

# ECO A

## Production Standard and Control Measures

*[ according to Regulation (EC) No.1235/2008, Art.11, Paragraph 3(b) ]*

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# ECOA Production Standard and Control Measures

[ according to Regulation (EC) No.1235/2008, Art.11, Paragraph 3(b) ]

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Annex (A): Relevant annexes of EC 889/2008 in their latest updates:

- Annex I, fertilizers and soil conditioners referred to in article 3(1)
- Annex II, plant protection products referred in article 5(1) **(Updated)**
- Annex IV, Maximum number of animals per hectare as referred to in Article 15 (2)
- Annex VI, Feed Additives used in Animal Nutrition referred to in Article 22 (g), Article 24 (2) and Article 25 m(2) **(Not in ECOA Scope of Accreditation) (Updated)**
- Annex VII, Products for cleaning and disinfection referred to in Article 23 (4)
- Annex VIII, Certain products and substances for use in production of processed organic food referred to in Article 27 (1) (a): **(Updated)**
- Annex IX, Ingredients of agricultural origin which have not been produced organically referred to in Article 28
- Annex XI, (a) Organic logo of the EU, referred to in Article 57, (b) Code numbers referred to in Article 58
- Annex XII, Model of documentary evidence to the operator referred to in Article 29 (1) of Regulation (EC) No. 834/2007 referred to in Article 68 of this Regulation, (a) Model of complementary documentary evidence to the operator according to Article 29(1) of Regulation (EC) No 834/2007 referred to in Article 68(2) of this Regulation, (b) Entry referred to in the second subparagraph of Article 68(2):
- Annex XIII, Model of a vendor declaration referred to in Article 69
- Annex XIV, Products and substances used in farming and criteria for their authorisation (Ref: (EC) No. 834-Article 16)

- Annex XV: Criteria for certain products and substances in processing (Ref: (EC) No. 834-Article 21)

Annex (B): Standard Procedures of ECOA Quality Manual (available upon request)

Annex (C): ECOA Master list of documents (available upon request)

## 1- Introduction

*ECOA* inspects and certifies organic production in Egypt in full compliance with EC regulations 834/2007 & 889/2008.

The present document describes the production standards and control measures applied under the agricultural conditions of Egypt. Basically, it addresses specific points equivalent to EC regulations for production (834/2007) and control measures (889/2008) that were raised throughout the application of these regulations, as well as during the annual surveillance audits conducted by the accreditation body (DAkkS, Germany). The document is presenting and quotes as well the implementation rules & formats that are specifically documented in “The Standard Procedures” of “*ECOA* Quality Manual” (Annex A).

The document does not specifically intend to cover articles of full compliance with EC regulations 834/2007 & 889/2008, and reference should be given to these particular regulations. Bearing in mind that organic agriculture aim, concept, general principles are of international acceptance but with regional adaptations when implemented.

The purpose of the document is to satisfy the procedures for requesting inclusion of *ECOA* in the list of recognised control bodies and control authorities for the purpose of equivalence, according to Regulation (EC) No. 1235/2008 Art.11, paragraph 3(b).

## **II. Regulations**

### **Organic Agriculture: aim, scope, objectives, principles and definitions**

#### **1. Aim**

This Standard provides the basis for the sustainable development of organic production while ensuring the effective functioning of the market, fair competition, as well as consumer confidence and interests.

It summarizes common objectives and principles to support the rules, set out under EC 834/2007 in combination with 889/2008, concerning major stages of production, preparation and distribution of organic products and their control; and the use of labeling to organic production.

#### **2. Scope**

This Standard shall apply to the following products originating from agriculture where such products are placed on the local market or intended to be exported to the EU market:

1. live or unprocessed agricultural products.

(This includes as well vegetative propagating material and seeds.)

2. processed agricultural products for use as food

This Standard shall apply to any operator involved in activities, at any stage of production, preparation and distribution, relating to the products covered by ecoa scope of accreditation.

This Standard shall be applied within the framework of relevant national or international law concerning such products, such as provisions governing the production, preparation, marketing, labeling and control.

### **3. Objectives for organic production**

The following objectives and principles are not standards in themselves, as it is specifically outlined in EC regulations (EC 834/2007 and EC 889/2008) but shall be used as points of references.

Organic production shall pursue the following general objectives:

1. establish a sustainable management system for agriculture that:

- (a) respects nature's ecosystems, and preserve and enhances the health of soil, water, plants and animals and their natural balances.
- (b) supports the utmost of biological diversity.
- (c) ensures responsible/rational use of energy and the natural resources, e.g. soil, organic matter and air.
- (d) provides high animal welfare standards, in particular meets animals' species-specific behavioral needs.

2. aim at producing high quality products, wide variety of foods and other agricultural products to satisfy consumers' demand in view of their concerns about environment, welfare and health of humans, plants and animals.

### **4. Principles of organic production**

#### **4.1 Overall principles**

Organic production shall be based on the following principles:

1. The appropriate design and management of biological processes based on prevailing ecological systems and using existing natural resources. This is achieved through the use of living organisms and mechanical production methods, exclusion of GMO products, risk assessment, and the use of preventive measures.
2. The restriction of the use of external inputs. If not available but unavoidably needed, shall be limited to those originated from organic production, natural or naturally-derived substances, and low solubility mineral fertilizers.
3. The strict limitations of the use of chemically synthesized inputs. Permissions can be given in exceptional cases to use such external inputs where the appropriate management practices do not exist, unavailability in the market, and least impacts on the environment.
4. The adaptation of the rules of organic production, taking into account the sanitary status, regional differences in climate, local conditions and stages of development.

#### **4.2 Specific principles and general rules applicable to farming**

In addition to the overall principles, organic farming shall be based on the following specific principles and general rules:

##### **4.2.A. Specific Principles for organic farming**

1. The maintenance and enrichment of soil life and soil biofertility, soil conservation and biodiversity preventing and combating soil compaction and erosion; and the nourishing of plants primarily through the plant- soil ecosystem.
2. The minimization of the use of non-renewable resources and off-farm inputs.
3. The recycling of agro-wastes and by-products of plant and animal origin as inputs in agricultural production
4. Taking into account the local and/or regional ecological balance when taking production decisions.
5. The maintenance of plant health by preventative measures, e.g. the choice of appropriate species and varieties resistant to pests and diseases, appropriate crop



rotations, mechanical and physical methods and the protection of natural enemies of pests.

6. The practice of site-adapted and land-related livestock production; and the observance of a high level of animal welfare respecting species-specific needs.

7. The feeding of livestock with organic feed composed of agricultural ingredients from organic farming and of natural non-agricultural substances.

8. The application of animal husbandry practices, which enhance the immune system and strengthen the natural defense against diseases

#### **4.2.B. General farm production rules**

1. The entire holding shall be managed in compliance with the requirements applicable to organic production. Where not all units of a holding are used for organic production, the operator shall keep the land and products used for, or produced by, the organic units separate from those used for, or produced by, the non-organic units, and keep adequate records to show the separation.
2. Use tillage and other suitable agronomic practices to maintain and build up soil organic matter, biofertility, biodiversity, and avoid soil compaction and erosion.
3. Adopt crop rotations, including legumes and green manure crops. As well as the application of farmyard manure, dried farmyard manure and dehydrated poultry manure; composted animal excrements, including poultry manure, composted farmyard manure and liquid animal excrements. The total amount of livestock manure applied on the holding may not exceed 170 kg of nitrogen per year/hectare of agricultural area used. In this respect, organic-production holdings may establish written cooperation agreements exclusively with other holdings and enterprises which comply with the organic production rules.
4. Use of biodynamic preparations, if available.
5. Mineral nitrogen fertilizers are not allowed.
6. Use of authorized fertilizers and soil conditioners.
7. Agronomic practices used shall prevent or minimize contamination of the environment.

8. Pest disease and weed control shall rely principally on the use of natural enemies, suitable/tolerant species and varieties, crop rotation, and cultivation techniques.
9. The plant protection products are used only if authorized for organic production.
10. Organically-produced seeds and propagating material shall be used; the mother plant of either shall have been produced organically for at least one generation (annual crops) and two growing seasons (perennial crops).
11. Products for cleaning and disinfection shall be used only if authorized for use in organic production.
12. Wild plants, growing naturally, are considered organic provided not receiving any treatments with products other than those authorized for use in organic production, for a period of at least three years. And the collection does not affect the natural habitat and biodiversity.
13. Suitable preparations of micro-organisms (not GMO) may be used to improve the overall condition of the soil or the availability of nutrients in the soil or in the crops, and/or for the purpose of bio-control agents. Appropriate preparations of micro-organisms (or plant-based preparations) may be used for compost activation.
14. Plant production records shall be compiled in the form of a register and kept available to the ECOA at all times at the premises of the holding. Such records shall provide at least the following information: 1. For fertilizers, date of application, type and amount of fertilizer, parcels concerned; 2. For plant protection products, reason and date of treatment, type of product, method of treatment; 3. for purchase of farm inputs: date, type and amount of purchased product; 4. for harvest: date, type and amount of organic or in conversion crop production.

### **4.3 Specific principles applicable to processing of organic food**

In addition to the overall principles, the production of processed organic food shall be based on the following specific principles:

1. The production of organic food from organic agricultural ingredients, except where an ingredient is not available on the market in organic form.
2. The restriction of the use of food additives of non-organic ingredients with mainly technological and sensory functions and of micronutrients and processing aids, so that they are used to a minimum extent, and only in case of essential technological need or for particular nutritional purposes

3. The exclusion of substances and processing methods that might be misleading regarding the true nature of the product
4. The processing of food with care, preferably with the use of biological, mechanical and physical methods.

#### **4.4. General rules for processing of organic food**

1. The preparation of processed organic food shall be kept separate in time or space from non-organic food.
2. Substances and techniques that correct the results of negligence in the processing of food products or that otherwise may be misleading as to the true nature of these products shall not be used.

#### **4.4. A. Rules for the production of processed food**

1. Additives, processing aids and other substances and ingredients used for processing food or and any processing practice applied, such as smoking, shall respect the principles of good manufacturing practice.
2. Operators producing processed food shall establish and update appropriate procedures based on a systematic identification of critical processing steps.
3. The application of the procedures referred to above shall guarantee that the produced processed products comply with the organic production rules.
4. Operators shall comply with and implement the procedures mentioned above. In particular, they shall: (a) take precautionary measures to avoid the risk of contamination by un-authorized substances or products; (b) implement and record suitable cleaning measures, and monitor their effectiveness; (c) guarantee that non-organic products are not placed on the market with an indication referring to the organic production method.

#### **4.4.B. Split operations**

Further to the provisions laid down in ' Rules for the production of processed food', when non-organic products are also prepared or stored in the preparation unit concerned, the operator shall:

1. carry out the operations continuously until the complete run has been dealt with, separated by place or time from similar operations performed on non-organic products;
2. store organic products, before and after the operations, separate by place or time from non-organic products;

3. inform the control body thereof and keep available an updated register of all operations and quantities processed;

4. take the necessary measures to ensure identification of lots and to avoid mixtures or exchanges with non-organic products;

5. carry out operations on organic products only after suitable cleaning of the production equipment.

6. Collection of products and transport to preparation units : Operators may carry out simultaneous collection of organic and non-organic products, only where appropriate measures are taken to prevent any possible mixture or exchange with 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 the control body.

#### **4.4. C. The following conditions shall apply to the composition of organic processed food**

1. the product shall be produced mainly from ingredients of agricultural origin; in order to determine whether a product is produced mainly from ingredients of agricultural origin, added water and cooking salt shall not be taken into account;

2. only additives, processing aids, flavourings, water, salt, preparations of micro-organisms and enzymes, minerals, trace elements, vitamins, as well as amino acids and other micronutrients in foodstuffs for particular nutritional uses may be used, and only in so far as they have been authorized for use in organic production in accordance with EC regulations;

3. non-organic agricultural ingredients may be used only if they have been authorized for use in organic production by the control body, provided the ingredient in question is not available as organic and the authorization shall be reviewed annually;

4. an organic ingredient shall not be present together with the same ingredient in non-organic form or an ingredient in conversion;

5. food produced from in-conversion crops shall contain only one crop ingredient of agricultural origin.

#### **4.4.D. Use of certain products and substances in processing of food**

1. Only the following substances can be used in the processing of organic food:

(a) substances listed in EC regulations (EC 889/2008);

(b) preparations of micro-organisms and enzymes normally used in food processing; however, enzymes to be used as food additives have to be listed in EC regulations (EC 889/2008);

(c) substances, and products labeled as natural flavouring substances or natural flavouring preparations;

(e) drinking water and salt (with sodium chloride or potassium chloride as basic components) generally used in food processing;

(f) minerals (trace elements included), vitamins, amino acids, and micronutrients, only authorized as far their use is legally required in the foodstuffs in which they are incorporated.

2. For the purpose of the calculation referred to earlier,

(a) food additives listed in EC regulations (EC 889/2008); and marked in the column of the additive code number, shall be calculated as ingredients of agricultural origin;

(b) preparations and substances referred to in paragraph 1.(b),(c),(d),(e), and (f) of this Article and substances not marked with an asterisk in the column of the additive code number shall not be calculated as ingredients of agricultural origin.

(c) Yeast and Yeast products shall be calculated as ingredients of agricultural origin as of 31 December 2013.

#### **4.4.E. Authorization of non-organic food ingredients of agricultural origin**

An ingredient of agricultural origin may only be used in non-organic form under the following conditions:

1. The operator has notified the control body of all the requisite evidence showing that the ingredient concerned is not produced in sufficient quantity in the country or production in accordance with the organic production rules or cannot be imported from other countries;

2. The control body has issued formal authorization which will be reviewed annually;

3. The authorization may be withdrawn when evidence suggests that the supply situation has improved.

#### **4.5 Prohibition on the use of GMOs**

1. Genetically modified organisms (GMOs), and products produced from or by GMOs shall not be used as food, processing aids, plant protection products, fertilizers, soil conditioners, seeds, vegetative propagating material and microorganisms.

