent recourse to substances or practices that are restricted in standards, conditions to minimize such usage shall be imposed.~~

~~7.2.8 When a subjective judgment is required to determine compliance these shall be based on criteria and procedures.~~

### **7.3 The certification process**

7.3.1 The procedures shall ensure that: \*See also guidance explanatory notes

- a. ~~that~~ the certification status of all operators and their production and, where relevant, the scope of existing certification, ~~be~~ indicated throughout the certification process;
- b. ~~that~~ processing of inspection reports and certification decisions shall be done in a timely manner;
- c. ~~that~~ processing of any issue related to violations of standards shall be done with highest priority. — \*

Guidance Note: Where the certification body operates more than one certification program, the applicable scope should also be stated.

### **7.4 Certificates \***

#### **Certificates of conformity**

7.4.1 The certification body shall issue certificates confirming conformity of a certified operation. These shall include at least:

- a. the name and address of the operator;
- b. the name and address of the certification body;
- c. the program under which the operator is certified;
- d. the scope of the certification including reference to the applicable standards, the products or product categories, and the certification status (conversion or organic) of each. \*See also explanatory notes
- e. the date of issuance;
- f. the period of validity.

#### **Transaction certificates**

7.4.2 Where the certification body issues transaction certificates ~~itself (self-declarations)~~, or provides forms for operators to issue self declared certificates, the certification body shall ensure that certificates contain sufficient information to prevent fraudulent usage. This shall at least include:

- a. the seller;
- b. the buyer;
- c. the date of delivery and/ or date of transaction
- d. the date of issuing the certificate;
- e. a clear indication of the product and the quantity and its certification status;
- f. lot numbers and other identification (marks) of the products.
- g. reference to an invoice or bill of lading if present at the time of certificate issuance;
- h. ~~an indication of~~ the certification body and the applicable standard;

i. a statement from the operator that the product is produced according to the applicable standards. Guidance Note: 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.\* See guidance notes.

7.4.3 The certification body shall take reasonable measures to verify that the information provided is correct, including verifying accumulative totals of transaction certificates issued against production estimates.

7.4.4 In the case of operator self declarations the certification body shall require that copies of issued transaction certificates be ~~retained by the operator for 5 years and be available to the CB if required.~~ Such transaction certificates shall be audited at the annual inspection.

7.4.5 Copies of all issued transaction certificates shall be stored in a manner that enables easy retrieval and audit of information on each operator.

## 7.5 Surveillance

### Frequency of scheduled inspections

#### 7.5.1 ~~New applicants shall be inspected upon application.~~

~~7.5.1-2~~ The certification body shall have a written policy on inspection frequency of already certified operators. ~~which shall require that inspection of certified and contracted operators and of subcontracted operators occurs at least annually;~~ This policy shall fulfill the following requirements.\* See also explanatory notes

- a. the frequency and type of inspections is based on the risks in the individual operator,
  - b. the risk analysis take into account any relevant threat to the organic integrity of the production and products,
  - c. the total number of inspections per calender year at least equals the total number of already certified operators.\* See also explanatory notes
  - d. that no operator is inspected less than every three years. This does not apply to group certification.
  - e. the certification body installs mechanisms to monitor operators to assess their risk level between very spread out inspections.
- ~~\*\*See also guidance explanatory notes~~

~~7.5.2-3~~ There shall be provisions for additional ~~scheduled~~ inspections. The criteria or circumstances ~~when for scheduling~~ more than one inspection annually will be scheduled per year shall be documented and shall be based on risk analysis taking into account factors such as ~~the type of production;~~ the operator's record of compliance; ~~and~~ complexity of production, and risk of non-compliance.- \*\*See also guidance explanatory notes

~~7.5.3-4~~ Timing of inspections shall not be so regular as to become predictable.

