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1. General

This document describes the control measures to be followed by ETKO and the activities to be realized by the operator in order to realize the evaluation(inspection) and certification of the organic production and processing activities. An operator having certification successfully in accordance with this procedure is approved for their production operations and is permitted to make use of the relevant ETKO logo and make claims related to organic in its business.

1.1. Accessibility

ETKO services are equally accessible without discrimination to any interested operation whose activities fall within ETKO's field of operation.
ETKO works according to non-discriminatory policies and procedures, ensuring that no undue financial (e.g. with regard to the fee structure) or other conditions (such as the size of the applicant or membership of any association) are applied.
ETKO accepts inspection assignments regardless of whether they are for the entire processing chain, parts thereof, or single operators.

1.2. Commitment of the Operator

The operator shall comply with the requirements stated in this procedure and other ETKO documents as well as relevant legal and statutory documents and shall maintain all the records related to the production and processes in a satisfactory condition in order to receive and maintain the Certification.

ETKO operators shall:

- Establish, implement, and update annually an organic compliance plan;
- Permit on-site inspections with complete access to the production or handling operation, including no certified production and handling areas, structures, and offices;
- make all necessary arrangements for the conduct of the evaluation (inspection), including provision for examining documentation and access to all areas, records (including internal audit reports), and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;
- make claims regarding certification only in respect of the scope for which certification has been granted;
- not use the product certification in such a manner as to bring ETKO into disrepute and not make any statement regarding its product certification which ETKO may consider misleading or unauthorized;
- Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State official, the Standard owner, and the ETKO inspector access to such records during normal business hours for review and copying to determine compliance with the regulations;
- upon suspension or cancellation of certification, stop its use of all advertising matter that contains any reference thereto and returns any certification documents as required by ETKO ;
- use certification only to indicate that products are certified as being in conformity with specified standards;
- endeavor to ensure that no certificate or report nor any part thereof is used in a misleading manner in making reference to its product certification in communication media such as documents, brochures, or advertising, complies with the requirements of ETKO
- Submit the applicable fees charged on a time
- Immediately notify ETKO concerning any:
  -application including drift, of a prohibited substance to any production unit, site, facility, or the product that is part of an operation; and
  -change in a certified operation or any portion of a certified operation that may affect its compliance with the regulations.
- Applicant shall have documented policies and procedures for excluding products from organic sale if test results are more than the tolerances of the applicable production regulations.

2. Application

2.1. Application for Certification

The operator shall duly complete the application form with relevant documents required by ETKO and submit these including other information and documents ETKO required to ETKO during the application process. After that, the offer/cost estimate to submit to the operator is prepared based on the information submitted by the operator with the use of the certification program-specific application forms.

In case the offer/cost estimate is accepted by the operator, the operator's authorized contact personnel shall sign the necessary section of the offer/cost estimate and submit the offer/cost estimate back to the ETKO office. The operator shall also submit an official document proving that the authorization of the personnel is valid.

This offer/cost estimate, signed by the authorized personnel of the operator shall be valid as a contract between ETKO and its operator and is accepted as an instruction to commence the certification process. ETKO shall determine the schedule, after reviewing the documents available, for the activities to be followed.

ETKO provide certification services under EU Regulation 2018/848 for the following categories a,d and g. This procedure applies to any operator involved in activities, at any stage of production, preparation, distribution, labelling, placing on the market,imported into or exported from the Union relating to the mentioned product categories;

O A Unprocessed plant product; An unprocessed product without altering the initial product. (unprocessed products mean foodstuffs that have not undergone processing, and include products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen,or thawed)

O D Processed agricultural products for use as food; Any action that substantially alters the initial product (processed products means foodstuffs resulting from the processing of unprocessed products. These products may contain ingredients that are necessary for their manufacture or to give them specific characteristics.)

O G other products listed in Annex I of EU Regulation 2018/848 or not covered by the previous categories.
oETKO certifies listed products as Category g;

- essential oils,
- cotton, not carded or combed,
- plant-based traditional herbal preparations.

2.2. Application Package

The operator shall prepare an “Application Package” for the production systems and processes and submit it to ETKO within the appropriate time period.

Unless these documents and the original copy of the contract are submitted to the ETKO office, it is not possible to start the inspection procedures.

2.2.1. Content of Application Package
2.2.1.1. Rules for Input Approval

2.2.1.1.1. Allowed and Prohibited Materials

Operators using processing inputs as a part of their organic processing whose input must be approved by ETKO otherwise may not be used for organic processing. The inputs must be approved by an authority or by ETKO to be used for organic processing. In case of improper use of inputs, nonconformity is raised and operator is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

The overall principles of organic production are:
1).The principle of management of natural and biological processes which concerning management of natural and biological processes based on ecological systems of using natural resources, with application of methods that include:
-living organisms and mechanical production methods,
-plant production in the soil that respects the principles of sustainable exploitation in farming.
-the prohibition of use of genetically modified organisms and products that contain or are obtained from genetically modified organisms,
-production procedure based on risk assessment and use of the preventive measures when appropriate.

2).The principle of limited use of intermediate goods (external inputs), which refers to the restricted use of external inputs in organic production, where can be used:
-inputs from organic production,
-natural or naturally produced substances,
-low soluble mineral fertilizers.

3).The principle of strictly limited use of chemically synthesized inputs, which refers to strict restrictions on the use of synthesized inputs in organic agriculture, except:
-if appropriate management systems do not achieve satisfactory results,
-if the external inputs from point 2) of this Article are not available on the market,
-if the use of external inputs from point 2) of this Article have an unacceptable impact on the environment;"
-The principle of adaptation, which refers to adaptation of organic production methods to the regional and local climate, and agro ecological conditions, sanitary conditions and stages of development.

ETKO is responsible to carry out verification of additives used in the production and processing in accordance with 2018/848 EU Standard.

The supplier, source, nature and food grade of the input used for preparation of organic food will be verified by the inspector. Verification results will be recorded by the Inspector.

2.2.1.1.1.1. Authorisation of products and substances for use in organic production EU Regulation 2018/848 Article 24

Operators using processing inputs as a part of their organic processing whose input must be approved by ETKO otherwise may not be used for organic processing. The inputs must be approved by an authority or by ETKO to be used for organic processing. In case of improper use of inputs, nonconformity is raised and operator is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

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-inputs from organic production,
-natural or naturally produced substances,
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-if appropriate management systems do not achieve satisfactory results,
-if the external inputs from point 2) of this Article are not available on the market,
-if the use of external inputs from point 2) of this Article have an unacceptable impact on the environment;"
-The principle of adaptation, which refers to adaptation of organic production methods to the regional and local climate, and agro ecological conditions, sanitary conditions and stages of development.

ETKO is responsible to carry out verification of additives used in the production and processing in accordance with EU Regulation 2018/848.

The supplier, source, nature and food grade of the input used for preparation of organic food will be verified by the inspector. Verification results will be recorded by the Inspector.

COMMISSION IMPLEMENTING REGULATION (EU) 2021/1165 defines authorised certain products and substances for use in organic production and establishes their lists.

2.2.1.1.2. Propagation Material Approval

ETKO may grant allowance for the use of GMO free non organic seeds / planting stock by the organic producer under the specified conditions. The material applied for an approval must be either non-treated or treated only with allowed materials and methods by the applicable organic production regulations.
Following conditions apply:
a) where no variety of the species which the user wants to obtain is registered in the database if there is one;
b) where no supplier, meaning an operator who markets seed or seed potatoes to other operators, is able to deliver the seed or seed potatoes before sowing or planting in situations where the user has ordered the seed or seed potatoes in reasonable time;
c) where the variety which the user wants to obtain is not registered in the database (if there is one), and the user is able to demonstrate that none of the registered alternatives of the same species are appropriate and that the authorization therefore is significant for his production;
Operator must get the propagation material approved before planting.

2.2.1.1.2.1. Propagation Material Approval EU Reg 2018/848 Annex II Part 1, 1.8.5.2

ETKO may authorise operators in Turkey to use non-organic plant reproductive material in an organic production unit, when organic or in-conversion plant reproductive material or plant reproductive material authorised in accordance with regulation is not available in sufficient quality or quantity in the territory of the Turkey in which the operator is located, under the conditions laid down in points below;

- Non-organic plant reproductive material shall not be treated after harvest with plant protection products other than those authorised for the treatment of plant reproductive material in accordance with Article 24(1) of EU 2018/848 Regulation, unless chemical treatment has been prescribed in accordance with Regulation (EU) 2016/2031 for phytosanitary

purposes by the competent authorities of the Member State concerned for all varieties and heterogeneous material of a given species in the area in which the plant reproductive material is to be used.
Where the non-organic plant reproductive material treated with the prescribed chemical treatment referred to in the above paragraph is used, the parcel on which the treated plant reproductive material is growing shall be subject, where appropriate, to a conversion period as provided in points 1.7.3 and 1.7.4 of EU Reg 2018/848 Annex III Part 2.

