



The  
**IFOAM**  
**ACCREDITATION**  
**CRITERIA** for  
**BODIES CERTIFYING**  
**ORGANIC PRODUCTION**  
and **PROCESSING**  
**VERSION 2005**



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**IFOAM**

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for

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**PROCESSING**

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# I. INTRODUCTION

## **1 THE IFOAM NORMS AND ORGANIC GUARANTEE SYSTEM**

### *The IFOAM Accreditation Criteria and the IFOAM Norms*

The IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing (IAC) along with the IFOAM Basic Standards (IBS) for Organic Production and Processing, , are called the IFOAM Norms. The Norms are the basis for IFOAM's Organic Guarantee System, which is described below.

This publication provides the IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing in an electronic book form.

Electronic copies of the Norms (including both the IBS and the IAC), or the IFOAM Basic Standards and the IFOAM Accreditation Criteria as self standing documents are also available for a small service fee in the "bookstore" on IFOAM's website, [www.ifoam.org/bookstore](http://www.ifoam.org/bookstore). IFOAM Members can download the Norms free of cost in the members' section of the website.

### *IFOAM's Organic Guarantee System*

Supporting the worldwide adoption of environmentally, socially, and economically sound systems based on the principles of organic agriculture.

### *The IFOAM Organic Guarantee System Enables Trade, Upholds Organic Integrity and Assures Consumers Internationally*

In the rapidly growing environment of marketing and trade of products claiming to be "organic," IFOAM provides a market guarantee of the integrity of organic claims. The Organic Guarantee System (OGS) unites the organic world by providing a common set of standards for organic production and processing, and a common system for verification and market identity. It fosters equivalence of participating certifiers and thereby facilitates the trade of organic products between operators certified by different participating certification bodies.

The IFOAM Organic Guarantee System enables organic certifiers to become "IFOAM Accredited" and for certified operators to label their products with the IFOAM Seal, next to the logo of their IFOAM accredited certifier. More than 30 certifiers worldwide participate in IFOAM accreditation.

### *The OGS Offers Conformity Assessment to Accepted International Norms*

IFOAM Accreditation guarantees to buyers, government authorities, other control agencies, and the public, that a product has been produced within a system that conforms to accepted international standards for organic production, processing, and certification.

The two pillars of the Organic Guarantee System are the IFOAM Basic Standards (IBS) and the IFOAM Accreditation Criteria (IAC). These two documents are international Norms to which

certifiers must comply when conducting an IFOAM accredited organic certification.

The IFOAM Accreditation Criteria are based on the International ISO norms for the operation of certifying bodies, and they are additionally developed to reflect the particular circumstances of certifying organic production and processing.

The IFOAM Basic Standards address the specific principles, recommendations, and required baseline standards that guide operators in producing their organic crops and maintaining organic integrity in the further handling and processing of organic commodities. The IBS are rooted in IFOAM's Principles of Organic Agriculture. The Principles of Organic Agriculture are the basis for all of IFOAM's work, particularly its organic standards. For this reason, the Principles are presented in this Introduction to the IFOAM Accreditation Criteria. IFOAM owns and develops these documents.

IFOAM's Basic Standards (IBS) and Accreditation Criteria are generally respected as the international guidelines from which national standards and inspection systems may be built; and they have been used as a reference by standard-setters and legislators in national and international arenas. IFOAM Basic Standards have had a strong influence on the development of Codex Alimentarius Guidelines for the Production, Labeling, and Marketing of Organically Produced Foods. The development of the IBS conform to ISO/IEC Guide 59 Code of good practice for standardization, and the WTO Technical Barriers to Trade (TBT) Agreement Annex 3 Code of good practice for the preparation, adoption and application of standards.

### *The OGS is a Collaboration between IFOAM and Other Organizations*

IFOAM Accreditation is administered by an independent organization, the International Organic Accreditation Service (IOAS). The IOAS evaluates the compliance of certification programs with the IBS and the IAC through a system of document review and site evaluation, and execution of accreditation decisions by a committee with global representation and expertise. Supported by this system, these accredited certification bodies are developing more and more functional equivalence with one another to streamline trade for their clients.

### *The OGS is Governed by Policies and Procedures*

The policies and procedures provide the framework for revisions and interpretations of the Norms. They prescribe under which circumstances revisions of the IFOAM Basic Standards, the lists of approved inputs, and the IFOAM Accreditation Criteria can be initiated and how decisions on changes are taken. The policies and procedures also regulate the responsibilities of the committees that are engaged in the continuous development of the Norms. The policies related to the OGS can be found in the OGS section of the IFOAM website at [www.ifoam.org](http://www.ifoam.org).

## 2 THE PRINCIPLES OF ORGANIC AGRICULTURE

### *Preamble*

These Principles are the roots from which organic agriculture grows and develops. They express the contribution that organic agriculture can make to the world, and a vision to improve all agriculture in a global context.

Agriculture is one of humankind's most basic activities because all people need to nourish themselves daily. History, culture and community values are embedded in agriculture. The Principles apply to agriculture in the broadest sense, including the way people tend soils, water, plants and animals in order to produce, prepare and distribute food and other goods. They concern the way people interact with living landscapes, relate to one another and shape the legacy of future generations.

The Principles of Organic Agriculture serve to inspire the organic movement in its full diversity. They guide IFOAMs development of positions, programs and standards. Furthermore, they are presented with a vision of their world-wide adoption.

Organic agriculture is based on:

- The Principle of Health
- The Principle of Ecology
- The Principle of Fairness
- The Principle of Care

Each principle is articulated through a statement followed by an explanation. The principles are to be used as a whole. They are composed as ethical principles to inspire action.

### *The Principle of Health*

Organic Agriculture should sustain and enhance the health of soil, plant, animal, human and planet as one and indivisible.

This principle points out that the health of individuals and communities cannot be separated from the health of ecosystems - healthy soils produce healthy crops that foster the health of animals and people.

Health is the wholeness and integrity of living systems. It is not simply the absence of illness, but the maintenance of physical, mental, social and ecological well-being. Immunity, resilience and regeneration are key characteristics of health.

The role of organic agriculture, whether in farming, processing, distribution, or consumption, is

to sustain and enhance the health of ecosystems and organisms from the smallest in the soil to human beings. In particular, organic agriculture is intended to produce high quality, nutritious food that contributes to preventive health care and well-being. In view of this it should avoid the use of fertilizers, pesticides, animal drugs and food additives that may have adverse health effects.

### *The Principle of Ecology*

Organic Agriculture should be based on living ecological systems and cycles, work with them, emulate them and help sustain them.

This principle roots organic agriculture within living ecological systems. It states that production is to be based on ecological processes, and recycling. Nourishment and well-being are achieved through the ecology of the specific production environment. For example, in the case of crops this is the living soil; for animals it is the farm ecosystem; for fish and marine organisms, the aquatic environment.

Organic farming, pastoral and wild harvest systems should fit the cycles and ecological balances in nature. These cycles are universal but their operation is site-specific. Organic management must be adapted to local conditions, ecology, culture and scale. Inputs should be reduced by reuse, recycling and efficient management of materials and energy in order to maintain and improve environmental quality and conserve resources.

Organic agriculture should attain ecological balance through the design of farming systems, establishment of habitats and maintenance of genetic and agricultural diversity. Those who produce, process, trade, or consume organic products should protect and benefit the common environment including landscapes, climate, habitats, biodiversity, air and water.

### *The Principle of Fairness*

Organic Agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities.

Fairness is characterized by equity, respect, justice and stewardship of the shared world; both among people and in their relations to other living beings.

This principle emphasizes that those involved in organic agriculture should conduct human relationships in a manner that ensures fairness at all levels and to all parties – farmers, workers, processors, distributors, traders and consumers. Organic agriculture should provide everyone involved with a good quality of life, and contribute to food sovereignty and reduction of poverty. It aims to produce a sufficient supply of good quality food and other products.

This principle insists that animals should be provided with the conditions and opportunities of life that accord with their physiology, natural behavior and well-being.

Natural and environmental resources that are used for production and consumption should be managed in a way that is socially and ecologically just and should be held in trust for future generations. Fairness requires systems of production, distribution and trade that are open and equitable and account for real environmental and social costs.

### *The Principle of Care*

Organic Agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment.

Organic agriculture is a living and dynamic system that responds to internal and external demands and conditions. Practitioners of organic agriculture can enhance efficiency and increase productivity, but this should not be at the risk of jeopardizing health and well-being. Consequently, new technologies need to be assessed and existing methods reviewed. Given the incomplete understanding of ecosystems and agriculture, care must be taken.