#### **Unannounced ~~visits~~ inspections**

~~7.5.4-5~~ The certification body shall have a documented policy requiring unannounced ~~visits inspections. that, which includes the minimum number (percentage) At least 5% of the certified operators to be carried out shall be inspected~~ annually. ~~This is in addition to the scheduled inspections referred to in 7.5.1 and 7.5.2 above.~~ \*\*See also guidance notes

~~7.5.5-6~~ Certification bodies shall secure the rights to conduct ~~such~~ unannounced ~~visits inspections.~~ Guidance note: This should be included in agreements or other documentation signed by the operator. \*\*See also guidance notes

~~7.5.6-7~~ Unannounced inspections shall normally be without any forewarning. However certifiers may define alternative definitions for particular circumstances where this can be justified. The definition shall address the purpose that the possible forewarning shall not be so extensive as to allow for the operator to correct substantial nonconformities.

7.5.7-8 The basis for selection of operators to be subject to such unannounced inspections shall be defined and include both random and targeted selection.

7.5.8-9A record of unannounced visitsinspections shall be maintained.

**Notification of changes in licensee's operation and extension of scope.**

~~7.5.9 The certification body shall have procedures for extendisionng and updating certification,~~

7.5.10 The certification body shall require operators to ~~sign contracts, agreements or affidavits obliging them to notify it the certification body of any~~ give notification of significant changes such as modification to the products, the manufacturing process, extension of acreage, management or ownership. \*See also guidance notes

7.5.11 The certification body shall ~~have procedures for assessing assess~~ the announced scope changes ~~as well as procedures for re-inspection when necessary and have criteria for inspection or alternative action. \*See also guidance notes. The operator shall not be allowed to release certified products resulting from such changes until the certification body has notified the operator accordingly. Remark: Deleted sentence moved to guidance notes.~~

**Guidance Note:** The operator should not be allowed to release certified products resulting from such changes until the certification body has granted permission.

**7.6 Use of licenses, certificates and mark certification marks of conformity**

7.6.1 The certification body shall exercise control over the use of its licenses, certificates and ~~and marks of conformity (logo, sealcertification marks), including a requirement for pre-approval of labels.~~

7.6.2 A certification body may permit its mark to be applied by a non-licensed party (contracted operator or seller) on behalf of a licensee provided:

- a. the non-licensed party is certified by another CB that is accepted under 9.2.1
- b. the licensee has a system for control of the label use that is regulated by contract and that this system is verified by the licensee's CB
- c. the CB of the non-licensed party agrees to control and verify label use

7.6.2-3 The certification body shall have documents which demonstrate its ownership or control of the certification mark, when such a mark exists.

7.6.3-4 The certification body shall establish rulerequirements concerning the use of its markcertification mark or other reference to the certification. These criteria shall require that the operator only makes claims regarding certification which are consistent with the scope of the certification that has been granted.

7.6.4-5 Certification bodies shall actively investigate suspected cases of fraud-fraudulent situations-of-which-they-gain-knowledge.

7.6.5-6 Incorrect references to the certification system or misleading use of licenses, certificates or markcertification marks shall be dealt with by suitable remedial actions.

7.6.6-7 The certification body shall have documented detailed procedures for responding to use of its name or markcertification mark or certificates by uncertified parties. Such procedures shall include all steps and include the possibility of legal action.

7.6.7-8 The certification body shall have documented procedures for withdrawal and cancellation of contracts, certificates and certification marks. These procedures shall require the operator to discontinue use of ~~certificati~~~~oes~~ and certification marks.

7.6.8-9 Certification bodies shall ensure that corrective actions related to misuse of licenses, certificates and ~~mark~~~~certification mark~~s have been effective.

## **7.7 Sanctions**

7.7.1 The certification body shall have a documented range of sanctions including measures to deal with minor ~~infractions~~~~infringements~~ of the standards. Guidance Note: The certification body will make the determination of whether an infringement 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 infringements 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. \*See also guidance notes

7.7.2 Documented procedures for imposing ~~such measure~~~~s~~~~sanctions~~ shall be in place.

7.7.3 Where an infringement; that affects ~~the~~ organic integrity is found, the certification body shall require that the certification mark or any other indication of ~~the~~ certification is removed from the entire production run or product affected by the infringement concerned.

7.7.4 Where a serious ~~violation~~~~infringement~~ is made by the operator, the certification body shall withdraw certification from the operator for a specified period.