2. For the purpose, operators using such non-organic products shall require the vendor to confirm that the products supplied have not been produced from or by GMOs.

3. An optional model for such a vendor declaration is set out in Annex XII.

#### **4.6 Prohibition on the use of ionising radiation**

The use of ionising radiation for the treatment of organic food , or of raw materials used in organic food is prohibited.

**4.7 Prohibition of hydroponic production:** hydroponic production is prohibited.

### **5. Definitions**

For the purpose of this standard, the following definitions shall apply:

1. **Organic production:** the use of the production method compliant with the rules established in this Regulation, which fully comply with EC 834/2007 in combination with EC 889/2008, at all stages of production, preparation and distribution.
2. **Stages of production, preparation and distribution:** any stage from and including the primary production of an organic product up to and including its storage, processing, transport, sale or supply to the final consumer, and where relevant labeling, advertising, import, export and subcontracting activities.
3. **Organic:** coming from or related to organic production.
4. **Operator:** the natural or legal persons responsible for ensuring that the requirements of this Regulation are met within the organic business under their control.
5. **Plant production:** production of agricultural crop products, including harvesting of wild plant products for commercial purposes.
6. **Production unit:** all assets to be used for a production sector such as production premises, land parcels, pasturages, open air areas, livestock buildings.
7. **Conversion:** the transition from non organic to organic farming within a given period of time, during which the provisions concerning the organic production have been applied.
8. **Preparation:** operations of preserving and/or processing of organic products, and also packaging, labeling and/or alterations made to the labeling concerning the organic production method.
9. **Energy from renewable sources:** renewable non-fossil energy sources: wind, solar, geothermal, wave, tidal, hydropower, landfill gas, sewage treatment plant gas and biogases.
10. **The definitions of 'food', 'feed' and 'placing on the market:** definitions are given in various EC Regulations (e.g. EC178/2002).
11. **Labeling:** means any terms, words, particulars, trade marks, brand name, pictorial matter or symbol relating to and placed on any packaging, document, notice, label, board, ring or collar accompanying or referring to a product.

12. **Advertising:** any representation to the public, by any means other than a label, that is intended or is likely to influence and shape attitude, beliefs and behaviors in order to promote directly or indirectly the sale of organic products.
13. **Competent authority:** the central national authority competent for the organization of official controls in the field of organic production in accordance with the provisions set out under this Regulation, or any other authority on which that competence has been conferred to.
14. **Control authority:** a public administrative organization to which the competent authority has conferred, in whole or in part, its competence for the inspection and certification in the field of organic production in accordance with the provisions set out under this Regulation.
15. **Control body:** an independent private third party carrying out inspection and certification in the field of organic production in accordance with the provisions set out under this Regulation;
16. **Mark of conformity:** the assertion of conformity to a particular set of standards or other normative documents in the form of a mark.
17. **Ingredients:** is the definition given in Article 6(4) of Directive 2000/13/EC.
18. **Plant protection products'** is the definition given in Council Directive 91/414/EEC (29).
19. **Genetically modified organism (GMO)'** is the definition given in Directive **2001/18/EC**.
20. **Produced from GMOs:** derived in whole or in part from GMOs but not containing or consisting of GMOs.
21. **Produced by GMOs:** derived by using a GMO as the last living organism in the production process, but not containing or consisting of GMOs nor produced from GMOs.
22. **Processing aid:** any substance not consumed as a food ingredient by itself, intentionally used in the processing of raw materials, foods or their ingredients, to fulfill a certain technological purpose during treatment or processing and which may result in the unintentional but technically unavoidable presence of residues of the substance or its derivatives in the final product, provided that these residues do not present any health risk and do not have any technological effect on the finished product.
23. **Compliance:** is the act of being conforming and in alignment with guidelines, regulations and/or legislation.
24. **Equivalence:** describing different systems or measures that are capable of meeting the same objectives and principles by applying rules which ensure the same level of assurance of conformity.
25. **Pre-packaged foodstuff:** is that given in Article 13.(b) of Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs.
26. **Ionizing radiation:** is that given in Council Directive 96/29/Euratom of 13 May 1996 laying down basic safety standards for the protection of the health of workers and the

general public against the dangers arising from ionizing radiation<sup>34</sup> and as restricted by Article 12. of Directive 1999/2/EC of the European Parliament and of the Council of 22 February 1999 on the approximation of the laws of the Member States concerning foods and food ingredients treated with ionizing radiation.

27. **Non-organic:** not coming from or not related to a production in accordance to Regulation (EC) No 834/2007 and this Regulation.
28. **Importer:** the natural or legal person who presents a consignment for release for free circulation either in person, or through a representative.
29. **First consignee:** the natural or legal person to whom the imported consignment is delivered and who will receive it for further preparation and/or marketing.
30. **Holding:** all the production units operated under a single management for the purpose of producing agricultural products.
31. **Production unit:** all assets to be used for a production sector such as production premises, land parcels, , the premises for the storage of crops, crop products, raw materials and any other input relevant for this specific production sector.
32. **Energy from renewable sources:** renewable non-fossil energy sources: wind, solar, geothermal, wave, tidal, hydropower, landfill gas, sewage treatment plant gas and biogases.
33. **Control file:** all the information and documents transmitted, for the purposes of the control system to control authorities and control bodies by an operator subject to the control system as referred to in Article 28 of Regulation (EC) No 834/2007, including all the relevant information and documents relating to that operator or the activities of that operator held by control authorities and control bodies, with the exception of information or documents that have no bearing on the operation of the control system.

**N.B. for any further explanations and missing definitions,** please refer to EC regulations, in particular 834/2007 in combination with EC 889/2008.



## **2-Registration of the new applicants according to ECOA Production Standard & Control measures**

Reference to the European Regulations on Organic Agriculture: 834/2007 Title I (Art. 1)

### **Regulations:**

<p><i>ECOA standard and related regulations shall apply to any operator involved in activities, at any stage of production, preparation and distribution relating to the products originating from agriculture, where such products are placed on the market or are intended to be placed on the market:</i></p> <p><i>(a) Live or unprocessed agricultural product</i></p> <p><i>(b) Processed agricultural products for use as food</i></p>	<b>834-Article 1</b>	<b>C</b>
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### **I. Implementation according to ECOA Quality Manual:**

Registration of the new applicant is based on a procedure that indicates his awareness of aim, scope and objectives of organic farming under Egyptian conditions and in accordance with EC regulation 834/2007. The procedure of application and registration starts clearly with disseminating ECOA Guide for Organic Certification (ADM-155) and filling ECOA Questionnaires for farms (INS-010) & firms (INS-020).

Farm operators should define clearly principles applied for organic production in their farms (Farm Questionnaire, INS-010 Point 2.7, Page 5). Firm operators should also define clearly principles applied for organic production in their firms (Firm Questionnaire, INS-020 Point 2, Page 3).

Farm operators should state specifically the means and efficiency to separate organic units from non-organic units and keep adequate records to show the separation (Farm questionnaire, INS-010, Point 2.6, Page 4 & Firm questionnaire, INS-020, Point 3, Page 4).

Once the farm/firm questionnaire is submitted to ECOA, the application goes through various steps as indicated below and controlled by ECOA Quality Manual.

### **1. Purpose**

*ECOA* standard describes how applicants are reviewed by *ecoa* and how further steps for evaluation and registration of firms, farms and management systems are planned according to EC regulation 834/2007, and to ensure that all applicants are treated in the same manner to avoid discriminatory action and that complete information, necessary for certification of products, processing as well as management systems are available.

### **2. Application**

Based on the clients request, *ecoa* dispatches an application form to the applicant together with the appropriate forms to submit a set of specific information.

Relevant ECOA formats:

- ADM-025 Request for Application Form
- INS-010 Farm Questionnaire
- INS-020 Firm Questionnaire
- INS-025 Subcontracted Processing Service Questionnaire
- INS-026 Subcontracted Storage Service Questionnaire
- ADM-320 Organic Operation Contract for Farms/Firms
- ADM-110 Notification for the Registration Request
- FIN-010 List of Fees for *ecoa* Services

### **3. Preparation for Evaluation**

After signing the application form, *ECOA* starts the evaluation process. The applicant review includes: comparison with possible information already at hand; searching for known problem areas or sources of contamination.

If everything is all right, the chief inspector assigns an experienced inspector for the initial visit. The firm or farm gets the invoice for the fees and initial visit costs according to the fee list published by *ecoa* every year together with the name of the selected inspector.

The applicant has the right to refuse the nominated inspector in writing and without any reasons. In such a case, *ecoa* offers a replacement. A second refusal is not accepted without reasonable or legal arguments. Nevertheless, *ecoa* has the right to cancel the contract with the applicant if this happens.

Relevant ECOA formats:

- INS-070 Inspection Note
- INS-080 Acceptance/ Refusal of the Inspection Note

#### **4. Initial Visit**

During the initial visit, the inspector uses the standard inspection forms/reports developed by *ecoa* to verify the information provided by the operator with his application. The initial visit evaluation report is countersigned by the operator of farm/firm/farmer group

The chief inspector revises the initial visit report and gives his approval or refusal to the inspector's recommendation.

Relevant ECOA formats:

- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report

#### **5. Registration for Organic Scheme**

With positive recommendation of the inspector and approval of the chief inspector, the firm or farm initial visit inspection report is submitted to the certification committee to take decision during its regular monthly meeting. The certification committee reviews the completeness and plausibility of the information in the initial visit inspection report. In case of approval, the certification committee will determine the farm

organic status and the appropriate conversion period according to EC 834/2007 regulation. The C.E.O. informs the client about the results of his application. In case of approval, the client is informed by the code number, suitable to clearly identify his farm or firm. After signature of the contract and payment of the annual registration fees, the client is registered in *ecoa* certification system and receives the farm / firm package containing the following documents:

- Short manual of EC 834/2007
- Book of forms and single sheet forms
- List of fees, Ecoa's sanction and appeals policies

#### Relevant ECOA formats:

- ADM-110 Notification for the Registration Request
- ADM-320 Organic Operation Contract for Farms/Firms
- ADM-200 Registered Farm List
- ADM-210 Registered Firm List
- ADM-155 Applicant/Organic guide for organic certification
- DCS-014 List of Documents in the Farm Package
- DCS-015 List of Documents in the Firm Package
- FIN-010 List of Fees for *ecoa* Services
- ADM-240 *ecoa* Sanction List

## 6. Related documents for the Implementation

- Standard Procedures of ECOA Quality Manual (SP-4-01 "Application & Registration"). (Annex A)
- ECOA Master List of Documents (Annex B)

## 7. Major References:

- EC 834/2007
- EC 889/2008

### 3- Recognition of the start and duration of the conversion period

Reference to the European Regulations on Organic Agriculture: 834/2007 Art.17 (1) a

#### I. Regulations:

<p><i>1. The following rules shall apply to a farm on which organic production is started:</i></p> <p><i>(a) the conversion period shall start at the earliest when the operator has notified his/her activity to the control system;</i></p> <p><i>(b) during the conversion period all rules established by this Standard shall apply;</i></p> <p><i>(c) conversion periods specific to the type of crop shall be defined</i></p> <p><i>(d) on a holding or unit partly under organic production and partly in conversion to organic production, the operator shall keep the organically produced and in-conversion products separate or readily separable and keep adequate records to show the separation;</i></p> <p><i>(e) in order to determine the conversion period referred to above, a period immediately preceding the date of the start of the conversion period may be taken into account, in so far as certain conditions concur.</i></p>	<p><b>834- Article 17</b></p> <p><b>(1) a</b></p>	<p><b>CE</b></p>
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#### II. Implementation according to ECOA Quality Manual:

##### 1. Registration for Organic Scheme

The certification committee reviews the completeness and plausibility of the information in the initial visit inspection report. In case of approval, the certification committee will determine the farm organic status and the appropriate conversion period according to EC 834/2007 regulation. In case of approval the client is informed by the code number, suitable to clearly identify his farm or firm. After signature of the contract

and payment of the annual registration fees, the client is registered in *ecoa* certification system and receives the farm / firm package containing the following documents:

- Short manual of EC 834/2007
- Book of forms and single sheet forms
- List of fees Ecoa's sanction and appeals policies

#### Relevant ECOA formats:

- ADM-110 Notification for the Registration Request
- ADM-320 Organic Operation Contract for Farms/Firms
- ADM-200 Registered Farm List
- ADM-210 Registered Firm List
- ADM-155 Applicant/Organic guide for organic certification
- DCS-014 List of Documents in the Farm Package
- DCS-015 List of Documents in the Firm Package
- FIN-010 List of Fees for *ecoa* Services
- ADM-240 *ecoa* Sanction List

## 2. Organic Certification of Farms & Firms

The certification process starts after the completion of the on-site inspection and the review and approval of the inspection reports by the chief inspector. The inspection reports are submitted to the certification committee to take decisions during its regular monthly meeting. The certification committee reviews the completeness and plausibility of the information in these reports. Checklists are used to ensure the comprehensive review of relevant information. The points of the checklists include previous certification conditions, outstanding sanctions, complaints, appeals, in addition to excuses granted during the season and fees-payment situation.

For new applicant, the certification decision includes the determination of the farm organic status and the appropriate conversion period to the full organic status. ECOA provides conversion periods of 24 months for seasonal crops, and 36 months for perennial crops. The beginning of the conversion period starts from the date of application. However, the conversion period can be reduced based on the submission of the following documents:

- Statements from the agricultural local authorities and/or cooperatives for the field history of using agrochemicals during the last 3 years.

- Certificates of pesticide analyses from accredited laboratory indicating no residues were detected in the sampled soils and standing crops of the concerned farm.

