

M1 – measure of warning	1 – First time	Rev. Date	29.09.2018
M2 – suspension	2 – Second time repeated	Rev. Nr	05
S1 –rejection/withdrawal I	3 – Third time repeated.	Page	1 / 14
S2 –rejection/withdrawal II			

OBJECTIVE

By this catalog there are defined measures and consequences by the producer/processor/trader has to face with in the case of established non-conformities during practicing production / processing / marketing of organic products. This catalogue is a part of the GP 15 Procedure. ETKO takes references described in this catalogue identifying sanction levels.

EXPLANATION OF THE MARKS

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Levels of deviation and description of procedures and consequences producer is facing with:

Level of Deviation	Description of procedure	Consequences	Validity Period
M 1 Minor non-conformity, not affecting organic status of the product	Measure of warning	Depending on the case, non-conformity can be closed before or after issuing the certificate	Depending on the case and type of production.
M2 Measure of warning not applied in prescribed dead line or not applied in full.	Suspension	Depending on the case, possibility of losing organic status of the products, animals, or new start of conversion period. Non-conformity must be closed before issuing the certificate.	Depending on the case and type of production.
S 1 Major non-conformity, affecting organic status of the products.	Rejection / Withdrawal I	Product cannot be certified. Plots, animals are keeping statuses.	Depending on the type of production.
S 2 Major non-conformity, affecting the organic status of production.	Rejection / Withdrawal II	Product concerned cannot be certified, plots, animals, part or in full, must undergo a conversion period from the beginning	Depending on the type of production.

If measure is defined as M1 in case of repeating the non-compliance that caused it, the measure becomes M2, S1 or S2, depending of the severity.

EXEMPTION FROM THE APPLICATION OF MEASURES, IN THE CASE OF PREVIOUS ANNOUNCEMENT BY THE PRODUCER

If the producer is forced not to comply with the prescribed rules, measures will not be issued in following cases:

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A-The status of the animal, field, (in conversion, organic) will not change but the product concerned cannot be marketed as organic in the particular production year or till the non-compliance continue to exist.

1 if the same type of animal raised / variety is grown in the organic and conventional unit (in the given year),

2. if conventional animal for breeding, seed is used for reproduction without authorization.

B-In the following case the product concerned cannot be marketed with references to organic production methods and the conversion period starts again.

1. if the operator is to apply products that are not in accordance with Organic Standard/Regulation.

In cases not regulated by the Catalogue of Measures, ETKO will decide taking account of all circumstances at operator in question as well as rules described in Organic Standard/Regulation.

1. OBLIGATIONS DURING APPLICATION

		M1	M2	S1	S2
1	Application is not submitted in accordance with the instructions of ETKO	+			
2	Giving incorrect data	+			
3	Deliberately omitting data	+			

2. AGRICULTURAL PRACTICES

		M1	M2	S1	S2
1	There are no clear data on land (the basis of use, size of parcels, etc.).	+			
2	History of parcels is not delivered during the first start in organic farming	+			
3	Production plan / Registration of Ministry is not present (if applicable)	+			
4	Maps not present	+			
5	Cadastral Registration / Title Dees / Rental Agreement not present	+			

3. CROP PRODUCTION

		M1	M2	S1	S2
1	No records available for agricultural production		+		
2	There is no crop rotation plan including leguminous or different crop (20% minimum)	+			
3	Crop rotation deviates as minimum	+			
4	Crop rotation deviates seriously organic rule		+		
5	Monoculture production more than 2 years		+		
6	There is no use of compost-manure, green manure	+			

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8	Heavy tillage, compaction	+			
9	Soil erosion / intensive irrigation	+			
10	There is no buffer zone between organic and conventional fields	+			
11	Harvest records are not provided to ETKO after harvest		+		
12	Access for conventional production areas and facilities no allowed			+	+

4. PARALLEL PRODUCTION CROPS

		M1	M2	S1	S2
1	ETKO was not submitted information related to parallel production, or plan is not present			+	
2	Same or similar varieties of organic and conventional products are produced in the same farm			+	
3	Deviation from the plan of conversion	+			
4	Organic and conventional products are not separated appropriately			+	
5	Conversion plan of perennial crops was not submitted to ETKO	+			
6	Harvest time and quantities were not communicated to ETKO	+			