7.7.5 The certification body shall have procedures for immediate ~~withdrawal~~~~suspension~~ of certification in cases where the inspector detects manifest infringements or fraudulent activity. Guidance Note: 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. \*\*See also guidance notes.

~~7.7.6 A record of sanctions imposed shall be maintained in line with criterion 45.4.5~~

~~7.7.7-6 The reasons for sanctions must~~~~shall~~ ~~be clearly~~ provided to the operator.

## **7.8 Appeals**

7.8.1 The certification body shall have procedures for the consideration of appeals against its certification decisions, ~~to grant or remove certification.~~ \*See also guidance~~explanatory notes~~

7.8.2 Appeals ~~and complaints~~ shall be dealt with in a timely and efficient manner

7.8.3 When an appeal is decided, a documented resolution shall be made and forwarded to the appellant

7.8.4 The certification body shall:

- a. keep a record of all appeals (~~see also 5.4.5~~);
- b. take appropriate subsequent action;
- c. document the action taken and its effectiveness

## **~~7.9 Complaints to certified processors and handlers~~**

~~7.9.1 The certification body shall require that the operator takes appropriate action on complaints related to the compliance with certification requirements.~~

~~7.9.2 The certification body shall require the operator to keep a record of the above complaints and the corrective action taken (see also 5.4.5).~~

## **7.10-9 Risk Reduction between certifiers**

### **Dual or multiple certification**

~~7.10.19.1 The certification body shall require operators to notify it if they are certified by other parties for of all previous and current certifications within the same scope. The certification body shall inquire of the former communicate with the other certification body to ascertain if there were any major issues. if there are any issues indicating problems. Alternatively the certification body shall require the operator to submit the most recent certification decision notification issued by the other certification body.~~

~~7.10.2-9.2~~ In cases of dual or multiple certification with the same certification scope, the certification body shall supply the other certification body (or bodies) with copies of transaction certificates or information regarding sales and inform them in event of decertification. The certification body shall request the same information from the other certification body (or bodies).

~~7.10.1 The certification body shall require the operator to notify it if operator is certified by other certification bodies for the same scope.~~

~~7.10.2 In cases of dual or multiple certification with the same certification scope, the certification body shall supply the other certification body (or bodies) with copies of transaction certificates or information regarding sales and inform them in event of decertification. The certification body shall request the same information from the other certification body (or bodies).~~

~~7.10.3 The certification body shall require operators to notify it of all previous certifications within the scope. The certification body shall communicate with the previous certification body to ascertain if there were any major issues.~~

## **7.11-10 Changes in certification requirements**

~~7.11.410.1~~ The certification body shall ensure that each certified operator be notified of changes in the ~~relevant procedures~~ certification requirements without unnecessary delay.

~~7.11.210.2~~ The certification body shall ~~have procedures for the verification of~~ verify the operator's implementation ~~in a timely manner.~~ of the required changes.

## **8 Inspection and Certification for particular-Specific circumstances-Circumstances or sScope**

### **8.1 Certification of wild products**

8.1.1 If the certification body includes wild product within ~~their~~its certification scope, ~~they~~it shall have documented requirements and an inspection regime that at least requires that:

~~a. The operator managing the harvesting or gathering of the products shall be clearly identified~~

~~b. a.~~ the operator issue instructions to the collectors and any local agents (middlemen), that at least defines the area of collection and informs them about the standards and other requirements for certification; Guidance Note: The collectors should sign statements that they have followed the instructions.

~~c. the collectors sign statements that they have followed the instructions;~~

~~d.b.~~ the operator has records of all collectors, and the quantities bought from each collector;

~~e.c.~~ any middlemen be under contract to the operator; ~~\*\*See also guidance explanatory notes~~

~~f.d.~~ the area of production be properly identified on appropriate maps, and be large and distinct enough to reduce the risk of commingling with non certified production.