ECOFA consider the bare desert lands within governmental agricultural extension areas, and which have never been cultivated before as virgin soils which consequently have a zero conversion period. The operator is entitled to present soil analysis indicating no pesticide residues as well as to declare in his questionnaire to apply crop rotations including legume plants to build up soil fertility.

In all cases the conversion period starts from the date of application.

During conversion, ECOFA does not allow the use of any marks of conformity, logos or labeling or any type of organic labeling before 12 months.

In all cases, the scope of certification (crops), the certification scheme, as well as the certification conditions/sanctions are determined within the decision. In case of positive decision by the certification committee a farm/firm certificate is issued with one year validity. Original copy of the certificate is submitted to the client and the registered farm/firm lists are updated. In case of negative decision by the Certification Committee the sanction is reported and the client is notified. Suspension and withdrawal of certification are included penalties in ecofa Sanctions.

The Certification Committee may reconsider its decision, including the conversion status of new applicants, based on satisfactory proofs submitted. In this case a retroactive decision is taken.

## Relevant ECOA formats:

- ADM-110 Notification for the Registration Request
- ADM-320 Organic Operation Contract for Farms/Firms
- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- CER-140 Farm Certification Checklist
- CER-150 Firm Certification Checklist
- CER-070 Request for The Use of non-organic Planting Materials
- CER-080 Request for Use of Restricted Fertilizers
- CER-090 Request for Use of Restricted Pesticides
- ADM-180 Certification Committee Decision
- ADM-220 Farm Certificates
- ADM-230 Firm Certificates
- ADM-200 Registered Farm List
- ADM-210 Registered Firm List
- ADM-180 Certification Committee Decisions
- ADM-130 Sanction note

### **3. Related documents for the Implementation**

- ECOA Quality Manual (Chapter 4 “Process Management”) & Standard Procedures (SP-4-01 "Application & Registration" & SP-4-04 “Certification”) (Annex A)
- ECOA Master List of Documents (Annex B)



## 4. The approval of new inputs

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 22 (2) a  
& 889/2008 Art. 45 (6)

### I. Regulations:

<p><i>ECOA may grant exceptions from the production rules.</i></p> <p><i>Exceptions shall be kept to a minimum and, where appropriate, limited in time and may only be provided in the following cases where:</i></p> <ul style="list-style-type: none"> <li><i>(a) they are necessary in order to ensure that organic production can be initiated or maintained on holdings confronted with climatic, geographical or structural constraints;</i></li> <li><i>(b) it is necessary in order to ensure access to ingredients of agricultural origin, where such ingredients are not available on the market in organic form</i></li> <li><i>(c) they are necessary with regard to the use of specific products and substances in the processing in order to ensure production of well-established food products in organic form;</i></li> <li><i>(d) temporary measures are necessary in order to allow organic production to continue or recommence in the case of catastrophic circumstances;</i></li> <li><i>(e) it is necessary to use food additives and other substances are not available on the market other than produced by GMOs;</i></li> <li><i>(f) the use of food additives and other substances is required on the basis of national law.</i></li> </ul>	<p><b>834- Article 22 (2) a</b></p>	<p><b>E</b></p>
<p><i>2. The authorisation shall be granted before the sowing of the crop or before the use in processing.</i></p>	<p><b>889-Article 45 (6)</b></p>	<p><b>E</b></p>

### II. Implementation according to ECOA Quality Manual:

Upon written request, *ECOA* approves the new inputs if the technical information provided together with Lab analysis confirm that ingredients are allowed /not prohibited according to EC 889/2008.

## **1. Organic Certification of Farms & Firms**

During the certification process, checklists are used to ensure the comprehensive review of relevant information. The points of the checklists include previous certification conditions, outstanding sanctions, complaints, appeals, in addition to excuses granted (including new inputs) during the season and fees-payment situation.

Relevant ECOA formats:

- CER-070 Request for The Use of non-organic Planting Materials
- CER-080 Request for Use of Restricted Fertilizers
- CER-090 Request for Use of Restricted Pesticides
- INS-100 Farm Diary
- INS-110 In/Out of Agricultural Inputs to/from farm Stores (or subcontracted Stores)

## **2. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-4-04 “Certification”) (Annex A)
- ECOA Related Master List of Documents (Annex B)

## 5. Seed Database for available Seed

**Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 12 (1) & 889/2008 Art. 45 (6)**

### I. Regulations:

<p><i>1. Seeds : For the production of products other than seed and vegetative propagating material only organically produced seed and propagating material shall be used. The mother plant in the case of seeds and the parent plant in the case of vegetative propagating material shall have been produced organically for at least one generation, or in the case of perennial crops, two growing seasons;</i></p>	<p><b>834-Article 12.1</b></p>	<p><b>C</b></p>
<p><i>2. Use of seed or vegetative propagating material not obtained by the organic production method, where:</i></p> <p><i>a. not available on the market,</i></p> <p><i>b. produced from a production unit in conversion to organic farming</i></p> <p><i>c. not treated with plant protection products.</i></p> <p><i>d. authorized by ECOA</i></p> <p><i>e. Authorisation may only be granted in the following cases: (i) where no supplier is able to deliver the seed or seed potatoes before sowing or in reasonable time; (ii) where the user is able to demonstrate that the desired variety and none of the registered alternatives of the same species are appropriate and that the authorisation therefore is significant for her/his production</i></p> <p><i>f. The authorisation shall be granted before the sowing of the crop.</i></p> <p><i>g. The authorisation shall be granted only to individual users for one season at a time and ECOA shall register the quantities of seed or seed potatoes authorised.</i></p>	<p><b>889-Article 45</b></p>	<p><b>E</b></p>

### II. Implementation According to ECOA Quality Manual:

Seed Database for available organic seeds is currently initiated by the Egyptian Ministry of Agriculture and Land Reclamation (MOA). However, there are some farmers/growers associations provide farmers with valuable information in this respect, for example “Horticultural Export Improvement Association, HEIA,

[www.heiaegypt.com](http://www.heiaegypt.com)” and “Union of Producers and Exporters of Horticultural Crops, UPEHC, [www.upehc.com](http://www.upehc.com)” .

Till such a database is completed, organic seeds authorized are those:

- Self- produced by farms certified at ECOA.
- Organic seeds produced by farms certified by other CBs, provided that the farm operator presents proofs of organic status, e.g. invoice and/or delivery notes during annual inspection.
- Certified organic seeds available in local market or imported , provided that the farm operator presents organic status certificates.

In case of no organic seeds available, permission is given to use conventional seeds provided that:

- They are not chemically treated and GMO free.
- Provide a statement from one of the farmers associations and/or at least three denied requests of no available organic seeds at the local market.

For this purpose, a specific ECOA format “ Request for Use of non-organic seeds, propagation materials or seedlings (INS-097)” is used by the farm operator. The format is presented to the related inspector and approved by the Chief Inspector to grant the permission, if justified.

## **2. Surveillance of farms**

If the farm requests for any exceptions, this has to be done in writing. Written requests are judged by *ecoa*’s Chief Inspector to conform with EC regulations 834/2007 & 889/2008. He decides to tolerate the exception or not (if necessary in arrangement with the chief certifier). If there is any doubt, the chief certifier has to decide with possible consultation from the advisory committee.

### Relevant ECOA formats:

- INS-097 Request for The Use of non-organic Planting Materials
- INS-100 Farm Diary
- INS-110 In/Out of Agricultural Inputs to/from farm Stores (or subcontracted Stores)

### **3. Related documents for Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-04 “Certification” & SP-4-05 “Surveillance”) (Annex A)
- ECOA Related Master List of Documents (Annex B)

## 6. Retroactive recognition of conversion times

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 36 (2)

### I. Regulations:

<p><i>1. ECOA may decide to recognise retroactively as being part of the conversion period any previous period in which:</i></p> <p><i>(a) the land parcels were registered in an official environmental protection or similar programme, provided that the measures concerned ensure that products not authorised for organic production have not been used on those parcels, or</i></p> <p><i>(b) the parcels were natural or agricultural areas which were not treated with products not authorised for organic production. The conversion period can be taken into consideration retroactively only where satisfactory proof has been furnished to ECOA allowing it to satisfy itself that the conditions were met for a period of at least three years.</i></p> <p><i>2. ECOA may decide, in certain cases, where the land had been contaminated with products not authorised for organic production, to extend the conversion period beyond the period.</i></p>	<p><b>889 Article 36</b> <b>(2)</b></p>	<p><b>E</b></p>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Organic Certification of Farms & Firms

For new applicant, the certification decision includes the determination of the farm organic status and the appropriate conversion period to the full organic status. In all cases the scope of certification (crops), the certification scheme, as well as the certification conditions/sanctions are determined within the decision. In case of positive decision by the certification committee a farm/firm certificate is issued with one year validity. Original copy of the certificate is submitted to the client and the registered farm/firm lists are updated. In case of negative decision by the Certification Committee the sanction is reported and the client is notified. Suspension and withdrawal of certification are included penalties in *ecoa* Sanctions.

ECOA consider the bare desert lands within governmental agricultural extension areas, and which have never been cultivated before as virgin soils which consequently have a zero conversion period. The operator is entitled to present soil analysis indicating no pesticide residues as well as to declare in his questionnaire to apply crop rotations including legume plants to build up soil fertility.

The Certification Committee may reconsider its decision, including the conversion status of new applicants, based on satisfactory proofs submitted:

- Statements from the agricultural local authorities and/or cooperatives, clearly stating that no agro-chemical inputs were provided to the related farm during the last 2 agricultural seasons.
- Certificates of pesticide analyses from accredited laboratory indicating no residues were detected in the sampled soils and standing crops of the related farm.

in this case a retroactive decision is taken.

Relevant ECOA formats:

- ADM-110 Notification for the Registration Request
- ADM-320 Organic Operation Contract for Farms/Firms
- ADM-290 Request for Sampling
- ADM-120 Notification for the sample test results
- INS-010 Farm Questionnaire
- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- ADM-140 Notification form
- CER-140 Farm Certification Checklist
- CER-150 Firm Certification Checklist
- CER-070 Request for The Use of non-organic Planting Materials
- CER-080 Request for Use of Restricted Fertilizers
- CER-090 Request for Use of Restricted Pesticides
- ADM-180 Certification Committee Decision
- ADM-220 Farm Certificates
- ADM-230 Firm Certificates
- ADM-200 Registered Farm List
- ADM-210 Registered Firm List
- ADM-180 Certification Committee Decisions
- ADM-130 Sanction note
- ADM-155 Applicant/Organic guide for organic certification
- DCS-014 List of Documents in the Farm Package
- DCS-015 List of Documents in the Firm Package
- FIN-010 List of Fees for *ecoa* Services
- ADM-240 *ecoa* Sanction List

## 2. Appeals against application, registration, and certification decisions

*ECO*A clients have the right to appeal against *eco*a decisions, within 15 days starting from the date of receiving the decision.

- The client writes to *eco*a explaining reasons of appeal supported with documents if possible.
- The client has to pay the appeal fee. This money is refunded in case of acceptance of the appeal.
- The appeal request and the file of the client operation are presented to the certification committee to evaluate the reasons presented by the client.
- If the committee detects a mistake in the previous decision or if the documents from the client proof new results, a new decision by explaining the reasons in written form will be taken.
- If the result of the evaluation is negative again, the C.E.O. invites the advisory committee to an unscheduled meeting to discuss the appeal within a period of 15 days.
- The advisory committee in this case acts as arbitration board. The decision of this committee will be binding for all parties and must reach the C.E.O. after the meeting is closed.
- In case of positive decision (acceptance of the appeal), the Certification Committee issues an updated decision, signed and stamped.
- The C.E.O. will then notify the client and re-fund the paid fees.
- In case of refusal, the C.E.O. informs the client in written form about the decision and no money is refunded.
- All appeals are listed separately in serial order

Relevant *ECO*A formats:

- ADM-040 Request for Appeal
- ADM-650 Register of Appeals
- ADM-140 Notification form

## 3. Related documents for the Implementation:

- *ECO*A Quality Manual (Chapter 4 “Process Management” and Standard Procedures ( SP-4-01 “Application & Registration”, “SP-4-04 “Certification” & SP-5-01 “Appeals, Complaints & Disputes”) (Annex A)
- *ECO*A Related Master List of Documents (Annex B)



## 7. Use of conventional seeds & vegetative propagation material

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 12 (1) & 889/2008 Art. 45

### I. Regulations:

<p><i>1. Seeds : For the production of products other than seed and vegetative propagating material only organically produced seed and propagating material shall be used. The mother plant in the case of seeds and the parent plant in the case of vegetative propagating material shall have been produced organically for at least one generation, or in the case of perennial crops, two growing seasons;</i></p>	<p><b>834-Article 12 (1)</b></p>	<p><b>C</b></p>
<p><i>2. Use of seed or vegetative propagating material not obtained by the organic production method, where:</i></p> <p><i>a. not available on the market,</i></p> <p><i>b. produced from a production unit in conversion to organic farming</i></p> <p><i>c. not treated with plant protection products.</i></p> <p><i>d. authorized by ECOA</i></p> <p><i>e. Authorisation may only be granted in the following cases: (i) where no supplier is able to deliver the seed or seed potatoes before sowing or in reasonable time; (ii) where the user is able to demonstrate that the desired variety and none of the registered alternatives of the same species are appropriate and that the authorisation therefore is significant for her/his production</i></p> <p><i>f. The authorisation shall be granted before the sowing of the crop.</i></p> <p><i>g. The authorisation shall be granted only to individual users for one season at a time and ECOA shall register the quantities of seed or seed potatoes authorised.</i></p>	<p><b>889-Article 45</b></p>	<p><b>E</b></p>

### II. Implementation according to ECOA Quality Manual:

#### 1. Organic Certification of Farms & Firms

During the certification process, checklists are used to ensure the comprehensive review of relevant information. The points of the checklists include previous certification conditions, outstanding sanctions, complaints, appeals, in addition to excuses granted

during the season (including use of conventional seeds & Vegetative propagation Material) and fees-payment situation.