This principle states that precaution and responsibility are the key concerns in management, development and technology choices in organic agriculture. Science is necessary to ensure that organic agriculture is healthy, safe and ecologically sound. However, scientific knowledge alone is not sufficient. Practical experience, accumulated wisdom and traditional and indigenous knowledge offer valid solutions, tested by time. Organic agriculture should prevent significant risks by adopting appropriate technologies and rejecting unpredictable ones, such as genetic engineering. Decisions should reflect the values and needs of all who might be affected, through transparent and participatory processes.

**II. IFOAM ACCREDITATION CRITERIA FOR  
BODIES CERTIFYING ORGANIC PRODUCTION  
AND PROCESSING**

**Version 2005**

Approved by the IFOAM World Board,  
Bonn, 2nd of July 2005

## INTRODUCTION

The IFOAM Accreditation Criteria (IAC) were first approved by the General Assembly in 1992. IFOAM seeks to continually improve these criteria. Revision occurs periodically and includes opportunity for input by interested parties. The revision process for these criteria is described in IFOAM Policies.

Generally speaking, the IAC establishes requirements for the 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 continual review, the IFOAM Basic Standards have been adopted as the basis for national, regional and international organic standards throughout the world.

The IFOAM Accreditation Criteria together with the IFOAM Basic Standards establish the requirements for certification bodies seeking IFOAM Accreditation. The standards used by the certification body in their IFOAM accredited certification program shall at least meet the IFOAM Basic Standards. 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.

The criteria have been 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.

Some examples of situations where varying solutions could be applied are:

- Where the criteria have clearly been developed for organizations with large numbers of staff or several offices.
- Where the criteria have clearly been developed for certification bodies with large numbers of operators or more complex operations.
- Where the criteria become particularly onerous due to cultural or developmental reasons, such as poor communication systems or low levels of literacy.

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.

Some criteria are accompanied by flexible requirements, called Guidance, and/or Explanatory Notes. The Guidance is named as such and directly follows the criterion it is referring to. The Explanatory Notes are incorporated as footnotes to the criterion.

Certification bodies are required to implement the criteria in line with the Guidance unless they can show that the same effect has been achieved by alternative methods. A Guidance does not constitute a binding interpretation or remove an accreditation body's rights and responsibilities to exercise its judgment in applying the criteria.

The Explanatory Notes explain the meaning and purpose of the criteria, and provide background information to explain the context of a particular section of the criteria or a particular criterion. In short, they aim to enhance understanding of the criteria.

The current version of the IAC 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 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, and, 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 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.

**Governing Board:** Committee group or person with overall legal responsibility for the affairs of the certification body.

**Group Certification:** Certification of an organized group of small-scale producers with similar farming and production systems. The criteria for group certification apply only to such groups when the certification applies to the group as a whole and when special inspection arrangements have been applied.

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

**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 operation.

**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 operation.

**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 requirements of that program.

**Non-Conformity:** An instance where a particular standard is not being met.

**Operator:** An individual or business enterprise, responsible for ensuring that production meets, and 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 to certified organic quality and to non-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.

**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 operators who have failed to comply with the standards or other requirements of the certification body.

**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.

**Trace Back Audit:** 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:** Breach of requirements other than standards.

## **1 STRUCTURE**

### **1.1 General Requirements**

- 1.1.1** The certification body shall have a documented and effective structure and organization that fosters confidence in its certification.
- 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 is responsible for each of the following:<sup>1</sup>
- a.** performance of inspection, evaluation and certification as defined in these 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 subcontracted 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.<sup>2</sup>
- 1.2.3** The certification body shall document clear lines of authority, responsibility and the accountability of personnel, officers and committees.

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<sup>1</sup> **Explanatory Note 1.1.3:** This refers to the actual day to day management.

<sup>2</sup> **Explanatory Note 1.2.2:** An outside body or person would normally include anybody that is a separate legal entity even if linked in some way. This would not mean that assessment and evaluation cannot be undertaken by a contracted party, but that the formal certification decisions mentioned may not. This includes appeals.

- 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.<sup>3</sup>
- 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.
- 1.2.6** Committees shall have clear responsibilities and rules of procedures.
- 1.2.7** An appeals committee shall be established.<sup>4</sup>

### **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 organizational structure of the certification body shall ensure that parties significantly affected by the certification system can participate in the development of its principles and policies.<sup>5</sup>
- 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, unless the product/service and certification programs are clearly separated in a manner that ensures that such compromise cannot occur.

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<sup>3</sup> **Explanatory Note 1.2.4:** This does not preclude the use of individual certification officers, as long as these persons are responsible to a certification committee or the governing board.

<sup>4</sup> **Explanatory Note 1.2.7:** An appeals committee can be ad hoc, or the task can be performed by the Board.

<sup>5</sup> **Explanatory Note 1.3.3:** The purpose of this criterion is expressed in 1.3.1. It is meant to ensure by structural means, that vested interests are unable to exert undue influence. This can be provided by a system of participatory democracy where the Board is elected by a broad based constituency of stakeholders. Stakeholders would generally be understood to mean more than only the certified operators- in the case of organic certification consumers, environmentalists, researchers and the like would also be considered stakeholders.

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

**1.3.5** The 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. This shall ensure an equal treatment for all certified operators. The certification body shall not solicit individual applications based on the needs of individual buyers.

**Guidance:** *The procedure shall 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.*<sup>6</sup>

**1.3.6** Certification bodies shall ensure that activities of related bodies do not affect the confidentiality, objectivity and impartiality of its certifications.<sup>7</sup>

**1.3.7** The body making or ratifying certification decisions shall be free from any commercial, financial and other pressures that might influence decisions.<sup>8</sup>

**Guidance:** *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.*

**1.3.8** Fee structures and other issues related to payment shall not compromise objectivity.

**Guidance:** *Certification bodies shall 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.*

**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.<sup>9</sup>

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<sup>6</sup> **Explanatory Note 1.3.5 Guidance:** If the policy is that no information will be supplied then no procedure is necessary.

<sup>7</sup> **Explanatory Note 1.3.6:** Related bodies would mean any separate entity that is structurally linked to the certification body by, for example, common ownership, shared directors etc. In the case of organic certification bodies this could be a producer association or other association responsible for establishing the certification body. The criterion does not prohibit the relationship but requires analysis of whether the other body may exert influence in a manner that compromises the impartiality and objectivity of the certification decisions. If so, measures must be taken to ensure this does not occur.

<sup>8</sup> **Explanatory Note 1.3.7:** This does not mean that individuals on the Board or committee (the decision making body) cannot have commercial, financial or other interests. It means that the committee as a whole may not. To ensure this a balance of interests is necessary.

<sup>9</sup> **Explanatory Note 1.3.9:** Substantial gifts are those that have a value that could potentially affect opinion, attitude, or decision of the certification body, including any of its inspectors, employees or officers.

### ***Division of Function***

- 1.3.10** The certification body shall have clear division of the functions of inspection, certification and appeals.
- 1.3.11** Persons responsible for a decision that is being appealed may not be involved in the decision on that appeal.<sup>10</sup>

### ***Consulting and Advising***

- 1.3.12** 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 non-conformity shall not include advice on how to overcome these non-conformities.
- 1.3.14** Specific advice given 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.
- 1.3.15** Certification bodies may provide general information for additional fees, provided that this service shall be offered to all certified operators in a non-discriminatory manner.<sup>11</sup>

### ***Conflicts of Interest of Individuals***

- 1.3.16** The certification body shall ensure that a declaration of interest is updated annually by all persons involved in certification, inspection and appeals as well as by the board. Such declarations shall be on file and take into account both direct and indirect interests. The certification body shall review the declarations and identify what constitutes a conflict.<sup>12</sup>
- 1.3.17** 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 shall be recorded in minutes or other records.<sup>13</sup>

<sup>10</sup> **Explanatory Note 1.3.11:** This means that the certification committee or personnel that made the decision being appealed may be heard at the appeal, but may not sit on the appeals committee.

<sup>11</sup> **Explanatory Note 1.3.15:** General information might refer to training, newsletters, seminars, advice concerning regulatory requirements etc.

<sup>12</sup> **Explanatory Note 1.3.16:** The declaration should be of all interests that relate to the organic sector. The certification body should decide which, if any, of these interests are of sufficient concern to question the individual's ability to be impartial and therefore to warrant the precautionary measure of declaring them to result in a conflict of interest.

<sup>13</sup> **Explanatory Note 1.3.17:** The certification body's responsibility is not only to determine conflict of interest, but to then use this list in its operation to ensure exclusion of the individual in cases where conflict exists.