~~8.1.2 The certification body shall require that the responsible operator be subject to all the normal certification requirements.~~

8.1.3 The inspection regime shall at least include:

a. document check

~~g.b.~~ interviews with the collectors, or a representative sample;

~~h.c.~~ visit to an appropriate proportion of the certified area;

~~i.d.~~ visits to and interviews with an appropriate proportion of any middlemen;

~~j.e.~~ gathering of relevant information about the area of collection from interviews of landowners and other parties (environment agencies, NGOs etc.).

## **8.2 Approval or Certification of inputs** ~~\*\*See also guidance explanatory notes~~

### **Approval systems for brand name inputs**

8.2.1 Where a certification body issues lists or in any other way approves brand name products without formal certification it shall document at least the following measures:

a. the application procedure, including the necessary documents to be submitted by the applicant;

b. the procedure to be followed in evaluating the products compliance with the certification body's standards;

c. the decision making authority;

d. the length of time for which approval is granted and the requirements for the manufacturer to report changes in composition or other relevant factors;

e. a clear statement of the nature and guarantee of the approval which ~~statement~~ shall appear in the listing. **Guidance Note:** The statement should include the limitations of the approval - for example that it does not imply effectiveness of the product\*\*~~See also guidance notes.~~

8.2.2 The certification body may receive payment for its work in assessment but shall not receive any non-work related payments such as advertising endorsement payments.

8.2.3 Approval systems shall not allow for any indication of the approval on the product itself.

### **Certification of brand name inputs**

8.2.4 Where a certification body issues certificates or allows the use of its certification mark on input products, in addition to the measures in ~~78.2.1~~ above, the certification body shall document the inspection and certification procedures. This shall clearly indicate:

a. the inspection frequency which may be less than annual but no less than once every 3 years;

b. the requirements other than the composition of the product that will be checked during inspection and evaluated in making the certification decision. **Guidance Note:** The inspection should verify compliance with relevant standards such as those related to separation of product, pollution resulting from the process and contamination\*\*~~See also guidance notes~~

~~8.2.5 The mark/certification mark used in 8.2.4 may not be the same logo as used for identification of organic agricultural products or suggest that it is organically produced (from biological origin) unless it is. In cases where the product is not a certified agricultural organic product, the certification mark may only be used when it is accompanied by explanatory language that clarifies the nature of the certification/approval.~~

### **8.3 Group Certification of smallholder groups** ~~See also guidance explanatory notes~~

8.3.1 Certification bodies that ~~do not require annual inspection of~~ certify individual growers in smallholder groups that use internal control systems shall have policies and procedures to verify compliance of the group and the individual growers/group members. The policy and procedures shall at least comply with the following criteria

#### **Scope**

8.3.2 The certification body shall limit the scope of such systems to groups that fulfill the following criteria:

- a. the group shall be constituted of operations with similar production systems. Guidance note: Atypical 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.
- b.
- c. 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. Simple processing and storage units may be included; ~~See also guidance notes~~
- d. smallholdings within the group members are in geographic proximity; ~~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.\*~~
- e. the group shall be large enough and have sufficient resources to support a viable internal control system that assures compliance of individual ~~operators~~members with production standards in an objective and transparent manner; ~~See also guidance explanatory notes~~
- f. the group shall have coordinated marketing; ~~to enable oversight of the product flow.~~

#### **General requirements**

8.3.3 The policies and procedures for ~~smallholder~~ group certification systems shall require that at least:

- a. the certified entity shall be the group as a whole. This means that individual ~~operators~~ group members may not use the certification independently (by marketing as individual producers outside of the group)
- b. an effective and documented internal control system shall be in place. Guidance note: The system shall include a documented management structure of the internal control system ~~See also guidance notes.~~
- c. documented inspections of all group members for compliance with production standards shall be carried out by the internal control system at least annually. ~~See also guidance explanatory notes~~

8.3.4 The certification body shall require the management ~~body~~ of the group to sign a written contract specifying the responsibilities of the group and of the internal control system. This shall include the requirement that the management obtain signed obligations from all ~~operators~~ group members to comply with the standards and to permit inspections.

8.3.5 The certification body shall ensure that all ~~operators~~ group members have access to a copy of the standards or the relevant sections of standards presented in a way adapted to their language and knowledge.