Seeds and vegetative propagation material authorized are those produced by organic farms. Permission is granted to use conventionally produced seeds and vegetative material provided not available in the local market, not chemically treated, GMO-free and upon written request.

## **2. Surveillance of farms**

If the farm requests for any exceptions, this has to be done in writing. Written requests are judged by ecoa's chief Inspector to comply with EC regulations 834/2007 & 889/2008. He decides to tolerate the exception or not (if necessary in arrangement with the chief certifier). If there is any doubt the chief certifier has to decide, if necessary with consultation from the advisory committee.

Relevant ECOA formats:

- INS-010 Farm Questionnaire
- INS-100 Farm Diary
- INS-110 In/Out of Agricultural Inputs to / from farm stores
- INS-170 Farm Inspection Report
- CER-070 Request for The Use of non-organic Planting Materials

## **3. Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-04 "Certification" & SP-4-05 "Surveillance") (Annex A)
- ECOA Master List of Documents (Annex B)

## 8. Deviating Fertilizers

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. (3) & Annex I

### I. Regulations:

<i>Resort to fertilizers and soil conditioners</i>  <i>Where the nutritional needs of plants cannot be met by cultivation practices, crop rotation and the application of organic material, only fertilizers and soil conditioners referred to in Annex I of 889/2008 (listed in ecoa standard annexes) may be used in organic production and only to the extent necessary. Operators shall keep documentary evidence of the need to use the product.</i>	<b>889-Article 3 &amp; Annex I</b>	<b>C</b>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Organic Certification of Farms & Firms

During the certification process, checklists are used to ensure the comprehensive review of relevant information. The points of the checklists include previous certification conditions, outstanding sanctions, complaints, appeals, in addition to excuses (including use of restricted fertilizers) granted during the season and fees-payment situation.

#### 2. Surveillance of farms

If the farm requests for any exceptions, this has to be done in writing. Written requests are judged by ecoa's chief Inspector to comply with EC regulations 834/2007 & 889/2008. He decides to tolerate the exception or not (if necessary in arrangement with the chief certifier). If there is any doubt the chief certifier has to decide, if necessary with consultation from the advisory committee.

Relevant ECOA formats:

- INS-010 Farm Questionnaire
- INS-100 Farm Diary
- INS-110 In/Out of Agricultural Inputs to / from farm stores
- INS-170 Farm Inspection Report
- CER-070 Request for The Use of restricted fertilizers

#### 3. Related documents for the Implementation

- Standard Procedures of ECOA Quality Manual (SP-4-04 "Certification" & SP-4-05 "Surveillance") (Annex A)
- ECOA Master List of Documents (Annex B)
- EC 889/2008: Annex I, fertilizers and soil conditioners referred to in article 3(1) in its latest updates

## 9. Deviating Plant Protection Agents

**Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 12 (1) & 889/2008 Art. (5) & Annex II**

### I. Regulations:

<p><i>Pest prevention and treatment</i></p> <p>1. The prevention of damage caused by pests, diseases and weeds shall rely primarily on the protection by natural enemies, the choice of species and varieties, crop rotation, cultivation techniques and thermal processes;</p> <p>2. Where plants cannot be adequately protected from pests and diseases by the measures mentioned above, only products referred to in Annex II EC 889/2008 (listed in ecoa standard annexes) may be used in organic production. Operators shall keep documentary evidence of the need to use the product.</p> <p>3. For products used in traps and dispensers, except pheromone dispensers, the traps and/or dispensers shall prevent the substances from being released into the environment and prevent contact between the substances and the crops being cultivated. The traps shall be collected after use and disposed of safely.</p>	<p><b>834-Article 12 (1)</b></p> <p><b>889-Article 5 &amp; Annex II</b></p>	<p><b>C</b></p> <p><b>C</b></p>
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## II. Implementation according to ECOA Quality Manual:

### 1. Organic Certification of Farms & Firms

During the certification process checklists are used to ensure the comprehensive review of relevant information. The points of the checklists include previous certification conditions, outstanding sanctions, complaints, appeals, in addition to excuses (including use of plant protection agents) granted during the season and fees-payment situation.

### 2. Surveillance of farms

If the farm requests for any exceptions, this has to be done in writing. Written requests are judged by ecoa's Chief Inspector to conform with EC regulations 834/2007 & 889/2008. He decides to tolerate the exception or not (if necessary in arrangement with the chief certifier). If there is any doubt the chief certifier has to decide, if necessary with consultation from the advisory committee.

### Relevant ECOA formats:

- INS-010 Farm Questionnaire
- INS-100 Farm Diary
- INS-110 In/Out of Agricultural Inputs to / from farm stores
- INS-170 Farm Inspection Report
- CER-070 Request for The Use of restricted Pesticides

### **3.Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-04 “Certification” & SP-4-05 “Surveillance”) (Annex A)
- ECOA Master List of Documents (Annex B)
- EC 889/2008: Annex II, plant protection products referred in article 5(1) in its latest updates

## **10. Deviating criteria for the separation between conventional and organic production units (production sites, parcels, storage premises for crops and inputs)**

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 11

### **I. Regulations:**

<p><i>General farm production rules</i></p> <p><i>1. The entire agricultural holding shall be managed in compliance with the requirements applicable to organic production.</i></p> <p><i>2. A holding may be split up into clearly separated units which are not all managed under organic production. As regards animals, different species shall be involved. As regards plants, different varieties that can be easily differentiated shall be involved.</i></p> <p><i>3. Where not all units of a holding are used for organic production, the operator shall keep the land, animals, and products used for, or produced by, the organic units separate from those used for, or produced by, the non-organic units and keep adequate records to show the separation.</i></p>	<b>834-Article 11</b>	<b>C</b>
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### **II. Implementation according to ECOA Quality Manual:**

#### **1. Application**

Based on the clients request, *ecoa* dispatches an application form to the applicant together with the appropriate forms to submit a set of specific information:

- Description of project (farm, processor) including size, type and field of production, number of operations, average size of farms, stores, maps, cultivation plan, livestock, source of water, etc.
- Geographic region and accessibility of operations
- Description of production and field history
- Technical equipment

- Organizational structure
- Implemented management systems
- List of suppliers, and list of products
- List of recipes...etc.
- Flow of goods
- List of subcontractors and declared produce handling sites together with the description of their measures, procedures and declaration. On basis of this self-information, *ecoa*'s secretary reviews the integrity of the application information and if it is complete, he forwards the request to the chief inspector.

Relevant ECOA formats:

- ADM-025Request for Application Form
- INS-010Farm Questionnaire
- INS-020Firm Questionnaire

## **2. Evaluation of the Inspection Report**

Upon the inspector return from the assessment, he has to submit his report at the earliest possible date which should not exceed 15 day after the date of the on-site inspection. The complete documentation is to be submitted to the chief inspector and should include:

- Inspection Report (farm, firm) including:
  - All documents received for inspection
  - All additional documents gathered during inspection
  - Answers to specific questions e.g. inputs as fertilizers and pesticides, farm documents, crop rotation, livestock, stables, farm fence, stores, buildings, source of water, weeds, hygiene, etc.
  - List with non-conformities and other observations
  - Form with dates for corrective actions, dated and signed by the applicant.
  - Recommendation for certification
  - Results of sample analyses (if samples are taken)
  - Sampling Protocols and order form

With the complete information, the chief inspector revises the results of the inspection and suggests his recommendation to the certification committee who has to decide over certifications. The report of the chief inspector may include:

- No deviation
- Warning
- Penalty
- Exclusion of parts of the farm / crop
- Withdrawal of the certification

Relevant ECOA formats:

- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-190 Inspection Report for Subcontracted Storing Services
- INS-200 Inspection Report for Subcontracted Processing Services
- ADM-120 Notification for the Sample Test Results
- ADM-300 Sampling Protocol

### **3. Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-01 “Application & Registration”, & SP-4-02 “Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)



## 11. Storage of prohibited inputs

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 35

### I. Regulations:

<p><i>Storage of products</i></p> <p><i>1. For the storage of products, areas shall be managed in such a way as to ensure identification of lots and to avoid any mixing with or contamination by products and/or substances not in compliance with the organic production rules. Organic products shall be clearly identifiable at all times.</i></p> <p><i>2. In case of organic plant storage of input products other than those authorised is prohibited in the production unit.</i></p> <p><i>3. Where operators handle both non-organic products and organic products:</i></p> <p><i>(a) the organic products shall be kept separate from the other agricultural products and/or foodstuffs;</i></p> <p><i>(b) every measure shall be taken to ensure identification of consignments and to avoid mixtures or exchanges with non-organic products;</i></p> <p><i>(c) suitable cleaning measures, the effectiveness of which has been checked, have been carried out before the storage of organic products; operators shall record these operations.</i></p>	<p><b>889-Article 35</b></p>	<p><b>C</b></p>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Evaluation of the Inspection Report

Upon the inspector return from the assessment, he has to submit his report at the earliest possible date which should not exceed 15 day after the date of the on-site inspection. The complete documentation is to be submitted to the chief inspector and should include:

- Inspection Report (farm, firm) including:
- All documents received for inspection
- All additional documents gathered during inspection
- Answers to specific questions e.g. inputs as fertilizers and pesticides, farm documents, crop rotation, livestock, stables, farm fence, stores, buildings, source of water, weeds, hygiene, etc.
- List with non-conformities and other observations

- Form with dates for corrective actions, dated and signed by the applicant.
- Recommendation for certification
- Results of sample analyses (if samples are taken)
- Sampling Protocols and order form

With the complete information, the chief inspector revises the results of the inspection and suggests his recommendation to the certification committee who has to decide over certifications. The report of the chief inspector may include:

- No deviation
- Warning
- Penalty
- Exclusion of parts of the farm / crop
- Withdrawal of the certification

Relevant ECOA formats:

- INS-010 Farm Questionnaire
- INS-020 Firm Questionnaire
- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-190 Inspection Report for Subcontracted Storing Services
- INS-200 Inspection Report for Subcontracted Processing Services

## **2. Related documents for the Implementation:**

- Standard Procedures of ECOA Quality Manual (SP-4-02 “Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 12. Information about the schedule of production of crop products (production plan)

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 71

### I. Regulations:

<p><i>Communication of Information about the schedule of production of crops products:</i></p> <p><i>Each year, before the date indicated by ECOA, the operator shall notify ECOA of its schedule of production of crop products, giving a breakdown by parcel.</i></p>	<b>889-Article 71</b>	<b>E</b>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Application

Based on the clients request, *ecoa* dispatches an application form to the applicant together with the appropriate forms to submit a set of specific information.

- Description of project (farm, processor) including size, type & field of production, number of operations, average size of farms, stores, maps, cultivation plan, livestock, source of water, etc.
- Geographic region and accessibility of operations
- Description of production and field history
- Technical equipment
- Organizational structure
- Implemented management systems
- List of suppliers, and list of products
- List of recipes...etc.
- Flow of goods
- List of subcontractors and declared produce handling sites together with the description of their measures, procedures and declaration. On basis of this self-information, *ecoa*'s secretary reviews the integrity of the application information and if it is complete, he forwards the request to the chief inspector.

### Relevant ECOA formats:

- INS-010 Farm Questionnaire
- INS-090 Cultivation Plan
- INS-095 Current Cultivation
- CER-135 Farm Crops Seeking Certification
- INS-170 Farm Inspection Report

## **2. Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-01 “Application & Registration”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 13. Inspection of conventional production units

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 66 (3), Art. 73

### I. Regulations:

<i>Several production units run by the same operator:</i>	<b>889-Article 66 (3)</b>	
<i>Where an operator runs several production units in the same area, the units for non-organic products, together with storage premises for input products must also be subject to the minimum control requirements.</i>	<b>889-Article 73</b>	<b>C</b>

### II. Implementation according to ECOA Quality Manual:

#### 1. Evaluation of the Inspection Report

Upon the inspector return from the assessment, he has to submit his report at the earliest possible date which should not exceed 15 day after the date of the on-site inspection. The complete documentation is to be submitted to the chief inspector and should include:

- Inspection Report (farm, firm) including:
  - All documents received for inspection
  - All additional documents gathered during inspection
  - Answers to specific questions e.g. fertilizers, pesticides, farm documents, crop rotation, livestock, stables, farm fence, stores, buildings, source of water, weeds, hygiene, etc.
  - List with non-conformities and other observations
  - Form with dates for corrective actions, dated and signed by the applicant.
  - Recommendation for certification
  - Results of sample analyses (if samples are taken)
  - Sampling Protocols and order form

With the complete information, the chief inspector revises the results of the inspection and suggests his recommendation to the certification committee who has to decide over certifications. The report of the chief inspector may include:

- No deviation
- Warning
- Penalty

- Exclusion of parts of the farm / crop
- Withdrawal of the certification

Relevant ECOA formats:

- INS-010 Farm Questionnaire
- INS-170 Farm Inspection Report

## **2. Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-02 “Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 14. Fulfillment of the notification requirements to the control body in case of parallel production of perennial crops

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 40 (1)

### I. Regulations:

<p><i>Parallel production -plant production:</i></p> <p><i>Under existing climatic and/or geographical constraints, a producer may apply to ECOA to run organic and non-organic production units in the same area:</i></p> <p><i>- 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></p> <p><i>(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;</i></p> <p><i>(ii) appropriate measures have been taken to ensure the permanent separation of the products obtained from each unit concerned;</i></p> <p><i>(iii) ECOA is notified of the harvest of each of the products concerned at least 48 hours in advance.</i></p> <p><i>(iv) Upon completion of the harvest, the producer informs ECOA of the exact quantities harvested on the units concerned and of the measures applied to separate the products;</i></p> <p><i>(v) the conversion plan has been approved by the control body, and shall be confirmed each year after the start of the conversion plan.</i></p>	<p><b>889-Article 40(1)</b></p>	<p><b>E</b></p>
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## II. Implementation according to ECOA Quality Manual:

### 1. Obligations of applicants

The obligations of applicants (firms or farms) are determined in the “organic operation contract” as terms and conditions. Suppliers have to inform **ecoa** about intended modifications to the product or process relevant for the requirements of EC 834/2007 in combination with EC 889/2008. To simplify the procedures to the applicants, **ecoa** provides a set of forms, called farm- or firm package to be used for mutual information. All quality records, relevant to product certification are collected and archived in **ecoa**’s filing system for farms and firms.

