

1. General

This document describes the procedure to be followed by ETKO and the activities to be realized by the operator in order to realize the evaluation and certification of the Organic Food, Feed, and crops. Operator having a certificate successfully in accordance with this procedure is approved for its production operations and is permitted to make use of relevant ETKO logo in its business.

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 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.

Reference Standards to ETKO certification programs are NOP Regulations and handbook.

Applicants can download the regulations and/or handbook from ETKO website section NOP Standard www.etko.com.tr.

When there are changes to the certification requirements affecting the certification system operators are informed by ETKO. Any important changes for ETKO’s inspection notified operators through ETKO website under section news. Additionally, operators are informed by email correspondence. Eventually, ETKO verifies adapting system changes by the operators during the inspections. When explanations or interpretations of certification standards are required it is prepared by the technical experts within the ETKO employees, impartiality 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.

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 Certificate.

The scope of ETKO certification process is limited only to products and processes, which are directly controlled by the operator. The 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 the operator’s own system.

ETKO operators shall:

- Comply with NOP standards and Handbook.
- 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 inspection, including provision for examining documentation and access to all areas, records (including internal audit reports), and personnel for the purposes of inspection (e.g. sampling, initial inspection, surveillance, unannounced inspection) 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 does 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 applicable State official and 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 the time
- Immediately notify ETKO concerning any:
 - Application, including drift, of a prohibited substance to any production unit, site, facility, or product that is part of an operation; and

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- Change in a certified operation or any portion of a certified operation that may affect its compliance with the regulations.

All applicants, upon request for certification, shall receive an application package, which includes fee structures, a copy of the applicable standard(s), required documentation, and other information deemed pertinent to certification-

2. Application for certification and contract

The 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. The operator shall duly complete the application form and submit the original copy to ETKO.

ETKO shall prepare the cost estimate in accordance with the information gathered from the application file and include all the required details related to the services to be provided, including the quotation.

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

The date for the initial inspection shall be determined mutually by ETKO and the operator. The periods and dates for the surveillance visits shall be determined by ETKO to ensure the compliance of the system and the maintenance of the certificate. The visit dates shall be informed to the operator a reasonable time ago by ETKO.

2.1 Verify supplier certificates of conformity

ETKO certified operators shall verify the documentary evidence “Certificate of Conformity” of their suppliers appropriately to ensure that the document is genuine and issued by the certifier of the supplier. It is important to verify it before trade arrangements are 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 the certifier of the supplier and/or ETKO to follow up, if a satisfactory answer is not received

eventually, ETKO will communicate to the certifier of the supplier and/or USDA.

3. Documents required by ETKO for Application Package Review:

Following the contracting, 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 ETKO office, it is not possible to start with the inspection planning.

Application package review covers the information submitted in the Application Form and other documents sent by the operator will be reviewed. The aim of this review is to determine the present status of the operator’s system; its compliance level to the requirements and to estimate if the on-site inspections will result in certification at this phase.

At this phase, ETKO may request additional information for missing points or for clarification of the data already submitted by the operator. A report shall be prepared by ETKO following the review and be 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.

4. Content of Application Package

- 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 Certification Body(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 noncompliance 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
- Other information necessary to determine compliance with the regulations
- Applicant must have documented policies and procedures for excluding products from organic sale if test results are more than the tolerances of the applicable production regulations.

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- the operator shall notify the following information to ETKO
 - (a) Name and address of operator;
 - (b) Location of premises and, where appropriate, parcels (land register data) where operations are carried out;
 - (c) Nature of operations and products;
 - (d) Undertaking by the operator to carry out the operation in accordance with the organic production rules as signing the Operator. "Declaration of Operator"
 - (e) In the case of an agricultural holding, the date on which the producer ceased to apply products not authorized for organic production on the parcels concerned with the Farm Production Report OP 01 F 28:

The operator responsible shall notify any change in the description or of the measures in due time.

