

	ETKO Certification Services Control Measures	Doc. Nr	GP 30
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1. General

This document describes the Control Measures to be followed by ETKO and the activities to be realized by operator in order to realize the evaluation and certification of the Organic production and processing activities. Operator having certification 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.

1.1. Handling Application in case No Prior Experience

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

1.2. Accessibility

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.

1.3. 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",
- Applicants can download these regulations aLogond/or standards from ETKO website

1.4. Changes in Standards

When there are changes to the certification requirements affecting the certification system operators may be informed by the program owner or via ETKO. Any important changes for ETKO's inspection notified to operators through ETKO website under section news. Eventually ETKO verifies adapting system changes by the operators during the inspections. When explanations or interpretations of certification standards required it is prepared by the technical experts within the ETKO employees, committee members or hired independent experts related to the scheme in question.

ETKO makes sure that this information will be formulated by relevant and impartial persons possessing the necessary technical competence such as agricultural experts for agriculture.

1.5. Scope of Certification

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.

1.6. 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

1.7. Commitment of the Operator

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 Certification

ETKO operators shall:

- Comply with applicable standards and requirements listed in point 1.3.
- 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;

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- 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;
- endeavour 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.
- **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.

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

2.1. Application for Certification

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.

3. Documents Required by ETKO for Application

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.

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

4. Content of Application Package

4.1. For Processing & Handling Operations

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

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

- The application process is completed with the above mentioned information and documents supplied to ETKO
- The operator responsible shall notify any change in the description or of the measures in due time. ^{889/64}

4.2. For Farming Operations a Production System Plan Including

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

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- 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.

4.3. 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.

5. Application Package Review

During review 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.

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.

6. Contract and Unique Licensee Number

Upon the acceptance of the application package **Contract is signed** clarifying the processes, producers, products, addresses and fee structure **and** site visit is planned. The contract is valid until cancelled and prolonged automatically one more year if not cancelled at least 6 weeks before the annum.

When the contract signed; ETKO shall submit to the client the documents describing and identifying the certification services, the mutual responsibilities, regulations. ETKO makes reference to its website for necessary documents such as “GP 10 Certification Services” and “TI 14 Fee Structure” and others.

When ETKO decides to sign a contract with the applicant a unique ID number is provided to the applicant. ID numbers are registered to the “GP 01 F 14 Client Register”. Unique ID numbers cannot be used for any other operator at all times. It is unique for each applicant and issued subsequent numbers for each subcontracted producer/facility.

Following the contract ETKO shall proceed to the further phases of certification process.

7. Preparation by Operator for Inspection

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

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

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

Provide sufficient information to inspectors, proving that production processes comply with the relevant

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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

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

Cooperate to resolve the nonconformity and initiating the corrective action.

8. Subcontractors ^{889.86}

ETKO evaluation procedures and policies will apply the same to subcontracted units which the operator is working with. This is undertaken by the client with the ETKO contract. Any operator, who produces, prepares, stores, or imports products who places such products on the market shall, prior to placing on the market of any products as organic or in conversion to organic must be certified prior marketing activities takes place.

With regard to the operations, which are contracted out to third parties, the full description of the unit shall include: ^{889.86}

a) A list of the subcontractors with a description of their activities and an indication of the control bodies or authorities to which they are subject.

b) Written agreement by the subcontractors that their holding will be subject to the control regime

c) All the practical measures, including inter alia an appropriate system of documentary accounts, to be taken at the level of the unit to ensure that the products the operator places on the market can be traced to, as appropriate, their suppliers, sellers, consignees and buyers.

9. 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.

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.

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 weather 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.

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

This period begins as soon as all operations subject to inspection (seeding, tapping, etc.) begin and ends with the packaging or placing in containers for storage of products to be certified.

10. Inspection of Organic Production Units ^{889.90}

The control visit will comprise a full physical inspection of all premises. Moreover, ETKO will make targeted visits based on a general evaluation of the potential risks of non-compliance with the organic production rules.

ETKO will pay particular attention to the critical control points pointed out for the operator, with a view to establishing whether the surveillance and checking operations are carried out correctly.

All the premises used by the operator for the conduct of his activities may be checked as frequently as the attendant risks warrant. ^{889.90}

Inspection covers production, handling and processing practices, transport, storage, packing, labelling, sampling,

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testing of the products, evaluation of the documentation and record keeping related to production and marketing of the certified products.