## **2. Information stream from clients to ECOA**

For initial certification, the client provides all his information about his organization, processes, measures, using the questionnaire during the application procedures. The clauses of the certification contracts with **ecoa** are binding to the client to keep **ecoa** informed with any changes in this information; and in particular the changes which affects the conformity of his operation with applicable standards. If the client fails to bind to that, violation will be recorded during next surveillance evaluation and he will be subject to applicable sanctions which could reach withdrawal of certification.

Relevant ECOA formats:

- ADM-320 Organic Operation Contract for Farms/Firms
- INS-010 Farm Questionnaire
- INS-170 Farm Inspection Report

## **3. Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-05 “Surveillance” & SP-5-03 “Information Communication”) (Annex A)
- ECOA Master List of Documents (Annex B)



# 15. Notification requirements about changes in the description of the production unit

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 63 & 64

## I. Regulations:

<p><i>Minimum control requirements</i></p> <p><i>1. When the control arrangements are first implemented, the operator shall draw up and subsequently maintain:</i></p> <p><i>(a) a full description of the unit and/or premises and/or activity;</i></p> <p><i>(b) 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;</i></p> <p><i>(c) the precautionary measures to be taken in order to reduce the risk of contamination by unauthorised products or substances and the cleaning measures to be taken in storage places and throughout the operator's production chain.</i></p> <p><i>2. The description and the measures referred to above shall be contained in a declaration, signed by the responsible operator. In addition, this declaration shall include an undertaking by the operator:</i></p> <p><i>(a) to perform the operations in accordance with the organic production rules;</i></p> <p><i>(b) to accept, in the event of infringement or irregularities, the enforcement of the measures of the organic production rules;</i></p> <p><i>(c) to undertake to inform in writing the buyers of the product in order to ensure that the indications referring to the organic production method are removed from this production. The operator shall countersign the control body's inspection report that identifies possible deficiencies and non-compliances and take the necessary corrective measures.</i></p> <p><i>(d) to accept the exchange of information, and control files if needed, between authorities, control bodies and ECOA in cases where the operator and/or the subcontractors of that operator are checked by different control authorities or control bodies;</i></p> <p><i>(e) to accept, in cases where the operator withdraws from the control system, to inform without delay ECOA. If the operator withdraws from the control system, the control file is kept for a period of at least five years;</i></p> <p><i>(f) to accept to inform ECOA without delay of any irregularity or infringement affecting the organic status of their product or organic products received from other operators or subcontractors. ';</i></p>	<p><b>889-Article 63</b></p>	<p><b>C</b></p>
<p><i>Modification of control arrangements:</i></p> <p><i>The operator responsible shall notify any change in the description or of the measures mentioned above</i></p>	<p><b>889-Article 64</b></p>	<p><b>C</b></p>

to ECOA in due time.		
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## II. Implementation according to ECOA Quality Manual:

### 1. Obligations of applicants

The obligations of applicants (firms or farms) are determined in the “organic operation contract” as terms and conditions. Suppliers have to inform **ecoa** about intended modifications to the product or process relevant for the requirements of EC 834/2007 in combination with EC 889/2008. To simplify the procedures to the applicants, **ecoa** provides a set of forms, called farm- or firm package to be used for mutual information. All quality records, relevant to product certification are collected and archived in **ecoa**’s filing system for farms and firms.

### 2. Information stream from clients to ECOA

For initial certification, the client provides all his information about his organization, processes, measures, using the questionnaire during the application procedures. The clauses of the certification contracts with **ecoa** are binding to the client to keep **ecoa** informed with any changes in this information; and in particular the changes which affects the conformity of his operation with applicable standards. If the client fails to bind to that, violation will be recorded during next surveillance evaluation and he will be subject to applicable sanctions which could reach withdrawal of certification.

Relevant ECOA formats:

- ADM-320 Organic Operation Contract for Farms/Firms
- INS-010 Farm Questionnaire
- INS-170 Farm Inspection Report

### 3. Related documents for the Implementation

- Standard Procedures of ECOA Quality Manual (SP-4-05 “Surveillance”& SP-5-03 “Information Communication”) (Annex A)
- ECOA Master List of Documents ( Annex B)

## 16. Procedures to establish risk orientated, additional inspection visits

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 65

### I. Regulations:

<p><i>Control visits</i></p> <p>1. ECOA shall carryout at least once a year a physical inspection of all operators.</p> <p>2. ECOA may take samples for testing of products not authorised for organic production, checking production techniques not in conformity with the organic production rules, and for detecting possible contamination by products not authorised for organic production.</p> <p>3. A control report shall be drawn up after each visit, countersigned by the operator of the unit or his representative.</p> <p>4. Moreover, ECOA shall carry out random control visits, primarily unannounced, based on the general evaluation of the risk of non-compliance with the organic production rules, taking into account at least the results of previous controls, the quantity of products concerned and the risk for exchange of products.</p> <p>5. ECOA shall carry out annually at least 10% unannounced inspection and at least 5% sampling of registered operations. The operations of these additional inspection visits and sampling are selected; either based on suspicious obtained by ecoa, or based on random sampling.</p>	<p><b>889-Article 65</b></p>	<p><b>CE</b></p>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Purpose

ECOA standard describes to all inspectors and other personnel of ecoa how to conduct routine and unannounced inspections of farms or firms. All results are reported in such a manner that persons who are not on site can evaluate them.

#### 2. Non-routine Inspection

Initial, follow-up, and unannounced visits are non-routine inspection. Initial inspection is the inspection done when the applicant apply for ecoa in the first time of practicing organic farming. Follow-up is the inspection need to be done after a routine inspection as recommended by the inspector and approved by chief Inspector to make

sure that the operation starts to implement necessary corrective actions. The unannounced inspections are done as spot check for any suspicious performance and/or practices.

The Chief inspector is responsible for planning all types of non-routine inspections. He decides which farm is to be inspected and he assigns the inspector; except of no operator notification the procedure of unannounced inspection is the same as of the routine inspection.

For a non-discriminatory approach, a method based on random sampling is followed to identify the firm/farm selected for unannounced inspection within the yearly inspection plan.

However consideration of potential hazards or deviations is also considered. The following criterion are used to mark registered firm/farm by using form, "Selection of unannounced inspected firms" and the form "Selection of unannounced inspected farms" as follows:

- i. Firm/Farm is marked if sanction is applied or complaint is received during the year before.
- ii. A firm is marked if it implements parallel processing.
- iii. A farm is marked if it implements a plan for partial conversion to organic.
- iv. A farm is marked if it grows crops of high sensitivity for diseases and pests.
- v. A firm is marked if it owns processing facilities, i.e. if it is not only exporter.

Unannounced inspection is done to 10% of the total number of registered Firm/Farm. These 10% are randomly selected from the marked ones first, and can be extended to unmarked Firm/Farm to complete the sample, if needed. . The Same procedure is followed for each year after the update of the marked farm/firm in the lists. The firm/farm which is randomly selected for unannounced inspection is not selected in subsequent years till all registered firm/farm are selected once.

Relevant ECOA formats:

- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-260 Selection of Unannounced Inspected Firms
- INS-270 Selection of Unannounced Inspected Farms

### 3. Related documents for the Implementation

- Standard Procedure of ECOA Quality Manual (SP-4-02 “Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 17. Inspection visits (announced & Unannounced)

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 65

### I. Regulations:

<p><i>Control visits</i></p> <p>1. ECOA shall carryout at least once a year a physical inspection of all operators.</p> <p>2. ECOA may take samples for testing of products not authorised for organic production, checking production techniques not in conformity with the organic production rules, and for detecting possible contamination by products not authorised for organic production.</p> <p>3. A control report shall be drawn up after each visit, countersigned by the operator of the unit or his representative.</p> <p>4. Moreover, ECOA shall carry out random control visits, primarily unannounced, based on the general evaluation of the risk of non-compliance with the organic production rules, taking into account at least the results of previous controls, the quantity of products concerned and the risk for exchange of products.</p> <p>5. ECOA shall carry out annually at least 10% unannounced inspection and at least 5% sampling of registered operations. The operations of these additional inspection visits and sampling are selected; either based on suspicious obtained by ecoa, or based on random sampling.</p>	<p><b>889-Article 65</b></p>	<p><b>CE</b></p>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Purpose

ECOA standard describes to all inspectors and other personnel of ecoa how to conduct routine and unannounced inspections of farms or firms. All results are reported in such a manner, that persons who are not on site can evaluate them.

#### 2. Organic Scheme Inspection

The Chief Inspector should develop an inspection plan to determine the time of the inspection of each farm with regard to the cultivated crops, the weather conditions,

and the availability of the inspectors. The time of the on-site visits should also change from one year to the other and is proposed by ecoa.

In addition to the routine inspection, ecoa should plan for unannounced inspection of at least 10% of registered operations. The operations of these additional inspection visits are selected; either based on suspicious obtained by ecoa, or based on random sampling, as explained and specified in "ECOA Quality Manual".

Based on the client request, any subcontracted processing or storage and services will also be inspected.

Relevant ECOA formats:

- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-070 Inspection Note

### **3. Non-routine Inspection**

Initial, follow-up, and unannounced visits are non-routine inspection. Initial inspection is the inspection done when the applicant apply for ecoa in the first time of practicing organic farming. Follow-up is the inspection need to be done after a routine inspection as recommended by the inspector and approved by chief inspector to make sure that the operation starts to implement necessary corrective actions. The unannounced inspections are done as spot check for any suspicious performance and/or practices.

The chief inspector is responsible for planning all types of non-routine inspections. He decides which farm is to be inspected and he assigns the inspector; except of no operator notification the procedure of unannounced inspection is the same as of the routine inspection.

For a non-discriminatory approach, a method based on random sampling is followed to identify the firm/farm selected for unannounced inspection within the yearly inspection plan.

However consideration of potential hazards or deviations is also considered. The following criterion are used to mark registered firm/farm by using form, "Selection of unannounced inspected firms" and the form "Selection of unannounced inspected farms" as follows:

- i. Firm/Farm is marked if sanction is applied or complaint is received during the year before.
- ii. A firm is marked if it implements parallel processing.
- iii. A farm is marked if it implements a plan for partial conversion to organic.
- iv. A farm is marked if it grows crops of high sensitivity for diseases and pests.
- v. A firm is marked if it owns processing facilities, i.e. if it is not only exporter.

Unannounced inspection is done to 10% of the total number of registered Firm/Farm. These 10% are randomly selected from the marked ones first, and can be extended to unmarked Firm/Farm to complete the sample, if needed.

The Same procedure is followed for each year after the update of the marked farm/firm in the lists. The firm/farm which is randomly selected for unannounced inspection is not selected in subsequent years till all registered firm/farm are selected once.

Relevant ECOA formats:

- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-260 Selection of Unannounced Inspected Firms
- INS-270 Selection of Unannounced Inspected Farms
- ADM-320 Organic Operation Contract of Farms & Firms

#### **4. Related documents for the Implementation:**

- Standard Procedure of ECOA Quality Manual (SP-4-02 "Inspection") (Annex A)
- ECOA Master List of Documents (Annex B)

## 18. Deviations in the frequency of inspection visits

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 27 (3),

889/2008 Art. 65

### I. Regulations:

<p><i>The nature and frequency of the controls shall be determined on the basis of an assessment of the risk of occurrence of irregularities and infringements as regards compliance with the requirements laid down in EC Regulation 834/2007. All operators shall be subject to a verification of compliance at least once a year.</i></p>	<p><b>834 Article 27 (3)</b></p>	<p><b>C</b></p>
<p><i>Control visits</i></p> <ol style="list-style-type: none"> <li><i>1. ECOA shall carryout at least once a year a physical inspection of all operators.</i></li> <li><i>2. ECOA may take samples for testing of products not authorised for organic production, checking production techniques not in conformity with the organic production rules, and for detecting possible contamination by products not authorised for organic production.</i></li> <li><i>3. A control report shall be drawn up after each visit, countersigned by the operator of the unit or his representative.</i></li> <li><i>4. Moreover, ECOA shall carry out random control visits, primarily unannounced, based on the general evaluation of the risk of non-compliance with the organic production rules, taking into account at least the results of previous controls, the quantity of products concerned and the risk for exchange of products.</i></li> <li><i>5. ECOA shall carry out annually at least 10% unannounced inspection and at least 5% sampling of registered operations. The operations of these additional inspection visits and sampling are selected; either based on suspicious obtained by ecoa, or based on random sampling.</i></li> </ol>	<p><b>889 Article 65</b></p>	<p><b>CE</b></p>



## **II. Implementation according to ECOA Quality Manual:**

### **1. Purpose**

*ECOA* standard describes to all inspectors and other personnel of *ecoa* how to conduct routine and unannounced inspections of farms or firms. All results are reported in such a manner, that persons who are not on site can evaluate them.

### **2. Organic Scheme Inspection**

After approval as an organic farm or firm, the chief inspector should develop an inspection plan to determine the time of the inspection of each farm with regard to the cultivated crops, the weather conditions, and the availability of the inspectors. The time of the on-site visits should also change from one year to the other and is proposed by *ecoa*.