**1.3.18** The certification body shall require persons engaged in inspection, certification and appeals to agree in writing to abstain from participating in work regarding operators with whom they have personal relations or 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.<sup>14</sup>

## **1.4 Resources**

### ***Financial and Personnel Resources***

**1.4.1** The certification body shall have the financial stability and personnel resources necessary for the effective operation of a certification system.

**Guidance:** *Financial stability shall include provisions to cover liabilities in situations where there is a significant risk of being sued.*

**1.4.2** The certification body personnel shall have the necessary education, training, technical knowledge and experience for performing functions relating to the type, range and volume of work performed.

**1.4.3** Personnel, including contracted inspectors, shall be assigned to inspection and certification work that is appropriate to their skills.

**1.4.4** Personnel shall have job descriptions describing their duties and responsibilities.

**1.4.5** Personnel shall have documented work instructions for complex or critical certification and inspection functions.<sup>15</sup>

**1.4.6** The body responsible for certification decisions shall ensure that all certification decisions are based on competence in all areas for which certification is granted.<sup>16</sup>

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<sup>14</sup> **Explanatory Note 1.3.18:** In criteria 1.3.16 and 1.3.17 the certification body takes responsibility for managing any conflict of interest. In 1.3.18 the individual is also required to be responsible. The purpose of the second sentence in 1.3.18 is to prevent an individual from contracting to do future work while engaged in the inspection or certification process (a clear conflict of interest) without this immediately being known to the certification body, so that others may be assigned to the case. This is most likely to occur in the case of contracted inspectors.

<sup>15</sup> **Explanatory Note 1.4.5:** Procedures can serve as work instructions if detailed enough.

<sup>16</sup> **Explanatory Note 1.4.6:** This may be on the certification committee itself or at staff level.

**1.4.7** The certification body shall require all persons 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.

**1.4.8** Records of the qualifications and training of all personnel shall be maintained.

### ***Training***

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

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

### ***Subcontractors***

**1.4.11** The integrity, competence and transparency of any subcontracted components of the certification system remain the responsibility of the certification body.

**1.4.12** 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.

## **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.

### **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 operator 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.

### **2.3 *Certification Scope***

**2.3.1** Organic certification shall be granted solely on the basis of a determination of an operation's conformity with specified published standards. These standards shall cover all production systems or product categories certified.

#### ***Certification Scope and the Chain of Custody*<sup>17</sup>**

**2.3.2** The certification body shall not issue any license to use its certification mark or issue any certificate for any product unless it is assured of the chain of custody of the product. Where steps in the production chain have been certified by other certification bodies, the criteria in section 9 shall be applied.

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<sup>17</sup> **Explanatory Note 2.3.2 to 2.3.5:** This section of the criteria regulates the requirements for certification bodies with regard to the whole production chain. The production chain includes the farmers, storage units, processing units, packers, brokers, wholesalers, transport companies and retailers. These criteria establish when either certification or inspection is required. These functions shall either have been carried out by the certification body itself or their certification should be approved in accordance with the criteria in section 9.

**2.3.3** Any entity in the chain of custody that has produced, processed, or packaged an organic product shall have been certified. Contracted production (see below) shall have been inspected.<sup>18</sup>

**Guidance:** *The certification body is not obliged to have a system for inspection of products that are further handled after being packed in the final consumer package. For certified product not in its final packaging the certification body's responsibility shall extend to the point where the product is sold to an operator certified by a different entity. The certification body shall take action where there is reason to believe that the certification body's own standards have been or may be violated in later handling stages.*

**2.3.4** 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.<sup>19</sup>

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

#### ***Certification Scope and Contracted Production or Processing***<sup>20</sup>

**2.3.6** 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.

**2.3.7** The policy shall prescribe the circumstances where the contracted party is not required to be certified. This shall preclude the contracted party from marketing certified products and require 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.<sup>21</sup>

<sup>18</sup> **Explanatory Note 2.3.3:** An example of such a situation is fumigation in import harbors, etc.

<sup>19</sup> **Explanatory Note 2.3.4:** Exceptions to the requirement for inspections may be made if a risk assessment based on the kind of storage, the product, the packaging, the prevailing storage practices (e.g. fumigation) and the period of storage has determined that further inspections are not necessary. Exceptions may also be made in the case of storage by common carriers and storage in customs houses.

<sup>20</sup> **Explanatory Note: 2.3.6 to 2.3.11:** This section establishes criteria applicable when a certified entity (or applicant) has subcontracted production to an operation which is not certified. (For example, a certified processor subcontracts with a storage, handling, or processing facility which is not certified in its own right.) It also applies to situations where a processor or trader has subcontracted producers.

<sup>21</sup> **Explanatory Note 2.3.7:** These provisions do not prohibit the contracted party from applying for certification in their own right.

- 2.3.8** The contracted party shall be inspected by the certification body 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 certification body documents the reasons for the reduced frequency.
- 2.3.9** 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 non-compliance of the contracted parties.  
*Guidance:* The contract between the certification body and the operator shall specify the liability in respect to sanctions, unless this is already stated in the general sanctions policies.
- 2.3.10** 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:* Where the certification body chooses not to have a direct contract with the contracted party it shall 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.
- 2.3.11** The certification body shall require that each contracted party 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 Certification Body shall document its objectives for, and commitment to, quality in a quality policy. The management shall ensure that this policy is understood, implemented and maintained.<sup>22</sup>

#### 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 personnel.<sup>23</sup>

#### 3.3 *Quality Documentation*

- 3.3.1** The quality documentation shall include at least the following:
- a. a brief description of the legal status of the certification body;  
*Guidance: The description shall include the names of its owners and, if different, names of the persons who control it.*
  - b. the names, qualifications, experience and terms of reference of the Governing Board, senior executive and other certification personnel, both internal and external;
  - c. an organization chart showing lines of authority, responsibility and allocation of functions stemming from the senior executive;
  - d. a description of the organization of the certification body, including the management (committee, group or person) identified in 1.1.3;
  - e. the policy and procedures for conducting management reviews;
  - f. administrative procedures including document control;
  - g. the operational and functional duties and services, so that the extent and limits of each person's responsibility are known to all concerned;
  - h. the procedure for the recruitment and training of certification body personnel and monitoring of their performance;

<sup>22</sup> **Explanatory Note 3.1.1:** A quality policy can consist of a simple statement to adhere to the IFOAM Accreditation System.

<sup>23</sup> **Explanatory Note 3.2.1:** An effective quality system is one which enables the certification body to demonstrate continuous quality improvement.

- i. a list of its approved subcontractors and the procedures for assessing, recording and monitoring their competence;
- j. its procedures for handling non-conformities and for assuring the effectiveness of any corrective and preventive actions taken;
- 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;
- l. the policy and procedure for dealing with appeals and complaints.

### **3.4 Internal Audits**

**3.4.1** The certification body shall conduct periodic internal audits such that 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:

- 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.

**3.4.2** The certification body shall review the management system at defined intervals. Records of such reviews shall be maintained.

**Guidance:** *A management review evaluates whether procedures and policies are effective in achieving the overall goals of the organization.*

**3.4.3** The certification body shall conduct performance reviews of inspection and certification personnel including employed inspectors at least annually. Records of the outcome shall be maintained.<sup>24</sup>

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

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<sup>24</sup> **Explanatory Note 3.4.3:** Where work is organized in teams this may be team review.

### 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, the resolution shall be documented. The complainant shall be informed of the general outcome of the complaint in a way that does not prejudice the confidentiality of the party concerned.
- 3.5.4** The certification body shall:
- a. investigate and take appropriate action regarding complaints related to certification;
  - b. review and take any necessary corrective action to the certification system;<sup>25</sup>
  - c. keep a record of all complaints and resulting actions.

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<sup>25</sup> **Explanatory Note 3.5.4b:** This criterion requires that complaints should not merely be resolved but that the certification body should review the complaint to determine whether the complaint indicates a structural or procedure fault and, if so, to remedy it.

## **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.<sup>26</sup>
- 4.1.2** These arrangements shall include the requirement for all personnel to sign a confidentiality agreement and the establishment of a confidentiality policy.
- 4.1.3** This policy shall:
- a.** specify the type of information that is not covered by confidentiality, such as name and address of operators, and
  - b.** identify the parties that may have access to confidential information such as accreditation bodies;
  - c.** require the certification body to inform operators of who the parties are;
  - d.** state potential requirements for disclosure of information under the law;
  - e.** require written consent in other cases.
- 4.1.4** 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.

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<sup>26</sup> **Explanatory Note 4.1.1:** The system shall be transparent while records pertaining to operators remain confidential.