- The authorisation to use non-organic plant reproductive material shall be obtained before the sowing or planting of the crop.
- The authorisation to use non-organic plant reproductive material shall be granted to individual users for one season at a time, ETKO responsible for authorisations shall list the quantities of the authorised plant reproductive material.
- Competent authorities shall not authorise the use of non-organic seedlings in the case of seedlings of species that have a cultivation cycle completed in one growing season, from the transplantation of the seedling to the first harvest of product.

2.2.1.1.3. Prohibited Methods and Substances

2.2.1.1.3.1. Genetically Modified Organisms - GMOs

Testing for the presence of Genetically Modified Organisms GMOs) in the Organic Material shall be carried out by ETKO based on a risk assessment. The risk assessment shall consider the type of organic crop and the prevalence of GMO varieties in the growing region.
Specific for cotton fibers: GMO testing shall be carried out at an early stage of the processing chain before ginning to ensure that sufficient DNA from the plant is available.

- All Organic Materials entering the supply chain shall have a Transaction Certificate (TC) issued by the Certification Body.

-Any products being sold as organic with a reference to “organic” on the label shall have the organic materials certified to the related regulation(s).

2.2.1.1.3.1.1 Genetically Modified Organisms - GMOs EU Regulation 2018/848 Article 11

GMOs, products produced from GMOs, and products produced by GMOs shall not be used in food or feed, or as food, feed, processing aids, plant protection products, fertilisers, soil conditioners, plant reproductive material, micro-organisms or animals in organic production.

For the purposes of the prohibition, with regard to GMOs and products produced from GMOs for food and feed, operators may rely on the labels of a product that have been affixed or provided pursuant to Directive 2001/18/EC, Regulation (EC) No 1829/2003 of the European Parliament and of the Council or Regulation (EC) No 1830/2003 of the European Parliament and of the Council or any accompanying document provided pursuant thereto.

Operators may assume that no GMOs and no products produced from GMOs have been used in the manufacture of purchased food and feed where such products do not have a label affixed or provided, or are not accompanied by a document provided, unless they have obtained other information indicating that the labelling of the products concerned is not in conformity with those legal acts.

For the purposes of the prohibition, with regard to products not covered above, operators using non-organic products purchased from third parties shall require the vendor to confirm that those products are not produced from GMOs or produced by GMOs.

Testing for the presence of Genetically Modified Organisms GMOs) in the Organic Material shall be carried out by ETKO based on a risk assessment. The risk assessment shall consider the type of organic crop and the prevalence of GMO varieties in the growing region.

Specific for cotton fibers: GMO testing shall be carried out at an early stage of the processing chain before ginning to ensure that sufficient DNA from the plant is available.
- All Organic Materials entering the supply chain shall have a Transaction Certificate (TC) issued by the Certification Body.

-Any products being sold as organic with a reference to “organic” on the label shall have the organic materials certified to the related regulation(s).

2.2.1.1.3.2. Ionizing Radiation
Ionizing radiation is not allowed

2.2.1.1.3.2.1 Ionising Radiation EU Reg 2018/848 Article 9(4)

Ionising radiation shall not be used in the treatment of organic food or feed, and in the treatment of raw materials used in organic food or feed.

2.2.1.1.3.3. Sewage Sludge
Sewage sludge is not allowed.

2.2.1.2. Application Package Content For Processing & Handling Operations

- An organic production or processing system plan
- The name of the person completing the application; the
- applicant's business name, address, and telephone
- number; and, if the applicant is a corporation, the name,
- address, and telephone number of the person authorized
- to act on behalf of the applicant
- The name(s) of any organic certifying agent(s) to which
- application has previously been made; the year(s) of
- application; the outcome of the application(s) submission,
- including, when available, a copy of any notification of
- non-compliance or denial of certification issued to the
- applicant; and a description of the actions taken by the
- applicant to correct the non-compliances noted in the
- notification of noncompliance, including evidence of such
- correction
- Location of premises where operations are carried out;
- Nature of operations and products;
- Undertaking contract by the operator to carry out the operation in accordance with the organic production rules as signing the Operator.
- Official company register document
- Official proof for authorized representative for signature.
- Site plan
- Process flow-charts
- A production plan including all details used to calculate estimated yields and production.
- Use of allowed, authorized processing inputs list and evidence of references for organic production (certificate, approval, content of the input etc.)
- Labels
- Traceability documents related to end product
- If valid GMO free declarations or similar evidences
- If valid quality system documents such as HACCP, GMP+, ISO and / or indicating Critical Organic Control Points.
- chain of custody documentation to verify inputs as being organically produced;
- details on the mechanics of the processing operation;
- Details on process management controls, including contamination prevention, pest management and sanitation's controls.
- Processing, packaging and/or marketing may take place at the production unit, where these activities are limited to its own agricultural produce will be regardless also inspected by ETKO.
- The application process is completed with the above mentioned information and documents supplied to ETKO

2.2.1.3. Application Package Content For Farming Operations

- A full description of the unit and/or premises and/or
- activity;
- All the practical measures to be taken at the level of the
- unit and/or premises and/or activity to ensure compliance
- with the organic production rules;
- The precautionary measures to be taken in order to reduce the risk of contamination by unauthorized products or substances and the cleaning measures to be taken in storage places and throughout the operator's production chain. Where appropriate, the description and measures provided may be part of a quality system as set up by the operator;
- The date on which the producer ceased to apply products not authorized for organic production on the parcels concerned with the "OP 01 F 28 Farm Production Report".
- Farm plot inventory production records from the three prior years for both the producer and for the hectare producing the crop seeking certification; "OP 01 F 28 Farm Production Report".
- Propagation material to be used including variety, quality, quantity, treatment, GMO Free declarations, approval letters, certificates for approval before seeding.
- Complete list of fertilizers, soil conditioners, compost activators,
- Any other type of mineral which may be used for any farm activities such as talk use for seeding equipment.
- Pest/disease/weed management strategies for the crops being produced;
- Estimated/realized harvest results

- Based on the risk appropriate separation of organic plots by a buffer zone from conventional neighbour plots or any other source of contamination.
- System set to separate harvest and handling of BZ affected crops from harvest up to marketing or distribution of the BZ crops.
- Post-harvest handling details
- Site plans of the farm facilities
- Maps of the plots including the Buffer Zone indications and precautionary measures taken against contamination for areas where risk is present.

2.2.1.4 Application package content for Products under Category g

- An organic production or processing system plan
- The name of the person completing the application; the
- applicant's business name, address, and telephone
- number; and, if the applicant is a corporation, the name,
- address, and telephone number of the person authorized
- Location of premises where operations are carried out;
- Nature of operations and products;
- Official company register document
- Official proof for authorized representative for signature.
- Site plan
- Process flow-charts
- Traceability documents related to end product
- If valid GMO free declarations or similar evidences
- If valid quality system documents such as HACCP, GMP+, ISO and / or indicating Critical Organic Control Points.
- chain of custody documentation to verify inputs as being organically produced;
- details on the mechanics of the processing operation;
- Details on process management controls, including contamination prevention, pest management and sanitation's controls.
- Processing, packaging and/or marketing may take place at the production unit, where these activities are limited to its own agricultural produce will be regardless also inspected by ETKO.
- A full description of the unit and/or premises and/or
- activity;
- All the practical measures to be taken at the level of the
- unit and/or premises and/or activity to ensure compliance
- with the organic production rules;
- The precautionary measures to be taken in order to reduce the risk of contamination by unauthorized products or substances and the cleaning measures to be taken in storage places and throughout the operator's production chain. Where appropriate, the description and measures provided may be part of a quality system as set up by the operator;
- The date on which the producer ceased to apply products not authorized for organic production on the parcels concerned with the "OP 01 F 28 Farm Production Report".
- Propagation material to be used including variety, quality, quantity, treatment, GMO Free declarations, approval letters, certificates for approval before seeding.

2.2.1.5. Application Package Content For Farm Operations in Post-Harvest Facilities

Regardless of whether they are originating from a specific farming operation or they are independent production processing, storage or handling facilities are also required to undergo inspection and certification. This package includes:

- chain of custody documentation to verify inputs as being organically grown,
- precautionary measures taken to separate buffer-zone crops and to keep records,
- details on the mechanics of the processing operation; risk of contamination possibilities,
- Details on process management controls, including contamination prevention from any sources such as use of inputs for production or handling for any purposes (processing aids for production, lubricants, talk, minerals for machinery, storages. Temporary use or reuse of packaging material etc.),
- equipment, tools and packing material, bags, boxes, containers, tanks etc,
- Pest management and sanitation's controls.

