

1. General

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

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

Reference Standards to ETKO certification programs are following: 4.6.a

- TC Organic Farming Regulation 27676/2010
- NOP Regulation
- IACB Standard “Equivalent European Organic Production and Processing Standard for Third Countries”,
- ETKO Sustainable Textile program GOTS and OCS,
- ETKO Sustainable Cosmetic program COSMOS and other private standards when applied.
- Applicants can download these regulations and/or standards from ETKO website section standards www.etko.com.tr Textile standards are available in Textile Section and Cosmetic is available in Cosmetic section.

When there are changes to the certification requirements affecting the certification system operators may be informed by the program owner or via ETKO. Any important changes for ETKO’s inspection notified to operators through ETKO website under section news. Eventually ETKO verifies adapting system changes by the operators during the inspections.

When explanations or interpretations of certification standards required it is prepared by the technical experts within the ETKO employees, advisory committee members or hired independent experts related to the

scheme in question. ETKO makes sure that this information will be formulated by relevant and impartial persons possessing the necessary technical competence such as textile experts for textile programs, cosmetic experts for cosmetic programs, agricultural experts for agriculture.

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

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

ETKO operators shall:

- Comply with applicable standards and requirements.
- Establish, implement, and update annually an organic compliance plan;
- Permit on-site inspections with complete access to the production or handling operation, including no certified production and handling areas, structures, and offices;
- make all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment) and resolution of complaints;
- make claims regarding certification only in respect of the scope for which certification has been granted;
- not use the product certification in such a manner as to bring ETKO into disrepute and does not make any statement regarding its product certification which ETKO may consider misleading or unauthorized;
- Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State official, Standard owner, and ETKO inspector access to such records during normal business hours for review and copying to determine compliance with the regulations;

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- upon suspension or cancellation of certification, stop its use of all advertising matter that contains any reference thereto and returns any certification documents as required by ETKO ;
- use certification only to indicate that products are certified as being in conformity with specified standards;
- endeavor to ensure that no certificate or report nor any part thereof is used in a misleading manner in making reference to its product certification in communication media such as documents, brochures or advertising, complies with the requirements of ETKO
- Submit the applicable fees charged on time
- Immediately notify ETKO concerning any:
 - Application, including drift, of a prohibited substance to any production unit, site, facility, livestock or product that is part of an operation; and
 - Change in a certified operation or any portion of a certified operation that may affect its compliance with the regulations.

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

2. Application for certification and contract

The offer/[cost estimate](#) to submit to the operator is prepared based on the information submitted by the operator with the use of the certification program specific application forms. The operator shall duly complete this form and submit the original copy to ETKO

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

In case the offer/[cost estimate](#) is accepted by the operator, the operator’s authorized contact personnel shall sign necessary pages of the offer/[cost estimate](#) submit the offer/[cost estimate](#) back to ETKO office. The operator shall also submit an official document proving that the authorization of the personnel is valid. This offer/[cost estimate](#), signed by the authorized personnel of the operator shall be valid as a contract between ETKO and its operator, and is accepted as an instruction to commence the certification process.

ETKO shall determine the schedule, after reviewing the documents available, for the activities to be followed.

The date for the initial inspection shall be determined mutually by ETKO and operator. The periods and dates for the surveillance visits shall be determined by ETKO to ensure the compliance of the system and the maintenance of the certificate. The visit dates shall be informed to operator at least two weeks before the inspection by ETKO.

2.1 Recertification of the products certified by other certification bodies abroad for the purpose of importing in to Turkey

Products coming from outside Turkey are subject to be re-certified by an accredited certifier according to Turkish Organic Farming Regulation 27676/2010. ETKO as an accredited certifier will prepare the certification file for the products and kept ready for Competent Authority audits. Once ETKO certifies the products, product could be custom cleared as organic. Any transactions done related to other scopes certified products such as NOP, EU or any other internationally recognized private standards, ETKO requirements are following:

In case a certification decision is needed for a product coming from another source certified by other accredited certifiers relevant documents shall be provided to ETKO, by the operator, before evaluation of the product.

- Valid accreditation letter of the certification body
- Inspection report of the producer
- Master certificate of the producer
- Transaction certificate of the product

2.2 Verify supplier certificates of conformity

ETKO certified operators shall verify the documentary evidence “Certificate of Conformity” of their suppliers appropriately to ensure that the document is genuine and issued by the certifier of the supplier. ^{30.2018} It is important to verify it before trade arrangements done.