In addition to the routine inspection, *ecoa* should plan for unannounced inspection of at least 10% of registered operations. The operations of these additional inspection visits are selected; either based on suspicious obtained by *ecoa*, or based on random sampling, as explained and specified in "ECOA Quality Manual".

Based on the client request any subcontracted processing or storage and services will also be inspected.

Relevant ECOA formats:

- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-070 Inspection Note

### **3. Non-routine Inspection**

Initial, follow-up, and unannounced visits are non-routine inspection. Initial inspection is the inspection done when the applicant apply for *ecoa* in the first time of practicing organic farming. Follow-up is the inspection need to be done after a routine

inspection as recommended by the inspector and approved by chief inspector to make sure that the operation starts to implement necessary corrective actions.

The unannounced inspections are done as spot check for any suspicious performance and/or practices.

The Chief inspector is responsible for planning all types of non-routine inspections. He decides which farm is to be inspected and he assigns the inspector, except of no operator notification the procedure of unannounced inspection is the same as of the routine inspection.

For a non-discriminatory approach, a method based on random sampling is followed to identify the firm/farm selected for unannounced inspection within the yearly inspection plan. However consideration of potential hazards or deviations is also considered. The following criterion are used to mark registered firm/farm by using form, "Selection of unannounced inspected firms" and the form "Selection of unannounced inspected farms" as follows:

- i. Firm/Farm is marked if sanction is applied or complaint is received during the year before.
- ii. A firm is marked if it implements parallel processing.
- iii. A farm is marked if it implements a plan for partial conversion to organic.
- iv. A farm is marked if it grows crops of high sensitivity for diseases and pests.
- v. A firm is marked if it owns processing facilities, i.e. if it is not only exporter.

Unannounced inspection is done to 10% of the total number of registered Firm/Farm. These 10% are randomly selected from the marked ones first, and can be extended to unmarked Firm/Farm to complete the sample, if needed.

The Same procedure is followed for each year after the update of the marked farm/firm in the lists. The firm/farm which is randomly selected for unannounced inspection is not selected in subsequent years till all registered firm/farm are selected once.

Relevant ECOA formats:

→ INS-170 Farm Inspection Report

- INS-180 Firm Inspection Report
- INS-260 Selection of Unannounced Inspected Firms
- INS-270 Selection of Unannounced Inspected Farms
- INS-050 Farm Inspection Plan
- INS-060 Firm Inspection Plan
- ADM-320 Organic Operation Contract of Farms & Firms

#### **4. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-4-02 “Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 19. Sampling and analysis in case of suspect of the use of prohibited substances

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 65 (2)

### I. Regulations:

<p><i>1. ECOA shall carry out annually at least 10% unannounced inspection and at least 5% sampling of registered operations. The operations of these additional inspection visits and sampling are selected; either based on suspicious obtained by ecoa, or based on random sampling.</i></p> <p><i>2. ECOA may take samples for testing of products not authorised for organic production, checking production techniques not in conformity with the organic production rules, and for detecting possible contamination by products not authorised for organic production.</i></p>	889-Article 65 (2)	CE
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### II. Implementation according to ECOA Quality Manual:

#### 1. Purpose

*ECOA* standard ensures that the data base from the analyses of samples agrees to the (EC) reg. 834/2007 in combination with (EC) reg. 889/2008, and supports the decision of product certification with scientific basis. It explains the frequency and extends of taking samples in firms and farms and during the surveillance of certified local market products. The requirements in respect of the laboratories are also described.

#### 2. Suspicion samples

Inspectors are trained to take samples during inspections of firms and farms by any clues of not allowed actions e.g. absence from insects or birds, suspicious surface traces or found containers with non-organic chemicals. Indicators to take samples are:

- Presence of traces of chemical spraying material on the foliage system of certain crop.
- Feeling of chemical smell in the farm
- Presence of considerable amount of killed insects and absence of predators and other insects in the field
- One group of death weeds, where others are still green
- Contaminated spraying tools or machines (smell)
- Empty containers from chemicals or pesticides
- Possible spray drift from non-organic neighbors

- History of the farm and the operator
- Susceptibility of the crop to attack by different pests and general situation of this crop in all area and special situation /condition in the inspected organic farm.
- Firms: Doubt about using forbidden disinfected materials
- Firms: Doubt about mixing organic products with others (of conventional origin) during processing or transportation
- Firms: Doubt of replacing/mixing organic goods with conventional products
- Firms: Doubtful balance of sales to purchased products

Relevant ECOA formats:

- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-260 Selection of Unannounced Inspected Firms
- INS-270 Selection of Unannounced Inspected Farms
- ADM-300 Sampling Protocol
- ADM-320 Organic Operation Contract of Farms & Firms
- ADM-310 Contract Agreement for EN 45001 accredited Laboratories

### **3. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-4-03 “Sampling & Analyzing”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 20. Deviating bookkeeping requirements, missing or deficient documents

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 66

### I. Regulations:

<p><i>Record keeping responsibilities of operators</i></p> <p><i>General:</i></p> <p><i>1. Stock and financial records shall be kept in the unit or premises to enable the operator to identify and ECOA to verify:</i></p> <p style="margin-left: 20px;"><i>(a) the supplier , the seller, or the exporter of the products;</i></p> <p style="margin-left: 20px;"><i>(b) the nature and the quantities of organic products delivered to the unit as well as all materials bought for their use ;</i></p> <p style="margin-left: 20px;"><i>(c) the nature and the quantities of organic products kept in storage at the premises;</i></p> <p style="margin-left: 20px;"><i>(d) the nature, the quantities and the consignees , the buyers of any products which have left the unit or the first consignee's premises or storage facilities;</i></p> <p style="margin-left: 20px;"><i>(e) in case of operators who do not store or physically handle such organic products, the nature and the quantities of organic products bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees.</i></p> <p><i>2. The documentary accounts shall also comprise the results of the verification at reception of organic products and all information required by ECOA for the purpose of proper control. The data in the accounts shall be documented with appropriate justification documents. The accounts shall demonstrate the balance between the input and the output.</i></p> <p><i>3. In case of an operator runs several production units in the same area, the units for non-organic products, together with storage premises for input products must also be subject to the minimum control requirements.</i></p>	<b>889-Article 66</b>	<b>C</b>
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### II. Implementation according to ECOA Quality Manual:

#### 1. On-site Inspection Procedure

The on-site standard procedures of inspection are covering a number of steps, the sequence may, however be decided by the inspector:

- Initial discussion with the managers in charge.

- Check of the existing documentation such as maps, charts, questionnaires, diaries, recipes, etc. and possible completion thereof.
- Inspection by observations and interviews with the staff.
- Taking of samples for analysis, on suspicion.
- Follow up of the product flow from "in" to "out" (field to export) and audit trail of the business transactions.
- Possible contacts with local organizations and officials.
- Final discussion with the management and information on the observations and findings of non-conformities and the major draw backs.
- Compiling the inspection report, with the documentation of nonconformities found in the assessment. This report has to be countersigned by the manager of the firm or farm.
- Appointment of corrective actions together with the operator.

Relevant ECOA formats:

- INS-110 In/Out of Agriculture Inputs to/ from Farm Stores
- INS-120 IN/Out of Products to/from farm Stores
- INS-130 Raw Products Inputs
- INS-140 Processing of Raw Products
- INS-220 IN/Out of Items to/from Firm Stores
- INS-150 Sales and Export
- INS-160 Label for Organic Product

## **2. Evaluation of the Inspection Report**

Upon the inspector return from the assessment, he has to submit his report at the earliest possible date which should not exceed 15 day after the date of the on-site inspection. The complete documentation is to be submitted to the chief inspector and should include:

- (e) Inspection Report (farm, firm or farmer group) including:
- a. All documents received for inspection
  - b. All additional documents gathered during inspection
  - c. Answers to specific questions e.g. fertilizers, pesticides, farm documents, crop rotation, livestock, stables, farm fence, stores, buildings, source of water, weeds, hygiene, etc.
  - d. List with nonconformities and other observations
  - e. Form with dates for corrective actions, dated and signed by the applicant.
  - f. Recommendation for certification

- g. Results of sample analyses (if samples are taken)
- h. Sampling Protocols and order form

With the complete information, the chief inspector revises the results of the inspection and suggests his recommendation to the certification committee who has to decide over certifications. The report of the chief inspector may include:

- (f) No deviation
- (g) Warning
- (h) Penalty
- (i) Exclusion of parts of the farm / crop
- (j) Withdrawal of the certification

**Relevant ECOA formats:**

- INS-010 Farm Questionnaire
- INS-020 Firm Questionnaire
- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- ADM-320 Organic Operation Contract of Farms & Firms
- INS-190 Inspection Report for Subcontracted Storing Services
- INS-200 Inspection Report for Subcontracted Processing Services
- ADM-120 Notification for the Sample Test Results
- ADM-300 Sampling Protocol

### **3. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-4-02 “Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)



## 21. Deficient financial records and calculation of flow of products

**Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 66**

### I. Regulations:

<p><i>Record keeping responsibilities of operators</i></p> <p><i>General:</i></p> <p><i>1. Stock and financial records shall be kept in the unit or premises to enable the operator to identify and ECOA to verify:</i></p> <p style="margin-left: 20px;"><i>(a) the supplier , the seller, or the exporter of the products;</i></p> <p style="margin-left: 20px;"><i>(b) the nature and the quantities of organic products delivered to the unit as well as all materials bought for their use ;</i></p> <p style="margin-left: 20px;"><i>(c) the nature and the quantities of organic products kept in storage at the premises;</i></p> <p style="margin-left: 20px;"><i>(d) the nature, the quantities and the consignees , the buyers of any products which have left the unit or the first consignee's premises or storage facilities;</i></p> <p style="margin-left: 20px;"><i>(e) in case of operators who do not store or physically handle such organic products, the nature and the quantities of organic products bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees.</i></p> <p><i>2. The documentary accounts shall also comprise the results of the verification at reception of organic products and all information required by ECOA for the purpose of proper control. The data in the accounts shall be documented with appropriate justification documents. The accounts shall demonstrate the balance between the input and the output.</i></p> <p><i>3. In case of an operator runs several production units in the same area, the units for non-organic products, together with storage premises for input products must also be subject to the minimum control requirements.</i></p>	<b>889-Article 66</b>	<b>C</b>
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### II. Implementation according to ECOA Quality Manual:

#### 1. On-site Inspection Procedure

The on-site standard procedures of inspection are covering a number of steps, the sequence may, however be decided by the inspector:

- Initial discussion with the managers in charge.
- Check of the existing documentation such as maps, charts, questionnaires, diaries, recipes, etc. and possible completion thereof.
- Inspection by observations and interviews with the staff.

- Taking of samples for analysis, on suspicion
- Follow up of the product flow from "in" to "out" (field to export) and audit trail of the business transactions
- Possible contacts with local organizations and officials;
- Final discussion with the management and information on the observations and findings of non-conformities and the major draw backs;
- Compiling the inspection report, with the documentation of nonconformities found in the assessment. This report has to be countersigned by the manager of the firm or farm
- Appointment of corrective actions together with the operator

Relevant ECOA formats:

- INS-020 Firm Questionnaire
- INS-110 In/Out of Agriculture Inputs to/ from Farm Stores (or Subcontracted Stores)
- INS-120 IN/Out of Products to/from farm Stores (or Subcontracted Stores)
- INS-130 Raw Products Inputs
- INS-140 Processing of Raw Products
- INS-150 Sales and Export
- INS-160 Label for Organic Product
- INS-170 Farm Inspection Report
- INS-180 Firm Inspection Report
- INS-220 IN/Out of Items to/from firm Stores (or Subcontracted Stores)

## 2. Certification of Organic Products

The certification procedure starts upon request to *ecoa* using a standard format given to all registered clients. This form includes the information needed to issue the product certificate as requested by the EU-member states. Among this information are those related to the importer and first consignee abroad, the import license number as well as the shipment description. The request is forwarded by *ecoa* secretary to the chief certifier, who is responsible for this process, together with all information needed to take the decision. A checklist is used by the chief certifier to facilitate his decision.

The chief certifier reviews the documents and makes sure that all requested data which appear on the certificate are correct. If the results of the examination are all right, the chief certifier signs the request and forwards it to the secretary to generate the corresponding certificates, with proper register numbers.

Each certificate is signed by the chief certifier as expert for the certification decision and/or by *ecoa*'s C.E.O. as approved signatory for the certification body, then stamped and handed over to the client's authorized representative (original and one

stamped copy). One copy is kept in *ecoa* file, signed by the client. The certificate is to be issued within 48 hours from the time it is requested.

The following certificates can be issued by *ecoa* on request:

- Import Certificate for organic products to European Community.
- Import Certificate for organic products to non European Community.
- Organic products certificate for domestic market

If the kind or amount of the product does not fit to the producer's records, or if there is any sanction on the producer or processor, the request is rejected by the chief certifier. The client is informed about the decision through a fax.