2.3. Application Package Review

The application materials received are reviewed to ensure that the application is complete as per ETKO procedures and other legal or statutory requirements by an ETKO staff who has got sufficient experience.
During the review, ETKO may request additional information for missing points or for clarification of the data already submitted by the operator. A report is prepared by ETKO following the review and is sent to the operator prior to the on-site inspection. The operator is expected to take corrective measures, prior to the on-site inspection, if any.

Also, the review includes the verification that an applicant who previously applied to another certifying agent and received a notification of noncompliance or denial of certification has submitted sufficient documentation to support the correction of any noncompliance identified in the notification of noncompliance or denial of certification.

It is determined whether the applicant complies with the relevant applicable requirements of the production and handling standards.

An on-site Inspection of the operation is scheduled to determine whether the applicant qualifies for certification if the review of application materials demonstrates that the production or handling operations are in compliance with the applicable requirements.

2.3.1. Handling Application in case No Prior Experience

ETKO will handle the applications according to its scopes, capacity, and experience within sufficient resources. ETKO denies the applications in case of lack of accreditation, expertise, and resources.

2.3.2. Omission of Activities from Inspection

If ETKO relies on certifications it has already granted to the client or has already granted to other clients, to omit any activities, then ETKO will reference the existing certification(s) in its records. If requested by the client, ETKO will provide justification for the omission of activities with its inspection reports. 7.3.5

2.3.3. Contract

Upon the acceptance of the application package and receiving the signed cost estimate, the contract is signed and a site visit is planned.
When ETKO decides to sign a contract with the applicant a unique ID number is provided to the applicant. Unique ID numbers cannot be used for any other operator at all times. It is unique for each applicant and issued subsequent numbers for each subcontracted producer/facility.

After signing contract, ETKO provides the translation of the production rules and control measures set out in Regulation (EU) 2018/848, and the delegated and implementing acts adopted pursuant to it in languages that are understandable for the contracted operators. (EU) Com Del Reg 2021/1698 Article 1.2.e Also, if any Commission implemented regulation or commission delegated act published, or new production rules updates, ETKO give an information about these acts and provide translations in operator's language of them.

Following the contract, ETKO proceeds to the further phases of the certification process.

3. Inspection Process

3.1. Operator's Preparation

Prior to the scheduled Inspection, the applicant is expected to have organized all of the records, which documents that, the commodities and / or processes under review are certifiable as organic.

The applicant's co-operation in completing all of the forms, providing thorough and proper documentation, and being prepared, train the personnel involved for production of the requirements of the regulation, will greatly contribute to the timely and cost effective completion of the entire certification process.

Operator shall have the relevant handling system plan in place including records and documents mentioned above for onsite inspection.

Provide sufficient information to inspectors, proving that production processes comply with the relevant requirements.
Ensure access to the facilities, records, and personnel enabling the inspectors satisfactorily verify that organic production systems and processes are maintained.

Provide assigned/authorized qualified staff members to accompany inspectors during the entire inspection.

Cooperate to resolve the nonconformity and initiate the corrective action.

3.2 Authorized Representative

Operators must assign an authorized representative person who is knowledgeable about the operation and responsible for the organic operation. All on-site Inspections are conducted when the authorized representative is present.
The staff involved with organic production may be interviewed during the audit to validate the status of the production practices applied to the organic product.

3.3. Subcontractors

3.3.1 Subcontractors EU Reg. 2018/848 Article 34(3)

Where operators or groups of operators subcontract any of their activities to third parties, both the operators or groups of operators and the third parties to whom those activities have been subcontracted shall comply with paragraph 1 of EU Reg 2018/848 Article 34, unless the operator or group of operators has declared in the notification referred to in paragraph 1
that it remains responsible as regards organic production and that it has not transferred that responsibility to the subcontractor. In such cases, ETKO shall verify that the subcontracted activities comply with this Regulation, in the context of the control it carries out on the operators or groups of operators that have subcontracted their activities.

ETKO evaluation procedures and policies will apply the same to subcontracted units which the operator is working with. This is undertaken by the client with the ETKO contract.
Prior to placing any products on the market as 'organic' or as 'in- conversion' or prior to the conversion period, operators and groups of operators referred to in Article 36 of EU Reg 2018/848 which produce, prepare, distribute or store organic or in-conversion products, which import such products from a third country or export such products to a third country, or which place such products on the market, shall notify their activity to the competent authorities of the Member State in which it is carried out and in which their undertaking is subject to the control system. EU Reg 2018/848 Article 34(1)

Operators, groups of operators and subcontractors shall keep records in accordance with this Regulation on the different activities they engage in. EU Reg 2018/848 Article 34(5)

3.4. Audit Planning

3.4.1 Annual Plan

The annual plan is prepared by the 31st of December of each year. And inspections are carried out according to this plan, as appropriate.7.4.1.
All existing operators to be listed in the plan, as well as new coming operators who passed through the application review and signed the contract. List of operators are always updated when there is a new operator contracted or existing operators excluded or sanctioned. Results from risk assessment are fed into the plan thus ensuring the higher risk operations are planned for additional controls. Where split operations are in question contamination and commingling of the certified products are always possible therefore to be indicated as high risk. Observed cases where the risk assessment resulted in sampling and/or additional inspections are also included in the annual plan.

3.4.1.1 Frequency of Inspection EU Reg 2018/848 Article 38

Annual Inspection are realised once a year covering all operations. ETKO will carry out at least once a year a physical inspection of all operators including all handling and processing sites and production fields. Equipment used for seeding, planting, spraying, harvesting, fertilizing, inputs, packing material, transporting, processing, documentary accounts, financial records.

Minimum 10 % of all official controls of operators or groups of operators shall be carried out without prior notice every year;
Minimum 10 % of additional controls to those referred to in Article 38(3) of Regulation (EU) 2018/848 shall be carried out every year;
Minimum 5 % of the operators that are members of a group of operators, but not less than 10 members, shall be subject to re-inspection every year.
Where the group of operators has 10 members or less, all members shall be controlled in connection with the verification of compliance referred to in Article 38(3) of Regulation (EU) 2018/848.

Inspections are planned on the basis of risk assessment. The risk analysis procedure is designed in such a way that:
the result of the risk analysis provides the basis for determining the intensity of the unannounced or announced annual controls and visits;

the selection of operators to be submitted to unannounced controls and visits is determined on the basis of the risk analysis and that these are planned according to the level of risk.

The inspection in organic production can be performed several times in one year, based on critical control points for each individual producer that are determined based on general assessment of risk of incompliance's to rules of organic production and taking into consideration previous controls, product quality and risk from mixing of organic products with products from conventional production.

The staffs of ETKO has sufficient knowledge, including knowledge of the risk elements affecting the organic status of products, qualifications, training and experience with respect to organic production in general and with the relevant EU rules in particular and appropriate rules on rotation of inspectors are in force.

ETKO will determine additional controls also for situations where epidemic, natural disasters affecting the organic production may occur. ETKO will take necessary measures accordingly in case of any violation of the rules detected.

3.4.1.2.1 Unannounced Inspection [848]

Of all physical on-the-spot inspections carried out by the control authority or control body, at least 10 % shall be without prior notice.

For the high-risk products, ETKO shall carry out, at least, two physical on-the-spot inspections per year of operators or groups of operators. One of these physical on-the-spot inspections shall be without prior notice. [EU Commission Delegated Regulation 2021/1698 Article 9(5) and (8)]

ETKO will select the operators for unannounced inspection based on the risk assessment results from the previous inspection.

Unannounced inspections are not notified to the operators, however in cases where it is not possible to conduct an unannounced inspection (e.g. for reasons related to site access or any other factors supported by a justification), advance notice may be given providing that this notice period does not allow time to cover up non-compliances that might exist.

Unannounced inspections may be limited in scope and may cover only certain aspects of the operation.

The operators chosen for unannounced inspections may be random, risk based, or as a result of a complaint or investigation.

ETKO is not obliged to disclose to the operator the reason for the unannounced or additional inspection.

3.4.2 Detailed Inspection plan

The date for the inspection is determined mutually by ETKO and the operator.

Prior to the site inspection, the inspector in charge prepares an inspection plan which needs the approval of the person in charge for inspector assignment. The responsible for the assignment verify the plan and whether all critical elements of the inspection are included.
Critical points might be scope-specific therefore inspector and the responsible person for the assignment work together to check previous issues or pending non-compliances, and any risk areas that exist.