## 5 DOCUMENTATION AND DOCUMENT CONTROL

### 5.1 *General*

- 5.1.1** The certification body shall document its certification system, make 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, current information on the following:<sup>27</sup>
- a. information, describing the authority under which the certification body provides its certification service;<sup>28</sup>
  - b. the requirements and procedures, (or a description of the procedures) for evaluation of the inspection report and approval, continuation or extension of certification;
  - c. the 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, location and the scope of the certification; if an operator is certified as a group it shall be identified as such;
  - i. a current list of contracted parties, although this may be a general list without linkage to the certified operator.

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<sup>27</sup> **Explanatory Note 5.2.1:** Make available does not mean these have to be distributed, only that they should be supplied if requested. It also means that a reasonable charge may be levied. Point b, e, f and g refer to descriptions or summaries and not necessarily the formal policies or procedures themselves.

<sup>28</sup> **Explanatory Note 5.2.1a:** This authority may be regulatory where a certification body has been approved under a government regulation. Authority may also be derived from the voluntary nature of the program or from linked producer or trader associations.

### **5.3 Document Control**

- 5.3.1** The certification body shall maintain a documented system for the control of all documentation relating to the certification system and shall ensure that:
- 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;
  - 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.** documentation clearly indicates its date of implementation.

**Guidance:** *The certification body shall have a documented procedure to ensure that above requirements are met.*

### **5.4 Records<sup>29</sup>**

- 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** Operator files shall be up to date and contain all relevant information, including inspection reports, history, and product specifications.

**Guidance:** *The certification body shall have available relevant data for all certified production units, including any contracted parties and members of grower groups.*

- 5.4.3** The records shall be sufficiently comprehensive so as to demonstrate that the procedures for certification decisions are properly applied.

- 5.4.4** Separate records shall be kept for major violations and non-conformities and resulting sanctions, precedents, exceptions, appeals, and complaints, in a way that enables easy retrieval of data.<sup>30</sup>

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<sup>29</sup> **Explanatory Note Section 5.4:** Requirements for records also apply to computerized systems.

<sup>30</sup> **Explanatory Note 5.4.4:** Such information should be available both in the producer's file as well in a separate record, or registered in a database system. The purpose of this criterion is for those involved in certification to have access to the file in order to ensure consistency in decision-making.

- 5.4.5** All records shall be safely stored and held secure and in confidence to the operator, for a period not less than five years. Computerized records shall be backed-up regularly.<sup>31</sup>
- 5.4.6** Inspection reports, certification decisions, certificates and other relevant records shall be signed by the authorized person.<sup>32</sup>
- 5.4.7** The record keeping system shall be transparent and enable easy retrieval of information.
- 5.4.8** 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:** *This right shall be communicated to operators.*

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<sup>31</sup> **Explanatory Note 5.4.5:** The records that should be maintained for the specified period would include not only the operator's records, but also records of the certification body's personnel and relevant activities such as internal audits.

<sup>32</sup> **Explanatory Note 5.4.6:** This may be an electronic signature.

## 6 APPLICATION AND INSPECTION PROCEDURES

### 6.1 Application Procedures

#### *Information for Applicants*

- 6.1.1** The certification body shall ensure that each applicant or certified operator has:
- a. a current version of the applicable standards;
  - b. an adequate description of the inspection, certification and appeals procedures;
  - c. a sample copy of the contract or 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. This shall determine at least the following information:
- a. the scope of the desired certification;<sup>33</sup>
  - b. sufficient information about the production system to enable appropriate assignment of the inspector and proper preparation by the inspector.  
*Guidance: This shall include disclosure of denial of organic certification by another certification body. Such a disclosure shall include the reasons for denial.<sup>34</sup>*

#### *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 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 proximity, to both certification and accreditation personnel;<sup>35</sup>

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<sup>33</sup> **Explanatory Note 6.1.2a:** This also includes the production and area to be certified, and in cases where the certification body offers more than one certification program, the standards against which the product is to be certified.

<sup>34</sup> **Explanatory Note 6.1.2b Guidance:** Regions where there is only one certification body are not considered relevant.

<sup>35</sup> **Explanatory Note 6.1.4b:** The criterion requires the right of access, but does not require that this right be exercised in all cases. Certification bodies should be able to inspect any part of an operation whether organic or not if they have reason to do so. The criterion requires that the right be fully exercised in cases of parallel production.

- c. provide access to all relevant documentation including financial records to both certification and accreditation personnel.

### ***Operator Documentation***

- 6.1.5** The certification body shall specify the documentation to be maintained by the operator to enable verification of compliance, and shall specify which records shall be available and held in a form that enables verification to take place.<sup>36</sup>
- 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.<sup>37</sup>

## **6.2 Preparation for Inspection**

### ***Review***

- 6.2.1** 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.<sup>38</sup>
- 6.2.2** For complex operations and foreign operations located in regions not usually covered by the certification body, the certification body shall assess whether it has the capability to perform the certification service with respect to the scope of the certification sought.
- 6.2.3** The certification body shall provide the inspector with sufficient information to prepare for the inspection.

**Guidance:** *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.*

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<sup>36</sup> **Explanatory Note 6.1.5:** These criteria refer not only to the required documentation but also to the way in which it is kept. This must allow for the specified audits to be carried out within the timeframe of an inspection.

<sup>37</sup> **Explanatory Note 6.1.6:** Although this is more likely to apply in processing operations it may also apply to farming operations. An example would be a procedure to ensure cleaning out of equipment in a split production situation. Conversion plans, farm plans and management plans to reduce dependence on restricted products would constitute such procedural documents.

<sup>38</sup> **Explanatory Note 6.2.1:** An example of assessment of the scope of certification sought is that an application for group certification meets the criteria in 8.3.2.

### ***Assignment of Inspector***

- 6.2.4** The assignment of the inspector shall take into account any possible conflict of interest.
- 6.2.5** The assignment of the inspector shall ensure that the same inspector shall as a rule not be assigned to an operator for more than 4 consecutive years and under no circumstances for more than 5 consecutive years.
- 6.2.6** 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 to raise objections based on conflict of interest or other reasons. The certification body shall rule whether the reasons are accepted.

### **6.3 *Visit Procedures***

- 6.3.1** The organic management systems of the operator shall be evaluated against the standards and certification requirements.
- 6.3.2** Inspection procedure shall follow a specific protocol to facilitate a non-discriminatory and objective inspection procedure.
- 6.3.3** The routine inspection procedure shall be documented and shall at least include:<sup>39</sup>
- a. assessment of production or processing system of operator by means of visits to facilities, fields, and storage units;
  - b. verification of the most recent information provided to the certification body by the operator;
  - c. identification and investigation of areas of risk;
  - d. review of records and accounts;
  - e. production/sales reconciliation on farms;  
**Guidance:** *At least every 3 years this shall be a comprehensive check.*
  - f. an input/output reconciliation and trace back audit in processing and handling;
  - g. interviews with responsible persons including an exit interview;  
**Guidance:** *The exit interview shall include findings of non-conformities made during the inspection.*<sup>40</sup>

<sup>39</sup> **Explanatory Note 6.3.3:** An exception to this may be made in the case of unannounced visits that are made in addition to the scheduled visit or in cases where more than one announced visit is conducted in the year. Such supplementary visits may be targeted to specific concerns or to check compliance with conditions of the certification.

<sup>40</sup> **Explanatory Note 6.3.3g Guidance:** This is not the final decision on non-conformities, but the observations of the inspector. As such it may be overturned by the certification decision.

- h. verification that changes that have taken place in the standards and requirements of the certification body have been effectively implemented by the operator;
- i. residue sampling in accordance with the certification body's sampling policy;
- j. 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 doing so.<sup>41</sup>

#### **6.4 Sampling and Testing<sup>42</sup>**

**6.4.1** The certification body shall have documented policies and procedures on residue testing, and other analyses 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 supporting evidence, then samples shall be taken for analysis;<sup>43</sup>
- c. the requirement that where standards set limits on residues or contamination in products, inputs or soil, analysis shall be done as appropriate;<sup>44</sup>
- d. instructions to inspectors on sampling requirements and methods;
- e. indication of responsibility for payment of sampling.

**6.4.2** Analyses shall be done by competent laboratories.

#### **6.5 Inspection Report**

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

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<sup>41</sup> **Explanatory Note 6.3.4:** Examples are: Parallel production and systems that are so similar that there might be undeclared parallel production, and any situation revealing high risk of cross-contamination.