8.3.6 The certification body shall maintain and enforce a set of minimum requirements of the group in order to undertake the certification.\* **Guidance Note:** 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:
  - complete farm or site maps/sketches
  - a complete list of group members
  - 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

\*See also guidance notes

**External Inspection by the certification body**

8.3.76 Annual (or more frequent) external inspection of the group shall be carried out by the certification body.

8.3.98 The certification body shall assign only those inspectors who have had specific training on inspection of internal control systems or who can otherwise document competency in such inspection.

8.3.879 The inspection visit shall include an assessment of the internal control system, of its effective application and of compliance with the standards. The inspection visit shall include both an evaluation of the effectiveness of the internal control system and inspection for compliance with the standards and an evaluation of the effectiveness of the internal control system.

8.3.10 The inspection shall include an assessment of the risks to organic integrity within the grower—group itself and the environment in which it functions. \*See also guidanceexplanatory notes

8.3.118 Re-!inspection of a sample of operatorsgroup members shall be undertaken to fulfill both the functions evaluate the effectiveness of the internal control system in 8.3.7

8.3.129 The percentage of operatorsgroup members subject to re-inspection shall take into account the results of the risk assessment the number of operations involved and their size as well as the degree of uniformity, the production system and the management structure. The certification body shall specify how it determines the number of growersgroup members to be re-inspected. \*\*See also guidance notes. In cases of groups with less than 1000 operators this shall not be less than 5% or 6, whichever is the higher. In cases of groups with more than one thousand operators this shall not be less than 5% or 100, whichever is the lower. **Guidance Note:** 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>

5000	71	85	99
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Certification bodies must have written rationale for other approaches to calculating re-inspection rate.

### Evaluation of the Internal Control

- 8.3.130 In evaluating the internal control system the certification body shall assure that:
- ~~a.~~ a. all internal control documentation is in place
  - ~~a.b.~~ a.b. internal inspections of all ~~operators~~group members have been carried out at least annually;
  - ~~b.c.~~ b.c. new ~~operators~~group members are only included after internal inspections, according to procedures agreed with the certification body;
  - ~~b.d.~~ b.d. ~~sample inspections (see 8.3.8) shall be carried out with the relevant documents from the internal control at hand, and the methods and results of the internal control shall be compared with the results of the inspection to determine whether the inspections of the internal control system have adequately addressed the compliance of operators;~~
  - ~~e.d.e.~~ e.d.e. instances of noncompliance have been dealt with appropriately by the internal control and according to a documented system of sanctions;
  - ~~d.e.f.~~ d.e.f. adequate records of inspections have been maintained by the internal control system;
  - ~~e.f.g.~~ e.f.g. internal records match the findings of the certification body's own sample inspections;
  - ~~f.g.h.~~ f.g.h. the ~~operators~~group members understand the standards.

8.3.14 Sample inspections (see 8.3.8) shall be carried out with the relevant documents from the internal control at hand, and the methods and results of the internal control shall be compared with the results of the inspection to determine whether the inspections of the internal control system have adequately addressed the compliance of operators.

~~8.3.1415~~ 8.3.15 The evaluation shall include (a) witness audit(s) of internal control inspections. ~~i.e. the inspector shall witness a number of internal control inspections. See also explanatory notes.~~

### ~~Grower~~ Group Records

~~8.3.152~~ In addition to certification records of the groups as a whole, the certification body shall maintain basic data on all operators.

~~8.3.163-15~~ 16 Certification bodies shall have a standardized form to be completed and updated by the ~~smallholder~~ group management. **Guidance Note:** 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. \*See also guidance notes ~~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.~~

### Responsibility and Sanctions

~~8.3.17417~~ The certification body shall hold the group as a whole (the certified entity) responsible for compliance of all operators.

~~8.3.185-18~~ The certification body shall have a clear sanctions policy in event of noncompliance by the group and/or its ~~operators~~members. Failure of the internal control system to detect and act on noncompliances shall invoke sanctions on the group as a whole. This shall also include provisions for withdrawal of certification from the group where the internal control system has been found to be ineffective.