Verifying certification of the suppliers is possible from their certifier’s website. Certifiers disclose their list of certified operators including type or range of products as well as the period of validity. In case any doubt remains operator to inform certifier of supplier and/or ETKO to follow up, if satisfactory answer not received eventually, ETKO will communicate to the certifier of the supplier and / or the competent authorities.

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2.3 Private Standards:

ETKO accepts the certificates issued in accordance with the COSMOS, GOTS and/or OCS where the products in the production chain are certified by other CBs which are COSMOS, GOTS and/or OCS approved. The certificates and residue analyses reports issued by other CBs and laboratories are also accepted on the ground that they are in accordance with the COSMOS, GOTS and/or OCS provisions. The certificates which are obviously not in accordance with the above mentioned standards are not accepted by ETKO

Inspection assignments are accepted regardless of whether they are for the entire processing chain or only parts thereof.

3. Documents required by ETKO for Application Package Review:

Following the contracting, the operator shall prepare an “Application Package” for the production systems and processes and submit it to ETKO within appropriate time period. (in two weeks)

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

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

At this phase ETKO may request additional information for missing points or for clarification of the data already submitted by the operator. A report shall be prepared by ETKO following the review and be sent to the operator prior to the on-site inspection. The operator is expected to take corrective measures, prior to the on-site inspection, if any.

4. Content of Application Package

- An organic production or processing system plan
- The name of the person completing the application; the applicant’s business name, address, and telephone number; and, if the applicant is a corporation, the name, address, and telephone number of the person authorized to act on behalf of the applicant

- The name(s) of any organic certifying agent(s) to which application has previously been made; the year(s) of application; the outcome of the application(s) submission, including, when available, a copy of any notification of non-compliance or denial of certification issued to the applicant; and a description of the actions taken by the applicant to correct the non-compliances noted in the notification of noncompliance, including evidence of such correction
- Other information necessary to determine compliance with the regulations
- **Applicant** must have documented policies and procedures for excluding products from organic sale, if test results are more than the tolerances of the applicable production regulations.
- the operator shall notify the following information to ETKO
 - (a) Name and address of operator;
 - (b) Location of premises and, where appropriate, parcels (land register data) where operations are carried out;
 - (c) Nature of operations and products;
 - (d) Undertaking by the operator to carry out the operation in accordance with the organic production rules as signing the Operator. “Declaration of Operator”
 - (e) In the case of an agricultural holding, the date on which the producer ceased to apply products not authorized for organic production on the parcels concerned with the Farm Production Report OP 01 F 28:

The operator responsible shall notify any change in the description or of the measures in due time. 889/64

Each year, before the date indicated by ETKO, the operator should notify ETKO of its schedule of production of crop products, giving a breakdown by parcel. 889.71 “Farm Production Report OP 01 F 28”

- Official company register document
- Official proof for authorized representative for signature.
- Site plan
- Process flow-charts
- A production plan including all details used to calculate estimated yields and production.
- Use of allowed, authorized processing inputs list and evidence of references for organic production (certificate, approval, content of the input etc..)

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- Labels
- Traceability documents related to end product
- If valid GMO free declarations or similar evidences
- If valid quality system documents such as HACCP, GMP+, ISO..
- chain of custody documentation to verify inputs as being organically produced;
- details on the mechanics of the processing operation;
- Details on process management controls, including contamination prevention, pest management and sanitation's controls.

Processing, packaging and/or marketing may take place at the production unit, where these activities are limited to its own agricultural produce will be regardless also inspected by ETKO.

The application process is completed with the above mentioned information and documents supplied to the certification body

➤ **COSMOS Application procedures**

Information for operators

- The users of the COSMOS Standard to comply with all relevant legislation, including the EU legislation for Cosmetic Products, EC directive 76/768/EEC & the EU REACH regulation and its amendments & other local or national laws where appropriate.
- ETKO will provide to operators an up-to-date description of the procedures to be applied for conducting certification. ETKO will inform operators about:
 - contractual conditions, including fees and possible contractual penalties;
 - the operator's rights and duties, including the appeals procedure;
 - the current version of COSMOS-standard (and/or other harmonized standard) and corresponding relevant documents released by the COSMOS-standard AISBL;
 - program changes, including regular updates of procedures and standards;
 - the evaluation and inspection procedures applied by ETKO in the course of certification; and
 - Documentation to be maintained by the operator to enable verification of compliance with the COSMOS-standard by ETKO.