<sup>42</sup> **Explanatory Note Section 6.4:** Testing is not the basis of organic certification as it is certification of process not products. However, testing is of value and the certification body shall have documented policies and procedures on residue testing, genetic testing and other analyses that meet these requirements.

<sup>43</sup> **Explanatory Note 6.4.1b:** The "use of" means the deliberate utilization of a substance. For issues related to unintentional contamination, refer to the IFOAM Basic Standards as well as criteria 6.4.1c and 6.7.4.

<sup>44</sup> **Explanatory Note 6.4.1c:** This refers to claims made in standards used by the certifying body regarding limits on contamination. For example, claims on limits on heavy metals in soil. In such cases certification bodies must verify the standard by means of residue testing.

- 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.<sup>45</sup>  
**Guidance:** *This shall include specific information about the input output analysis.*
- 6.5.5** Reports shall contain an assessment of risk with regard to loss of organic integrity as well as the inspector's observations regarding conformity with standards. Inspectors shall be able to make recommendations regarding non-conformities but shall not be required to make an overall judgment of whether the operator should be certified.<sup>46</sup>

## **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, trace back, etc.).

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<sup>45</sup> **Explanatory Note 6.5.4:** An example would be: In cases of partial compliance or lack of clarity in the standards the inspector being required to elaborate.

<sup>46</sup> **Explanatory Note 6.5.5:** The criterion prohibits requiring an inspector to make an overall judgment of whether the unit should be certified or not. The overall judgment is a function of certification and not of inspection and would contravene criterion 1.3.10 if it was required of the inspector. The criterion does not prohibit the inspectors from providing an overall recommendation but does prohibit the certification body from requiring this of them. The actions in 6.7.4 are an exception based on the emergency nature of the case and the overriding need to prevent fraud.

## 6.7 **Additional Requirements and Inspection Regime for Particular Circumstances**<sup>47</sup>

### **Conversion Period**

- 6.7.1** The certification body shall verify full application of the standards for a period of no less than that stated in the IFOAM Basic Standards. This shall take place following the application for certification except in the case of 6.7.3.<sup>48</sup>
- 6.7.2** Inspection shall occur during the conversion period to verify compliance with standards.
- 6.7.3** Exceptions to 6.7.1 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:** *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.*

### **Split Production**<sup>49</sup>

- 6.7.4** When split production occurs, the certification program shall have additional requirements and inspection regimes to safeguard that the products are not mixed or contaminated.

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<sup>47</sup> **Explanatory Note Section 6.7:** These criteria apply to situations, where product is being sold as organic.

<sup>48</sup> **Explanatory Note 6.7.1:** Full application of standards should normally mean active organic management not just absence of use of prohibited materials. The IFOAM Basic Standards define organic as a management system. Certification should not occur unless this organic management system is fully in place. In order to verify this the certification body should normally not grant retrospective conversion prior to the application for certification and should require the conversion period stated in the standards to monitor the system.

<sup>49</sup> **Explanatory Note 6.7.4 to 6.7.7 - Split Production and Parallel Production:** The criteria include requirements for two situations that may occur in organic operations. Split production is the term used when a unit is not fully dedicated to organic production processing or handling and is also producing, processing or handling conversion or non-organic produce. This is regardless of whether these are the same product or different product. If they are the same product this is termed parallel production. Parallel production is a particular form of split production. As parallel production is a higher risk situation when a product is sold as organic, specific criteria in addition to those for split production have been specified. The requirements for parallel production are in addition to those for split operations. These criteria apply to situations where product is being sold as organic.

- 6.7.5** In cases of split production the certification body shall require and verify by inspection:
- a.** that the documentation regarding the production or processing, storage and sales is well managed and makes clear distinctions between certified and non- certified products;
  - b.** that the measures taken to safeguard against the risk to the organic integrity is understood at all levels of the operation.

#### ***Parallel Production***<sup>50</sup>

- 6.7.6** If a farm is engaged in parallel production, the certification body shall require that in addition to the requirements for split production above:
- 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 6.7.7;
  - b.** accurate production estimates are recorded and shall be checked against sales records;
  - c.** the inspection includes visits to the non-organic fields and/or processing units.
- 6.7.7** In cases where an exception has been granted to the requirements in 6.7.6a inspections shall occur more frequently than once a year and at critical times. This shall normally include inspections at the time of harvest or during processing.

#### ***Genetically Engineered Products***

- 6.7.8** Based on risk assessment the certification body shall implement a system to inspect and verify that genetically engineered (GE) organisms and their products or derivatives are not used in certified organic production and or/processing as required by the IFOAM Basic Standards.<sup>51</sup>
- 6.7.9** For genetically engineered (GE) product use and contamination risk areas, the certification body shall adopt one or more of the following measures:
- a.** review of supplier's statements verifying that the product is not genetically engineered;
  - b.** and/or analytical testing to defined limits;
  - c.** and/or documentation and evaluation of suppliers' GE control systems;
  - d.** and/or other measure(s) determined by the certification body to be more appropriate than a. through c., and as defined in the certification body's policies and procedures, consistent with this criterion.

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<sup>50</sup> **Explanatory Note 6.7.6 and 6.7.7:** In all parallel production on farms 6.7.6 b and c shall be required. In addition 6.7.6a must be enforced or - if an exception is granted to this provision - then the operator must be subject to the requirements in 6.7.7.

<sup>51</sup> **Explanatory Note 6.7.8:** This includes the conventional ingredients in a multi ingredient product. The risk assessment is for the possibility of usage of GE products or their derivatives and would therefore look at whether GE versions of the ingredients exist.

## 7 CERTIFICATION PROCEDURES

### 7.1 *General Requirements*

- 7.1.1** The certification body shall execute its certification in compliance with all its stated procedures and standards.
- 7.1.2** The certification body shall specify contractual requirements under which it grants, and the procedures for granting, certification.
- 7.1.3** The certification body shall have procedures to:
- a. grant, maintain, withdraw and, if practiced, suspend certification;<sup>52</sup>
  - b. extend or reduce the scope of certification;
  - c. re-evaluate the operation.<sup>53</sup>
- 7.1.4** The documented certification policies and procedures shall include all procedural steps in processing the application, until final certification.

### 7.2 *Certification Decisions*

- 7.2.1** All certification decisions including the scope shall be objective and transparent and shall be recorded.
- 7.2.2** Following initial inspection the certification decision shall be communicated to the operator. Thereafter, operators shall be kept informed about their certification status.<sup>54</sup>
- 7.2.3** When certification is denied, withdrawn or suspended, the reasons shall be clearly stated.

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<sup>52</sup> **Explanatory Note 7.1.3a:** The text refers to “if practiced” because certification bodies may choose to not have a suspension policy and instead simply withdraw certification for serious infringements. The exception is found in 7.7.5 where suspension is the only possibility.

<sup>53</sup> **Explanatory Note 7.1.3c:** Re-evaluation is indicated in the event of changes significantly affecting the product’s specification, or changes in the standards to which compliance of the product is certified, or changes in the ownership, structure or management of the supplier, if relevant, or in the case of any other information indicating that the product may no longer comply with the requirements of the certification system.

<sup>54</sup> **Explanatory Note 7.2.2:** In a system where the certification is done annually the operator should be informed accordingly. In a system with an ongoing status the certification body is only required to inform the operator when there is a change in the certification status.

**7.2.4** 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.

**7.2.5** 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 shall be in place.

### **7.3 The Certification Process**

**7.3.1** The procedures shall ensure that:<sup>55</sup>

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

**Guidance:** *Where the certification body operates more than one certification program, the applicable scope shall 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;<sup>56</sup>
- e. the date of issuance;
- f. the period of validity;
- g. an authorized signature of the certification body.

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<sup>55</sup> **Explanatory Note 7.3.1:** This criterion requires that the current certification status (certified, conversion, non-organic) of all product or production is stated on all forms and documents used through the certification process.

<sup>56</sup> **Explanatory Note 7.4.1d:** Product categories noted on the certificate should be as specific as the circumstances permit.

### **Transaction Certificates**

- 7.4.2** Where the certification body issues transaction certificates 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, 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. the certification body and the applicable standard;
  - i. a statement from the operator that the product is produced according to the applicable standards.

