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CERTIFICATION PROCESS ECOCERT SA

Organic farming according to the Ecocert Organic Standard (EOS)





PREAMBLE:

ECOCERT has been committed to audit and certification of products for over 25 years. Our proven experience enables us to operate a certification scheme for your products in compliance with organic farming requirements according to the Ecocert Organic Standard (EOS).

Thanks to a global network, worldwide offices and cross country audit pools, ECOCERT is able to operate such certification scheme in most countries.

A detailed list of all subsidiaries and services is available on our official website www.ecocert.com

ECOCERT SA is accredited by the French accreditation committee COFRAC¹. The Ecocert Organic Standard (EOS) is a private standard implemented by ECOCERT SA and approved as equivalent by the European Commission for organic certification in a large selection of Third Countries (outside the European Union) and applicable to several types of products.

The certification issued by an independent organization provides objective evidence of compliance with the requirements of a certification scheme. It is a proactive process whereby the operator becomes responsible for the compliance of his operation with the requirements of the organic farming certification scheme.

This document aims at providing a description of the key stages of the certification process according to the EOS and does under no circumstances supersede applicable regulations. It is however a contractual document enabling you to familiarize yourself with the requirements to be met for organic certification.

Ultimately, the purpose of certification is to provide consumers and end users who buy your products with added value organic products.

List of activities under Cofrac accreditation available at www.ecocert.com

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OFRAC Accreditation(French Committee for Accreditation) n°5-0074 for the certification of food products /services, list of accredited sites and scopes of accreditation should be checked on the Cofrac website www.cofrac.fr



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I. DEFINITIONS

The definitions of the terms used in this document are available in **Annex 1**.

II. APPLICABLE SCHEME

The Ecocert Organic Standard (EOS) scheme is operated by Ecocert SA as a private certification scheme. Ecocert SA is listed as a certification body approved for the purpose of equivalence in Annex IV of Regulation EC 1235/2008 and accredited for certification according to EOS. Thanks to this, any « EOS » certified client may export his products to Europe as "organic". The EOS also enables to sell products as « organic » in countries outside Europe when there is no domestic regulation or when the standard is regarded as equivalent.

Documents associated to the scheme pertaining to organic farming according to Ecocert Organic Standard are either available upon request or on the website indicated below.

The scheme EOS is regulated by **The ECOCERT ORGANIC STANDARD for Third Countries into force** (available on https://ecocert.box.com/v/EOS-standard-en) hereafter entitled "Standard" or the "Regulation".

In addition to these specific requirements are those of the certification system, namely:

- The certification process in force to be downloaded on our website: This document TS01(CE) (https://ecocert.box.com/v/EOS-certificationprocess-en)
- The Rules on reference to Ecocert and the Ecocert certification trademark (logo: TS17 (https://ecocert.box.com/v/Agrifood-ReferencetoEcocert-en)
- Our general Conditions for certification

III. ACCESS TO SERVICES PROVIDED BY ECOCERT SA

The EOS standard extends to all stages of production, processing and distribution of organic products including the basic production of an organic product up to product storage, processing, labelling, advertising, import, export, transport, marketing and delivery to the end user. The above-described range of activities may be carried out directly by the company or via a subcontractor.

The following product categories qualify for certification:

- Category A: unprocessed plant products originating from farming or wild collection





- Category B: live animals or unprocessed animal products (Bovine including the species bubalus, bison, equidae, porcine, ovine, ovine, caprine, poultry, please refer to the species listed in Annex III of the EOS; bees)
- Category D: processed agricultural products and yeasts intended for food
- Category E: processed agricultural products and yeasts intended for feed
- Category F: Vegetative propagating material and seeds for cultivation

IV. THE CERTIFICATION PROCESS STEP BY STEP

The provision of the certification services is based on an annual cycle. If all certification requirements are met, the process will lead to organic certificate issuance of renewal enabling you to market products with a reference to the certification by Ecocert SA.