Both inspector and the responsible person for the assignment make sure that the regulation used for that specific inspection requirements will be covered during the inspection and evaluation process. Those requirements could be but are not limited to; inspection requirement of all production, processing, and handling sites as well as inputs, processing/handling aids, sanitation system, tools and equipment used, traceability and record keeping, input-output reconciliation, product segregation packing material, labeling, marketing arrangements, product flow from the production sites to the final buyer. Organic regulations require inspection of the non-certified part of the production, therefore plan includes when it is valid.

Inspection is realized at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the production and handling requirements can be observed.

3.4.3 Inspector Assignment

A scope-approved inspector is assigned by ETKO for inspection purposes. ETKO makes sure the inspector assigned has sufficient experience and qualification for the type of production and no conflict-of-interest issues.

In case the operator has objection to any one of the inspectors in charge, it is requested to inform ETKO management officially, together with valid and objective proof. In case ETKO management agrees, the personnel shall be replaced.

3.5. Control Visit (Inspection)

3.5.1 Control Visit (Inspection)

The inspection covers production, handling and processing practices, transport, storage, packing, labeling, sampling, testing of the products, evaluation of the documentation, and record-keeping related to the production and marketing of the certified products.

In general, a regular audit covers the opening and closing meetings and production practices evaluation including transport, and storage.

- An opening meeting with the authorized personnel or management of the operator. The scope is confirmed, reporting method and how to deal with nonconformities are discussed. Responsible personnel of the operator shall be ready in the opening meeting. After the meeting a site visit is done.

- Assessment of the production / processing system by means of visits to production facilities and storage units which may also include visits to non-organic production and/or processing areas if there is reason for doing so;
- Review of records and accounts in order to verify flow of goods (input/output reconciliation, mass balance and traceability records) and on and off product statements.
- Identification of areas of risk to organic integrity;
- Verification of the operator's risk assessment of contamination and residue testing policy potentially including sample drawing for residue testing either as random sampling or in case of suspicion of contamination or non-compliance.
- Verification that changes to the standards and to related requirements have been effectively implemented; and
- Verification that corrective actions have been taken.

After the site visit;

- All the nonconformity, observations are discussed with the operator.
- All the findings are reported to the operator in the closing meeting.
- The inspection report are prepared and submitted to the operator.

On a farm that is certified for the first time, ETKO carries out the first inspection of each parcel before cultivation measures on that parcel in order to be able to certify the product listed in the "Ares(2023)8135116 Ltr to CB additional controls in 2024" by the end of the year 2024.
Ares(2023)8135116 Ltr to CB additional controls in 2024

3.5.1.1 Transition/Conversion Period for Agricultural Production Eu Reg 2018/848 Annex II Part I 1.7

For plants and plant products to be considered as organic products, the production rules laid down in this Regulation shall have been applied with respect to the parcels during a conversion period of at least two years before sowing, or, in the case of grassland or perennial forage, during a period of at least two years before its use as organic feed, or, in the case of perennial crops other than forage, during a period of at least three years before the first harvest of organic products. 1.7.1

Where the land or one or more parcels thereof have been contaminated with products or substances not authorised for use in organic production, the competent authority may decide to extend the conversion period for the land or parcels concerned beyond the period referred above.

In the case of treatment with a product or a substance not authorised for use in organic production, the competent authority shall require a new conversion period .

3.5.1.2 Split Operations, Parallel Production

3.5.1.2.1 Split Operations, Parallel Production EU Reg 2018/848 Article 9(7)

The holding may be split into clearly and effectively separated production units for organic, in-conversion and non-organic production, provided that for the non-organic production units:

(a) as regards livestock, different species are involved;
(b) as regards plants, different varieties that can be easily differentiated are involved.

In the case of perennial crops which require a cultivation period of at least three years, different varieties that cannot be easily differentiated, or the same varieties, may be involved, provided that the production in question is within the context of a conversion plan, and provided that the conversion of the last part of the area related to the production in question to organic production begins as soon as possible and is completed within a maximum of five years.

In such cases:
(a) the farmer shall notify ETKO, of the start of harvest of each of the products concerned at least 48 hours in advance;
(b) upon completion of the harvest, the farmer shall inform ETKO, of the exact quantities harvested from the units concerned and of the measures taken to separate the products;
(c) the conversion plan and the measures to be taken to ensure the effective and clear separation shall be confirmed each year by ETKO, after the start of the conversion plan.

The requirements concerning different species and varieties, shall not apply in the case of research and educational centres, plant nurseries, seed multipliers and breeding operations.

Where, in the cases referred above, not all production units of a holding are managed under organic production rules, the operators shall:

(a) keep the products used for the organic and in-conversion production units separate from those used for the non-organic production units;

(b) keep the products produced by the organic, in-conversion and non-organic production units separate from each other;
(c) keep adequate records to show the effective separation of the production units and of the products.

3.5.1.3 Control Visit (Inspection) Commission Delegated Reg. 2021/1698 Article 9

Controls performed by ETKO for the verification of compliance with Regulation (EU) 2018/848 by operators and groups of operators in TURKEY will include:

(a) the verification of the application of preventive and precautionary measures, at every stage of production, preparation and distribution;
(b) where the holding includes non-organic or in-conversion production units, the verification of the records and of the measures or procedures or arrangements in place to ensure the clear and effective separation between organic, in- conversion and non-organic production units as well as between the respective products produced by those units,
and of the substances and products used for organic, in-conversion and non-organic production units.

Such verification will include checks on parcels for which a previous period was recognised retroactively as part of the conversion period, and checks on the non-organic production units;

(c) where organic, in-conversion and non-organic products are collected simultaneously by operators, are prepared or stored in the same preparation unit, area or premises, or are transported to other operators or units, the verification of the records and of the measures, procedures or arrangements in place to ensure that operations are carried out separated by place or time, that suitable cleaning measures and measures to prevent substitution of products are implemented, that organic products and in-conversion products are identified at all times, that organic, in-conversion and non-organic products are stored, before and after the preparation operations, separated by place or time from each other, and that traceability of each lot from the individual land parcels to the collection centre has been ensured.

Controls by ETKO for the verification of compliance with Regulation (EU) 2018/848 shall be performed on all operators and groups of operators in third countries regularly, on a risk basis and with appropriate frequency, throughout the entire process at all stages of production, preparation and distribution on the basis of the likelihood of non-compliance.

All EU Regulation requirements for 2018/848 will apply mutatis mutandis to controls in respect of groups of operators in third countries.

ETKO will carry out a verification of compliance with Regulation (EU) 2018/848 for all operators and groups of operators at least once a year. The verification of compliance will include a physical on-the- spot inspection.

ETKO will ensure that it carries out every year at least 10 % of additional controls to those physical on-the spot inspection. Of all physical on-the-spot inspections carried out by ETKO, at least 10 % shall be without prior notice.

Controls carried out as a follow-up on a suspected or established non-compliance shall not count towards the additional controls referred to in paragraph above.

Every year, the control authority or control body shall re-inspect at least 5 % of the members of a group of operators, but not less than 10 members. Where the group of operators has 10 members or less, all members shall be re-inspected.

The physical on-the-spot inspection and the sampling shall be carried out by ETKO at the most appropriate times in order to verify compliance on critical control points.

For the high-risk products, ETKO will carry out, at least, two physical on-the-spot inspections per year of operators or groups of operators. One of these physical on-the-spot inspections shall be without prior notice.

Where operators or groups of operators run several production units or premises, including purchase and collection centres, all production units or premises, including purchase and collection centres, used for non-organic products shall also be subject to the control requirements. 2021/1698 Article 9

Control methods and techniques applied by ETKO regarding to EU Delegated Regulation 2021/1698 Article 11.

3.5.1.3.1. Plant production rules 2018/848 Annex II Part I

Organic crops, except those which are naturally grown in water, shall be produced in living soil, or in living soil mixed or fertilised with materials and products allowed in organic production, in connection with the subsoil and bedrock.
Hydroponic production, which is a method of growing plants which do not naturally grow in water with their

roots in a nutrient solution only or in an inert medium to which a nutrient solution is added, is prohibited. Derogations are detaily explained, placed Plant Production rules part of EU Reg. 2018/848.

For the production of plants and plant products other than plant reproductive material, only organic plant reproductive material shall be used. Derogations are explained in EU 2018/848 Plant Production Rule part and approval of non organic reproductive material are explained in 12.2 of this control measures.