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

- 7.4.3** 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. 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 before certification.
- 7.5.2** The certification body shall have a written policy on inspection frequency of already certified operators. The policy shall require that certified operators are inspected at least annually. Alternatively, (except in the cases of new applicants, operators wholly in conversion or group certification) the policy shall fulfill the following requirements:
- a. the frequency and type of inspections are based on the risks with respect to 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 calendar year at least equals the total number of already certified operators;<sup>57</sup>
- d. that no operator is inspected less than once in three calendar years;
- e. the certification body installs mechanisms to monitor operators to assess their risk level between very spread out inspections.<sup>58</sup>

**7.5.3** There shall be provisions for additional inspections. The criteria or circumstances for scheduling more than one inspection annually 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, complexity of production, and risk of non-compliance.<sup>59</sup>

**7.5.4** Timing of inspections shall not be so regular as to become predictable.

### ***Unannounced Inspections***

**7.5.5** The certification body shall have a documented policy requiring unannounced inspections. At a minimum, the policy shall require:

- a. in the case of a risk-based approach to determine inspection frequency, at least 5% of the certified operators shall be subject to unannounced inspections;
- b. in the case of an annual inspection frequency, the number of unannounced inspections chosen randomly and the additional scheduled inspections according to 7.5.3 together shall be at least 5% of the certified operators;
- c. unannounced inspections shall be in addition to the scheduled inspections under 7.5.2.

**7.5.6** Certification bodies shall secure the rights to conduct unannounced inspections.  
**Guidance:** *This shall be included in agreements or other documentation signed by the operator.*

**7.5.7** Unannounced inspections shall normally be without any forewarning. However, certification bodies may define alternative definitions for particular circumstances where this can be justified. The definition shall address the purpose that the possible

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<sup>57</sup> **Explanatory Note 7.5.2c:** If a certification body has 5000 operators, the certification body has to perform at least 5000 inspections per calendar year plus new applications.

<sup>58</sup> **Explanatory note 7.5.2e:** An example would be an annual form that requires sufficient information to determine whether there have been changes in risk situation.

<sup>59</sup> **Explanatory Note 7.5.3:** This could be done on a case-by-case basis or according to the type of operation. Annual means the calendar year, which is not every 365 days. 7.5.3 only applies in cases where the certifier has, according to 7.5.2, chosen to inspect every certified operator annually (annual inspection frequency).

forewarning shall not be so extensive as to allow for the operator to correct substantial non-conformities.

- 7.5.8** The basis for selection of operators to be subject to unannounced inspections shall be defined and include both random and targeted selection.
- 7.5.9** A record of unannounced inspections shall be maintained.

### ***Notification of Changes in Licensee's Operation and Extension of Scope***

- 7.5.10** The certification body shall require the operator to give notification of significant changes such as modification to the products, the manufacturing process, extension of acreage or changes to management, or ownership.
- 7.5.11** The certification body shall assess the announced scope changes and have criteria for inspection or alternative action.
- Guidance:** *The operator shall 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 Certification Marks**

- 7.6.1** The certification body shall exercise control over the use of its licenses, certificates and certification marks.
- 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 certification body 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 certification body;
  - c.** the certification body of the non-licensed party agrees to control and verify label use.
- 7.6.3** The certification body shall have documents, which demonstrate its ownership or control of the certification mark, when such a mark exists.
- 7.6.4** The certification body shall establish requirements concerning the use of its certification 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.

- 7.6.5 Certification bodies shall actively investigate suspected cases of fraud.
- 7.6.6 Incorrect references to the certification system or misleading use of licenses, certificates or certification marks shall be dealt with by suitable remedial actions.
- 7.6.7 The certification body shall have documented procedures for responding to use of its name or certification mark or certificates by uncertified parties. Such procedures shall include all steps and include the possibility of legal action.
- 7.6.8 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 certificates and certification marks.
- 7.6.9 Certification bodies shall ensure that corrective actions related to misuse of licenses, certificates and certification marks 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 non-conformities with the standards.

**Guidance:** *The certification body will make the determination of whether a non-conformity of the regulations is minor. Minor non-conformities 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.*

*Non-conformities with the standards are considered “minor” only:*

- a. *if they do not compromise health or safety of workers, or*
- b. *if they do not involve flagrant non-conformities with standards.*

*Typically, minor non-conformities result from shortcomings in record keeping. Minor non-conformities may be considered to be flagrant if they are not addressed within a year of being identified.*

- 7.7.2 Documented procedures for imposing sanctions shall be in place.
- 7.7.3 Where a non-conformity that affects organic integrity is found, the certification body shall require that the certification mark or any other indication of certification is removed from the entire production run or product affected by the non-conformity concerned.
- 7.7.4 Where a serious non-conformity 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 suspension of certification in cases where the inspector detects manifest non-conformities or fraudulent activity.  
**Guidance:** *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.*

**7.7.6** The reasons for sanctions shall be 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.<sup>60</sup>

**7.8.2** Appeals 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;
- b. take appropriate subsequent action;
- c. document the action taken and its effectiveness.

## **7.9 Risk Reduction Between Certification Bodies**

**7.9.1** The certification body shall require operators to notify it of all previous and current certifications within the scope. The certification body shall communicate with the other certification body to ascertain if there were any major issues. Alternatively, the certification body shall require the operator to submit the most recent certification decision issued by the other certification body.

**7.9.2** 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 de-certification. The certification body shall request the same information from the other certification body (or bodies).

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<sup>60</sup> **Explanatory Note 7.8.1:** Appeals may be lodged by the operator subject to a decision or by a third party. However, in the context of these criteria, appeals refers to decisions regarding certification status. Third party statements concerning compliance of operators with the requirements may be considered complaints and dealt with under the complaints procedures.

**7.10 *Changes in Certification Requirements***

**7.10.1** The certification body shall ensure that each certified operator be notified of changes in the certification requirements without unnecessary delay.

**7.10.2** The certification body shall verify the operator's implementation in a timely manner.

## 8 INSPECTION AND CERTIFICATION FOR SPECIFIC CIRCUMSTANCES OR SCOPE

### 8.1 *Certification of Wild Products*

- 8.1.1** If the certification body includes wild product within its certification scope, it shall have documented requirements and an inspection regime that at least requires that:
- a. the operator issues 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: The collectors shall sign statements that they have followed the instructions.*
  - b. the operator has records of all collectors, and the quantities bought from each collector;
  - c. any middlemen shall be under contract to the operator;<sup>61</sup>
  - d. the area of production shall be properly identified on appropriate maps, and shall be large and distinct enough to reduce the risk of commingling with non-certified production.
- 8.1.2** The inspection regime shall at least include:
- a. document check;
  - b. interviews with the collectors, or a representative sample;
  - c. visit to an appropriate proportion of the certified area;
  - d. visits to and interviews with an appropriate proportion of middlemen;
  - 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*<sup>62</sup>

#### *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;

<sup>61</sup> **Explanatory Note 8.1.1c:** Middlemen in this context refers to agents or tribal authorities who may act as initial collection or storage points.

<sup>62</sup> **Explanatory Note Section 8.2:** Certification bodies are required under the IFOAM Basic Standards to have lists of generic inputs. The criteria 8.2.1 and 8.2.3 apply to certification bodies who have produced lists of branded (proprietary) products to assist their operators in determining whether they meet the generic list. The criterion 8.2.4 and 8.2.5 are additional requirements applicable when the certification body certifies the product, allowing the operator to indicate the certification status on product, and thereby making a claim to the general public.

- 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 shall appear in the listing.

**Guidance:** *The statement shall include the limitations of the approval - for example, that it does not imply effectiveness of the product.*

- 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 8.2.1 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:** *The inspection shall verify compliance with relevant standards such as those related to separation of product and pollution resulting from the process and contamination.*

- 8.2.5** 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.

### **8.3 Group Certification<sup>63</sup>**

- 8.3.1** Certification bodies that certify groups that use internal control systems shall have policies and procedures to verify compliance of the group and the individual group members. The policy and procedures shall at least comply with the following criteria.

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<sup>63</sup> **Explanatory Note Section 8.3:** This system of certification is evolving from the need to devise a system of control and certification of small farmer groups towards a system of combined internal and external control which in situations specified in 8.3.2 appear to be more appropriate than external control alone.

## 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;<sup>64</sup>
  - b. large farming units, processing units and traders shall not be included in the inspection arrangements for such groups and shall be inspected by the certification body in accordance with the requirements of 7.5.2. Simple processing and storage units may be included;
  - c. group members shall be in geographic proximity;
  - d. the group shall be large enough and have sufficient resources to support a viable internal control system that assures compliance of individual members with production standards in an objective and transparent manner;<sup>65</sup>
  - e. the group shall have coordinated marketing.

## General Requirements

- 8.3.3** The policies and procedures for group certification systems shall require that at least:
- a. the certified entity shall be the group as a whole. This means that individual 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:** *The system shall include a documented management structure of the internal control system.*
  - c. documented inspections of all group members for compliance with production standards shall be carried out by the internal control system at least annually.<sup>66</sup>
- 8.3.4** The certification body shall require the management 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 group members to comply with the standards and to permit inspections.