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

- 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, mass balance and traceability records) and on and off product statements.
- Identification of areas of risk to organic integrity;
- Verification of the operator's risk assessment of contamination and residue testing policy potentially including sample drawing for residue testing either as random sampling or in case of suspicion of contamination or non-compliance.
- Verification that changes to the standards and to related requirements have been effectively implemented; and
- Verification that corrective actions have been taken. After the site visit
- All the nonconformity, observations 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.

11. Specific Control Requirements for Plants and Plant Products from Farm Production or Collection-Control Arrangements IACB 5.4, 889.70

For on-site Inspections of farming / collection operations, the inspector is required to walk through the applicant's operation to evaluate the farming / collection practices. The applicant is required to make available to the inspector all of the farming / collection records and facilities, which are contributory to the commodity being certified.

This includes the farm / collection area itself, adjacent areas, ancillary facilities and equipment such as storage areas, tractors and other farming / collection implements and also the land, premises and equipment not included in certification.

ETKO inspector shall inspect the whole unit, including the conventional parts if present.

- 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, collection, irrigation, pest-disease and weed management practices.
- 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.
- 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.)

11.1. Plant Production Records 889.72

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

The records shall provide not limited but at least the following information:

- (a) as regards the use of fertilizer: date of application, type and amount of fertilizer, parcels concerned;
- (b) as regards the use of plant protection products: reason and date of treatment, type of product, method of treatment;
- (c) as regards purchase of farm inputs: date, type and amount of purchased product;
- (d) as regards harvest: date, type and amount of organic or in conversion crop production

11.2. Transition/Conversion Period for Agricultural Production 889.36

Conversion period is implemented of at least 24 months before sowing, or, in the case of grassland or perennial forage, at least 24 months before its use as feed from organic farming, or, in the case of perennial crops other

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than forage, at least three years before the first harvest of organic products.

-Annual crops: period prior to seed planting or transplanting.

-Perennial crops: period prior to the appearance of flower buds.

Transition period may be shortening on condition that there were not any obligatory treatments done by the state; otherwise it is subject to pass the 36 months transition starting the treatment date. To be sure an official declaration is needed from the local authorities for retroactive recognition.

11.3. Split Operations, Parallel Production ^{889.40}

In cases where agricultural producers carry out split operations the Inspector assigned for the Inspection must 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 sought for. In case of doubt of high risk contamination second Inspection may be carried out during harvest period.

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

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

i) the production in question forms part of a conversion plan in respect of which the producer gives a firm undertaking and which provides for the beginning of the conversion of the last part of the area concerned to organic production in the shortest possible period which may not in any event exceed a maximum of five years;

ii) appropriate measures have been taken to ensure the permanent separation of the products obtained from each unit concerned;

iii) ETKO must be notified of the harvest of each of the relevant products at least 48 hours in advance;

iv) upon completion of the harvest, the producer informs ETKO of the exact quantities harvested on the relevant units and of the measures applied to separate the products;

v) The conversion plan and the control measures approved by ETKO; this approval shall be confirmed each year after the start of the conversion plan;

b) In the case of areas intended for agricultural research or formal education agreed by the competent authorities 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.

11.4. Control Requirements for Units for Preparation of Plant and Livestock Products and Foodstuffs Composed of Plant and Livestock Products ^{889.80}

In the case of a unit involved in the preparation for its own account or for account of a third party, and including in particular units involved in packaging and/or re-packaging of such products or units involved in labeling and/or re-labeling of such products, the full description of the unit shall show the facilities used for the reception, the processing, packaging, labeling and storage of agricultural products before and after the operations concerning them, as well as the procedures for the transport of the products. ^{889.80}

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

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

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

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

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

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

All ingredients added to the processed product, or

Pest and rodent management systems,

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

Disposal of waste and other production process by products.

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

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

11.5. Small Holders Group Organizations

The projects containing several small farm holders may have an Internal Control System operating internal check of the producers to prepare them for certification. ICS operation needs to be checked by the inspector according to "OP 02 Certification of Grower Groups".

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

Existence of internal controlling system documentation such as ICS procedure, description of duties and responsibilities of the personnel, legal status, and contract signed between project and ICS.