Each year, before the date indicated by ETKO, the operator should notify ETKO of its schedule of production of crop products, giving a breakdown by parcel. "Farm Production Report OP 01 F 28"

- Official company register document
- Official proof for the 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, the content of the input, etc..)
- Labels
- Traceability documents related to end product
- If valid GMO-free declarations or similar evidence
- 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 controls.
- Supplier list of materials and supplier verification method for verifying suppliers in the supply chain and organic status of agricultural products received, and to prevent organic fraud, as appropriate to the certified operation's activities, scope, and complexity

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.

➤ **For farming operations:**

A production system plan includes;

- Farm plot inventory production records from the three prior years for both the producer and for the hectare producing the crop seeking certification;
- Propagation material including variety, quality, quantity, treatment, GMO-Free declarations
- 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 neighbor plots or any other source of contamination.
- System set to separate harvest and handling of buffer zones affected crops from harvest up to marketing or distribution of the buffer zone 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.

Input Material Approval of ETKO

ETKO evaluate the inputs for the National Organic Program and decides them is able to used or not used in organic operations. ETKO accepts the inputs according to documents listed below;

- NOP Handbook 5034-1 Materials for Organic Crop Production,
- NOP Handbook 5023 Substances Used in Post-Harvest Handling of Organic Product
- § 205.601 Synthetic substances allowed for use in organic crop production.
- § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."
- § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic."
- ETKO checks EPA list 4 according to 205.601 (m) for approving the materials.

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- ETKO accept the OMRI listed inputs and WSDA listed inputs, and other attestation/confirmation letter that issued from another accredited certifying agent for NOP Regulation.

When ETKO reviews the inputs, also check following documents;

- NOP Handbook 5034-2 Appendix of Prohibited Materials for Organic Crop Production
- NOP Handbook 5034-3 Response to Comments Materials for Organic Crop Production
- NOP Handbook 5012 Approval of Liquid Fertilizers for Use in Organic Production
- NOP Handbook 5026 The Use of Chlorine Materials in Organic Production and Handling
- Policy Memorandum – 13-3 Synthetic Algicides, Disinfectants, and Sanitizers Allowed in Organic Crop Production

Parallel Production

A producer may run organic and non-organic production units in the same area:

a) in the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, provided the following conditions are met:

- i) the production in question forms part of a conversion plan in respect of which the producer gives a firm undertaking and which provides for the beginning of the conversion of the last part of the area concerned to organic production in the shortest possible period which may not, in any event, exceed a maximum of five years;
 - ii) appropriate measures have been taken to ensure the permanent separation of the products obtained from each unit concerned;
 - iii) ETKO must be notified of the harvest of each of the relevant products at least 48 hours in advance;
 - iv) upon completion of the harvest, the producer informs ETKO of the exact quantities harvested on the relevant units and of the measures applied to separate the products;
 - v) The conversion plan and the control measures approved by ETKO; this approval shall be confirmed each year after the start of the conversion plan;
- b) In the case of areas intended for agricultural research or formal education agreed by the competent authorities and-providing that the above-mentioned “a i – v” conditions are met.
- c) In the case of production of seed, vegetative propagating material, and transplants, providing that the conditions set out in point (a)(ii) (iii)(iv) and the relevant part of the point (v) are met;
- d) In the case of grassland exclusively used for grazing.

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 are 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 the 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 controls.

Application review consists of the following:

- A review to ensure that the application is complete as per ETKO procedures and other legal or statutory requirements.
- A determination of whether the applicant complies with the relevant applicable requirements of the production and handling standards;
- Verification that an applicant who previously applied to another Certification Body and received a notification of noncompliance or denial of certification has submitted documentation to support the correction of any noncompliance’s identified in the notification of noncompliance or denial of certification; and
- The scheduling of an on-site inspection of the operation 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.
- A review of the application materials received and communication of the findings to the applicant.

Contract

Upon the acceptance of the application package contract is signed and a site visit is planned. The contract is signed after the application package review procedure is finalized and the cost estimate must be confirmed. It is essential that the applicant fulfills the requirement of the application and complete the operation file with all components for Inspection. When the application package is completed, a contract is signed between ETKO and the

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applicant, clarifying the processes, producers, products, addresses, and fee structure.