The main stages of the certification process are the following (as detailed below):



A. Application for certification

a. Content of the application file

In order to provide you with all the required data for the successful completion of the certification process, Ecocert can send you the following starter pack (documents to be provided via attachments or hyperlinks) upon application:

- Applicable version of the EOS standard
- Regulation guidelines in relation with your operation
- This certification process document
- The certification application form

The application for certification can also be done directly online either on the link http://application.ecocert.com/ or through the application form filled and providing the data needed to carry out the so-called "application review". The application review consists in a feasibility study and the definition of the project specifications, for the following purposes:

- Ensuring that you have read all the standard's requirement





- Checking that all the required information have been provided
- Carrying out a feasibility study for the certification of the products based on the data provided

b. Causes of application rejection by Ecocert SA

Ecocert SA may have to reject a an application for certification, to deny to sign a certification contract with a company or to carry on a certification process with a client for reasons relating to its organization, to the operator, his products or his activity, and/or for external reasons namely:

- Proven non-conformity (ies) with the standard
- Conflict of interest that may impact the impartiality of our decisions
- Operations considered to be out of scope with the standard
- Proven implication in illegal activities
- Identified health risks to the consumer
- Production practice impacting human and/or environmental rights
- Geographic locations associated with technical issues or high risk for traveling auditors/staff
- Companies associated with high financial risk
- Lack of qualified and competent staff (technical skills, languages...) able to meet the need of the client
- Prohibition of certification imposed by a local competent authority
- Impossibility to meet the local requirements, prerequisite to EOS certification...

B. <u>Formal certification contract</u>

a. Issuance of a quote for your project

Based on the data provided by you, we will issue a customized quote, valid for the current calendar year and based on the estimated working time required (audit, review, evaluation etc.). ECOCERT will review the operations and risk factors will also be taken into account for the estimated time. Main criteria to be considered are:

- Type of operation
- Number of sites to be audited
- Number of persons to interview (case of Grower groups and/or organized system of wild collection)
- Type of internal control system
- Size of the facilities (number of hectares, animals etc.)
- Number of products to be certified
- Applicant history
- Technical risks





The initial quote includes all activities to be certified and is sent with our general Conditions for certification.

With the exception of complex cases, a quote should be issued within 15 days upon receipt of the full application.

b. Contractual documents

Your certification contract with Ecocert SA consists in the applicable versions of the following documents:

- 1. General conditions for certification
- 2. This certification process document
- 3. The quote together with the commitment declaration

c. Formal commitment

Once you have signed the certification quote, he is contractually bound to ECOCERT SA with immediate effect. With the signature of the contract, the operator commits to operate in compliance with our general conditions for certification and more specifically with the requirements set by the standard

Please note that a contract signature occurring late in the year may lead to a certification effective that same year, provided that the following conditions are all met:

- the optimum audit time (depending of the type of operation: harvest time, start of processing operations etc.) falls between the contract start date and the end of the calendar year
- a detailed description of your operations please refer to paragraph C.a) has been provided within a tight deadline
- our auditors are available to carry out the audit (namely before harvest or collection for plant productions)
- the instalment provided in the quote duly paid before the audit

If one of the above requirements are not met, the audit and certification process may be postponed to the following calendar year.

C. Initial evaluation

The initial evaluation aims at assessing the compliance of your operation with the requirements of the standard.





a. Documentary requirements & preparation for the on-site audit

Once the contract is signed, ECOCERT will ask you to provide a <u>detailed</u> description of your operation with the following information:

- The administrative details of the company
- The full description of the designated units and/or facilities and/or operations
- All actions implemented onsite in relation with the designated unit and/or operation to
 ensure that the operation is handled in compliance with the requirements of organic farming
- Precautionary measures implemented in order to minimize the risk of contamination by unauthorized products or substances and cleaning measures implemented at storage places and all along the production chain of the operator
- Any other information required by Ecocert for your compliance assessment.

That document will have to be duly dated and signed by you.

Please note: when the standard provisions for a possible derogation (exceptional production rules), upon request, Ecocert will provide the requirements to be met for granting each type of derogation. Ecocert will review each of your application before the derogation is either approved or denied after study.

Upon receipt, your description is reviewed by ECOCERT to assess potential issues or non-conformities with regards to compliance with production rules of organic farming. You are afterwards responsible for the implementation of all corrective actions in terms of practice and management system in order to achieve compliance of the operation before the audit.