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<sup>64</sup> **Explanatory Note 8.3.2a:** This criterion does not limit the arrangement to farmers. Other operations organized collectively may also be included provided the other criteria in 8.3.2 are met.

<sup>65</sup> **Explanatory Note 8.3.2d:** The criterion refers to the three factors that the size of the group should ensure - sufficient resources, transparency and impartiality. The certification body must determine whether the group is large enough to satisfy these factors.

<sup>66</sup> **Explanatory Note 8.3.3c:** This does not mean that those personnel responsible for the internal control must have visited the individual at least once during the year - it means they must have done so with the specific purpose of checking compliance with standards.

- 8.3.5** The certification body shall ensure that all 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.  
**Guidance:** *The following are considered essential requirements, although a certification body may list additional requirements:*
- a. *there are competent personnel implementing the internal control system;*
  - b. *the core documentation is complete, which includes:*
    - *appropriate maps/sketches,*
    - *a complete list of group members,*
    - *farm/field or processing records,*
    - *signed member agreements,*
    - *yield estimates;*
  - c. *the internal inspection protocol is described and implemented;*
  - d. *a monitored and documented conversion period is in place;*
  - e. *a mechanism to remove non-compliant group members from the list is in place and executed;*
  - f. *there are procedures to accept new members;*
  - g. *risk assessment.*

### ***External Inspection by the Certification Body***

- 8.3.7** Annual (or more frequent) external inspections of the group shall be carried out by the certification body.
- 8.3.8** The certification body shall assign inspectors who have had specific training on inspection of internal control systems or who can otherwise document competency in such inspection.
- 8.3.9** The inspection visit shall include an assessment of the internal control system, of its effective application and of compliance with the standards.
- 8.3.10** The inspection shall include an assessment of the risks to organic integrity within the group itself and the environment in which it functions.<sup>67</sup>
- 8.3.11** Re-inspection of a sample of group members shall be undertaken to evaluate the effectiveness of the internal control system.

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<sup>67</sup> **Explanatory Note 8.3.10:** The risk assessment identifies the critical aspects to the functioning of the group, from farm level through processing, transporting, etc. that is under responsibility of the group. The critical aspects must be addressed by the internal standards and internal control system. Risk assessment within the internal standards and internal control system must be regularly updated in relation to each other. For further information reference is made to the IFOAM Guidance Manuals for Group Certification.

**8.3.12** The percentage of group members subject to re-inspection shall take into account the results of the risk assessment. The certification body shall specify how it determines the number of group members to be re-inspected.

**Guidance:** *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 shall be added when necessary.*

<b>MINIMUM AMOUNT OF GROWERS TO BE INSPECTED BY EXTERNAL INSPECTORS</b>			
<i>Number of group members</i>	<i>Normal risk factor 1</i>	<i>Medium risk risk factor 1,2</i>	<i>High risk risk factor 1,4</i>
Minimum	10	12	14
50	10	12	14
100	10	12	14
200	14	17	20
500	22	27	31
1000	32	38	44
2000	45	54	63
5000	71	85	99

*Certification bodies shall have written rationale for other approaches to calculating re-inspection rate.*

### **Evaluation of the Internal Control System**

**8.3.13** In evaluating the internal control system the certification body shall determine whether:

- all internal control documentation is in place;
- internal inspections of all group members have been carried out at least annually;
- new group members are only included after internal inspections, according to procedures agreed with the certification body;
- instances of non-compliance have been dealt with appropriately by the internal control and according to a documented system of sanctions;
- adequate records of inspections have been maintained by the internal control system;
- the group members understand the standards.

**8.3.14** Sample inspections (see 8.3.11) 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. The certification body shall maintain records of sample inspections so as to ensure that over time the inspections are representative of the group as a whole and take into account any previously identified risk.

**8.3.15** The evaluation shall include (a) witness audit(s) of internal control inspections.<sup>68</sup>

### ***Group Records***

**8.3.16** Certification bodies shall have a standardized form to be completed and updated by the group management.

**Guidance:** *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; in the case of processor type of processing.*

### ***Responsibility and Sanctions***

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

**8.3.18** The certification body shall have a clear sanctions policy in event of non-compliance by the group and/or its members. Failure of the internal control system to detect and act on non-compliances 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.

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<sup>68</sup> **Explanatory Note 8.3.15:** (A) witness audit(s) will depend on the size of the group and the number of internal inspectors.

## 9 ACCEPTANCE OF PRIOR CERTIFICATION

### 9.1 *General Requirements for all Methods of Acceptance*<sup>69</sup>

**Guidance:** *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 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>70</sup>
- 9.1.3 The procedures and responsibility for granting recognition shall be clearly documented.

### 9.2 *Acceptance of Product Based on Recognition of a Certification Program*

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

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<sup>69</sup> **Explanatory Note section 9.1:** It is not a requirement of organic certification that all elements of the production chain or that all inputs be certified by the same certification body. Feedstuffs, ingredients in multi-ingredient products, bulk food for pre-packing may all have been certified by a certification body different from that determining the certification of the product at the end or in the middle of the production chain. This section of the criteria establishes the acceptable methods for the acceptance of the prior certification, and the requirements for each of these methods. The general requirements apply to both acceptance based on recognition of a certification body and acceptance based on document review.

<sup>70</sup> **Explanatory Note 9.1.2:** Criteria 9.2 and 9.3 establish the requirements for permitting use by the certification body's certified operators of a product certified under another certification program. There is a measure of equivalency of procedures, policies and standards. This does not confer certification rights to the original operator. The criteria in 9.4 establish the requirements when an operator certified by another certification body seeks full certification and the associated rights.

**9.2.2** 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 of 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;<sup>71</sup>

**Guidance:** *The assessment and decision to include a certification body on the register shall be documented. Verification of equivalence shall include elements such as the requirements for:*

- Chain of Custody (section 2.3.2-2.3.5);
- Contracted Production (section 2.3.6-2.3.11);
- Inspection Visit Procedures (section 6.3);
- Parallel and Split Production (section 6.7);
- Genetically Engineered Products (section 6.7);
- Group Certification if applicable (section 8.3).

- 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 standards and the performance of the other certification body. The assessment and decision to include a certification body on the register shall be documented;<sup>72</sup>

- d. an equivalent accreditation. Where such accreditation does not include assessment of compliance with the IFOAM Basic Standards, the certification body shall conduct a standards equivalency assessment.

An accreditation can be considered equivalent by either:

- IFOAM has determined that another accreditation is equivalent to IFOAM Accreditation;
- the body conducting IFOAM Accreditation has determined that another accreditation is equivalent to IFOAM Accreditation.

**9.2.3** A contract with recognized certification bodies that regulates the obligations of the parties shall be drawn up. The contract shall at least contain the following provisions:<sup>73</sup>

- 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 and the right to have access to other relevant information.

<sup>71</sup> **Explanatory Note 9.2.2b:** Peer review would mean participation in a formal peer review between accreditation bodies.

<sup>72</sup> **Explanatory Note 9.2.2c:** Third party means a body that has experience in conducting evaluation of certification bodies, e.g. governments, certification bodies.

<sup>73</sup> **Explanatory Note 9.2.3:** This refers to unilateral, bilateral or multilateral contracts.

### **9.3 Acceptance of Product Based on Document Review**

**9.3.1** In the absence of an 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 last inspection report, last 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 subsequent non-conformities have occurred.

**Guidance:** *In conducting document review for the purpose of accepting product previously certified by another certification body 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 shall be obtained and reviewed in addition.*

**9.3.3** 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.

**9.3.4** The procedures and responsibility for assessment and decision making shall be documented and follow the normal certification procedure.

**9.3.5** 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 both of the following requirements are met:

- a.** the other certification body is currently under the register indicated in 9.2.2;
- b.** the operator is certified by the other certification body up to the point of transfer.

**9.4.2** Where the requirements of 9.4.1 a are not met, certification of the operator may be awarded on the basis of information contained in the current inspection report of the previous certification body. The certification body shall ensure that the standards and requirements for a certification are met. In case of missing information a full inspection of the operator has to be carried out prior to certification.<sup>74</sup>

<sup>74</sup> **Explanatory Note 9.4.2:** This requires compliance with and not equivalency of the standards.

**9.4.3** An operation that meets the conditions in 9.4.1 or 9.4.2 may be certified without prior inspection, provided that an inspection according to the certification body's own standards takes place within 12 months after transfer of certification.

**9.4.4** Where the requirements of 9.4.1 or 9.4.2 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 (1.4.11 to 1.4.12).