5. STORAGE

		M1	M2	S1	S2
1	There is no cleaning procedure applied in store	+			
2	There is waste of material from the previous product stored	+			
3	Store is not totally close, birds, rodents can easily enter	+			
4	Storing conventional product in the same store and necessary precautions for separation is not present			+	
5	Storing sanitary equipment, detergents, chemicals, fertilizers in the store	+			
6	There is machinery in the same store	+			
7	Contamination risk from organic or mineral fertilizers is present			+	
8	The lamps or windows are not protected, risk of breakage	+			
9	Rental agreement is not present for rented stores	+			
10	Using prohibited substances pest-rodent control in the store during or right before organic product is			+	

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	stored				
11	No store register book is present		+		
12	No clear indications present for organic products	+			
13	Mixing organic products with in-conversion or conventional products.			+	

6. PROPAGATION MATERIAL

		M1	M2	S1	S2
1	Conventional non-treated material use without approval by ETKO	+	+		
2	Conventional treated material use			+	
3	No proof for own material use in case parallel cropping present		+		
4	No proof for own material use in case parallel cropping not present		+		
5	For critical varieties there is no proofs for free from GMO.		+		
6	GMO variety is used intentionally.			+	
7	GMO Variety was used un-intentionally			+	
8	Origin of the propagation material cannot be proven		+		

7. FERTILIZERS AND PLANT PROTECTION PRODUCTS

		M1	M2	S1	S2
1	Contamination from the conventional fields present			+	
2	Use of pesticides in his own conventional farm		+		
3	No records, proofs available for used pesticides		+		
4	Use of unallowed pesticides				+
5	Copper use exceeds the limits described by the standards	+			
6	GMO derived products used as inputs			+	
7	Allowed substances use is present without justification	+			
8	There is no evidence of the need for the use of plant protection products when allowed substances are used	+			
9	Use of unallowed synthetic fertilizers use				+
10	Excess use of organic fertilizers exceeding 170 kg/N/ha in a year				+
11	Use of manure from intensive farms		+		
12	No records, proofs available for used fertilizers				+
13	There is no stock register for used inputs				+
14	Composting Process not appropriate C/N	+			
15	Manure use before harvest contaminating crops		+		

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	edible part				
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8. DOCUMENTATION and PRODUCT INTEGRITY

		M1	M2	S1	S2
1	Minor defects which do not affect the issuance of certificates in record-keeping	+			
2	Documentation required by ETKO is not given in time	+			
3	Major defects that affect the issuance of certificates in record-keeping			+	+
4	Documents kept for traceability not correct, manipulated, corrupted			+	+
5	There is no record of production - diaries, separation of conventional and organic farming in all phases is not documented			+	+
6	Inability to secure traceability, procurement, production and sales.			+	+
7	Disclosure of false information in the documentation or hiding the data			+	+
8	No use of official documents			+	
9	Subcontractor used not accredited	+			
10	Access is not allowed for conventional products records, documents including financial transaction			+	+
11	Risk based sampling and analyses in order to comply the consumers countries MRLs	+			
12	Written procedures in order to safeguard product quality	+			
13	No clear action taken when recall is necessary			+	+

9. LABELING

		M1	M2	S1	S2
1	Use of not approved labels with minor defects	+			
2	No use of label		+		
3	Mixing organic products or the products from the transition period with the conv. products			+	
4	Accompanying documentation is not labeled, but the origin of the goods can be proved	+			
5	Accompanying documentation is not labeled and the product is not listed on the certificate			+	
6	Inadequate labeling of the products and accompanying documents	+			
7	Deliberately inadequate labeling of the products and accompanying documents (incorrectly stating the status of the product)			+	
8	Labeling of products which is not listed on the			+	+

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	certificate as organic, and / or distribution of products without a valid certificate				
	During suspension of the certificate distribution of products with the organic label			+	