3.5.1.3.1.1 Soil management and fertilisation

In organic plant production, tillage and cultivation practices shall be used that maintain or increase soil organic matter, enhance soil stability and soil biodiversity, and prevent soil compaction and soil erosion. Eu Reg 2018/848 Annex II Part I 1.9.1

The fertility and biological activity of the soil shall be maintained and increased:
(a) except in the case of grassland or perennial forage, by the use of multiannual crop rotation including mandatory leguminous crops as the main or cover crop for rotating crops and other green manure crops;
(b) in the case of greenhouses or perennial crops other than forage, by the use of short-term green manure crops and legumes as well as the use of plant diversity; and
(c) in all cases, by the application of livestock manure or organic matter, both preferably composted, from organic production. Eu Reg 2018/848 Annex II Part I 1.9.2

Only fertilisers and soil conditioners that have been authorised for use in organic production shall be used, and only to the extent necessary.

Preparations of micro-organisms may be used to improve the overall condition of the soil or to improve the availability of nutrients in the soil or in the crops. Eu Reg 2018/848 Annex II Part I 1.9.6

Operators shall keep records of the use of those products, including the date or dates on which each product was used, the name of the product, the amount applied and the crop and parcels concerned.

3.5.1.3.1.2 Pest and weed management

The prevention of damage caused by pests and weeds shall rely primarily on the protection by:
— natural enemies,
— the choice of species, varieties and heterogeneous material,
— crop rotation,
— cultivation techniques such as biofumigation, mechanical and physical methods, and
— thermal processes such as solarisation and, in the case of protected crops, shallow steam treatment of the soil (to a maximum depth of 10 cm).

Where plants cannot adequately be protected from pests by measures or in the case of an established threat to a crop, only products and substances authorised pursuant to Articles 9 and 24 of 2018/848 for use in organic production shall be used, and only to the extent necessary.
Operators shall keep records proving the need for the use of such products, including the date or dates on which each product was used, the name of the product, its active substances, the amount applied, the crop and parcels concerned, and the pest or disease to be controlled.

In relation to products and substances used in traps or in dispensers of products and substances other than pheromones, the traps or dispensers shall prevent the products and substances from being released into the environment and shall prevent contact between the products and substances and the crops being cultivated. All traps, including pheromone traps, shall be collected after use and shall be safely disposed of.

3.5.1.3.1.3 Products used for cleaning and disinfection

Only those products for cleaning and disinfection in plant production authorised pursuant to Article 24 Eu Reg 2018/848 for use in organic production shall be used for that purpose.

Operators shall keep records of the use of those products including the date or dates on which each product was used, the name of the product, its active substances, and the location of such use.

Plant production records shall be compiled in the form of a register and kept available to the control of ETKO or other authorities at all times at the premises of the holding. Operator may use “OP 01 F 28 Farm Production Report” form for this purpose.

Operators shall keep records regarding the parcels concerned and the amount of the harvest. In particular, operators shall keep records of any other external input used on each parcel and, where applicable, keep available documentary evidence on any derogation from production rules obtained.

3.5.2 Processed food production rules EU Reg 2018/848 Annex II Part IV

Operators that produce processed food shall comply, in particular, with the detailed production rules set out in Part IV of Annex II of EU Reg. 2018/848 and in any implementing acts.

Operators producing processed food shall establish and update appropriate procedures based on a systematic identification of critical processing steps.

Operators shall comply with and implement the procedures referred above, and shall in particular,:
(a) take precautionary measures and keep records of those measures;
(b) implement suitable cleaning measures, monitor their effectiveness
and keep records of those operations;
(c) guarantee that non-organic products are not placed on the market
with an indication referring to organic production.

In the processing of food, the following products and substances may be used:
* preparations of micro-organisms and food enzymes normally used in food processing, provided that food enzymes to be used as food additives have been authorised for use in organic production;
* substances and products defined in points (c) and (d)(i) of Article 3(2) of Regulation (EC) No 1334/2008 that have been labelled as natural flavouring substances or natural flavouring preparations in accordance with Article 16(2), (3) and (4) of 2018/848 EU Regulation;
* drinking water and organic or non-organic salt (with sodium chloride or potassium chloride as basic components) generally used in food processing;
* minerals (trace elements included), vitamins, amino acids and micronutrients (see Annex II Part IV 2.2.2.f of EU Reg 2018/848)

Only the products for cleaning and disinfection authorised for use in processing shall be used for that purpose.

Operators shall keep records of the use of those products, including the date or dates on which each product was used, the name of the product, its active substances and the location of such use.

For the purpose of the calculation referred to in Article 30(5) of EU Reg 2018/848, the following rules shall apply:

(a) certain food additives shall be calculated as agricultural ingredients;
(b) preparations and substances shall not be calculated as agricultural ingredients;
(c) yeast and yeast products shall be calculated as agricultural ingredients.

Operators shall keep records of any input used in the food production.
In case of production of composite products, complete recipes/ formulae showing the quantities of input and output shall be kept available for ETKO.

The processing facilities used for organic production including processing lines, stores, packing units, testing labs, must conform the requirement of the organic production regulation including local regulations. Incase a contradictory situation is present no application is done, if aplication is done it must be denied as explaining the reason of denial.

Detailed site plans and maps of the production facilities must be present.

For on-site Inspections of processing facilities, the inspector is required to:

Evaluate the process flow as described on the applicant's flow chart.

Verify traceability starting from the field up to the delivering to the next step of processes or to the buyer's gate by checking throughout the processing activities and records kept

Equipment being used for major processes as one of critical control points,

All ingredients added to the processed product, or

Pest and rodent management systems,

All inputs used in the maintenance and/or cleaning of the process equipment; and

Disposal of waste and other production process by products.

No unacceptable materials may be used in the cleaning, packaging or storing of a certifiable product.

The responsible person for these activities will be required to keep records regarding post-harvest handling operations. Failure to properly complete this portion of the certification process could be cause for denial of certification.

3.5.3. Small Holders Group Organizations

The projects containing several small farm holders may have an Internal Control System operating internal check of the producers to prepare them for certification. ICS

operation needs to be checked by the inspector according to “OP 02 Certification of Grower Groups”.

Following points shall be verified by ETKO Inspector(s) to ensure that the client operates the internal controlling system effectively. The observations are recorded on related audit documents.

Existence of internal controlling system documentation such as ICS procedure, description of duties and responsibilities of the personnel, legal status, and contract signed between project and ICS.
Proper records kept as required by ICS, such as detailed maps indicating parcels, farmer agreements, internal Inspection reports including findings of the internal Inspections, exclusion of members and sanctions, farmer lists indicating internal and external Inspection dates.

Existence of properly trained independent internal controllers. ICS results are approved by different persons then the ICS controllers.

Farmer parcels shall be fully described in Inspection forms/reports. (Relating to the conventional parcels operated by the farmer and neighbours activities as potential source of contamination).
Maintenance of field records by individual farm members or by the project is a requirement of the certification and will be verified during Inspection.

3.5.3.1 Small Holders Group Organizations
Group of operators EU Regulation 2018/848 Article 36

A member of a group of operators shall register to only one group of operators for a given product, also where the operator is engaged in different activities related to that product.
The maximum size of a group of operators shall be 2 000 members. Commission Implementing Reg. 2021/279 Article 4

1. Each group of operators shall:
(a) only be composed of members who are farmers or operators that produce algae or aquaculture animals and who in addition may be engaged in processing, preparation or placing on the market of food or feed;
(b) only be composed of members:
(i) of which the individual certification cost represents more than 2 % of each member’s turnover or standard output of organic production and whose annual turnover of organic production is not more than EUR 25 000 or whose standard output of organic production is not more than EUR 15 000 per year; or
(ii) who have each holdings of maximum:
— five hectares,
— 0,5 hectares, in the case of greenhouses, or
— 15 hectares, exclusively in the case of permanent grassland;
(c) be established in a Member State or a third country;
(d) have legal personality;
(e) only be composed of members whose production activities or possible additional activities referred to in point (a) take place in geographical proximity to each other in the same Member State or in the same third country;
(f) set up a joint marketing system for the products produced by the group; and
(g) establish a system for internal controls comprising a documented set of control activities and procedures in accordance with which an identified person or body is responsible for verifying compliance with this Regulation of each member of the group.

The system for internal controls (ICS) shall comprise documented procedures on:

(i) the registration of the members of the group;
(ii) the internal inspections, which include the annual internal physical on-the-spot inspections of each member of the group, and any additional risk-based inspections, in any case scheduled by the ICS manager and conducted by ICS inspectors;
(iii) the approval of new members in an existing group or, where appropriate, the approval of new production units or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report;
(iv) the training of the ICS inspectors, which is to take place at least annually and to be accompanied by an assessment of the knowledge acquired by the participants;
(v) the training of members of the group on the ICS procedures and the requirements of this Regulation;
(vi) the control of documents and records;
(vii) the measures in cases of non-compliance detected during the internal inspections, including their follow-up;
(viii) the internal traceability, which shows the origin of the products delivered in the joint marketing system of the group and allows the tracing of all products of all members throughout all stages, such as production, processing, preparation or placing on the market, including estimating and cross-checking the yields of each member of the group;

(h) appoint an ICS manager and one or more ICS inspectors who may be a member of the group. Their positions shall not be combined. The number of ICS inspectors shall be adequate and proportional in particular to the type, structure, size, products, activities

and output of organic production of the group. The ICS inspectors shall be competent with regard to the products and activities of the group.