➤ **For farming operations:**

A production system plan including;

- Farm plot inventory production records from the three prior years for both the producer and for the hectare producing the crop seeking certification;
- Propagation material including variety, quality, quantity, treatment, GMO Free declarations
- Complete list of fertilizers, soil conditioners, compost activators,
- Any other type of mineral which may be used for any farm activities such as talk use for seeding equipment.
- Pest/disease/weed management strategies for the crops being produced;
- Estimated/realized harvest results
- Based on the risk appropriate separation of organic plots by a buffer zone from conventional neighbor plots or any other source of contamination.
- System set to separate harvest and handling of BZ affected crops from harvest up to marketing or distribution of the BZ crops.
- Post-harvest handling details
- Site plans of the farm facilities
- Maps of the plots including the Buffer Zone indications and precautionary measures taken against contamination for areas where risk is present.

Parallel Production

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

- a) in the case of the production of perennial crops, which require a cultivation period of at least three years, where varieties cannot be easily differentiated, provided the following conditions are met:
 - i) the production in question forms part of a conversion plan in respect of which the producer gives a firm undertaking and which provides for the beginning of the conversion of the last part of the area concerned to organic production in the shortest possible period which may not in any event exceed a maximum of five years;
 - ii) Appropriate measures have been taken to ensure the permanent separation of the products obtained from each unit concerned;
 - iii) ETKO must be notified of the harvest of each of the relevant products at least 48 hours in advance;
 - iv) Upon completion of the harvest, the producer informs ETKO of the exact quantities harvested on the relevant units and of the measures applied to separate the products;
 - v) The conversion plan and the control measures approved by ETKO; this approval shall be confirmed each year after the start of the conversion plan;

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b) In the case of areas intended for agricultural research or formal education agreed by the competent authorities ~~and~~ providing that the above mentioned “a i – v” conditions are met.

c) In the case of production of seed, vegetative propagating material and transplants, providing that the conditions set out in point (a)(ii) (iii)(iv) and the relevant part of point (v) are met;

d) In the case of grassland exclusively used for grazing.

• **For farm operations in post-harvest facilities:**

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

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

• **For textile processing facilities:**

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

- chain of custody documentation to verify inputs as being organically grown,
- details on the mechanics of the processing operation,
- details on process management controls, including contamination prevention, pest management and sanitation’s controls,
- textile auxiliary agents and dyes,
- approvals by accredited certification bodies.

➤ **For textile input producers**

Application form and MSDS of the products to be approved for GOTS or COSMOS

Application review consists of the following:

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

Contract

Upon the acceptance of the application package CONTRACT is signed and site visit is planned. Contract is signed after application package review procedure is finalized and offer/cost estimate must be confirmed. It is essential that applicant fulfill the requirement of the application and complete the operation file with all components for Inspection. When application package is completed, a contract signed between ETKO and the applicant, clarifying the processes, producers, products, addresses and fee structure.

Preparation by Operator:

- Prior to the scheduled Inspection, the applicant is expected to have organized all of the records, which documents that, the commodities and / or processes under review are certifiable as organic. The applicant’s co-operation in completing all of the forms, providing thorough and proper documentation, and being prepared, train the personnel involved for production of the requirements of the regulation, will greatly contribute to the timely and cost effective completion of the entire certification process. Applicant must have a complaint handling procedure in place related to complaints received from the

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customers, officials and from any other sources

- Operator shall have the relevant handling system plan in place including records and documents mentioned above for onsite inspection.
- Provide sufficient information to inspectors, proving that production processes comply with the relevant requirements.
- Ensure the access to the facilities, records; personnel enabling the inspectors satisfactorily verify that organic production systems and processes are maintained.
- Results of own quality assurance program
- Cooperate to resolve the nonconformity and initiating the corrective action.

5. Site Inspection

Inspector Assignment: A scope approved inspector is assigned by ETKO for inspection purpose. ETKO makes sure inspector assigned has sufficient experience and qualification for the type of production, and no conflict of interest issues.