10. PROCESSING

		M1	M2	S1	S2
1	Cannot provide recipe	+			
2	Cannot prove the origin of raw material		+		
3	Using non allowed substances (additives and processing aids) without permission			+	
4	Using conventional agricultural products without permission			+	
5	Using ionizing radiation			+	
6	Using gmo's and their derivate			+	
7	Cannot provide non-gmo declaration		+		
8	Cleaning prior to organic processing ,when separation is in time, cannot be proven	+			
9	No access is allowed to conventional products processing areas, stores.			+	+

11. IMPORT & EXPORT & TRADE

		M1	M2	S1	S2
1	Cannot provide certificate that accompanies the product		+		
2	Cannot prove verification of documentation		+		
3	Cannot provide documentation about imports		+		
4	No separate record keeping solely organic				
5	No access possible for conventional products trade records, documents including financial transaction			+	+

12. OTHER

		M1	M2	S1	S2
1	Missing the fixed inspection date	+			
2	Falsification of documents				+

13. CORRECTIVE and PREVENTIVE ACTIONS

		M1	M2	S1	S2
1	Not to accept NCs without any valid objection		+		
2	Repeating NCs		+		
3	Delay in corrections of Nonconformities		+		
4	Nonconformities that affect the certification were			+	+

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	not corrected				
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LIVESTOCK
14-ORIGIN of ANIMALS

		M1	M2	S1	S2
1	Origin of the animals for organic livestock was not in compliance		+		
2	Identification of animals not complete	+			
3	Non organic poultry for meat and pullets for eggs brought in organic farm not less than 3 days.		+		
4	Husbandry practices and housing conditions do not comply	+			
5	Stocking density does not comply 170 kg/N/ha/year rule		+		
6	Access to open air areas rule is not complied with the standard		+		
7	Landless livestock production is practiced				+
8	Tethering animals rule was not respected at all times	+			
9	Any suffering, including mutilation was not kept to a minimum during its life and slaughter		+		
10	Rules pertaining to housing conditions are not appropriate for mammals and poultry	+			
11	Reproduction of livestock was practiced systematically by treatment with hormones		+		

15-FEED USE

		M1	M2	S1	S2
1	Feed was not obtained primarily from own holding, or neighbor producers	+			
2	Feed does not meet the animals nutritional requirements at the various stages of its development		+		
3	Non authorized feed material was used			+	
4	Feeding young mammals period does not comply		+		
5	Rearing system for herbivores does not comply the requirement		+		
6	60% of the dry matter in daily rations of herbivores does not consist of roughage, fresh or dried fodder or silage.		+		
7	Force feeding was done for fattening practices.			+	
8	In conversion feed use does not comply the rule.		+		
9	Non organic feed materials and/or feed additives used for organic feed do not comply the standards.			+	

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16-FEED PROCESSING

		M1	M2	S1	S2
1	Producer does not respect the principles of good manufacturing practice	+			
2	Producer has no systematic identification of critical processing steps, or does not comply the with the organic production rules		+		
3	Did not take precautionary measures to avoid the risk of contamination by unauthorized products		+		
4	implement suitable cleaning measures, monitor their effectiveness and record these operations	+			
5	guarantee that non-organic products are not placed on the market with an indication referring to the organic production method		+		
6	the restriction of the use of feed additives and processing aids is not to a minimum extent		+		
7	No precautions taken to exclude substances and methods that might be misleading as to the true nature of the product		+		
8	The use of biological, mechanical and physical methods were not preferred for processing feed.	+			
9	No good separation is present for processing organic feed	+			
10	Organic or in conversion feed materials enters simultaneously with the same feed material produced by non-organic means into the composition		+		
11	Chemically synthesized solvents used for process			+	
12	Substances or techniques misleading as to the true nature of these products are used			+	
13	Storing organic products are not separate by place or time from non-organic products	+			
14	Producer did not inform ETKO for production register of all operations quantities (org and conv.)	+			
15	Producer did not take the necessary measures to ensure identification of lots and to avoid mixtures or exchanges with non-organic products		+		
16	Producer did not carry out operations on organic products only after suitable cleaning of the production equipment	+			

17-STORAGE of PRODUCTS

		M1	M2	S1	S2
1	Identification of products are not possible at all times of the storage	+			
2	Organic products are not kept separate than other	+			

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	products				
3	Suitable cleaning measures were not taken before storing organic products	+			