Relevant ECOA formats:

- CER-010 Request of organic product certificate
- CER-020 Product Certificate Checklist
- CER-100 Import certificate for organic products to European Community
- CER-110 Import certificate for organic products to non European Community
- CER-120 Organic products certificate for domestic market
- ADM-240 ECOA sanction list
- CER-130 Notification for the request of organic product certificate

### **3. Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-02 "Inspection"& SP-4-04 "Certification") (Annex A)
- ECOA Master List of Documents (Annex B)

## 22. Deviations from the sealing and closing requirements during transport

Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 31& Art. 33

### I. Regulations:

<p><b><i>Packaging and transport of products to other operators or units</i></b></p> <p><i>1. Operators shall ensure that organic products are transported to other units only in appropriate packaging, containers or vehicles closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating:</i></p> <p><i>(a) the name and address of the operator and the owner or seller of the product;</i></p> <p><i>(b) the name of the product accompanied by a reference to the organic production method;</i></p> <p><i>(c) the name and/or the code number of the control body to which the operator is subject;</i></p> <p><i>(d) the lot identification mark according to a marking system either approved at national level or agreed with the control body .</i></p> <p><i>The information referred to above may also be presented on an accompanying document. This accompanying document shall include information on the supplier and/or the transporter.</i></p> <p><i>2. The closing of packaging, containers or vehicles shall not be required where:</i></p> <p><i>(a) transportation is direct between an operator and another operator who are both subject to the same organic control system</i></p> <p><i>(b) the products are accompanied by a document giving the information required</i></p> <p><i>(c) both the expediting and the receiving operators shall keep documentary records of such transport operations available for the control body of such transport operations.</i></p>	<p><b>889-Article 31</b></p>	<p><b>C</b></p>
<p><b><i>Reception of products from other units and other operators</i></b></p> <p><i>1. On receipt of an organic product, the operator shall check the closing of the packaging or container where it is required and the presence of the indications provided above. The operator shall crosscheck the information on the label with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts .</i></p> <p><i>2. The operator shall verify the documentary evidence of his/her suppliers.</i></p>	<p><b>889-Article 33</b></p>	<p><b>C</b></p>

## **II. Implementation according to ECOA Quality Manual:**

### **1. Purpose**

*ECOA* standard ensures that surveillance of certified products shipped for foreign destinations encloses the supervision until the cargo is loaded. Particularly condition of products and appropriate packaging and labeling in accordance to EC 834/2007 is checked, that ensures the identity of the lot to the inspection certificate. It explains the frequency and extends of taking samples in firms and farms and during the surveillance of certified local market products. *ECOA* identity inspections ensure that the products which are shipped are only those which conform to the standards.

### **2. Identity inspection**

The chief inspector names an inspector for identity inspection. The selected inspector gets the inspection certificates and the firm files with the request and the whole information for the shipment. He arranges the inspection visit, accompanied by a firm's representative. On site the inspector enables cargo loading and supervises it. He checks the origin from different farms, condition of goods and packaging, quantities and number of lots to be shipped with the aid of an “Identity Inspection Checklist”.

Particularly, he checks if packaging or containers are appropriate and closed in a manner to prevent substitution of the content, and if labeling is provided on each container, to identify the exporter, the container number and the lot number. The inspector should match this information with the inspection certificate. He marks every container of the lot with a red colored stamp with ecoa emblem and the reference number of certificate and keeps a loading list and protocol. The protocol is signed by the inspector and the firm's representative and copied. The original is attached to the certificates and the copy is kept in ecoa file.

Relevant ECOA formats:

→ INS-210 Identity Inspection Checklist

### **3. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-4-06 “Identity Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 23. Intermediate marketing stop of products that are under suspicion of a non-conformity, missing procedure for information

**Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 91 and 92**

### I. Regulations:

<p><i>Measures in case of suspicion of infringements and irregularities</i></p> <p><i>1. Where an operator considers or suspects that a product which he has produced, prepared, imported or that he has received from another operator, is not in compliance with organic production rules, he shall initiate procedures either to withdraw from this product any reference to the organic production method or to separate and identify the product. He may only put it into processing or packaging or on the market after elimination of that doubt, unless it is placed on the market without indication referring to the organic production method. In case of such doubt, the operator shall immediately inform ECOA. ECOA may require that the product cannot be placed on the market with indications referring to the organic production method until it is satisfied, by the information received from the operator or from other sources, that the doubt has been eliminated.</i></p> <p><i>2. Where ECOA has a substantiated suspicion that an operator intends to place on the market a product not in compliance with the organic production rules but bearing a reference to the organic production method, ECOA can require that the operator may provisionally not market the product with this reference for a time period to be set by ECOA. Before taking such a decision, ECOA shall allow the operator to comment. This decision shall be supplemented by the obligation to withdraw from this product any reference to the organic production method if ECOA is sure that the product does not fulfill the requirements of organic production.</i></p> <p><i>However, if the suspicion is not confirmed within the said time period, the decision referred to in the above subparagraph shall be cancelled not later than the expiry of that time period. The operator shall cooperate fully with ECOA in resolving the suspicion.</i></p>	<b>889-Article 91</b>	<b>C</b>
<p><i>Exchange of information</i></p> <p><i>1. Where the operator and his subcontractors are checked by different control authorities or control bodies, the declaration shall include an agreement by the operator on his</i></p>	<b>889-Article 92</b>	<b>C</b>

<p><i>behalf and that of his subcontractors, that the different control bodies or control authorities can exchange information on the operations under their control and on the way this exchange of information can be implemented. This includes elements of the control files, the specific reports and related non-conformities.</i></p> <p>2. <i>Where the operator withdraws from the control system he shall inform ECOA without delay.</i></p>		
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## **II. Implementation according to ECOA Quality Manual:**

### **1. Interference**

In case of complaints or suspicions concerning the condition of products to be shipped, the inspector on site has to inform immediately the chief inspector and the chief certifier, who are responsible for clarifying the situation. If there are serious doubts concerning the quality of products, the inspection must be terminated and the certificates must be withdrawn.

Relevant ECOA formats:

→ INS-210 Identity Inspection Checklist

### **2. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-4-06 “Identity Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 24. Information exchange between control bodies

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 31 &

889/2008 Art. 92

### I. Regulations:

<p><i>Exchange of information</i></p> <p><i>Upon a request duly justified by the necessity to guarantee that a product has been produced in accordance with this Regulation, the competent authorities, control authorities and the control bodies shall exchange relevant information on the results of their controls with other competent authorities, control authorities and control bodies. They may also exchange such information on their own initiative.</i></p>	<b>834-Article 31</b>	<b>C</b>
<p><i>Exchange of information</i></p> <p>1. <i>Where the operator and his subcontractors are checked by different control authorities or control bodies, the declaration shall include an agreement by the operator on his behalf and that of his subcontractors, that the different control bodies or control authorities can exchange information on the operations under their control and on the way this exchange of information can be implemented. This includes elements of the control files, the specific reports and related non-conformities.</i></p> <p>2. <i>Where the operator withdraws from the control system he shall inform ECOA without delay.</i></p>	<b>889-Article 92</b>	<b>C</b>

### II. Implementation according to ECOA Quality Manual:

#### 1. Exchanging information with other control bodies, Competent authorities & EU Commission

In principle, no information about ecoa clients is released by ecoa to third parties without the prior written consent of the client. However, the clients and their subcontractors within the context of the clauses of the contracts signed with ecoa agree to the cases where *ecoa* is authorized to exchange information with other control bodies whom might be involved in the supply chain of organic products from farms to processors, to exporters, and finally to importers.

This information flow is usually required either for issuing import licenses or for confirmation of equivalence of the certification standards.

On annual basis, ecoa shall submit a concise annual report to EU commission including:

- Updating the information of the technical dossier.
- Describing the control activities during the previous year, results obtained, irregularities observed, and the corrective measures taken.



- Briefing on the latest assessment reports containing the results of the annual surveillance assessment.

This authorization is also valid in case of TRANSFER of clients between *ecoa* and other control bodies whether *ecoa* is the issuing control body or the accepting control body.

## **2. Reporting information to accreditors and competent authorities**

According to signed contracts between *ecoa* and its clients, *ecoa* is authorized to provide, as necessary, information about the operation of its clients to accreditors.

Relevant ECOA formats:

- ADM-150 Information Release Permission
- ADM-320 Organic Operation Contract
- ADM-325 Subcontracted agreement service

## **3. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-5-03 “Information Communication”) (Annex A)
- ECOA Master List of Documents (Annex B)

## **25. Option to prohibit the operator concerned from marketing products which refer to the organic production method in the labeling for a limited time period**

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 30 (1)

### **I. Regulations:**

<p><i>Measures in case of infringements and irregularities</i></p> <p><i>Where an irregularity is found as regards compliance with the requirements laid down in this Regulation, ECOA shall ensure that no reference to the organic production method is made in the labelling and advertising of the entire lot or production run affected by this irregularity, where this would be proportionate to the relevance of the requirement that has been violated and to the nature and particular circumstances of the irregular activities.</i></p> <p><i>Where a severe infringement or an infringement with prolonged effect is found, ECOA shall prohibit the operator concerned from marketing products which refer to the organic production method in the labelling and advertising for a period to be agreed with the relevant authorities.</i></p>	<p><b>834-Article 30 (1)</b></p>	<p><b>C</b></p>
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### **II. Implementation according to ECOA Quality Manual:**

#### **1. Purpose**

*ECOA* standard explains the legal use of inspection certificates, registration no., logo, marks of conformity, inspection audit reports, as well as the sanctions in case of misuse.

#### **2. Use of licenses, certificates and marks of conformity**

*Ecoa* exercises proper control over ownership, use and display of licenses, certificates and marks of conformity.

Incorrect references to the certification system or misleading use of licenses, certificates or marks, found in advertisements, catalogues etc, are be dealt with suitable action, which are described in the ecoa standards "Labeling, Use of Certificates,..” and which varies from corrective actions up to legal action against the operator. The process owner is the C.E.O.

### **3. Sanctions for misusing certificates, marks and any other indications to organic farming**

Any misuse of the supplier is dealt with suitable action which can reach from corrective actions till legal action. In the first step the supplier gets a sanction note with the description of the nonconformity and a deadline to respond or to make adequate corrective action. The chief certifier is responsible for the sanction note. It is countersigned by *ecoa* Chief Executive Officer. Sanctions can include warnings, fines, suspension or withdrawal of certifications. In the second step, adequacy of the corrective actions is evaluated by the Chief Certifier. If the corrective action can be accepted, the case will be closed and archived in the file and the register of sanctions. In case of non-reaction, rejection or appealing to the sanction note, existing certifications from the supplier are immediately suspended.

### **4. Interference**

In case of complaints or suspicions concerning the condition of products to be shipped, the inspector on site has to inform immediately the chief inspector and the chief certifier, who are responsible for clarifying the situation. If there are serious doubts concerning the quality of products, the inspection must be terminated and the certificates must be withdrawn.

Relevant ECOA formats:

- ADM-130 Sanction Note
- ADM-640 Register of Sanctions
- INS-210 Identity Inspection Checklist

### **5. Related documents for the Implementation:**

- ECOA Quality Manual (Chapter 4 “Process Management”) and Standard Procedures (SP-4-07 “Use of Licenses, Certificates and Marks of Conformity” & SP-4-06 “Identity Inspection”) (Annex A)
- ECOA Master List of Documents (Annex B)

## **26. Duty to inform the customers when the references to the organic production method were withdrawn from an affected lot in case of irregularities**

**Reference to the European Regulations on Organic Agriculture: 889/2008 Art. 63 (2)**

### **I. Regulations:**

<p><i>Control arrangements and undertaking by the operator</i></p> <p><i>The description and the measures (referred to in article 63 (1)) shall be contained in a declaration, signed by the responsible operator. In addition, this declaration shall include an undertaking by the operator:</i></p> <p><i>(a) to perform the operations in accordance with the organic production rules;</i></p> <p><i>(b) to accept, in the event of infringement or irregularities, the enforcement of the measures of the organic production rules;</i></p> <p><i>(c) to undertake to inform in writing the buyers of the product in order to ensure that the indications referring to the organic production method are removed from this production.</i></p> <p><i>The declaration provided shall be verified by ECOA that issues a report identifying the possible deficiencies and non-compliances with the organic production rules. The operator shall countersign this report and take the necessary corrective measures.</i></p>	<p><b>889-Article 63 (2)</b></p>	<p><b>C</b></p>
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### **II. Implementation according to ECOA Quality Manual:**

#### **1. Information on the procedure**

*Ecoa* provides applicants by detailed description of the evaluation and certification procedures, appropriate to each certification scheme. Documents for application contain the requirements for certification, the applicant's rights and duties, and the suppliers of the certified products.

By accepting the request, the administration officer makes a legal contract that states all contractual clauses among which are the following commitments by the applicant

- always complies with the relevant provisions of the certification program
- makes all necessary arrangements for the conduct of the evaluation

- makes claims regarding certification; only with respect to the scope of which certification has been granted.
- does not use its product / system certification in such a manner as to bring the certification body into dispute and does not make any statement regarding its certification which ecoa may consider misleading or unauthorized
- upon suspension or cancellation of certification, discontinues its use of all advertising material that contain any reference thereto and returns any certification documents as requested by the certification body
- uses the certificates only to indicate that products/systems are certified as being in conformity with the standards of the applicable certification scheme.
- endeavors to ensure that no certificate or report nor any part thereof is used in a misleading manner
- Complies with the requirements of ecoa, in any reference to its certified products/systems in communication media such as documents, brochures or other advertising means.

The administration officer of ecoa is responsible to provide any additional application information that might be requested by the applicant.

## **2. Information stream from clients to ECOA**

For initial certification, the client provides all his information about his organization, processes, measures, using the questionnaire during the application procedures. The clauses of the certification contracts with *ecoa* are binding to the client to keep *ecoa* informed with any changes in this information; and in particular the changes which affects the conformity of his operation with applicable standards. If the client fails to bind to that, violation will be recorded during next surveillance evaluation and he will be subject to applicable sanctions which could reach withdrawal of certification.