Proper records kept as required by ICS, such as detailed maps indicating parcels, farmer agreements, internal Inspection reports including findings of the internal Inspections, exclusion of members and sanctions, farmer lists indicating internal and external Inspection dates.

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

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

11.6. Collection of Wild Crops

Collection of wild crops and parts thereof growing in natural habitats, forests and agricultural areas is considered as method of organic plant production provided that:

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

12. Approved Inputs

12.1. Allowed and Prohibited Materials

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

The overall principles of organic production are:

1).The principle of management of natural and biological processes which concerning management of natural and biological processes based on ecological systems of using natural resources, with application of methods that include:

- living organisms and mechanical production methods,
- plant production in the soil that respects the principles of sustainable exploitation in farming.
- the prohibition of use of genetically modified organisms and products that contain or are obtained from genetically modified organisms,
- production procedure based on risk assessment and use of the preventive measures when appropriate.

2).The principle of limited use of intermediate goods (external inputs), which refers to the restricted use of external inputs in organic production, where can be used:

- inputs from organic production,
- natural or naturally produced substances,
- low soluble mineral fertilizers.

3).The principle of strictly limited use of chemically synthesized inputs, which refers to strict restrictions on the use of synthesized inputs in organic agriculture, except:

- if appropriate management systems do not achieve satisfactory results,

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-if the external inputs from point 2) of this Article are not available on the market,
-if the use of external inputs from point 2) of this Article have an unacceptable impact on the environment;"
-The principle of adaptation, which refers to adaptation of organic production methods to the regional and local climate, and agro ecological conditions, sanitary conditions and stages of development.

ETKO is responsible to carry out verification of additives used in the production and processing in accordance with EU 834/2007, 889/2008 and IACB Standard.

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

Inputs used must comply IACB Standard Annexes
Annex I: Fertilisers, soil conditioners and nutrients referred to in 6.4.4

Annex II: Plant protection products referred to in 6.5.1

Annex VII: Products for cleaning and disinfection

Annex VIII: Certain products and substances for use in production of processed organic food, yeast and yeast products referred to in 7.4.1

Section B — Processing Aids and Other Products, Which May Be Used For Processing Of Ingredients of Agricultural Origin from Organic Production

Section C — Processing Aids for the Production of Yeast and Yeast Products

Annex VIIIa: Products and substances permitted for use or addition in organic products of the wine sector referred to in 7.4.4

12.2. Propagation Material Approval

Use of seed or vegetative propagating material not obtained by the organic production method. ^{889.45}

ETKO may grant allowance for the use of GMO free non organic seeds / planting stock by the organic producer under the specified conditions. The material applied for an approval must be either non-treated or treated only with allowed materials and methods by the applicable organic production regulations.

Following conditions apply:

- a) where no variety of the species which the user wants to obtain is registered in the database if there is one;
- b) where no supplier, meaning an operator who markets seed or seed potatoes to other operators, is able to deliver the seed or seed potatoes before sowing or planting in situations where the user has ordered the seed or seed potatoes in reasonable time;

c) where the variety which the user wants to obtain is not registered in the database (if there is one), and the user is able to demonstrate that none of the registered alternatives of the same species are appropriate and that the authorization therefore is significant for his production;
Operator must get the propagation material approved before planting.

13. Prohibited Methods and Substances

13.1. Genetically Modified Organisms - GMOs

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

Specific for cotton fibers: GMO testing shall be carried out at an early stage of the processing chain before ginning to ensure that sufficient DNA from the plant is available.

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

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

13.2. Ionizing Radiation

Ionizing radiation is not allowed

13.3. Sewage Sludge

Sewage sludge is not allowed.

14. Sampling & Laboratory Analysis

Sampling to be done 5% of total operators per year according to EC, 889.65.2. When necessary and/or according to risk analyses, samples are taken random for laboratory testing. Samples might be taken without informing the operator. Risk analyses for sampling are done according to ETKO procedures.

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

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

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

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

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

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

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

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

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

15. Frequency of Inspection ^{889.65}

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

Inspections are planned on the basis of risk assessment. The risk analysis procedure is designed in such a way that:
(a) the result of the risk analysis provides the basis for

determining the intensity of the unannounced or announced annual controls and visits;

(b) additional random control visits carried out of at least 10 % of operators under contract in accordance with the risk category are performed;

(c) at least 10 % of all controls and visits carried out (as described under (a) and (b)) are unannounced;

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

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

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

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

15.1. Unannounced Inspection Criteria ^{889.65}

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

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

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

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

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

16. Reporting of Audit Results 889.63.2.c, 889.65.3

During the audit Inspector(s) are obliged to keep records on relevant forms as applicable.