Preparation by Operator:

- 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 the production of the requirements of the regulation, will greatly contribute to the timely and cost-effective completion of the entire certification process. Applicant must have a complaint handling procedure in place related to complaints received from the customers, officials, and from any other sources
- Operator shall have the relevant handling system plan in place including records and documents mentioned above for inspection.
- Provide sufficient information to inspectors, proving that production processes comply with the relevant requirements.
- Ensure access to the facilities, records; personnel enabling the inspectors satisfactorily verify that organic production systems and processes are maintained.
- Results of own quality assurance program
- Cooperate to resolve the nonconformity and initiate the corrective action.

5. Site Inspection

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.

Inspection plan: 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 should verify the plan 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 checking previous issues or pending non-compliances, any risk areas exist.

Both inspector and the responsible person for the assignment make sure that the NOP Regulations and Handbook 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 the plan should include when it is valid.

Objection for assigned inspector: 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.

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

The inspection shall be conducted according to ETKO procedures and covers the following:

- An opening meeting with the authorized personnel or management of the operator. The scope shall be confirmed, reporting method and how to deal with nonconformities shall be discussed. Responsible personnel of operator shall be ready in opening meeting. After the meeting, a site visit should be done to evaluate the following.
- 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 the reason for doing so;
- Assessment of site plans including risk points where the contamination may occur.
- A complete site visit is obligatory which covers all sites used for production and handling activities.
- Use of inputs for production for any purposes (processing aids for production, lubricants, talk, minerals for machinery, storage. Temporary use or reuse of packaging material, etc.)
- Review of records and accounts in order to verify the flow of goods (input/output reconciliation and tracing back) 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

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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 that;

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

Farming operation-specific:

- Review of organic system plan including records and accounts of the farm and handling inputs used for the production of agricultural crops. Technical activities such as fertilization, crop rotation, harvest, irrigation, pest-disease, and weed management practices.
- Assessment of field maps including risk points where the contamination may occur.
- Buffer zone issues; separate harvesting and handling of buffer zone crops. Guaranteeing good separation and traceability of buffer zone crops from the field to the marketing.
- A complete field visit is obligatory which covers all fields used for production and handling activities.
- Use of inputs for handling operations for any purposes (processing aids for production, lubricants, talk, minerals for machinery, storage. Temporary use or reuse of packaging material, etc.)

Split Operations, Parallel Production

- In cases where agricultural producers carry out split operations the Inspector assigned for the Inspection will visually determine what is being planted in all cultivated fields within the production unit. Inspections of split operations will be carried out during the Inspection of the product (on-field) where certification is sought for. In case of doubt of high-risk contamination, a second Inspection may be carried out during the harvest period.

Producer group operation.

- Operator may be a producer, organized as a person, consisting of producer group members and production units in geographic proximity governed by an internal control system under one organic system plan and certification.
- Producer group production unit is a defined subgroup of producer group members in geographic proximity within a single producer group operation that use

shared practices and resources to produce similar agricultural products.

- The producer group operations need to have an internal control system that establishes and governs the review, monitoring, training, and inspection of the producer group operation, and the procurement and distribution of shared production and handling inputs and resources, to maintain compliance with the USDA organic regulations.

A producer group operation must: 205.400(g)

- (1) Be organized as a person;
- (2) Use centralized processing, distribution, and marketing facilities and systems;
- (3) Be organized into producer group production units;
- (4) Maintain an internal control system to implement the practices described in § 205.201(c) and ensure compliance with this part;
- (5) Ensure that all agricultural products sold, labeled, or represented as organic are produced only by producer group members using land and facilities within the certified operation;
- (6) Ensure that producer group members do not sell, label, or represent their agricultural products as organic outside of the producer group operation unless they are individually certified;
- (7) Report to ETKO, at least annually, the name and location of all producer group members and producer group production units, the agricultural products produced, estimated yields, and size of production areas;
- (8) Conduct internal inspections of each producer group member, at least annually, by internal inspectors with the member present, which must include mass-balance audits and reconciliation of each producer group member's and each producer group production unit's yield and group sales;
- (9) Implement recordkeeping requirements to ensure traceability from production at each producer group member and production unit through handling to sale and transport;
- (10) Implement procedures to ensure all production and handling by the producer group operation is compliant with the USDA organic regulations and the Act; and
- (11) Address any other terms or conditions determined by the Administrator to be necessary to enforce compliance with the USDA organic regulations and the Act.