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

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

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

Evaluation Audit:

Inspection covers production, handling and processing practices, transport, storage, packing, labelling, sampling, testing of the products, evaluation of the documentation and record keeping related to production and marketing of the certified products. 7.4.3, In general a regular audit covers opening, closing meetings and production practices evaluation including transport, storage.

Inspection shall be conducted according to ETKO procedures and covers following:

- An opening meeting with the authorized personnel or management of the operator. The scope shall be confirmed, reporting method and how to deal with nonconformities shall be discussed. Responsible personnel of operator shall be ready in opening meeting. After the meeting a site visit should be done to evaluate following.
- Assessment of the production / processing system by means of visits to production facilities and storage units which may also include visits to non-organic production and/or processing areas if there is reason for doing so;
- Review of records and accounts in order to verify flow of goods (input/output reconciliation and tracing back) and on and off product statements.
- Identification of areas of risk to organic integrity;
- Verification of the operator’s risk assessment of contamination and residue testing policy potentially including sample drawing for residue testing either as random sampling or in case of suspicion of contamination or non-compliance.
- Verification that changes to the standards and to related requirements have been effectively implemented; and
- Verification that corrective actions have been taken. After the site visit
- All the nonconformity, observations shall be discussed with operator.
- All the findings shall be reported to operator in the closing meeting.
- The inspection report shall be prepared and submitted to operator.

Farming operation specific:

- Review of organic system plan including records and accounts of the farm and handling inputs used for production of agricultural crops. Technical activities such as fertilization, crop rotation, harvest, irrigation, pest-disease and weed management practices.

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- Assessment of field maps and site plans including risk points where the contamination may occur.
- Buffer zone issues; separate harvesting and handling of BZ crops. Guaranteeing good separation and traceability of BZ crops from the field to the marketing. C.5.2.2
- A complete field and site visits is obligatory which covers all fields and sites used for production and handling activities.
- Use of inputs for production or handling operations for any purposes (processing aids for production, lubricants, talk, minerals for machinery, storages. Temporary use or reuse of packaging material etc.)

Split Operations, Parallel Production

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

Small Holders Group organizations:

- The projects containing several small farm holders may have an internal control system operating internal check of the producers to prepare them for certification. Operator must guarantee an effective ICS management in place. ICS operation needs to be evaluated by ETKO before on-site inspection planned. ICS system implementation will be verified by the qualified inspector according to OP 02 Certification of Grower Groups procedure.

GOTS Specific:

- Inspection of the chemical inputs (dyes and auxiliaries) and accessories used and assessment of their compliance with the applicable criteria of the applicable standards.
- Inspection of the waste water (pre-) treatment system of wet processors.
- Verification of adherence to the defined minimum social criteria (including confidential interviews of workers, if applicable).

OCS Specific

The CCS applies to organizations that wish to demonstrate the validity and legality of the material content claim of the products they buy, sell and/or produce. It provides

third party verification of the amount of a given material being claimed in a final product. It addresses the flow of goods within and between companies, and covers manufacturing, storage, handling, and shipping.

Chain of Custody

1. Organic Material content integrity is maintained through to the final OCS Product.

- The OCS requires compliance with the requirements of the CCS. For application to the OCS, each reference of “CCS” in the Content Claim Standard shall be understood as “OCS” – with the exception of some labeling requirements.

- The OCS requires all Organizations to be certified beginning with post-harvest processing sites through to the seller in the final business-to- business transaction. Depending on the kind of Organic Material processed, the following examples are considered the first post-harvest processing stages that shall be OCS certified:

- Ginning for cotton
- Retting for bast fibers
- Boiling and washing cocoons for silk
- Scouring for wools and other animal fibers respective grading if this step is undertaken before scouring and not already covered by the organic farming certification)

Gins shall not be certified to both GOTS and OCS. If a gin is certified to OCS and wants to be certified to GOTS, it shall contact ETKO to terminate its OCS Scope Certificate prior to the GOTS Scope Certificate issuance.

Non-gin Organizations certified to both the Global Organic Textile Standard and the OCS shall be certified by ETKO in order to properly reconcile organic volumes among both standards.

2. Allowable Organic Material input is defined and verified.

- Claimed Material, as defined to in the CCS, refers to “Organic Material” in the OCS, which is defined as: Organic Material: any output of organic farms that have been certified by an accredited certification body to comply with the USDA National Organic Program NOP), Regulation EC) 834/2007, or any other) organic standard that is approved in the IFOAM Family of Standards.