Noncompliances described will be discussed with the operator to make him/her understand the issues. Inspector has no power to issue nonconformities but has power to report his findings to ETKO with necessary supporting evidences. ETKO will decide the level of noncompliance's whether it is major, minor or point of attention.

ETKO will officially notify the results to the operator.

The audit report will be completed when all the other relevant records are completed, by the Inspector. Audit report is sent to client for his verification and approval of technical matters.

The reports which are not replied in 15 work days are accepted as approved by the client.

17. Grading Non-Conformities

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

- 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 shall be issued. Major non-conformities are usually clear-cut system deficiencies.

17.1. Major Non-Conformities

Major Non-Conformities occur if, either alone or in combination with further nonconformities of other requirements, it results in, or is likely to result in, a fundamental failure to achieve the objectives of the standards system.

Such fundamental failure may be indicated by non-conformities which continue over a long period of time, are repeated or systematic, affect a wide area, or are not corrected or adequately responded to by the client once they have been identified.

Factors causing risk on the product.

- Use of inputs which are not allowed by the regulations.
- Non-Organic product sales as organic.
- Requirements of regulation or standard not applied.
- Frequent minor non-conformities on the same requirement of regulation.
- Operator complaints not handled failure on taking remedial actions, or complaints and action records not available.
- Misuse of the licenses and certificates.
- Production process plan not implemented.

17.2. Minor Non-Conformities

Minor non-conformities occur when a single observed lapse has been identified in a procedure required as part of the client's management system.

A non-conformity may be considered minor if it is a temporary lapse; it is unusual / non-systematic; the impacts of the non-conformity are limited in their temporal and spatial scale; or prompt corrective action has been put in place to ensure that it will not be repeated.

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

17.3. 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.

Note: providing advice on the implementation of the improvements is prohibited by accreditation rules.

17.4. Reporting Non-Conformities

All non-conformities observed during inspections are graded according to clause "Grading Non-Conformities" by the inspector in charge, and are recorded on the "Noncompliance Register" (GP 14 F 02). Although inspector mentions his proposal in the NCR, certifier has the power to decide final grade status of the nonconformities.

Minor issues called Point of Attention will also be recorded to the NCR form.

For nonconformities which are not closed satisfactorily until the closing meeting will be reported in NCR; "GP 14 F 02 Noncompliance Register"

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Inspector explains results of the inspection to the operator during closing meeting makes him to understand raised issues including point of attention. The operator is requested to determine a target date for the corrective actions to close by a notification of noncompliance.

When ETKO notifies Noncompliance's to the operator, operator will be asked if there is any objection for any nonconformities and provide supporting evidences.

Notification will be made by ETKO within appropriate time period which will not exceed 10 working days after the inspection.

Recommendation for certification shall be considered after the closing date of the major non-conformities. NCR register will include minimum:

- Clear cut description of non-compliance supported with objective proof.
- Operator identity information.
- Inspector and operator names.
- The corrective action plan and implementation date by the operator.

After notification made, results not responded in 15 days are counted to be accepted by the client as they are.

Certifier or assigned person will follow up corrective actions and resolutions before taking the decision.

17.5. Surveillance Visit Required for Closing and Implementation Follow up NCRs

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

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

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

The non-conformities shall be closed in case of satisfying results are determined.

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

As a general implementation process major non-conformities should be corrected within 30 days starting the date of notification made by ETKO and minor nonconformities 60 days, however when integrity of organic products not in danger ETKO may decide for longer periods for minor nonconformities which should not exceed following surveillance audit.

In case of an urgent reaction is required for a product which is not in compliance with the production rules, an immediate suspension could be decided to disqualify related lot of that product.

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

ETKO will register the NCRs 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 NCRs.

ETKO inspector(s) will take note in the review report before going on site inspection to emphasis the resolutions of the previous NCRs 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 NCRs during the previous inspection will be assessed carefully if implementation of the previous NCRs 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 NCRs will be reported by the inspector and further sanctions will be implemented.