This stage is also an opportunity for Ecocert to confirm the time required for your on-site audit that was previously estimated at the time of issuing a quote.

Finally, the auditor assigned for the audit will liaise with you and plan a date for the on-site audit.

b. The on-site audit

In order to optimize your audit preparation, we recommend to refer to the guidelines available for download at our website www.ecocert.com. If need be, your contact person at Ecocert will clarify some regulatory requirements with you.

The purpose of the on-site audit is to assess the product compliance with the requirements of the certification standard. Audits are carried out in your presence on all the sites of production, processing, packing operations...

Below are the different stages of the audit:





OPENING MEETING AND DISCOVERY PHASE

- •Introduce the participants, explain the type of audit, the goal and the rules (namely confidentiality, the communication of conclusions...)
- •Confirm the audit scope (audited documents, sites, personnel, specific requirements...), the concerned standard(s) and confirm the audit plan
- •Understand the operations, the organizational charts describing the activities, the management system including the traceability and identification, Identify the necessary updated documents and identify the main risks at different levels of the operation

DOCUMENTARY AND ON-SITE VERIFICATIONS

- Question the management system of the operations
- •Visit the facilities/units
- •Collect and submit the information to cross checks and interview the staff
- Proceed to flow and traceability
- Follow up the previous nonconformities/findings and conclusions
- Proceed to samplings for analyses

CLOSING MEETING

- •Remind the audit scope, the goals and the plan
- •Conclude on the goals achievements of the audit and collected information
- •Explain the results and requirements of the concerned standard
- Explain the principles of corrective actions les principes (including the potential time lines) record those which have been proposed
- Answer the questions
- Cosign the audit results or at least the list of findings

When analyses are required, samples will be collected in your presence or that of your authorized representative to sign the supporting documents. The specifications for the tests as well as the laboratory to carry out the tests are assigned by Ecocert SA.

If need be, the auditor may choose to leave one of the collected samples in your premises. This sample must be stored in appropriate conditions in order to avoid any deterioration (freezing recommended). Its purpose is only for counter analysis, if applicable it will be dispatched by you, by the auditor or an authorized third-party in accordance with Ecocert SA's instructions and sent to the laboratory appointed by Ecocert SA.

In all cases, all samples collected will remain Ecocert's property and test results will always be sent out to you.

Please note: On-site audits are not always announced in advance. In the case of an unannounced audit, you have the obligation to grant access to your operations and premises. For this reason we will require from you to identify a representative on each of your sites/units who will enable a smooth performance of these audits.





Please note: you have the right to refuse the staff assigned by ECOCERT at any stage of the certification process on reasonable grounds (e.g. conflict of interest)

Please note: Special case of grower groups – Ecocert may carry out audits of selected members only (partial audit) provided an Internal Control System (ICS) is implemented and will be assessed by ECOCERT before and during the audit. For more detailed information, please refer to Ecocert guidelines entitled "TSO1 (EC-NOP) Guidelines on the organic certification of growers groups"

c. Audit conclusions

During the audit, non-conformities with the requirements of the standard may be noted. These will require follow-up actions from your side (so called "corrective actions") in order to achieve compliance.

At the end of the audit, a detailed listing of all non-conformities that may have been noted is to be signed by both you and the auditor.

Finally, the detailed findings during your audit as well as test results (if applicable) will be submitted to ECOCERT for full review. If non-conformities have been noted, you will receive a written notice listing all non-conformities, with details on the deadlines to send answers and further evaluation tasks required to check that the non-conformities have been duly addressed.

d. Evaluation of implemented corrective actions

At this stage, if you choose to continue the certification process, you are required to propose corrective actions to each noted non-conformity within the time limits set for this purpose (set in the notification sent to you). For the continuity of certification process, the proposed corrective actions must be relevant and exhaustive. Depending on the noted non-conformity, you will be required to identify the cause of non-conformity and its extent (products and activities impacted by the non-conformity).

If the items submitted are deemed insufficient, you will be required to propose new corrective actions before the end of the deadline.