Relevant ECOA formats:

- ADM-320 Organic Operation Contract of Farms & Firms
- INS-020 Firm Questionnaire

## **3. Related documents for the Implementation**

- ECOA Quality Manual (Chapter 4 “Process Management”) and Standard Procedure (SP-5-03 “Information Communication”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 27. Deviating ingredients of non-organic origin

Reference to the European Regulations on Organic Agriculture: 889/2008 Article (29) and Annex IX

### I. Regulations:

<p><b><i>Authorization of non-organic food ingredients of agricultural origin:</i></b></p> <p><i>An ingredient of agricultural origin may only be used in non-organic form under the following conditions:</i></p> <ol style="list-style-type: none"> <li><i>1. The operator has notified ECOA of all the requisite evidence showing that the ingredient concerned is not produced in sufficient quantity in the country or production in accordance with the organic production rules or cannot be imported from other countries;</i></li> <li><i>2. ECOA has issued formal authorization which will be reviewed annually;</i></li> <li><i>3. The authorization may be withdrawn when evidence suggests that the supply situation has improved.</i></li> </ol>	<p><b>889-Article 29</b></p> <p><b>&amp;</b></p> <p><b>Annex IX</b></p>	<p><b>E</b></p> <p><b>C</b></p>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Organic Certification of Farms & Firms

During the certification process, checklists are used to ensure the comprehensive review of relevant information. The points of the checklists include previous certification conditions, outstanding sanctions, complaints, appeals, in addition to excuses (including use of restricted fertilizers) granted during the season and fees-payment situation.

#### 2. Surveillance of firms

Firms are regularly inspected at least once a year by *ecoa* on site. Samples may be collected during inspections on a random basis or on suspicion. Changes in the processing itself, including processing aids and ingredients, or in the circumstances of processing have to be announced to *ecoa* for permission/decision in writing. The firm's subcontractors relevant during organic processing are involved in the operation contract. This includes the possibility to inspect also the subcontractors and to peruse the contracts between the firm and its subcontractor.

Depending on the kind of changes announced by the firm, the chief inspector in arrangement with the chief certifier has to decide if there is a need for an inspection on site or not.

If samples are taken under suspicious circumstances and with positive test results, the costs for analyzing the samples are to be covered by the client.

Relevant ECOA formats:

- INS-020 Firm Questionnaire
- INS-180 Firm Inspection Report

### **3.Related documents for the Implementation**

- Standard Procedures of ECOA Quality Manual (SP-4-05 “Surveillance”) (Annex A)
- ECOA Master List of Documents (Annex B)
- EC 889/2008: Annex VIII, Certain products and substances for use in production of processed organic food referred to in article 27 (1) (a) and its latest updates.
- EC 889/2008: Annex IX, ingredients of agricultural origin which have not been produced organically referred to in article 28, and in its latest updates

## 28. Inclusion of operators in the certification program

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 1,

### I. Regulations:

<p><b>1. Aim</b></p> <p><i>This Standard provides the basis for the sustainable development of organic production while ensuring the effective functioning of the market, fair competition, as well as consumer confidence and interests.</i></p> <p><i>It summarizes common objectives and principles to support the rules, set out under EC 834/2007 in combination with 889/2008, concerning major stages of production, preparation and distribution of organic products and their control; and the use of labeling to organic production.</i></p> <p><b>2. Scope</b></p> <p><i>This Standard shall apply to the following products originating from agriculture where such products are placed on the local market or intended to be exported to the EU market:</i></p> <ol style="list-style-type: none"> <li><i>1. live or unprocessed agricultural products;</i></li> <li><i>2. processed agricultural products for use as food;</i></li> </ol> <p><i>This Standard shall apply to any operator involved in activities, at any stage of production, preparation and distribution, relating to the products covered by ecoa scope of accreditation.</i></p> <p><i>This Standard shall be applied within the framework of relevant national or international law concerning such products, such as provisions governing the production, preparation, marketing, labeling and control.</i></p>	<p><b>834-Article (1)</b></p>	<p><b>C</b></p>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Information dissemination to clients

After completing the registration and contracting procedure with *ecoa*, an applicant / operator Guide is handed over. This guide includes detailed description for all processes of *ecoa* certification system. It also includes the sanction list which is



applicable for violating standards as well as the fees list for **ecoa** services. For the organic certification scheme, the client also receives a farm/firm package which contains all forms needed for book keeping of the information related to his operation.

For changes which could happen for any of **ecoa** certification rules mentioned in Applicant/Operator Guides, a form explaining these changes is prepared and timely circulated to all clients through different dissemination tools like seminars organized by growers/exporters associations, faxes, mails, attachments to inspection notes, inspection visits, .....etc.

For updates and explanation of applicable certification standards, **ecoa** keeps issuing “Explanation Sheets “and distributes it to clients through the above mentioned dissemination channels.

Notification for registration together with the assigned number or code is sent to **ecoa** client within 14 calendar days from the date of application The certification decision is sent to **ecoa** client within 28 calendar days of completion of inspection or audit. Response to appeals and complains are also received by **ecoa** clients within 28 calendar days from the date of submittal

#### Relevant ECOA formats:

- ADM-155 Applicant / Operator Guide for Organic Certification
- ADM-240 ecoa Sanction list
- DCS-014 List of Documents in the Farm Package
- DCS-015 List of Documents in the Firm Package
- ADM-165 Certification Rules Update
- ADM-170 EC-834/2007 Regulation Explanation
- ADM-110 Notification for Registration Request
- ADM-040 Request for Appeal
- ADM-050 Docket for complain

## **2.Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual, (SP-5-03 “Information Communication”) (Annex A)
- ECOA Master List of Documents (Annex B)

## 29. Publication of a list of certified operators

Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 28,

### I. Regulations:

<p><i>Adherence to the control system</i></p> <p><i>1. Any operator who produces, prepares, stores, or exports from a third country organic products or who places such products on the market shall, prior to placing on the market of any products as organic or in conversion to organic: (a) submit her/his undertaking to an authorised control body.</i></p> <p><i>2. Where an operator contracts out any of the activities to a third party, that operator shall nonetheless be subject to the requirements referred to in point (a), and the subcontracted activities shall be subject to the control system.</i></p> <p><i>3. ECOA shall keep an updated list containing the names and addresses of operators under its control. This list shall be made available to the interested parties. (Published on ecoa website:<a href="http://www.ecoa.com.eg">http://www.ecoa.com.eg</a>)</i></p>	<b>834-Article 28</b>	<b>E</b>
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### II. Implementation according to ECOA Quality Manual:

#### 1. Organic Certification of farms and firms

For new applicant, the certification decision includes the determination of the farm organic status and the appropriate conversion period to the full organic status. In all cases the scope of certification (crops), the certification scheme, as well as the certification conditions/sanctions are determined within the decision. In case of positive decision by the certification committee, a farm/firm certificate is issued with one year validity. Original copy of the certificate is submitted to the client and the registered farm/firm lists are updated. In case of negative decision by the Certification committee, the sanction is reported and the client is notified. The lists are regularly updated in ecoa files and website.

Relevant ECOA formats:

→ ADM-180 Certification Committee Decision

- ADM-220 Farm Certificates
- ADM-230 Firm Certificates
- ADM-200 Registered Farm List
- ADM-210 Registered Firm List
- ADM-130 Sanction note
- CER- 100 Import Inspection Certificate (EUROPEAN)
- CER-110 Import Inspection Certificate (Non EUROPEAN)
- CER-120 Organic Products Certificate for Domestic Market

## **2. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-4-04 “Certification”) (Annex A)
- ECOA Master List of Documents ( Annex B)
- ECOA Website: <http://www.ecoa.com.eg>

## **30. Acceptance of the organic status of suppliers certified by other certification bodies with different organic certification programs**

**(different production standards or certification systems)**

**Reference to the European Regulations on Organic Agriculture: 834/2007 Art. 33 (1),**

### **I. Regulations:**

<p><i>Import of products providing equivalent guarantees</i></p> <p><i>1. A product imported from a third country may also be placed on the Community market as organic provided that:</i></p> <p><i>(a) the product has been produced in accordance with production rules comply/ equivalent to those referred to in EC 834/2007 ( Titles III, production rules; and IV, labeling);</i></p> <p><i>(b) the operators have been subject to control measures of comply/equivalent effectiveness to those referred to in EC 834/2007 (Title V, controls) and such control measures have been permanently and effectively applied;</i></p> <p><i>(c) the operators at all stages of production, preparation and distribution in the third country have submitted their activities to a control system ,control authority or control body recognized by the EU Commission;</i></p> <p><i>(d) the product is covered by a certificate of inspection issued by the competent authorities, control authorities or control bodies of the third country recognised by the EU Commission, which confirms that the product satisfies the conditions set out in this paragraph.</i></p> <p><i>The original of the certificate referred to in this paragraph shall accompany the goods to the premises of the first consignee; thereafter the importer must keep the certificate at the disposal of the control authority or the control body for not less than two years.</i></p>	<p><b>834-Article 33 (1)</b></p>	<p><b>C</b></p>
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### **II. Implementation according to ECOA Quality Manual:**

#### **1. Exchanging information with other control bodies**

In principle, no information about ecoa clients is released by *ecoa* to third parties without the prior written consent of the client. However, the clients and their subcontractors within the context of the clauses of the contracts signed with ecoa agree to the cases where ecoa is authorized to exchange information with other control bodies whom might be involved in the supply chain of organic products from farms to processors, to exporters, and finally to importers.

This information flow is usually required either for issuing import licenses or for confirmation of equivalence of the certification standards.

This authorization is also valid in case of transfer of clients between *ecoa* and other control bodies whether *ecoa* is the issuing control body or the accepting control body.

Relevant ECOA formats:

- ADM-150 Information Release Permission
- ADM-320 Organic Operation Contract
- ADM-325 Subcontracted agreement service
- INS-010 Farm Questionnaire
- INS-020 Firm Questionnaire

## **2. Related documents for the Implementation**

- Standard Procedure of ECOA Quality Manual (SP-5-03 “Information Communication”) (Annex A)
- ECOA Master List of Documents (Annex B)

## Not in ECOA Scope of Accreditation

31	Deviating composition of substrates for mushroom production	EC 889/2008 Article 6
32	Deviating criteria for the purchase of non-organic animals	EC 889/2008 Article 9
33	Deviating use of conventional animal feed and feedingstuff	EC 889/2008 Article 22, Annex V
34	Preventive use of allopathic veterinary medicinal products	EC 889/2008 Article 23 (1)
35	Incomplete documentation of the use of veterinary medicines	EC 889/2008 Article 76 (e), Article 77
36	Non-compliance with the withdrawal periods after the use of veterinary medicines	EC 889/2008 Article 24 (5)
37	Tethering of livestock	EC 834/2007 Article 14 (b) vi, EC 889/2008 Article 39 & Article 95
38	Identification of livestock and livestock products	EC 889/2008 Article 26 (5) d & Article 75
39	Deviating minimum surface areas indoors and outdoors	EC 889/2008 Article 10(4); Annex III
40	Overgrazing and poaching of grassland	EC 834/2007 Article 14b iv
41	Use of deviating products of cleaning and disinfection	EC 834/2007 Article 14 (f); Annex VII
42	Deviating requirements for the purchase of bees	EC 889/2008 Article 8(2)
43	Deviating feeding requirements for the feeding of bees	EC 889/2008 Article 19 (2,3)
44	Deviating material requirements for bee hives	EC 834/2007 Article 14 (b) x EC 889/2008 Article 13 (4,5)
45	Deviating certain products and other substances	EC 889/2008 Annex VIII,

## Annexes of the standard

<p><b>Annex (A): Relevant annexes of EC 889/2008:</b></p> <ul style="list-style-type: none"> <li>• Annex I, fertilizers and soil conditioners referred to in article 3(1)</li> <li>• Annex II, plant protection products referred in article 5(1)</li> <li>• Annex IV, Maximum number of animals per hectare as referred to in Article 15 (2)</li> <li>• Annex VII, Products for cleaning and disinfection referred to in Article 23 (4)</li> <li>• Annex VIII, Certain products and substances for use in production of processed organic food referred to in Article 27 (1) (a):</li> <li>• Annex IX, Ingredients of agricultural origin which have not been produced organically referred to in Article 28</li> <li>• Annex XI, (a) Organic logo of the EU, referred to in Article 57, (b) Code numbers referred to in Article 58</li> <li>• Annex XII, Model of documentary evidence to the operator referred to in Article 29 (1) of Regulation (EC) No. 834/2007 referred to in Article 68 of this Regulation, (a) Model of complementary documentary evidence to the operator according to Article 29(1) of Regulation (EC) No 834/2007 referred to in Article 68(2) of this Regulation, (b) Entry referred to in the second subparagraph of Article 68(2):</li> <li>• Annex XIII, Model of a vendor declaration referred to in Article 69</li> <li>• Annex XIV, Products and substances used in farming and criteria for their authorisation (Ref: (EC) No. 834-Article 16)</li> <li>• Annex XV: Criteria for certain products and substances in processing (Ref: (EC) No. 834-Article 21)</li> </ul>	<p><b>Please refer to the major document of EC 889/2008</b></p>
<p><b>Annex (B): Standard Procedures of ECOA Quality Manual</b></p>	<p><b>Available Upon Request</b></p>

<b>Annex (C): ECOA Master list of documents</b>	<b>Available Upon Request</b>
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## **Annex (A): Relevant annexes of EC 889/2008:**

- Annex I, fertilizers and soil conditioners referred to in article 3(1)
- Annex II, plant protection products referred in article 5(1)
- Annex IV, Maximum number of animals per hectare as referred to in Article 15 (2)
- Annex VII, Products for cleaning and disinfection referred to in Article 23 (4)
- Annex VIII, Certain products and substances for use in production of processed organic food referred to in Article 27 (1) (a):
- Annex IX, Ingredients of agricultural origin which have not been produced organically referred to in Article 28
- Annex XI, (a) Organic logo of the EU, referred to in Article 57, (b) Code numbers referred to in Article 58
- Annex XII, Model of documentary evidence to the operator referred to in Article 29 (1) of Regulation (EC) No. 834/2007 referred to in Article 68 of this Regulation, (a) Model of complementary documentary evidence to the operator according to Article 29(1) of Regulation (EC) No 834/2007 referred to in Article 68(2) of this Regulation, (b) Entry referred to in the second subparagraph of Article 68(2):
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