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Genetically Modified Organisms - GMOs

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

GMO testing on cotton shall be carried out at an early stage of the processing chain (ginning or spinning) to ensure that sufficient DNA from the plant is available in the seed or fiber material.

- The OCS allows “in-conversion” Organic Material as inputs if the applicable farming standard permits such certification.

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

- The OCS may be used with any product that contains non-food Organic Material.

The OCS may not be used to support claims on food products; food products are governed by national laws. Food products in this context refer to those that are “intended for consumption” as agricultural food crops may have other purposes than consumption e.g. cucumbers in shampoo).

-Any products being sold in the United States and making a reference to “organic” on the label shall have the organic materials certified to the USDA NOP standard as per USDA policy).

-Organic fiber certification according to the Japanese Agricultural Standard (JAS) is not possible as per the JAS definition).

- The OCS applies to products that contain 5% to 100% Organic Material.

- Buyers of the OCS product are responsible to set any requirements on the specific organic standards to which the input material should be certified. For example, companies selling into the United States should ensure that the input materials have been certified to the United States Department of Agriculture’s National Organic Program standard, while for companies selling into Europe, there are no legal requirements for non-food organic products.

In advance of each inspection, the organization must prepare and submit to ETKO OCS document that contains: a full description of the production units including:

- name of each unit
 - name and location of the site
 - activity being performed
 - a list of all the practical measures taken at the level of the unit to ensure compliance with the CCS standard
 - a declaration that the organization is performing its operations in accordance with the CCS standard
- The description, practical measures list, and statement of compliance with the Standard must be signed by a representative of the Organization.

This document will be verified by ETKO during the certification process. If deficiencies and non-compliances with the requirements of this Standard are found, ETKO will issue an inspection report to the organization. The organization must countersign this report and take necessary corrective measures. Certification will be given only after deficiencies or non-compliance issues have been corrected by the applying organization and confirmed by ETKO.

OCS: A2.1.Chain of Custody

A2.1a The OCS requires compliance with the requirements of the CCS. For application to the OCS, each reference of “CCS” in the Content Claim Standard shall be understood as “OCS” –with the exception of some labeling requirements

A2.1b The OCS requires all Organizations to be certified beginning with post –harvest processing sites through to the seller in the final business-to-business transaction.

COSMOS Specific:

- Inspection of the ingredients, technology or process could pose a health or environmental risk, this will be checked thoroughly to avoid from non-allowed material and/or methods such as;
 - Nanomaterial
 - GMO s or derivatives of GMOs
 - Irradiation
 - Animal testing

COSMOS products under organic certification

The product:

- must be labelled with the signature „COSMOS ORGANIC“ in conjunction with the seal of the COSMOS-standard AISBL member organization as detailed in the Labelling Guide

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- must indicate on the label the percentage of organic origin ingredients by weight in the total product, as “x% organic of total”
- Must indicate organic ingredients and those made from organic raw materials in the INCI list. This should be limited to the wording: “from organic agriculture” for physically processed agro-ingredients and “made using organic ingredients” for chemically processed agro-ingredients or similar expressions using the same typing as used for the INCI list
- May also indicate the percentage of organic origin ingredients by weight in the total product without water and minerals (as defined in 6.2.1 and 6.2.2), as “y% organic of total minus water and minerals”.

• COSMOS products under natural certification

The product:

- must be labelled with the signature „COSMOS NATURAL“in conjunction with the seal of the COSMOS-standard AISBL member organization as detailed in the Labelling Guide
- Must indicate organic ingredients and those made from organic raw materials only in the INCI list. This must be limited to the wording: “from organic agriculture” for physically processed agro-ingredients and “made using organic ingredients” for chemically processed agro-ingredients or similar expressions using the same typing as used for the INCI list
- may indicate the percentage of organic origin ingredients by weight in the total product, as “x% organic of total”
- May indicate the percentage of organic origin ingredients by weight in the total product without water and minerals (as defined in 6.2.1 and 6.2.2), as “y% organic of total minus water and minerals”.

Any claim relating to organic is not permitted, either ingredients or percentages, on the front of the packaging.