Depending on the additional evaluation tasks required to check that non-conformities have been addressed, Ecocert may have to:

- Perform a new on-site audit
- Collect new samples for testing
- Carry out a documentary assessment





D. Review of evaluation conclusions and certification decision

The review of the relevance of assessment activities and their exhaustiveness is carried out and recorded by Ecocert. This review takes into account the conclusions of all assessments and any other relevant data.

If all stages of the evaluation are deemed comprehensive and relevant, a certification decision is made accordingly. The decision may be positive or negative

In order to make the certification decision, Ecocert takes into account a corrective action plan listing all potential non-conformities and links them with a severity level. This plan defines namely the measures to be taken and establishes the implementation rules. The intentionality, the fraudulent nature and the recurrence of a non-conformity are also taken into account to determine the follow-up to the certification process. This enables an impartial treatment of the certification files.

- If the certification decision is positive, the certification documents will be sent to you.
- If the decision is negative, in full or in part, a written notice of certification denial will be sent to you detailing the reasons. This denial may be related to part of your operation or the whole operation. In such case, you may apply for certification anew, starting the process all over from step A.
- The conclusions of the review may also lead to the identification of additional evaluation tasks that are required before a certification decision can be made: certification is thus pending. If the required conditions are not met within the time limits, Ecocert will proceed to the certification denial of the concerned products.

The different negative certification decisions connected with detected non-conformities are detailed in paragraph I below.

E. The Organic Certificate

Organic certificates are issued when the decision to grant certification is positive. They will clearly mention:

- The company name and address
- details of Ecocert SA
- The issuance date
- Your company name and address details
- A list of all organic operation types (main and secondary activity)
- A list of all certified products, associated certification category and validity dates.

Certificates issued by Ecocert are published and available online at www.ecocert.com. Check of validity and authentication may be done at any time. You will be notified by email or regular





mail of the online availability of your certificate and you will be able to download or print them from the website.

Ecocert SA cannot be held accountable for any operational costs incurred by you (e.g.: starting production, printing labels etc.) anticipating the certification decision not made yet by Ecocert, should the certification decision on the concerned products be negative.

Please note: In some cases, attestations or statements may be issued upon request in relation for the attention of third parties; these may not be considered as documentary evidence of certification and cannot be used for the purpose of marketing products as organic and/or with references to the certification or to Ecocert.

F. Certificate of inspection and transaction certificate

a. Transactions to Europe

In order to export your organic products to the European Union, an organic master certificate is not sufficient. Organic products to be <u>imported</u> into the EU must be accompanied with a <u>socalled certificate of inspection</u> as required in the EU Regulation No 1235/2008 and using the model and the notes set out in Annex V of the above-mentioned regulation.

The certificate of inspection is mandatory and issued by the certification body of the exporter for one or several consignments of certified products. This document is issued upon request by the importer, the 1st consignee in the EU or the exporter, using the *electronic Trade Control Expert System*, (TRACES), a software established by the European Commission.

For further information on the issuance of the certificate of inspection using TRACES, please refer to the Ecocert guidelines « TS29(EC) Exports to the EU » available on our website.

b. Transactions outside Europe

For transaction of organic products between Third countries (that is to say outside the EU), a so-called **transaction certificate** may also accompany the goods.

Strictly speaking, this document is not mandatory but may be required by the competent authorities or the certification body in risky areas, for risky products or transactions. The transaction certificate is issued by the certification body of the exporter for one or several consignments of certified products.

c. Common provisions

Applications for certificate of inspection/transaction certificate must be submitted latest before the arrival of the goods in the country of destination. However, in some cases, the application shall be sent to Ecocert upstream of the shipment of the goods so that Ecocert



may perform a physical check of the consignment concerned by the transaction before dispatch.

Applications shall be accompanied with supporting documents enabling to confirm the compliance of the dispatched consignments. They include not only transport and sales documents, but also, depending on the type and risk of the transaction, documents/records corroborating the origin of the raw materials, to trace and quantify the products back to the producer and to validate the "sanitary" compliance of the dispatched consignments (ex. analyses result, phytosanitary certificate...).