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A producer group operation’s organic system plan will describe its internal control system. The description of the internal control system will: 205.201(c)

- (1) Define the organizational structure, roles, qualifications, and responsibilities of all personnel;
- (2) Identify producer group production units and locations;
- (3) Describe measures to protect against potential conflicts of interest and protect internal control system personnel from retribution;
- (4) Define geographic proximity criteria for producer group members and producer group production units;
- (5) Describe procedures for accepting new members into the producer group operation, including initial inspection and compliance determination;
- (6) Describe characteristics of high-risk producer group members and producer group production units;
- (7) Describe how shared resources, including production practices and inputs, are procured and provided to all producer group members and personnel;
- (8) Describe how training, education, and technical assistance is provided to producer group members and internal control system personnel;
- (9) Describe the system of records used to demonstrate compliance with this part, including traceability and mass balance audits; and
- (10) Describe how internal monitoring, surveillance, inspection, sanctions, and auditing are used to assess the compliance of all producer group members.

ETKO assesses the internal control system’s compliance, or ability to comply by reviewing the internal insoections. ICS system implementation will be verified by the qualified inspector according to OP 02 Certification of Grower Groups procedure.

ETKO conducts witness audits of internal control systems inspectors performing inspections of a producer group operation.

Individually inspect at least 1.4 times the square root or 2% of the total number of producer group members, whichever is higher. All producer group members determined to be high risk by ETKO is inspected. At least one producer group member in each producer group production unit is inspected. Also ETKO inspects each handling facility. 205.403(a)(2)

Genetically Modified Organisms - GMOs

Compliance with the organic standards entails that operations have verifiable practices in place to avoid contact with GMOs. Since organic certification is process-based, the presence of detectable GMO residues alone

does not necessarily constitute a violation of the regulation.

Laboratory Analysis

During the inspection, the inspector may take samples to be sent to an ISO 17025 accredited laboratory for pesticide analysis. The sampling method will be followed according to ETKO procedure and instruction. The inspector certainly will take a sample in case of suspicion of the product being inspected. Also, the operator must maintain GMO-free records for the seeds or for each additive that he intends to use for organic production. The operator is responsible to show GMO-Free documents to the ETKO inspector when asked upon. The ETKO inspector may take a sample from the organic seed to be analyzed.

Additional Evaluation Criteria

US-Canada Organic equivalency arrangement (USCOEA)

The United States has an equivalence arrangement with Canada. The equivalence arrangement grants USDA certified organic products access to Canada’s market and grants Canada Organic Regime (COR) certified organic products access to the U.S. market. Certified products can be labeled and sold as organic in both countries if the product meets the terms of the arrangement.

In order to be sold, labeled, or represented as organic in Canada, USDA organic products will meet the following additional requirements:

- Agricultural products produced with the use of sodium nitrate will not be sold or marketed as organic in Canada.
- Agricultural products produced by hydroponic or aeroponic production methods will not be sold or marketed as organic in Canada.
- Agricultural products derived from animals (with the exception of ruminants) will be produced according to livestock stocking rates as set out in the Canadian organic regulations, CAN /CGSB32.310-2006.
- The U.S.-Canada equivalence arrangement does not extend to the USDA recognition agreements with India, Israel and New Zealand. USDA organic products certified by India, Israel and New Zealand accredited certification bodies are for direct export to the U.S. only. See the Government of Canada website for more information.
- Aquatic plants are eligible for USDA organic certification under the crop standards (Policy

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Memo 12-1) and can be sold or marketed as organic in Canada.