## 9 Acceptance of prior certification

## 9.1 General requirements for all methods of acceptance <sup>\*See also guidance explanatory notes</sup>

**Guidance Note:** 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.

9.1.1 The certification body shall take full responsibility for recognizing the certification as equivalent to its own.

~~9.1.2 The certification body shall ensure that any accepted product has been subjected to equivalent requirements as product certified by itself.~~

9.1.3 Acceptance of prior certification on the basis of the criteria in 9.2 and 9.3 shall only be for acceptance of product for use by the certification body's own operators and shall not confer certification status to the operator supplying the product. Acceptance of prior certification of operators seeking certification status shall only be granted on the basis of the criteria in 9.4. <sup>\*See also guidance explanatory notes</sup>

9.1.4 The procedures and responsibility for granting recognition shall be clearly documented

## 9.2 Acceptance of product based on recognition of a certification program ~~body~~

9.2.1 The certification body shall maintain a formal register of recognized certification ~~bodies~~ programs. The register shall be subject to periodic review and updated when necessary and shall be available on request.

9.2.2 Inclusion in the register shall only be on the basis of at least one of the following:

a. IFOAM accreditation;

b. ISO 65 accreditation with an organic certification scope carried out by an accreditation body that participates in a peer review system. The certification body shall verify equivalency of standards and additional aspects by these criteria which are not covered in ISO 65. Certification bodies shall obtain and assess the protocol for acceptance of prior certification practiced by the recognized certification body. **Guidance note:** The assessment and decision to include a certification body on the register shall be documented. 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) <sup>\*See also guidance explanatory notes</sup>

~~b.c.~~ An assessment of equivalency to IFOAM norms based on a recent and adequate evaluation visit and report conducted either by the ~~certification body~~ granting acceptance or by an appropriate third party. The assessment shall include the equivalency of policies and procedures; relevant ~~production~~ standards and the performance of the other certification body ~~as noted during the visit~~. The assessment and decision to include a certification body on the register shall be documented, ~~and shall show that criteria equivalent to these criteria have been used.~~

~~e.d.~~ An equivalent accreditation, performed by an IFOAM accreditation body, including those other bodies that it recognizes, contracted to perform IFOAM accreditation or an accreditation body with whom the contracted body has signed an agreement. Where such accreditation does not include assessment of compliance with the IFOAM Basic

Standards, the certification body shall conduct a standards equivalency assessment. ~~including standards, inspection and certification procedures and evaluation reports, shall be kept~~

An accreditation can be considered equivalent by either

- IFOAM has determined that another accreditation is equivalent to IFOAM Accreditation.

- The IFOAM accreditation body has determined that another accreditation is equivalent to IFOAM Accreditation.

[e. A close cooperation between the two organizations which has given the certification body full insight in the operations of the other body. Guidance: The CB shall demonstrate that it has worked for a long enough period and closely enough for guaranteeing the competence of the accepted CB.]

**NOTE from the CC: The CC is disinclined to include it and has therefore kept this new section in brackets but wants to invite comments – especially from the ACB's – on this issue.**

~~9.2.3 Documentation of the registered certification bodies, including standards, inspection and certification procedures and evaluation reports, shall be kept~~

~~9.2.4~~ ~~3~~ ~~A comprehensive contract (unilateral, bilateral or multilateral) with recognized certification bodies that regulates the obligations of the parties shall be drawn up.~~ The contract shall at least contain the following provisions: *\*See also guidance explanatory notes*

- a. the scope of the mutual recognition, specifying the applicable programs of the certification bodies and any exclusions;
- b. the procedures and conditions for how a product certified by one party will be accepted by the other;
- c. obligation to inform the other party in case of loss of accreditation or approval by regulatory authorities;
- d. the obligation for parties to inform each other of major program or standards changes.

**Guidance Note:** 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.

### **9.3 Acceptance of product based on document review**

9.3.1 In the absence of a equivalency agreement or contract of recognition, the certification body shall only accept previous certification on a case by case review of the product in question.