2. ETKO, shall withdraw the certificate for the whole group where deficiencies in the set-up or functioning of the system for internal controls, in particular as regards failures to detect or address non-compliance by individual members of the group of operators, affect the integrity of organic and in-conversion products.

ICS operation needs to be checked by the inspector according to "OP 02 Certification of Grower Groups".

Documents and records of a Group of operators are detailed in Commission Implementing Regulation 2021/279 Article 5. ETKO inspector checks related documents and records during the control and assess the ICS efficiency.

3.5.4. Collection of Wild Crops

Collection of wild crops and parts thereof growing in natural habitats, forests and agricultural areas is considered as method of organic plant production provided that:
1).the areas have not been treated with products not allowed for use in organic production, in the period of at least three years prior to collection;
2).protection zone/belt is established near roads or other sources of pollution for the purpose of protection from contamination;
3).collection does not affect the stability of natural habitat or maintenance of species in collection zone;
4).collection is carried out in accordance with standard governing the protection of rare, endemic endangered plant species and unprotected plant species.

3.5.4.1. Collection of Wild Crops EU Reg 2018/848 Annex II Part I 2.2

The collection of wild plants and parts thereof growing naturally in natural areas, forests and agricultural areas is considered as organic production, provided that:

(a) for a period of at least three years before the collection, those areas were not treated with products or substances other than those authorised pursuant to Articles 9 and 24 for use in organic production;

(b) the collection does not affect the stability of the natural habitat or the maintenance of the species in the collection area.

Operators shall keep records of the period and location of the collection, the species concerned and the quantity of wild plants collected.

3.5.5. Sampling & Laboratory Analysis

When necessary and/or according to risk analyses, samples are taken random for laboratory testing. Samples might be taken without informing the operator. Risk analyses for sampling are done according to ETKO procedures.

Although, ETKO may take additional samples in accordance with the "Ares(2023)8135116 Ltr to CB additional controls in 2024" by the end of the year 2024.

Where ETKO has suspicion that products not authorized for organic production are used, ETKO will take and analyze samples of the products concerned. In such cases no minimum number of samples will apply.

Samples may also be taken and analyzed by ETKO in any other case for detecting non-compliance with the organic requirements.

Pesticide residue testing might be combined with soil, water and plant tissue analysis, where appropriate, forms an integral part of the ETKO certification procedures.

In the case of processed products, the finished product and appropriate facility control points are also tested.

Within the recognized boundaries of analytical limitations, ETKO may require from the operators or may realize the following basic tests:
1. Soil analyses for macronutrients, micronutrients and agronomic conditions.
2. Soil samples may be tested for pesticide residuals when required.
3. Raw commodity samples are tested for a broad spectrum of pesticide residues.
4. Processed product samples are also tested for a broad spectrum of pesticide residue.

In addition to these routine basic tests, ETKO may perform additional selective testing when circumstances and/or conditions deem such action to be appropriate. Most often these tests are selected from the broad range of chemicals, heavy metals, microbial contaminants and GMO or other health hazards.

Analyses are done by the laboratories accredited to ISO 17025. To provide compliance for ISO 17065 subcontracted laboratories must be accredited. ETKO

does not have his own laboratory for analyses purposes. Analyses done by the operator are important for decision making process for certification therefore ETKO requires clients realize testing at a minimum level.

Analyses results are communicated to the clients where the sample taken from. Analyses results affect the certification decision therefore maximum attention to be paid for having a representative sample for the lot. Sampling form is completed indicating product, quality, quantity and lot number.

3.5.5.1 Sampling & Laboratory Analysis Commission implementing Regulation 2021/279 Article 7

Minimum 5 % of the number of operators, shall be subject to sampling in accordance with Article 14(h) of Regulation (EU) 2017/625 every year;

Minimum 2 % of the members of each group of operators shall be subject to sampling in accordance with Article 14(h) of Regulation (EU) 2017/625 every year;

For the high-risk products ETKO shall take, in addition to the sampling rate mentioned above, at least one field sample of the crop each year. That sample shall be taken from crops in the field, at the most appropriate moment to detect potential use of non-authorised substances according to the assessment of ETKO. For operators not growing crops, a relevant sample of incoming raw material or intermediate product or processed product shall be taken. EU Commission Delegated Regulation 2021/1698 Article 12(4)

For consignments of high-risk products referred to in Article 8, the relevant control authority or control body shall carry out systematic physical checks and take at least one representative sample of each consignment. Moreover, the control authority or control body shall have complete documentation of the traceability of the operators or groups of operators and the product, including transport and commercial documents, including invoices. At the request of the Commission or the competent authority of a Member State, the control authority or control body shall send this traceability documentation as well as the results of the sampling analysis to the control authority or control body of the importer and to the competent authority of the Member State where the consignment is verified. EU Commission Delegated Regulation 2021/1698 Article 16(6)

When necessary and/or according to risk analyses, samples are taken random for laboratory testing. Samples might be taken without informing the operator. Risk analyses for sampling are done according to ETKO procedures.

Where ETKO has suspicion that products not authorized for organic production are used, ETKO will take and analyze samples of the products concerned. In such cases no minimum number of samples will apply.

Samples may also be taken and analyzed by ETKO in any other case for detecting non-compliance with the organic requirements.

Pesticide residue testing might be combined with soil, water and plant tissue analysis, where appropriate, forms an integral part of the ETKO certification procedures.

In the case of processed products, the finished product and appropriate facility control points are also tested.

Within the recognized boundaries of analytical limitations, ETKO may require from the operators or may realize the following basic tests:

1. Soil analyses for macronutrients, micronutrients and agronomic conditions.
2. Soil samples may be tested for pesticide residuals when required.
3. Raw commodity samples are tested for a broad spectrum of pesticide residues.
4. Processed product samples are also tested for a broad spectrum of pesticide residue.

In addition to these routine basic tests, ETKO may perform additional selective testing when circumstances and/or conditions deem such action to be appropriate. Most often these tests are selected from the broad range of chemicals, heavy metals, microbial contaminants and GMO or other health hazards.

Analyses are done by the laboratories accredited to ISO 17025. To provide compliance for ISO 17065 subcontracted laboratories must be accredited. ETKO does not have his own laboratory for analyses purposes. Analyses done by the operator are important for decision making process for certification therefore ETKO requires clients realize testing at a minimum level.

Analyses results are communicated to the clients where the sample taken from. Analyses results affect the certification decision therefore maximum attention to be paid for having a representative sample for the lot. Sampling form is completed indicating product, quality, quantity and lot number.

4. Certification

4.1 Review 7.5

ETKO assigns at least one person to review all information and results related to the evaluation. The review will be carried out by a person(s) who has not been involved in the evaluation process. 7.5.1
The reviewer competent to assess systems for internal controls (ICS) is assigned in order to verify the compliance of a group of operators. COMMISSION DELEGATED REGULATION (EU) 2021-771 Article 2.1
Recommendations for a certification decision based on the review will be documented unless the review and the certification decision are completed concurrently by the same person. 7.5.2
The review process is completed by the certifier and/or competent personnel assigned by the certifier as follows. In case competent personnel is assigned he/she must be always free from the Inspection of that specific operator. (7.5.2) competent personnel means at least a person who qualifies as an inspector for any certification program of ETKO. 7.5.1
Reviewer;
-Receive Inspection files from the inspector assigned
-Verifies the content of the file and clarifies missing information and/or documents
-Report the findings in Review Report form.
-Questions described by the review report must be addressed before a certification decision is taken.
-Reviewed file is forwarded to the certifier for a final decision.
The reviewed file includes

- Inspection Report
- Cleared Nonconformity Reports
- All the other records and reports as necessitated by relevant procedures and processes.

Prior to submitting the file to the Certifier, the reviewer duly checks all the Inspection reports and NCs detected according to the Catalogue of Measures.
Certifier grants or deny taking also into consideration the followings:

- The operator is in compliance with its organic system plan and all procedures;
- The activities of the operator's operation are in compliance with the appropriate regulations and ETKO procedures
- The operator is able to conduct operations in accordance with the plan

4.2. Certification Decision

As an independent body ETKO responsible for, and will retain authority for its decisions relating to certification.