18. Certification Decision

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

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

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

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

18.1. The Certificate 7.7. 889.68, 834.29.1

Upon successful completion of the certification process, an officially numbered certificate is issued by ETKO. The model of the Certificate is set according to the specific regulation clause such as for EU "according to Article 29 (1) of Regulation (EC) No 834/2007 referred to in Article 68 of Regulation (EC) No 889/2008".

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

18.2. 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.

18.3. 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.

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

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 re-evaluation, a/m rules are applicable.

18.4. Verification of Supplier Certification Status

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

19. Use of Logo and Certificate 4.6.c

Compulsory Indications EU:

Code nr of control body

Community logo

Raw material country of production. In this case following forms of indication as appropriate shall appear in the same visual field as the logo:

"EU Agriculture", where the agricultural raw material has been farmed in the EU;

"non-EU Agriculture", where the agricultural raw material has been farmed in third countries;

"EU/non-EU Agriculture", where part of the agricultural raw materials has been farmed in the Community and a part of it has been farmed in a third country.

The above mentioned indication "EU" or "non-EU" may be replaced or supplemented by a country in the case where all agricultural raw materials of which the product is composed have been farmed in that country.

For the above mentioned "EU" or "non-EU" indication, small quantities by weight of ingredients may be

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disregarded provided that the total quantity of the disregarded ingredients does not exceed 2 % of the total quantity by weight of raw materials of agricultural origin. The above mentioned "EU" or "non-EU" indication shall not appear in a colour, size and style of lettering more prominent than the sales description of the product.

The indications referred to in paragraph above shall be marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.

Organic Production Logos:

Community Organic production logo may be used in the labelling, presentation and advertising of products which satisfy the requirements set out under IACB Standard. The Community logo shall not be used in the case of in conversion products and food.

In-conversion products of plant origin may bear the indication 'product under conversion to organic farming' provided that:

- (a) a conversion period of at least 12 months before the harvest has been complied with;
- (b) the indication shall appear in a colour, size and style of lettering which is not more prominent than the sales description of the product; the entire indication shall have the same size of letters;
- (c) the product contains only one crop ingredient of agricultural origin;
- (d) the indication is linked to the code number of the control body

Use of Certificate: 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 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 operator from its legal responsibilities.

In case production practices are related to NOP Final rule, certification process requires GP 18, Turkish Organic Regulation requires OP 01 and IACB/EU program requires OP 04.

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.

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

20. Requirement of Operator Documentation-Processing & Handling 889.30-35.

20.1. 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.

20.2. 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

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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:

(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.

20.3. 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.

20.4. 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 20.2.

1. The operator shall crosscheck the information on the label referred to in 20.2 with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts

2. When operator suspects that any input or product is not in compliance with this Standard, they shall withdraw references to the organic claim of the related product until they can confirm the valid certification of the product, and shall inform ETKO immediately.

20.5. 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.

In case of organic plant production units, storage of input products other than those authorised under this standard is prohibited in the production unit.

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21. Control Requirements of Units Preparing Organic Animal Feeding Stuffs, Compound Feeding and Feed Material 889.88

In livestock farming where they integrate a professional feed material processing a HACCP plan is developed. HACCP Form is used Inspection this type of facilities. Production of processed organic feed shall be based on the specific principles given by the IACB 4.4, 834.7 Control arrangements require;

1. The full description of the unit shall indicate:
 - (a) the facilities used for the reception, preparation and storage of the products intended for animal feed before and after the operations concerning them;
 - (b) the facilities used for the storage of other products used to prepare feeding stuffs;
 - (c) the facilities used to store products for cleaning and disinfection;
 - (d) where necessary, the description of the compound feeding stuff that the operator intends to produce, in accordance with Article 5(1)(a) of Directive 79/373/EEC, and the livestock species or class for which the compound feeding stuff is intended;
 - (e) where necessary, the name of the feed materials that the operator intends to prepare.

2. The measures to be taken by operators, to guarantee compliance with the organic production rules shall include the indications of measures referred to in Article 889.26.

3. ETKO will use these measures to carry out a general evaluation of the risks attendant on each preparation unit and to draw up a control plan. This control plan will provide for a minimum number of random samples depending on the potential risks.