9.3.2 The basis of the acceptance shall be an assessment of the information contained in the ~~previous~~ last inspection report, last ~~inspection~~ certification decision and other ~~relevant~~ documents against the standards and certification requirements of the accepting certification body. Acceptance may only be granted if steps have been taken with the other responsible certification body to ensure that the information is accurate, complete and up to date and that no ~~late~~ subsequent infringements have occurred. **Guidance Note:** In conducting document review for purpose of accepting product previously certified by another CB excluding all those in the register made up under 9.2. the last inspection report shall be obtained for each ingredient and a risk analysis conducted to determine if further reports must be obtained and reviewed in addition. \*see also guidance notes

9.3.3 ~~Minor ingredients~~ Ingredients that constitute less than 10% of the total weight of the product may be accepted on the basis of being certified by a certification body that has been approved by its government or has been accredited by a national accreditation body for the scope of organic certification. The total of all ingredients accepted on this basis shall not exceed 20% of the total weight of the product.

9.3.3-4 The procedures and responsibility for assessment and decision making shall be documented and follow the normal certification procedure.

9.3.4-5 Acceptance of such products shall be for a defined period.

## **9.4 Acceptance of applicants currently certified by another certification body**

9.4.1 Certification of an operator may be transferred from another certification body provided ~~all both~~ of the following requirements are met:

a the other certification body is currently ~~IFOAM accredited under the register indicated in 9.2.2~~

~~b a contract as detailed in 9.2.4 has been established with the other certification body~~  
c the operator is ~~currently~~ certified by the other certification body ~~and intends to remain certified by themit. (dual certification) up to the point of transfer.~~

9.4.2 Where the conditions in 9.4.1 are met the operator may be certified without prior inspection. ~~This shall take place within 12 months after transfer against the certification bodies own standards. provided that the requirements in 9.4.3 are met at the next scheduled inspection.~~

~~9.4.3 Inspections of the operator shall be carried out by the certification body itself or may be subcontracted to the other certification body. In cases where the inspection is subcontracted the certification body shall identify any substantial differences between its standards and those of the other certification body and ensure that compliance with these different standards is verified at the inspection visit and documented in the inspection report.~~

~~9.4.4 The certification body shall make its own certification decisions based on inspection reports~~

~~9.4.5 Appropriate records shall be kept.~~

9.4.5-3 Where the requirements of 9.4.1 ~~and 9.4.3~~ are not met, acceptance of the operator's current or prior certification shall be limited to the exemption from conversion requirements. Exemption shall only be granted following assessment of relevant historical records, including a recent inspection report, obtained from the other certification body.

## **9.5 Certification partnerships**

9.5.1 Joint ventures, partnerships and similar forms of cooperation with other certification bodies shall comply with the relevant criteria for acceptance of product (9.1 to 9.4) and or for subcontracting (1.4.12 to 1.4.15) .

9.5.2 The certification body shall take full responsibility for any work done on their behalf by the partner.

9.5.3 The certification decision shall not be "subcontracted" to the partner.

9.5.4 The arrangement between the certification bodies shall be documented.

## **10 Standards Development**

### **10.1 General requirements**

~~10.1.1 Standards shall either meet or exceed the current IFOAM Basic standards.\*~~

~~10.1.2 Standards, or the relevant sections of standards, shall be presented in a way adapted to the language and knowledge of operators for all languages declared in the certification body's field of application (See also 2.2.4).\*~~

## ~~10.2 Standards Review~~

~~10.2.1 The standards shall be reviewed regularly.~~

~~10.2.2 The certification body shall have adequate procedures for enabling input concerning revisions from affected parties and shall take these into account.\*~~

~~10.2.3 The body responsible for review of standards shall be clearly identified and shall evidence sufficient qualifications or experience to be competent to carry out its functions, or utilize external experts as a means to achieve competency.~~

~~10.2.4 The certification body shall ensure that each certified operator be notified of changes in the standards without unnecessary delay.~~

~~10.2.5 The certification body shall have a policy for the normal time periods allowed for implementation of new standards by the operators. Where necessary, an additional time period shall be allowed for operators to implement specific major changes to the standards. In such cases the time for implementation shall be clearly stated.\*~~