• COSMOS Approval of ingredients

For non-organic cosmetic ingredients to be approved as acceptable for use under COSMOS Standard, it is required to:

- supply all information and documents needed for the approval as requested by ETKO and
- Declare to ETKO any changes to the processing of that ingredient that may affect its approval.

It is forbidden to label or otherwise indicate that approved cosmetic ingredients are certified according to COSMOS Standard.

• Laboratory Analysis

During the inspection the inspector may take samples to be sent to an ISO 17025 accredited laboratory for pesticide analysis. The sampling method will be followed according to ETKO’s OP 03 Testing procedure and TI 05 Sampling Method. The inspector certainly will take a sample in case of suspicion of the product inspected. Also the operator must maintain GMO free records for the seeds or for each additive that he intends to use for organic production. The operator is responsible to show GMO Free documents to the ETKO inspector when asked upon. The ETKO inspector may take a sample from the organic seed to be analyzed for GMO.

6. Non-conformities & Corrective Actions

Nonconformity procedure is kept available for the access of the interested bodies.

Grading non-conformities

Non-conformities are graded as major and minor. While grading non-conformities the following conditions shall be considered:

6.1 Major Nonconformity:

- One of the requirements of standard or regulation related to the process or product are not complied
- Production process plan not applied
- Product is under risk

If any one of the above is observed on the system under inspection MAJOR non-conformity report shall be issued. Major non-conformities are usually clear-cut system deficiencies.

6.2 Minor non-conformity

- Failure to fully satisfy a requirement of a standard or regulation.
- Factors causing no risk on the condition of the product.

6.3 Point of Attention

Apart from the major and minor non compliances, the points to be improved and similar cases are mentioned in the inspection report as “Point of Attention”. These have no direct effect on the certification decision.

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

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

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

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

6.3.1 Surveillance visit required for closing and implementation follow up NCs

To close major non-conformities a follow up inspection may be required within the target date described. In this case ETKO will assign an inspector to follow up the NCR issued to operator and corrective actions taken by the operator. Inspector will evaluate over all activities and implementation done including preventive actions with the responsible person(s). When applicable inspector takes samples, evidences by electronic means picture, video or documents for further evaluations incase needed.

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

Resolutions for the minor non-conformities that are not critical for product integrity can be evaluated by a desk audit without site audit but still they are to be confirmed during the following inspection.

Non-conformities that are not closed on time shall result in further sanctions of suspension, revocation and cancellation of the contract as explained in GP 15.

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

ETKO will register the NCs in its database and classify the risk levels of the operators in line with the risk assessment procedure. Unannounced inspections and sampling for analyses will be decided for which operators to be subjected. Selected operators will receive un-announced inspection particularly verifying the implementation of the previous NCs. ETKO inspector(s) will take note in the review report before going on site inspection to emphasis the resolutions of the previous NCs with the inspection plan in order not to forget verification of the resolutions. Findings will be recorded with the GP 14 F 02 Noncompliance Register.

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

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

7. Use of Logo and Certificate ^{4.6.c}

The certificate is issued only if the inspection is completed successfully and the fees are paid by the operator. Certificate is valid through the issue date for a year, if none otherwise stated for specific programs.

TC 27676/2010, IACB “Equivalent European Organic Production and Processing Standard for Third Countries”, regulations and ETKO Sustainable Textile program GOTS and OCS, COSMOS, GLOBALGAP and other private standards require the validity of the certificate as one year. According to NOP regulation validity of the certificate continues until surrendered, suspended or revoked.

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

In case production practices are related to NOP Final rule, certification process requires GP 18, Other National Organic Regulations requires OP 01. ETKO Textile, Cosmos and other private standard certification programs requires Private Standards Certification GP 24.

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

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

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

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

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

8. Maintenance of Approval for Certification.

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

Surveillance visit are planned during the initial inspection preferably and is informed to operator two weeks before it is conducted.

The periods for surveillance inspections are determined during the initial inspection.

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

9. Changes in the Operator's System

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

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

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

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

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

10. Suspension, Withdrawal and Cancellation of the Certificate.

ETKO reserves its right suspending, withdrawal, cancelling, or changing the scope of the certificate during the certification period.

Suspension, withdrawal, cancel is caused by the operator:

- If the corrective actions are not taken as planned for the nonconformity found and reported, in a timely manner as mutually agreed by ETKO and operator.
- Postponing the surveillance inspection
- Not complying with the requirements of relevant standards and statutory requirements.