ETKO checks these requirements in OSP and during inspection. If the requirements are met, ETKO will issue the certificate and it will include the following attestation statement:

“Certified in accordance with the terms of the U.S.-Canada Organic Equivalency Arrangement.”

6. Non-conformities & Corrective Actions

Nonconformity procedure is kept available for the access of the interested bodies. For further information please check TI-49-A Catalogue of Measures – NOP is available on ETKO website.

Grading non-conformities

Non-conformities are graded as Minor issue, Notice of NC and Major

While grading non-conformities the following conditions shall be considered:

6.1 Major Nonconformity:

These violations warrant a Notice of Proposed Suspension (NOPS) or, to applicants for organic certification, a denial of certification.

USDA - NOP distinguish between situations warranting a Proposed Suspension and those warranting a Combined Notice of Noncompliance and Proposed Suspension each other.

The most common reason for a NOPS is a failure by an operation to successfully rebut or correct violation(s) identified in a NONC within a prescribed time period.

6.2 Notice of Noncompliance

Violations that needed a NONC, do not indicate a systemic failure in OSP design or implementation, and therefore do not indicate that an operation is otherwise unable to produce or handle agricultural products in compliance with the USDA organic regulations.

Violations that fall into this category are correctable and a certifier is to allow time for their correction (§205.662(a)(3)).

6.3 Minor Issue

These types of violations require correction, but do not preclude certification and do not necessitate a Notice of Noncompliance (NONC).

Minor issues, whether found in operational practices or recordkeeping, indicate no systemic failure in the design or implementation of the organic system plan (OSP), they do not show an inability to comply with the USDA organic regulations.

Certification can be granted or continued before

correction, but correction must occur within a time period specified by ETKO.

6.4 Point of Attention

Apart from the Major NC, NONC and Minor issue, the points to be improved and similar cases are mentioned in the inspection report as “Point of Attention”. These have no direct effect on the certification decision.

All the nonconformity found and reported during the inspection shall be cleared (major NCR) or planned to be cleared (minor NCR) and the effectiveness of the action taken by the operator shall be verified by ETKO for issuing the Certificate.

There are three levels of corrective action to take by the operator:

- Corrective actions were taken during the site inspection. If this is the case the action taken is verified by the inspector and the non-conformity is reported to the certifier. Certifier evaluates and finds satisfactory evidence of the corrective actions; the non-compliance is closed and filed.
- Corrective actions related only to the documents. In this case, the operator shall send the relevant evidence of the action taken together with the duly filled nonconformity report. The NCR and the evidence for the action taken are reviewed by the certifier and if found satisfactory NCR is closed and filed.
- In all other cases the inspector makes a follow-up visit to the field again to verify the action taken and close the NCR (**NONC**) if the action is effective on a date. In this case, the duration of this visit is charged to the operator. Follow-up visits are not included in the contract and will be invoiced to the operator additionally.

The maximum permissible period for taking and verification of corrective action for **NONC** is 30 days and should be verified by ETKO. For, **Minor issue** corrective action plans are sent to ETKO within 30 days. In case the corrective action plans are approved by ETKO, their implementation is verified on the next inspection visit. In case allowed time periods for corrective actions are exceeded, the complete certification process shall be renewed. In case of renewal, the costs shall be charged on the inspection fees which are valid on that date.

6.3.1 Surveillance visit required for closing and implementation follow up NCs

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 on the

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NCR issued to the operator and corrective actions taken by the operator. Inspector will evaluate overall activities and implementation done including corrective actions with the responsible person(s). When applicable inspector takes samples, evidence by electronic means picture, video, or documents for further evaluations in case needed.

The non-conformity report shall be closed in case of satisfying consequences 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.

Non-conformities that are not closed on time shall result in further sanctions of suspension, revocation, and cancellation of the contract as explained in TI 49.

