

<b>GENERAL INFORMATION ON ETKO ORGANIC CERTIFICATION SERVICES</b>	DOK. NO	GP 10
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### 1. General

This document describes the procedure to be followed by ETKO and the activities to be realized by client in order to realize the evaluation and certification of the Organic Food, Feed, Textile, Cosmetics and other applicable processing activities of the client. Client 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.

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

TC Organic Farming Regulation 27676/2010,

IACB

Canadian Organic Regime "COR",

BIOSUISSE regulations,

ETKO Sustainable Textile program GOTS and TE,

ETKO Sustainable Cosmetic program COSMOS,

NATURLAND and other private standards when applied.

Applicants can download these regulations and/or

standards from ETKO website section standards

[www.etko.org](http://www.etko.org). Textile standards are available in Textile Section and Cosmetic is available in Cosmetic section.

Client 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 client. Certification process does not cover the systems in which the products are not produced by the client's own system and the processes not managed and controlled by client's own system.

ETKO clients 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;
- 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 packet, which includes fee structures, a copy of

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the applicable standard(s), required documentation and other information deemed pertinent to certification.4.6.b

## 2. Application for certification and contract

The offer to submit to the client is prepared based on the information submitted by the client with the use of the certification program specific application forms. The client shall duly complete this form and submit the original copy to ETKO

ETKO shall prepare the offer 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 is accepted by the client, the client's authorized contact personnel shall sign necessary pages of the offer submit the original of the offer back to ETKO office. The client shall also submit an official document proving that the authorization of the personnel is valid. This offer, signed by the authorized personnel of the client shall be valid as a contract between ETKO and its client, 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 client. 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 client at least two weeks before the inspection by ETKO.

### 2.1 Recertification of the products certified by other certification bodies

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 client, before evaluation of the product.

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

ETKO accepts the certificates issued in accordance with the COSMOS, GOTS and/or TE where the products in the production chain are certified by other CBs which are COSMOS, GOTS and/or TE 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 TE 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 client shall prepare an "Application Package" for the production systems and processes and submit it to ETKO 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 client. The aim of this review is to determine the present status of the client's system; its compliance level to the requirements and to estimate if the field 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 client. A report shall be prepared by ETKO following the review and be sent to the client prior to the field inspection. The client is expected to take corrective measures, prior to the field inspection, if any.

## 4. Content of Application Package

- An organic compliance plan
- The name of the person completing the application; the applicant's business name, address, and telephone number; and, when the applicant is a corporation, the name, address, and telephone number of the person authorized to act on the applicant's behalf

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- 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.

➤ **COSMOS Application procedures**

**Information for operators**

- COSMOS Specific; 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 harmonised standard) and corresponding relevant documents released by the COSMOS-standard AISBL;
  - programme 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:**

- production records from the three prior years for both the producer and for the hectare producing the crop seeking certification;
- detailed soil improvement and pest management strategies for the crops being produced;
- a production plan including all details used to calculate estimated yields and production.

➤ **For all post harvest facilities:**

Regardless of whether they are continuations from a specific farming operation or they are independent production processing, storage or handling facilities is 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.

➤ **For textile processing facilities:**

Regardless of whether they are continuations from a specific farming operation or they are independent production processing, storage or handling facilities such as ginneries, spinners, weavers is 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

**5. Site Inspection**

Prior to the site inspection an inspection plan shall be sent to client. The inspector in charge prepares plan. Plan includes the personnel in charge also.

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In case the client 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.

During the site inspection the client shall :

- 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.
- Cooperate resolving the nonconformity and initiating the corrective action.

The first site inspection shall be conducted according to ETKO procedures and cover the following:

- An opening meeting with the authorized personnel or management of the client. The scope shall be confirmed, reporting method and how to deal with nonconformities shall be discussed. Responsible personnel of client 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.
- Review of records and accounts of the inputs used for production of agricultural crops. Technical activities such as fertilization, crop rotation, harvest, irrigation, pest-disease and weed management practices.
- 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.
- Identification of areas of risk to organic integrity;

- Inspection of the waste water (pre-) treatment system of wet processors.
- 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 of adherence to the defined minimum social criteria (including confidential interviews of workers, if applicable).
- 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 client.
- All the findings shall be reported to client in the closing meeting.
- The inspection report shall be prepared and submitted to client.
- The projects containing several small farm holders may have an internal control system operating internal check of the producers to prepare them for certification. ICS operation needs to be checked by the inspector according to OP 01 Inspection regulation art.21.
- 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;
  - Nanomaterials
  - GMO sor 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”.
- **For 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 organisation 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 additives that he intends to use for organic production. The operator is responsible to show the GMO Free documents to the ETKO inspector when asked upon. The ETKO inspector may take a sample from the organic seed to be analysed for GMO.

#### 6. Corrective Actions

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 client shall be verified by ETKO for issuing the Certificate.

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

- Corrective actions taken during the site inspection. If this is the case the action taken is verified by the inspector and the non-conformity report is closed and filed.
- CA related only with the documents. In this case client 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 inspector 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

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and close the NCR (Major NCR) if the action is effective on date. In this case, the duration for this visit is charged to client. 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.

#### **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 client. Certificate is valid through the issue date for a year, if none otherwise stated for specific programs.

TC 27676/2010, "Equivalent European Organic Production and Processing Standard for Third Countries EEUOPPSTC", COR and BIOSUISSE regulations and ETKO Sustainable Textile program GOTS and TE, 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.

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

In case production practices are related to NOP Final rule, certification process requires GP 18, for BIOSUISSE regulation GP 19, for COR regulation, GP 20. ETKO Textile, Cosmetics and other private standard certification programs requires Private Standards Certification GP 24.

The client 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 client defining the rules to be followed in using the certificate and logo. The client 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 client is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

Clients 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 client is requested to take corrective action. Such nonconformity may cause the suspension or withdrawal of the certificate.

ETKO maintains a list demonstrating the certificated clients. The list is open for public information on the website [www.etko.org](http://www.etko.org)

#### **8. Maintenance of Approval for Certification.**

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

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

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

The client shall maintain compliance to relevant regulations requirements to ensure the maintenance of its certificate. NCR reported during the surveillance inspections will be evaluated according to paragraph 5.5

#### **9. Changes in the Client's System**

Client shall inform ETKO in case of change in the

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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 can not 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 client 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 client 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 client:

- 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 client.
- Postponing the surveillance inspection
- Not complying with the requirements of relevant standards and statutory requirements.
- Misuse ETKO Logo and certificate
- Not complying to the contract between ETKO and client
- 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 client and request corrective action in an acceptable time period. If the client does not take corrective action on time ETKO shall suspend or withdraw or cancel the certificate; the client shall return the certificate back to ETKO as determined also by the contract.

ETKO makes public its decision about the client suspending, withdrawal, or cancelling the certificate. See [www.etko.org](http://www.etko.org)

In cases the client 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 client 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 client shall apply to ETKO management formally in writing. More information is available GP 05 Appeal, Complaints and Disputes Info Letter. See [www.etko.org](http://www.etko.org)

#### **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 client obtained during the contract and the certification process, unless the client 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.

Client 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 client. This amount shall not be excluded from the total sum of original inspection fee.

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In case the contract is cancelled by the client in any phase, ETKO shall charge to client %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 Objections, Complaints and Legal Cases by Client

The client shall properly handle the objections, complaints, and legal cases received from its own clients. 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 objections, complaints, and legal cases either by the client or as recorded by the client 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

#### 16. Extension and Renewal of Certification

The operators are regularly re evaluated in order to verify that they maintain their system in compliance with the 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

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.

Incase 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.

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