22. 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 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

23. Changes Affecting Certification 7.10

ETKO informs its clients about the amendments in the certification scheme and in its procedures that affect the client. ETKO ensures formally in writing form or publishing in its website in a timely manner (On the website the links will be published for the program the client has applied for, i.e. IACB). The amendments are valid on the date as informed to the client. 7.10.1

ETKO verifies the implementation of the changes by the clients. The client is responsible to implement the changes in the requirements as soon as he receives. 7.10.1

ETKO considers other changes affecting certification including changes initiated by the client and decides upon the appropriate action. 7.10.2

Actions implement changes affecting certification includes evaluation, review and decision, revision of the certificate issued, to extend or reduce the scope of certification and/or if surveillance is a part of the certification scheme revise surveillance. 7.10.3

Actions are completed in accordance with this Inspection and Certification Procedure.

In case of exclusion (omission) any of the above activities (e.g. when a certification requirement that is not a product requirement changes and no evaluation, review or decision activities are necessary), necessary records

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shall include the rationale for excluding any of the above activities.

The clients are responsible to inform ETKO about the planned changes in their processes, on time. ETKO shall not be responsible of the results due to the late notification of the client about the changes. The changes in the client's system have to be evaluated and approved prior to the implementation. The evaluation is done on site by checking activities and documents and affected products. Depending on the changes it may be limited to document review.

The changes to be made by the client have to be not affecting the organic status of the current production. The planned changes are strictly required to be in accordance with relevant legal requirements and standards. Otherwise, ETKO may deny the change and its consequences, and may postpone or cancel the certification of the product (ion) effected by the change.

24. Extend / Reduce Certification

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

Such changes may include the following but not limited to:

- Adding a new subcontractor, changing or omitting an existing subcontractor, reducing or extending the scope of an existing subcontractor
- Any changes made to units, additional production line, a new process or partial or full renounce/surrender to certification
- Changes made to products, to the composition of existing products; adding new product(s) to production or partial or full renounce/surrender to certification of existing products
- Changes made to inputs to be used in production, adding a new product range to existing ones or omitting a new product range from existing ones. i.e. adding a new product range to existing product list, etc.

Therefore;

- the operator must evaluate the changes to be made to the production method within the scope of Regulations before carrying into effect.
- Organic production system plan that the operator prepares must be updated and provided to ETKO.
- If needed, ETKO submits an on-site inspection plan to operator following the assessment of the above mentioned organic production system plan.

- If the change in question does not require an on-site inspection -i.e. changes not affecting the status and the content of the product in production line, storages, site plan or in case of producing different products by using the existing inputs such as producing through only a physical process like fruit aroma or puree produced in a unit for fruit concentration- , certification of such products may be managed through a remote audit.
- Operator ensures that they provide the necessary know-how, document, record and drawings/pictures to enable ETKO to make decision when the changes not requiring on-site inspections are subject to being included in or omitted from the certification scope. Such changes will be a part follow-up/unannounced inspection.
- All processes, products, units undergoing changes are subjected to on-site inspection and assessment.
- Certification process will be completed following a favourable result of the on-site or remote audit and then, the operator may start organic production.
- When the certification procedure completed successfully, Scope Certificate will be renewed with a new revision number and public database will be updated as appropriate

25. Sanctions

25.1. Sanctioning of Certification

Certification of an operation may be sanctioned depending on the severity of non-conformity identified. Sanctions implemented according to "TI 49 Catalogue of Measures". See: www.etko.com.tr

Sanction may include Suspension / Revocation / Reduction of certification. In case such issues arise ETKO will assign one or more persons to formulate and communicate the following to the client:

- actions needed to end the sanction imposed and restore certification for the product(s) in accordance with the certification scheme;
- any other actions required by the certification scheme;

These persons will be competent in their knowledge and understanding of all aspects of the handling of sanctioned certifications.

Any evaluations, reviews or decisions needed to resolve the sanction imposed, or that are required by the certification scheme, will be completed in accordance with the ISO 17065 applicable parts of Evaluation, Review, Certification Decision, Certificate, Surveillance, and Exchange of information with related parties, public, authorities, other certifiers, scope standard owners.

If payments are not made in a timely manner, and in accordance with the terms and conditions of the Certification Agreement, this procedure is followed, until

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the payments have a valid status.