Monitoring the implementation of the non-compliances resolved to be done as follows:

ETKO will register the NCs in its database and classify the risk levels of the operators in line with the risk assessment procedure. According to that, unannounced inspections and sampling for analyses will be decided for which operators to be subjected. Selected operators will receive unannounced inspections particularly verifying the implementation of the previous NCs.

ETKO inspector(s) will take note in the review report before going on-site inspection to emphasize the resolutions of the previous NCs with the inspection plan in order not to forget verification of the resolutions. Findings will be recorded with the Noncompliance Register.

All operators who received NCs during the previous inspection will be assessed carefully if the implementation of the previous NCs were in place and effective since resolutions were reported. Inspector will pay attention to the implementation date of the resolutions from the record-keeping of the operator or interviewing the people involved.

Issues pending with the implementation of the NCs will be reported by the inspector and further sanctions will be implemented.

7. Use of Logo and Certificate

Certification decision could be taken by ETKO only when client passes inspection and review process successfully including financial obligations.

The certificate is valid through the issue date and the validity of the certificate continues until surrendered, suspended, or revoked.

The inspection realized for certification purposes does not preclude the operator from its legal responsibilities.

The operator has the right to demonstrate the certificate on his premises, in marketing, or in any advertising media. The certificate shows the scope of the certification, the status of the products, identifying relevant statutory requirements.

A guiding document is provided for the operator defining the rules to be followed in using the logo. The operator shall send its logo samples to ETKO for approval prior to use. ETKO shall control the use of the logo at its discretion and during the surveillance visits.

In case of improper use of logo, nonconformity is raised and the operator is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

ETKO maintains a list demonstrating the certificated operators. The list is open for public information on the website www.etko.com.tr

8. Maintenance of Certification.

Maintenance of certificate depends on the operator's performance to comply with the relevant requirements of NOP Regulations and Handbook. ETKO shall ensure the compliance with planned surveillance visits.

Surveillance visits are planned after the initial inspection preferably and are informed to operator a reasonable time ago it is conducted.

The periods for surveillance inspections are determined during the initial inspection. ETKO arranges and conduct an on-site inspection, to the certified operation at least once per calendar year. 205.406(b)

For continuation of the certification, a certified operation must annually pay the certification fees and submit the following information to ETKO:

- (1) A summary statement, supported by documentation, detailing any deviations from, changes to, modifications to, or other amendments made to the organic system plan submitted during the previous year;
- (2) Any additions or deletions to the previous year's organic system plan, intended to be undertaken in the coming year, detailed pursuant to § 205.201;
- (3) Any additions to or deletions from the information required pursuant to § 205.401(b); and
- (4) Other information as deemed necessary by ETKO to determine compliance with the Act and the regulations in

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this part. 205.406(a)

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

Unannounced Inspections; 205.403 (b)

ETKO, on an annual basis, conduct unannounced inspections of a minimum of five percent of the operations it certifies, rounded up to the nearest whole number.

ETKO is able to conduct unannounced inspections of any operation they certify and is not accept applications or continue certification with operations located in areas where they are unable to conduct unannounced inspections. 205.403 (b)

9. Changes in the Operator's System

The operator shall inform ETKO in case of change in the production system and processes (such as changes in location, additional units, name, shareholders, products...) in time, formally in writing. ETKO shall evaluate the effect of the changes on the certification and determine if a special surveillance inspection is required or not.

In case it is determined that a special surveillance visit is required until the special inspection visit is conducted, ETKO logo or any other document cannot be used by the operator and none of the products can be labeled as organic. The operator will be informed by ETKO.

In case it is determined that a special surveillance visit is required the time planning will be done by "ETKO Control Division" and charged to the operator on the fee stated in the contract following the visit.

In case there are changes limited to the production system and not effective on certification, or if there are changes in documentation, these shall be subject to review in the next inspection visit by the inspector.

NOTE: All the changes in the production and documents shall be kept by the operator for the inspector to be a reference.

10. Denial, Suspension, Surrender, and Revocation of the Certificate.

ETKO reserves its right to suspend, revoke, denial, or change the scope of the certificate during the certification period(reduction).