18-CONVERSION LAND & LIVESTOCK

		M1	M2	S1	S2
1	The conversion rules referred to shall apply to the whole area of the production unit on which animal feed is produced		+		
2	Producer did not follow correct procedures for reducing conversion period for pasturage and open air areas		+		
3	There was no correct procedures applied for the non-organic livestock been brought in this holding in accordance and if livestock products are to be sold as organic products			+	
4	Feed material labelled as organic does not comply 95% of the products dry matter to be organic			+	
5	Labelling does not comply "conditions for use of indications on processed feed"		+		

19-LIVESTOCK RECORDS

		M1	M2	S1	S2
1	Livestock records not compiled in the form of a register and/or kept available to the control of ETKO at all times at the premises of the holding	+			
2	Records does not provide a full description of the herd or flock management system comprising at least the following information		+		
3	(a) as regards animals arriving at the holding: origin and date of arrival, conversion period, identification mark and veterinary record;		+		
4	(b) as regards livestock leaving the holding: age, number of heads, weight in case of slaughter, identification mark and destination;		+		
5	(c) details of any animals lost and reasons thereof;	+			
6	(d) as regards feed: type, including feed supplements, proportions of various ingredients of rations and periods of access to free-range areas, periods of transhumance where restrictions apply;		+		
7	(e) as regards disease prevention and treatment and veterinary care: date of treatment, details of the diagnosis, the posology; type of treatment product, the indication of the active pharmacological substances involved method of			+	

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	treatment and veterinary prescription for veterinary care with reasons and withdrawal periods applying before livestock products can be marketed labelled as organic				
8	"Whenever veterinary medicinal products are used, the information to be declared to ETKO before the livestock or livestock products are marketed as organically produced.		+		
9	Livestock treated shall be clearly identified, individually in the case of large animals; individually, or by batch, or by hive, in the case of poultry, small animals and bees."		+		

20-LIVESTOCK PARALLEL PRODUCTION

		M1	M2	S1	S2
1	Non organic and organic units are not clearly separated from each other		+		
2	Non-organic animals reared in organic pasturage without informing ETKO		+		
3	No proper separation of the organic products were done		+		

21-BEEKEEPING PARALLEL PRODUCTION

		M1	M2	S1	S2
1	Beekeeper keep organic and non-organic hives in the same operation without climatically, geographical or structural constraints		+		
2	Beekeeper sold his products as organic		+		
3	There is no approval from ETKO for parallel production		+		
4	There is no documentary evidence using this provision.		+		

22-BEEKEEPING PRODUCTION RULES

		M1	M2	S1	S2
1	Products sold before complying conversion period of 12 months			+	
2	Wax was not replaced with organic wax during conversion period			+	
3	For renovation apiaries more than 10% queen bees and swarms were replaced		+		
4	queen bees and swarms were not placed in hives with combs or comb foundations coming from organic production units	+			

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5	Use of non-organic beeswax during conversion period does not comply the rules, non-availability of organic wax, no residues of pesticides and antibiotics, and it comes from the cap		+		
6	Hive location chosen does not ensure nectar and pollen sources consisting essentially of organically produced crops or, as appropriate, of spontaneous vegetation or non-organically managed forests or crops that are only treated with low environmental impact methods, within a radius of 3 km from the apiary site		+		
7	Apiaries were not kept at sufficient distance from sources that may lead to the contamination of beekeeping products or to the poor health of the bees		+		
8	Hives are not made from natural material or there is risk of contamination to the products.	+			
9	Beekeeping husbandry practices do not comply		+		
10	There is not enough pollen and honey left for winter feed.	+			
11	The feeding of bee colonies by allowed feed material did not take place according to standard		+		
12	In a catastrophic circumstance bee-keeper did not ask approval from ETKO to use feed material.	+			
13	The use of disease prevention and veterinary treatment does not comply Annex II products			+	
14	The used material is not allowed by National Law			+	
15	Treated hives with chemically synthesized allopathic products not isolated, and/or wax not replaced with organic wax, and/or conversion period was not applied correctly			+	