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- Misuse ETKO Logo and certificate
- Not complying to the contract between ETKO and operator
- Acting in a way harming ETKO’s prestige in the sector or aiming to act so.
- Not paid fees in due time

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

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

In cases the operator itself decides to stop the certification by any reason during the certification period ETKO shall cancel the certificate.

11. Appeals and Complaints 4.6.d

In case operator wishes to raise objections to any decision of ETKO about certification, or in case of a dispute between the parties the appeal or corrective actions procedures shall be followed. The operator shall apply to ETKO management formally in writing. More information is available GP 05 Appeal, Complaints and Disputes Info Letter, or SP 06 Corrective & Preventive Actions. See www.etko.com.tr.

12. Confidentiality

Except where national law or accreditation bodies require, ETKO shall keep confidential and shall not disclose to third parties the information about the operator obtained during the contract and the certification process, unless the operator permits in writing not to do so.

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

Operator accepts the verification and inspection activities of the accreditation bodies by signing the contract with ETKO for certification services. No fee is charge for the inspection of accreditation bodies.

13. Postponing and Cancellation

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

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

14. Legal Aspects

The contract for certification services is valid under the legislation of TR. In case of dispute, the parties shall apply to Izmir courts

15. Handling of Appeals, Complaints and Disputes by Operator

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

This file shall include the following:

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

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

16. Extension and Renewal of Certification

The operators are regularly reevaluated in order to verify that they maintain their system in compliance with the standard and that the corrective actions are implemented effectively. For the extension of the certification the operator is required to renew the contract and start the application process.

Renewal of certification must be annual for all programs except NOP. NOP certification is valid until surrender, suspended or revoked, but every year before anniversary

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date all inspection and evaluation process to be completed.
Operators shall continue to be met for certification criteria and apply annually for continued certification. In case no application is made timely NOP requires ETKO to initiate suspension or cancellation process. ETKO will evaluate the application documents eventually on-site inspection will follow. Each location of the operation will be verified.
Operators shall pay the certification fees deemed by ETKO When operator does not renew certification ETKO will formally notify the operator that certification is withdrawn, no longer valid.

For the reevaluation, a/m rules are applicable.

17. Exchange of Information

Where an operator is certified also by other Certification Bodies within the same scope, ETKO will seek information exchange with the other Certification Bodies involved misuse of certificates.
ETKO may, if necessary exchange information with other Certification Bodies and/or authorities including GOTS, TE and COSMOS-standard AISBL to verify the authenticity of the information.

Where the operator and/or the subcontractors of that operator are checked by ETKO and a different control body, ETKO will exchange the relevant information on the operations under its control. 889-92-1.

Where ETKO operators and/or their subcontractors change their control body; the change will be notified without delay to the competent authority by ETKO. ETKO will hand over the relevant elements of the control file of the operator concerned and the reports and non-conformities to the subsequent control body.

In case ETKO accepts a new operator coming with non-conformities; ETKO will ensure that non-conformities noted in the report of the previous control body have been or are being addressed by the operator. 889-92-2.
Where the operator withdraws from the control system, ETKO will without delay, inform the competent authority. 889-92-3.

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

In case of irregularities or infringements found with regard to products under the control of other control bodies/authorities, ETKO will also inform those authorities or bodies without delay. 889-92-4.

18- Reserved

19. Requirement of Operator documentation-processing & handling 889.30-35.

19.1 Collection of products and transport to preparation units. 889.30, IACB 7.5.1

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 ETKO.

19.2 Packaging and transport of products to other operators or units' 889.31-IACB 7.5.2

1. Operators shall ensure that organic products are transported to other units, including wholesalers and retailers, 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, without prejudice to any other indications required by law:

- (a) The name and address of the operator and, where different, of the owner or seller of the product;
- (b) The name of the product or a description of the compound feeding stuff accompanied by a reference to the organic production method;
- (c) The name and/or the code number of ETKO to which the operator is subject; and
- (d) Where relevant, the lot identification mark according to a marking system either approved at national level or agreed with the control body and which permits to link the lot with the accounts referred to in Section "Record keeping responsibilities of operators".

The information referred to in points (a) to (d) of the first subparagraph may also be presented on an accompanying document, if such a document can be undeniably linked with the packaging, container or vehicular transport of the product. This accompanying document shall include information on the supplier and/or the transporter.