Suspension, revocation, denial, and reduction is caused by the operator:

- If the corrective actions are not taken as planned for the nonconformity found and reported, in a timely manner as mutually agreed by ETKO and operator.
- Postponing the surveillance inspection
- Not complying with the requirements of NOP Regulations and Handbook.
- Misuse ETKO Logo and certificate
- Not complying with the contract between ETKO and the operator
- Acting in a way harming ETKO's prestige in the sector or aiming to act so.
- Not paid fees in due time

In such cases, ETKO shall raise a nonconformity report to the operator and request corrective action in an acceptable time period. If the operator does not take corrective action on time ETKO shall suspend or revoke or deny the certificate; the operator shall return the certificate back to ETKO as determined also by the contract.

A certified operation or a person responsibly connected with an operation whose certification has been suspended may at any time, unless otherwise stated in the notification of suspension, submit a request to the Secretary for reinstatement of its certification, or submit a request for eligibility to be certified. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the Act and the regulations. 205.662(f)(1)

ETKO makes public its decision about the operator suspending, revoking, or denying the certificate. See www.etko.com.tr

In cases, the operator itself decides to stop the certification for any reason during the certification period, the operator may submit to ETKO the surrender form signed at any time.

11. Appeals and Complaints

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, Complaints, and Disputes Info Letter. See www.etko.com.tr.

12. Confidentiality

Except where national law or USDA requires, ETKO shall keep confidential and shall not disclose to third parties

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the information about the operator obtained during the contract and the certification process, unless the operator permits in writing not to do so.

The supplier shall be informed of the information provided when required by the law and that all other times that information not be disclosed without the consent of the supplier.

The operator accepts the verification and assessment activities of USDA by signing the contract with ETKO for certification services. No fee is charged for the assessment of accreditation bodies.

13. Postponing and Surrender

In cases the field inspection is postponed less than 2 weeks prior to the inspection date, ETKO charges %25 of the total inspection fee to the operator. This amount shall not be excluded from the total sum of the original inspection fee.

In case the contract is surrendered by the operator in any phase, ETKO shall charge to operator %25 of the fees of the services not realized yet plus all the expenses incurred already for the services provided.

14. Legal Aspects

In case of dispute, the parties shall apply to Trade Court of Izmir.

15. Handling of Appeals, Complaints and Disputes by Operator

The operator shall properly handle the appeals, complaints, and disputes received from its own operators. All the records related to such cases and relevant corrective actions shall be filed in an auditable manner and shall be kept open to the inspector during the inspections.

This file shall include the following:

- The statement of the nature of the received appeals, complaints, and disputes either by the operator or as recorded by the operator itself.
- The identity of the involved persons/groups that are in charge of the case solving and verifying.
- The statement of the root cause of the problem
- The action is taken or action plan to be taken
- Verification and documentation of the effectiveness of the initiated measures.

When there is appeals, complaints, and disputes situation received by ETKO, ETKO will act according to its Appeals, Complaints, and Dispute procedures (GP 15).

16. Extension and Renewal of Certification

The operators are regularly re-evaluated in order to verify that they maintain their system in compliance with the NOP Regulations and Handbook and that the corrective actions are implemented effectively. For the extension of the certification, the operator is required to renew the contract and start the application process. The certification is valid until surrender, suspended, denial, or revoked, but every year all inspection processes are to be completed.

17. Exchange of Information

Where an operator is certified by other Certification Bodies within the NOP scope before, ETKO will seek information exchange with the other Certification Bodies involved in the misuse of certificates.

ETKO may if necessary exchange information with other Certification Bodies to verify the authenticity of the information.

Where the operator and/or the subcontractors of that operator are checked by ETKO and a different certification body, ETKO will exchange the relevant information on the operations under its control.

ETKO will hand over the relevant elements of the inspection file of the operator concerned and the reports and non-conformities to the subsequent control body. In case ETKO accepts a new operator coming with non-conformities; ETKO will ensure that non-conformities noted in the report of the previous control body have been or are being addressed by the operator.

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