The decision to certify a product will be taken if ETKO determines that all procedures and activities contained in the organic plan are in compliance with regulatory requirements and that the applicant is able to conduct operations in accordance with this plan and after the correction of all nonconformities.

This decision is valid until the results of the next annual evaluation are known and a new decision is made or unless ETKO is made aware of information to cause for action (e.g. suspension or withdrawal). This information can come from an external source or from the ETKO's own efforts.

Within a reasonable time after completion of the evaluation and the review of the evaluation results, ETKO proceeds for certification decision;

The scope of ETKO certification process is limited only to products and processes, which are directly controlled by the operator. Certification process does not cover the systems in which the products are not produced by the operator's own system and the processes not managed and controlled by operator's own system.

4.3. The Certificate 7.7.

The certificate specifies all pertinent information to properly identify the final product being certified, along with providing a special audit trail, which will allow one to trace the product back to its source. Information provided on the certificate identifies also the certified producer, product and dates for which the certificate is valid.

4.3.1 The Certificate EU Regulation 2018/848 Article 35

Upon successful completion of the certification process, an officially numbered certificate is issued by ETKO.

The certificate shall:
(a) be issued in electronic form wherever possible;
(b) allow at least the identification of the operator or group of operators including the list of the members, the category of products covered by the certificate and its period of validity;
(c) certify that the notified activity complies with the Regulation; and
(d) be issued in accordance with the model set out in Annex VI of EU Reg 2018/848.

An operator or a group of operators shall not be entitled to obtain a certificate from more than one control body in relation to activities carried out in the same Member State regarding the same category of products, including cases in which that operator or group of operators operates at different stages of production, preparation and distribution.

Members of a group of operators shall not be entitled to obtain an individual certificate for any of the activities covered by the certification of the group of operators to which they belong.

5. Surveillance (Maintenance of Approval for Certification)

Maintenance of certificate depends on the operator's performance to comply with the relevant requirements of standards and statutory documents. ETKO shall ensure the compliance with planned surveillance visit.

The operators are regularly re-evaluated in order to verify that they maintain their system in compliance with the standard and that the corrective actions are implemented effectively.

The operator shall maintain compliance to relevant regulations requirements to ensure the maintenance of its certificate. NCR reported during the surveillance inspections will be evaluated after corrective actions.

Also, to close major non-conformities a follow up inspection may be required within the target date described.

In this case ETKO will assign an inspector to follow up the NCR issued to operator and corrective actions taken by the operator. ETKO will evaluate over all activities and implementation done including preventive actions by the responsible person(s).

When applicable samples are taken, evidences by electronic means picture, video or documents for further evaluations in case needed

The non-conformities shall be closed in case of satisfying results are determined.
Resolutions for the minor non-conformities that are not critical for product integrity can be evaluated by a desk audit without site audit but still they are to be confirmed during the following inspection.

5.1. Certificate of Inspection & Transaction Certificate

It is important to verify it before trade arrangements done.
Verifying certification of the suppliers is possible from their certifier's website. Certifiers disclose their list of certified operators including type or range of products as well as the period of validity. In case any doubt remains operator to inform certifier of supplier and/or ETKO to follow up, if satisfactory answer not received eventually, ETKO will communicate to the certifier of the supplier and / or the competent authorities.
Records shall be maintained to enable the operator and ETKO to track the certified product as it moves through and between the different processing and/or marketing operations. Records are current, complete, accurate, easily auditable, and understood, and are held for at least five years by the operator.
The information that ETKO looks for and verifies includes:
-the identity of the certified inputs being supplied, the quantities, and the supplier of the inputs,
-the identity of the certified products being produced, the quantities, and the consignees or buyers of the outputs
-the relationship between the amounts of certified inputs and outputs

ETKO reviews the documents and amounts before issuing a TC, with all inputs accounted for through valid TCs. At a minimum ETKO checks against the written requirements of the Standard as applicable as well as:

- Copies of invoices/shipping documents and TCs for inputs that will be used to produce certified final products
- Amounts of stock on hand for inputs that will be used to produce certified final products
- Expected gain or loss during the production process (es)
- Amount of certified final product being shipped, and the amount being put into stock
- Copies of invoices/shipping documents and TCs for certified final products that are being sold

Also**, t**he certificate of inspection is issued by ETKO before the consignment leaves the third country of export or origin.

Although, ETKO may implement additional control measures for consignments in accordance with "Ares(2023)8135116 Ltr to CB additional controls in 2024" by the end of the year 2024.

5.2. Use of Logo 4.6.c

See GP 11 Use of Logo Licensees Mark of Conformity Procedure

6 Changes Affecting Certification 7.10

6.1. Changes in Regulations/Standards

When there are changes to the certification requirements affecting the certification system operators may be informed by the program owner or via ETKO. Any

important changes for ETKO's inspection notified to operators through ETKO website under section news. Eventually ETKO verifies adapting system changes by the operators during the inspections.
When explanations or interpretations of certification standards required it is prepared by the technical experts within the ETKO employees, committee members or hired independent experts related to the scheme in question. ETKO makes sure that this information will be formulated by relevant and impartial persons possessing the necessary technical competence such as agricultural experts for agriculture.

6.2 Changes Made by the Operator (Extend / Reduce Certification)

The operator may have changes in the production system. Any changes made to the operator's production system which has an ongoing certification process can affect the scope of certification.

Such changes may include the following but are not limited to:
-Adding a new subcontractor, changing or omitting an existing subcontractor, reducing or extending the scope of an existing subcontractor
-Any changes made to units, additional production lines, a new process, or partial or full renounce/surrender to certification
-Changes made to products, to the composition of existing products; adding new product(s) to production or partial or full renounce/surrender to certification of existing products
-Changes made to inputs to be used in production, adding a new product range to existing ones or omitting a new product range from existing ones. i.e. adding a new product range to the existing product list, etc.
Therefore;
-the operator must evaluate the changes to be made to the production method within the scope of the Regulations before carrying them into effect.
- Organic production system plan that the operator prepares must be updated and provided to ETKO.
- If needed, ETKO submits an on-site inspection plan to the operator following the assessment of the above-mentioned organic production system plan.
- If the change in question does not require an on-site inspection -i.e. changes not affecting the status and the content of the product in the production line, storages, site plan, or in case of producing different products by using the existing inputs such as producing through only a physical process like fruit aroma or puree produced in a unit for fruit concentration-, certification of such products may be managed through a remote audit.
-Operator ensures that they provide the necessary know-how, document, record, and drawings/pictures to enable ETKO to make decisions when the changes not requiring on-site inspections are subject to being included in or omitted from the certification scope. Such changes will be a part follow-up/unannounced inspection.
-All processes, products, and units undergoing changes are subjected to on-site inspection and assessment.
-Certification process will be completed following a favorable result of the on-site or remote audit and then, the operator may start organic production.
-When the certification procedure is completed successfully, the Scope Certificate will be renewed with a new revision number and the public database will be updated as appropriate.

7. Requirements of Operator Documentation-Processing & Handling 889.30-35.

7.1. Collection of Products and Transport to Preparation Units EU Reg. 2018/848 Annex III 1

Operators may carry out simultaneous collection of organic, in-conversion and non-organic products, only where appropriate measures are taken to prevent any possible mixture or exchange with organic, in-conversion and nonorganic products and to ensure the identification of the organic products.

The operator shall keep the information relating to collection days, hours, circuit and date and time of reception of the products available to ETKO.

7.2. Packaging and Transport of Products to Other Operators or Units EU Reg 2018/848 Annex III 2

1. Operators shall ensure that organic products and in-conversion products are transported to other operators or units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner containers or vehicles closed in such a manner that alteration, including substitution, of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by Union law:

(a) The name and address of the operator and, where different, of the owner or seller of the product;

(b) The name of the product

(c) The name and/or the code number of ETKO to which

the operator is subject; and

(d) Where relevant, the lot identification mark according to a marking system either approved at national level or agreed with ETKO and which permits to link the lot with the accounts referred to in Article 34(5) of EU Reg. 2018/848.

Operators shall ensure that compound feed authorised in organic production transported to other operators or holdings, including wholesalers and retailers, are provided with a label stating, in addition to any other indications required by Union law:
(a) the information provided in point 2.1.1 of Annex III of Reg 2018/848;
(b) where relevant, by weight of dry matter:
(i) the total percentage of organic feed materials;
(ii) the total percentage of in-conversion feed materials;
(iii) the total percentage of feed materials not covered by points (i) and (ii);
(iv) the total percentage of feed of agricultural origin;

(c) where relevant, the names of organic feed materials;
(d) where relevant, the names of in-conversion feed materials; and
(e) for compound feed that cannot be labelled in accordance with Article 30(6) of EU Reg. 2018/848, the indication that such feed may be used in organic production in accordance with this Regulation.