Immediate Suspension / Revocation / Reduction of certification will be imposed on the certified operations which fail to implement corrective actions for the **major noncompliance** within **30 calendar days** or to resolve the issue through rebuttal or mediation, or to file an appeal, on time.

In case of Suspension / Revocation / Reduction/Denial, the certified operation is no longer able to sell, label, and represent the product as organic for the time period described. Once suspended /revoked / reduced, reinstatement for certification may only be requested from ETKO management and will only be considered for certification if the NCR(s) is (are) corrected and the operation has been inspected by ETKO to verify that the operation complies with the requirements.

ETKO will not send a notification of sanction to a certified operation that has requested mediation or filed an appeal, while final resolution of either is pending.

25.2. Suspension and Cancellation Policy Grower Group

The grower group as a whole is responsible for compliance of all members.

The certification granted to the grower group is suspended or cancelled as a whole, in accordance with the Organic Production Regulations, in cases where the grower group's internal control system fails to act on the non-compliances.

In the event of noncompliance by the grower group or a member, Catalogue of Measures will be implemented section 26 as appropriate.

Period of the suspension will be determined for each case related to the level of violation.

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.

26. Confidentiality and Conflict of Interest

Any ETKO employee, inspector, contractor, or other personnel are not permitted to provide to any applicants / operators the following services:

Being the designer, manufacturer, promoter, distributor or maintainer of the certified product by ETKO

Giving advice or providing consultancy services to the applicant/operator as to methods of dealing with matters which are barriers (eg: non-conformities identified in the course of the certification process) to the standard's certification.

Explanatory information may be provided to the applicant/operator in regard to complicated issues (e.g. concerning the non-conformities identified in the course of the certification process) such as the methods related to the certification in accordance with the standards.

Explanations regarding the standard and its quality assurance system are not considered to be advice or consultancy. General information or training may be given as long as this service is offered to all applicants / operators in a non-discriminatory manner.

Providing any other products or services compromising the confidentiality, impartiality or conflict of interest which might influence ETKO certification process and decisions.

27. Appeal, Complaint and Disputes Applied to ETKO

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, Complaint and Disputes" info letter, or "SP 06 Corrective & Preventive Actions". See www.etko.com.tr.

28. 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

29. Objections, Complaints and Legal Cases Applied to Clients 4.1.2.2.c.2

Operator is obliged to prepare a file to handle the objections, complaints, and legal cases from its own clients on a regular basis.

Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available is a major non-conformance.

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Customer complaints records and actions taken for complaints by the client are subject to Inspection to verify that the client takes proper and effective action.

A specific file is maintained for handling of objections, complaints, and legal cases which at least includes followings:

The nature of the received objections, complaints, and legal cases

The identity of the involved persons/groups

The causes of the problem

The action taken

Verification and documentation of the effectiveness of the initiated measures

30. Disclosure of Information ^{4,6}

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

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

b) a description of the means by which ETKO obtains financial support and general information on the fees charged to applicants and to clients by TI 14 Fee Structure and GP 07 Fees Procedure

c) a description of the rights and duties of applicants and clients, including requirements, restrictions or limitations on the use of ETKO's name and certification mark and on the ways of referring to the certification granted by GP 23 and GP 11 Use of Logo, Licences, Mark of Conformity;

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

31. Free Movement of Organic Products EU Specific Requirement

ETKO will not, on grounds relating to the method of production, to the labelling or to the presentation of that method, prohibit or restrict the marketing of organic products controlled by another control body, in so far as those products meet the requirements of this Regulation. In particular, no additional controls or financial burdens in addition to the regular control requirements will be imposed.

32. Exchange of Information

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

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

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

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

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

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

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

5. ETKO communicates the results of the controls carried out to the competent authority on a regular basis and whenever the competent authority so requests. If the results of the controls indicate non-compliance or point to the likelihood of non-compliance, ETKO will immediately inform the competent authority. ETKO will have an effective coordination with the delegating competent authority. ^{834.27.5.d}

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

In case of irregularities or infringements found with regard to products under the control of other control

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authorities or control bodies, ETKO will also inform those authorities or bodies without delay.

ETKO Commits that ETKO will use following documented procedures and templates in compliance with the EU Regulation 889.92e.c.

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

SECTION CONTENT	SECTION NR	REV. NR	REV. DATE

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