**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.

## THE IFOAM ACCREDITATION PROGRAM



### **INTERNATIONAL ORGANIC ACCREDITATION SERVICE**

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### *What is the IFOAM Accreditation Program?*

It is primarily a means of ensuring fair and orderly trade in organic products throughout the world. Accreditation is an assessment of the competence of certification bodies worldwide by confirming whether they meet IFOAM Norms - the Criteria for Certification Bodies and the IFOAM Basic Standards. But it is more than this, much more.

### *Why should my organization become IFOAM accredited?*

There are many reasons but the main ones are:

**IFOAM Norms are set by the IFOAM membership.** It is a fully democratic structure open to all who work in the field of organic agriculture and production. This means that standards and operating requirements for certification bodies are set by the people who live them day to day and whose livelihood depends upon them. The mechanism is accessible, transparent and global; an elegant example of industry self-regulation.

**IOAS is an international accreditation body.** In fact, the IOAS is one of a small number of sector specific, international accreditation bodies that have developed a novel solution to international equivalence problems. Equivalence is not an issue when the same accreditation body oversees all certification bodies. If all certification bodies around the world became IFOAM Accredited, or if governments more fully used the services of IOAS, equivalence problems that farmers and processors worldwide experience day to day would become a thing of the past.

**IOAS is made up of experts.** IOAS is solely committed to organic agriculture, which means that all its resources are applied in this field. Its entire professional staff, its Board and Accreditation Committee members are experts in this field and are drawn from across the world. This means that you will be subject to a rigorous but empathetic evaluation, both technically and culturally.

### *Isn't government approval of certification bodies enough?*

It is true that governments are increasingly interested in regulating the organic sector and that is a good thing as they provide a backdrop of enforcement. Unfortunately, the trend is towards individual countries developing their own standards and approval procedures rather than referencing international standards such as Codex and the IFOAM Norms. Currently, over 40 countries have implemented legislation on organic agriculture and another 20 are in the process of drafting such rules. The subsequent requirement that other countries then demonstrate equivalence to the rules of the importing country is complex and slow and lacks accessibility and transparency. This adds unnecessary bureaucracy and cost to organic products. As a result, most certification bodies now run multiple programs to ensure that products are seen to comply with the many regulations that have been developed. In addition, many certification bodies are being evaluated by several authorities or accreditation bodies; which is further duplicating and increasing the cost of an already complicated system. Ultimately the expansion of organic agriculture and the spread of its benefits is diminished. There is another way.

### *A partnership with government*

IFOAM and the IOAS actively invite government involvement in the Accreditation Program and encourage them to use our expertise and services. Two or more duplicating accreditation systems across the world that do not relate to each other does not make sense. Together however, we can make a powerful team.

Currently, several country regulations require IFOAM Accreditation as their measure of equivalence for import approval. Other regulatory systems also use compliance reports prepared by the IOAS on accredited certification bodies. For instance, IOAS reports that specifically address equivalence with EU Regulation 2092/91, provide a basis for import authorizations issued by the Member State authorities. IOAS is also in discussion with several governments concerning sub-contracting certification body oversight to the IOAS and joint evaluations are already under way with three national accreditation bodies to reduce the burden of evaluation on certification bodies. Within the IOAS organization itself, one Board member and one Accreditation Committee member are already from government structures. We understand governments' caution in working with a small private NGO but we believe it is just a matter of time before common sense prevails. International accreditation is the future.

### *From where does IOAS get its authority?*

The IOAS has not been given its authority; it has earned it.

Over a number of years IFOAM and the IOAS have worked hard to gain the respect of governments, certification bodies and the trade. This has culminated in August 2004 when the US Dept. of Commerce, National Institute of Standards and Technology announced their recognition of IOAS as judged against ISO61 (now ISO17011), with scope of IFOAM Norms and ISO65. Hereafter, IOAS is subject to ongoing surveillance by NIST.

### *What's involved in the accreditation process?*

Documentation from certification bodies is submitted for screening against the IFOAM requirements. Normally the screening will indicate required improvements which need to be rectified by the applicant. An evaluation visit is made by an IOAS evaluator, who then compiles a report. This report is assessed by the IOAS Accreditation Committee which makes the final accreditation decision. Accredited bodies are subject to continuous review through annual surveillance visits and complete re-evaluation every four years. Such surveillance includes office and operator visits and where relevant, visits to foreign offices and operators. The IOAS also has the power to investigate any complaints against an accredited certifier, wherever in the world the issue arises.

### *How can we demonstrate our accreditation?*

An accreditation list is published by the IOAS office and is available from the IOAS website and in publications. This is freely available and indicates details of accreditation scope and countries of activity. IOAS also publish an annual guide to all its accredited certification bodies. As IFOAM Accreditation is primarily a business-to-business guarantee, accredited certifiers are required to indicate on operator and product certificates to which products IFOAM Accreditation applies. Accredited certification bodies may make their status known on their letterheads, and their own publicity material such as web sites and business cards. Since 1999 IFOAM Accredited Certification Bodies have also been able to sublicense the use of the IFOAM Seal to operators. The Seal is the mark of organic integrity around the world and allows consumers to directly see on product packaging the mark of what is becoming the Global Organic Guarantee.

For a complete list of IFOAM Accredited certification bodies and applicants, please check [www.ioas.org](http://www.ioas.org)

For contact information please also refer to the IOAS website at [www.ioas.org](http://www.ioas.org). There you will find up to date contact information and information about the IOAS Board, the IOAS Accreditation Committee and the IOAS personnel.

## About IFOAM

IFOAM's mission is leading, uniting and assisting the organic movement in its full diversity. Our goal is the worldwide adoption of ecologically sound systems that are based on the Principles of Organic Agriculture.

Leading the organic movements worldwide, IFOAM implements the will of its broad based constituency - from farmers' organizations to multinational certification agencies, ensuring the credibility and longevity of organic agriculture as a means to ecological, economic and social sustainability.

Uniting the organic world, IFOAM provides platforms to stakeholders for a wide range of purposes. Through international conferences, committee meetings, and other forums, IFOAM facilitates the ongoing and constructive dialogue about the future and status of organic agriculture.

Assisting its membership, IFOAM implements specific projects that facilitate the adoption of organic agriculture, particularly in developing countries. IFOAM also represents the organic agriculture movements at United Nations and other intergovernmental agencies. IFOAM has observer status or is otherwise accredited by the following international institutions:

- *The Food and Agriculture Organization of the United Nations (FAO)*
- *United Nations Conference on Trade and Development (UNCTAD)*
- *Codex Alimentarius Commission (FAO & WHO)*
- *United Nations Environment Program (UNEP)*
- *The Organization for Economic Cooperation and Development (OECD)*

IFOAM's major aims and activities are:

- *To provide authoritative information about organic agriculture, and to promote its worldwide application.*
- *To exchange knowledge.*
- *To represent the organic movement at international policy making forums.*
- *To establish, maintain and regularly revise the international "IFOAM Basic Standards" as well as the "IFOAM Accreditation Criteria for Certifying Programs", published together as the*

*'IFOAM Norms.'*

- *To make an agreed international guarantee of organic quality a reality via the IFOAM Accreditation Program and Seal.*
- *To build a common agenda for all stakeholders in the organic sector, including producers, farm workers, consumers, the food industry, trade and society at large.*

The IFOAM General Assembly serves as the foundation of IFOAM. It elects the World Board for a three-year term. The World Board appoints members to official committees, working groups and task forces based upon the recommendation of the IFOAM membership. IFOAM member organizations also establish regional groups and sector specific interest groups. As of August 2005, IFOAM has 771 members - farmers groups and cooperatives, processors, trade firms, scientific organizations, consulting firms and certifiers - from 108 countries.

In order to achieve its mission and address the complexity of the various components of the organic agricultural movement worldwide, IFOAM has established official committees and groups with very specific purposes, from the development of standards to the facilitation of organic agriculture in developing countries.

In pursuing the mission, IFOAM acts in a fair, inclusive and participatory manner. IFOAM values the diversity of organic agriculture movements all over the world, and strives to be reliable and professional, open and accountable, and innovative towards challenges and opportunities, while demonstrating leadership and vision in its activities.

For further information, please visit [www.ifoam.org](http://www.ifoam.org) or contact the IFOAM Head Office:

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## IFOAM DIRECTORY 2006



The Directory of IFOAM Members and Associates includes a listing of over 700 IFOAM members and associates from 105 countries around the world. The directory is one of IFOAM's most popular publications, a useful and comprehensive reference tool.

To order a copy, visit IFOAM webshop at [www.ifoam.org](http://www.ifoam.org)