23-BEEKEEPING RECORD

		M1	M2	S1	S2
1	There is no register which production practices applied and quantities of products harvested	+			
2	Feeding with the type of product, date, quantities and hives was not registered.	+			
3	Records of veterinary medicinal products including, type, active substance, details of diagnosis, the posology, method of administration, duration of treatment, and legal withdrawal period not complete or present.	+			
4	ETKO was not informed before marketing the products as organic.	+			
5	The zone where the apiary situated was not registered together with hive identification.	+			

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6	ETKO was not informed before move	+			
7	Particular care was not taken to ensure extraction, processing and storage of beekeeping products.	+			
8	Removals of the supers and the honey extraction was not entered in the register of the apiary.	+			

24-DISEASE PREVENTION & VETERINARY TREATMENT

		M1	M2	S1	S2
1	There is use of chemically synthesized allopathic veterinary medicinal products or antibiotics for preventive treatment.			+	
2	There is growth promoters			+	
3	Hygiene rules not implemented such as cleaning, pens, equipment and utensils shall be properly cleaned and disinfected to prevent cross-infection and the buildup of disease carrying organisms.		+		
4	Feces, urine and uneaten or spilt feed are not removed as often as necessary to minimize smell and to avoid attracting insects or rodents	+			
5	There is cleaning and agent use out of Annex VII for cleaning and disinfection of livestock buildings, installations, and utensils and disinfection material Annex X		+		
6	There is no record keeping for use of medicines, cleaning agents		+		
7	Veterinary treatment does not comply the standard, there is use of material outside of the Annex V and Annex VI			+	
8	Sick animal was not treated to avoid suffering to the animal		+		
9	Sick animal was not isolated or suitable housing was not provided	+			
10	The store where the allopathic veterinary medicinal products and antibiotics is not supervised, no register available.	+			

25-RECORD KEEPING LIVESTOCK

		M1	M2	S1	S2
1	Stock and financial records shall be kept in the unit or premises and shall enable the operator to identify and the control body to verify	+			
2	Documentary accounts comprise results of the balance between the input and the output.	+			
3	Livestock records shall be compiled in the form of a register and kept available to ETKO control at all	+			

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	times at the premises of the holding				
4	Information on the origin, nature and quantities of feed materials, additives, sales and finished products are not mentioned partly or whole.	+			

26-Grower Group Sanctions

	M1	M2	S1	S2
QMS				
QMS documentation, quality manual, procedures..	+			
QM covers all aspects of the certification program	+			
QMS available to related to personnel	+			
Management and Organization				
Internal audits are regularly done	+			
Management review is properly done	+			
Management structure is proper trained personnel	+			
Responsibilities and duties are clearly defined	+			
Training and qualification of personnel regularly done	+			
Training producers annually realized	+			
Document control				
Document control is performed and implemented	+			
Documents updated according to standard change	+			
Record Keeping				
Organic System Plan is updated and provided annually		+		
Records are kept minimum 5 years			+	
Records are kept good condition, accessible, auditable	+	+		
Description of production, handling and processing	+	+		
Producers list, fields, production records updated	+	+		
Internal Control				
Internal control is done for every members annually		+		
ICS documents used correctly by producers and staff	+			
Issues identified, sanctions implemented, results provided		+	+	+
Resolutions provided, results kept for external inspection	+	+		
New members registered after internal control done	+	+		
Internal Audit of QMS and ICS				
Internal audit of the system realized annually	+	+		
Internal auditor is qualified and independent	+			
Results and resolutions of the internal audit maintained	+	+		
Grower group has a neutral advisory system in place	+	+		
Non-compliances and Corrective Action, Sanctions	+	+		
Procedure handling NCs&CAs is in place and effective	+	+		
NCs&CAs are dealt with appropriately by ICS	+	+		
Mechanism removing non-compliant members in place	+	+		
Notifying irregularities to ETKO in place and effective	+	+	+	+
Sanction system is in place	+	+	+	+
Product Traceability and Segregation				
Organic products are traceable and integrity maintained		+	+	+
Identification system of products allowing traceability	+	+		
System in place for correct Labelling	+	+		
Withdrawal procedure is in place and effective	+	+	+	+

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Use of the Organic Farming Regulations Logo					
	There is a mechanism to control logo use	+			
	The procedure covers the regulations requirements for logo use	+			

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