2. The closing of packaging, containers or vehicles shall not be required where:

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- (a) Transportation is direct between an operator and another operator who are both subject to the organic control system, and
- (b) The products are accompanied by a document giving the information required under paragraph 1, and
- (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.

19.3 Transporting animal feed to other production / preparation units or storage premises. 889.32, IACB 8.2

In addition to the provisions of 19.2 when transporting feed to other production or preparation units or storage premises, operators shall ensure that the following conditions are met:

- a. During transport, organically-produced feed, in-conversion feed, and non-organic feed shall be effectively physically separated;
- b. The vehicles and/or containers which have transported nonorganic products are used to transport organic products provided that:
 - (i) Suitable cleaning measures, the effectiveness of which has been checked, have been carried out before commencing the transport of organic products; operators shall record these operations,
 - (ii) All appropriate measures are implemented, depending on the risks to organic integrity and, where necessary, operators shall guarantee that non-organic products cannot be placed on the market with an indication referring to organic production, and
 - (iii) The operator shall keep documentary records of such transport operations available for ETKO;
- c. The transport of finished organic feed shall be separated physically or in time from the transport of other finished products;
- d. During transport, the quantity of products at the start and each individual quantity delivered in the course of a delivery round shall be recorded.

19.4 Reception of products from other units and other operators 889.33, IACB 7.5.3

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 to in 19.2.

- 1. The operator shall crosscheck the information on the label referred to in 19.2 with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts

- 2. The operator shall verify the documentary evidence of his/her suppliers.

19.5 Storage of products IACB 7.5.4, 889.35

- 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.
- 2. Where operators handle both non-organic products and organic products, including organic plant, seaweed, livestock and aquaculture animals, and the latter are stored in storage facilities in which also other agricultural products or foodstuffs are stored:
 - (a) The organic products shall be kept separate from the other agricultural products and/or foodstuffs;
 - (b) Every measure shall be taken to ensure identification of consignments and to avoid mixtures or exchanges with non-organic products;
 - (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.
 - (d) The storage of allopathic veterinary medicinal products and antibiotics is permitted on holdings provided that they have been prescribed by a veterinarian in connection with treatment, provided that they are stored in a supervised location and that they are entered in the livestock record as appropriate.

20. Documentary accounts: IACB 10.1 889.66

- 1. Stock and financial records shall be kept in the unit or premises and shall enable the operator to identify and the control authority or control body to verify:
 - (a) The supplier and, where different, the seller, or the exporter of the products;
 - (b) The nature and the quantities of organic products delivered to the unit and, where relevant, of all materials bought and the use of such materials, and, where relevant, the composition of the compound feeding stuffs;
 - (c) The nature and the quantities of organic products held in storage at the premises;
 - (d) The nature, the quantities and the consignees and, where different, the buyers, other than the final consumers, of any products which have left the unit or the first consignee's premises or storage facilities;
 - (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

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suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees.

2. The documentary accounts shall also comprise the results of the verification at reception of organic products and any other information required by ETKO 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.

3. Where an operator runs several production units in the same area, the units for non-organic products, together with storage premises for farm input products must also be subject to the minimum control requirements. IACB 5.2.3, 889.66

4. For the purposes of proper control of the operations, the documentary accounts mentioned in this section should include information on the origin, nature and quantities of feed materials, additives, sales and finished products. IACB 10.8, 889.89

21 ETKO Training services:

ETKO may organize public trainings

Training programs: ETKO provides following trainings

- Good Agricultural Practices
- Globalgap
- Globalgap internal auditing
- HACCP, Food Safety
- GMP and Organic Cosmetics standards and regulations
- ISO 22000:2005,
- ISO 9001:2000
- ISO 9001:2000 internal auditing.
- Organic agriculture standards and regulations
- Organic textile standards and regulations
- Social compliance standards and regulations

Training programs are prepared by qualified experts of ETKO or subcontracted to outside sources. Suitable trainers for the training programs are determined by MD and or QM as evaluating their competence. It is a pre requisite that the trainer shall be technically and professionally qualified about the program, and shall have suitable training, communication skills.

Public trainings are delivered in ETKO office. In case ETKO training room is not sufficient for the delivery of proper training, external resources are utilized with proper arrangements.

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