7.3 Reception of Products from Other Units and Other Operators EU Reg. Annex III 5

On receipt of an organic or in-conversion product, the operator shall check the closing of the packaging, container or vehicle where it is required and the presence of the indications provided for in Section 20.2.

The operator shall cross-check the information on the label referred to in Section 20.2 with the information on the accompanying documents. The result of those verifications shall be explicitly mentioned in the records referred to in Article 34(5).

7.4 Storage of Products EU Reg. 2018/848 Annex III 7

1. Areas for the storage of products shall be managed in such a way as to ensure identification of lots and to avoid any mixing or contamination with products or substances not in compliance with the organic production rules. Organic and in-conversion products shall be clearly identifiable at all times.
2. No input products or substances other than those authorised pursuant to Articles 9 and 24 of EU Reg. 2018/848 for use in organic production shall be stored in organic or in-conversion plant and livestock production units.
3. Allopathic veterinary medicinal products, including antibiotics, may be stored in agricultural and aquaculture holdings provided that they have been prescribed by a veterinarian in connection with the treatment referred to in points 1.5.2.2 of Part II and 3.1.4.2(a) of Part III of Annex II, that they are stored in a supervised location and that they are entered in the records referred to in Article 34(5).
4. Where operators handle organic, or in-conversion or non-organic products in any combination and the organic or in-conversion products are stored in storage facilities in which also other agricultural products or foodstuffs are stored:
(a) the organic or in-conversion products shall be kept separate from the other agricultural products or foodstuffs;
(b) every measure shall be taken to ensure identification of consignments and to avoid mixtures or exchanges between organic, in-conversion and non-organic products;
(c) suitable cleaning measures, the effectiveness of which has been checked, shall have been carried out before the storage of organic or in-conversion products and the operators shall keep records of those operations.
5. Only the products for cleaning and disinfection authorised pursuant to Article 24 for use in organic production shall be used in storage facilities for that purpose.

7.5. Documentary Accounts

7.5.1 Documentary Accounts *Commission Delegated Ref2021/771*

1. The physical on-the-spot inspection pursuant to Article 38(3) of Regulation (EU) 2018/848 shall include a traceability check and a mass balance check of the operator or group of operators carried out by means of checks of documentary accounts.

2. ETKO perform the traceability and mass balance check according to the standard template documented in the written record referred to in Article 38(6) of Regulation (EU) 2018/848.
3. For the purpose of the traceability check and mass balance check, the selection of products, groups of products and period under verification shall be made on a risk basis.
4. The traceability check shall cover at least the following elements justified by appropriate documents including stock and financial records:

(a) the name and address of the supplier and, where different, of the owner or the seller, or the exporter of the products;
(b) the name and address of the consignee and, where different, of the buyer or importer of the products;
(c) the certificate of the supplier in accordance with Article 35(6) of Regulation (EU) 2018/848;
(d) the information referred to in point 2.1.1 of Annex III to Regulation (EU) 2018/848;
(e) the appropriate lot identification.
5. Where relevant, the mass balance check shall cover at least the following elements justified by appropriate documents including stock and financial records:
(a) the nature and the quantities of products delivered to the unit and,
where relevant, of materials bought and the use of such materials, and, where relevant, the composition of products;
(b) the nature and the quantities of products held in storage at the premises;
(c) the nature and the quantities of the products that have left the unit of operator or group of operators to the consignee's premises or storage facilities;
(d) in case of operators who buy and sell the product(s) without physically handling the product(s), the nature and the quantities of products that have been bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees;
(e) the yield of the products obtained, collected or harvested over the previous year;
(f) the actual yield of the products obtained, collected or harvested over the current year;
(g) the number and/or weight in case of livestock managed over the current and previous year;
(h) any losses, increase or decrease in quantity of products at any stage of production, preparation and distribution;
(i) organic or in-conversion products that are sold on the market as non-organic.

8. Appeal, Complaint, and Disputes Applied to ETKO

In case the operator wishes to raise objections to any decision of ETKO about certification, or in case of a dispute between the parties the appeal or corrective actions procedures shall be followed.
The operator shall apply to ETKO management formally in writing. More information is available "GP 05 Appeal, Complaint and Disputes" info letter. See www.etko.com.tr.

9. Disclosure of Information 4.6

ETKO maintains (through publications, electronic media or other means), and makes available on the website www.etko.com.tr, the following:

a) information about (or reference to) the certification scheme(s), including evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification;

b) a description of the means by which ETKO obtains financial support and general information on the fees charged to applicants and to clients by TI 14 Fee Structure

c) a description of the rights and duties of applicants and clients, including requirements, restrictions or limitations on the use of ETKO's name and certification mark and on the ways of referring to the certification granted by GP 11 Use of Logo, Licences, Mark of Conformity;

d) information about procedures for handling complaints and appeals by GP 05 Appeal, Complaint and Disputes procedure.

10. Exchange of Information

Exchange of information between control authorities, control bodies and competent authorities

1. Where the operator and/or the subcontractors of that operator are checked by different control bodies, ETKO will exchange the relevant information on the operations under their control.

ETKO permits sharing of information upon request if justified by the necessity to guarantee that the products have been produced in accordance with the Applicable Regulation, and will exchange with other Inspection and competent authorities

2. Where operators and/or their subcontractors change their control body, the change will be notified without delay to the competent authority by ETKO.

ETKO will hand over the operators file including nonconformities to the new CB. When ETKO receives an applicant certified by a different CB with outstanding nonconformities then ETKO will make sure nonconformities are resolved before accepting applicant.

3. Where the operator withdraws from the control system, ETKO will, without delay, publish it on the website where the clients and sanctions are registered, also inform the related competent authority (ies) as required.

4. Where ETKO finds irregularities or infringements affecting the organic status of products, ETKO will inform the competent authority without delay. That competent authority may require, on its own initiative, also any other information on irregularities or infringements.

5. ETKO communicates the results of the controls carried out to the competent authority on a regular basis and whenever the competent authority so requests. If the results of the controls indicate non-compliance or point to the likelihood of non-compliance, ETKO will immediately inform the competent authority.

6. ETKO gives the competent authorities access to its offices and facilities and provide any information and assistance deemed necessary by the competent authorities for the fulfilment of the obligations assigned for.

In case of irregularities or infringements found with regard to products under the control of other control authorities or control bodies, ETKO will also inform those authorities or bodies without delay.

1-ETKO performs annual risk analysis according to TI 32 Risk Analyses Inspection Visit Agriculture& Livestock
2-Preparing a risk-based sampling strategy, conducting sampling and laboratory analysis according to the risk analyses done to the operators implementing OP 03 Testing procedure
3-Information exchange with other control bodies and with the competent authority according to 7.17 of this procedure;
4-Initial and follow-up controls of contracted operators are regulated according to the section 7.1 to 7.4 of this procedure;
5-The application and follow-up to the catalogue of measures to be applied in case of infringements or irregularities according to GP 15; Termination, Reduction, Suspension or Withdrawal of Certification
6-Observing the requirements of the protection of personal data for the operators under its control with GP 08 Confidentiality & Conflict of Interest procedure.

10.1 Exchange of Information EU Reg 2018/848 Article 43

Exchange of information between control authorities, control bodies and competent authorities

1. Competent authorities shall immediately share information with other competent authorities, as well as with the Commission, on any suspicion of non–compliance that affects the integrity of organic or in-conversion products.
Competent authorities shall share that information with other competent authorities and the Commission via a computer system that enables the electronic exchanges of documents and information made available by the Commission.

2. In cases where suspected or established non-compliance has been identified with regard to products under the control of other control authorities or control bodies, control authorities and control bodies shall immediately inform those other control authorities or control bodies.

3. ETKO shall exchange other relevant information with other control authorities and control bodies.

4. Upon receiving a request for information that is justified by the need to guarantee that a product has been produced in accordance with this Regulation, ETKO shall exchange with other competent authorities, as well as with the Commission, information on the results of own controls.

5. Competent authorities shall exchange information on the supervision of the control bodies with national accreditation bodies.

6. Competent authorities shall take appropriate measures and establish documented procedures in order to ensure that information about the results of controls is communicated to the paying agency in accordance with its needs and the acts adopted on the basis of that Article.

7. The Commission may adopt implementing acts to specify the information to be provided by the competent authorities, control authorities and control bodies in charge of the official controls and other official activities in accordance with this Article, the relevant recipients of that information and the procedures in accordance with which this information is to be provided, including the functionalities of the computer system.
Commission Delegated Regulation 2021/1698 Article 20 and Article 21 explain detaily the case of exchange of information.