Ecocert will inform you in advance of the specific requirements that may apply to your situation for the issuance of certificates of inspection/transaction.

G. Surveillance and renewal of the certification process

a. The Principle of surveillance

The certification process shall be automatically renewed each year, unless you have duly notified Ecocert of the termination of your certification contract within the deadline set in the applicable general conditions for certification.

The surveillance applies to any modification impacting certification requirements and/or your operation and/or the scope of products proposed to certification. Therefore, you are required to update your operation unit description

- 1- Without delay if there are any modification in your system (practices, production tool, representative...) or in the scope of products to be certified
- 2- Yearly at least, before your annual audit, at the date that will be communicated to you by Ecocert as the case may be.

b. Risk analysis

ECOCERT shall carry out a risk analysis in relation to your certification based on set criteria such as the type of product, the sales, the complexity of the operation, the previous assessment results and the implementation of a risk management plan in your operation.

Depending on the results of the assessment, a level of risk is associated to your operation which may lead to enhanced evaluation (additional audits announced or not, samples for analysis, documentary review...).

c. Audit plan

In order to assess the continuity of the compliance of your operations, Ecocert will implement an annual assessment plan (onsite audits, analysis plan...):





- In all cases, any eligible operator applying for organic certification, must be thoroughly audited at least once a year on all operations to maintain his certification.
- To this should be added enhanced audits for some operators, depending on the risk analysis as described above.

In case of suspicions by Ecocert with regards to the organic status of your products (e.g. further to a notification from another certification body etc.), additional evaluations tasks may be carried out at any time. This may cause Ecocert to urge you to temporarily hold on the sales of organic products for a set period of time, until the doubts have been lifted.

d. Cost of the surveillance service provision

Ecocert will provide you with a quote for the cost of renewing the annual certification, based on the information submitted at the time of the renewal, on the risk analysis and the data collected during previous audits.

e. Surveillance evaluation

As with the initial evaluation, the evaluation plan is implemented.

Documentary and on-site evaluations will include the review of corrective actions (implementation and efficiency) concerning the non-conformities found during the previous evaluations.

As part of the surveillance process, steps C, E and F are repeated.

Please note: Ecocert may decide to stop the certification process at any time in the cases set in paragraph IV.A. b above, for outstanding payments, for rejection of audit or in case of prolonged loss of contact.

A diagram summarizing the certification process as described in the present document is available in **Annex 2**.

H. <u>Certification renewal</u>

Just as at the time of granting certification, after carrying out the complete annual audit and prior to the certification deadline, a review of the evaluation elements is performed and a new certification decision is made taking into account the detected non compliances.

If the certification decision is positive, your certification is renewed and Ecocert issues a new certificate confirming the decision.





If the certification decision is negative, your certification will not be renewed and a written denial notification will be sent to you detailing the reasons. This decision may be related to part of your operation or to the whole operation.

The result of the review may also lead to the identification of additional evaluation tasks necessary to the renewal of certification. If the required conditions are not met in the set time limits, Ecocert proceeds either to reduction, suspension or withdrawal of the certification of the concerned products.

The different certification decisions linked with the findings of non-conformities are detailed in paragraph I below.

I. Non-conformity and certification decision

When a non-conformity is proven at any stage of the certification process, Ecocert shall review your file and take appropriate measures.

Based on a corrective action plan and depending on the extent and the severity of the detected non-conformities, Ecocert makes the following certification decisions:

(i) The certification denial

The certification is denied for the product(s) submitted for certification by the client. This denial may concern one or several products and/or batches, one of your operations or all your operations.

A complete certification denial is accompanied with an automatic contract termination with Ecocert SA at the time limit set for appeal.

(ii) The certification maintained with conditions

Certification is maintained but with conditions, they may include for example:

- Enhanced surveillance via additional audit or analyses
- A set deadline to enable you to close the corrections of your non conformities,
- ...

If the set requirements are not met within the deadlines, Ecocert will initiate the process of partial or total reduction or suspension of certification.

(iii) The certification suspension

This decision implies a disruption of the certification for a set period of time or until compliance is achieved. Suspension may apply to one or several products and/or product lots, to one of your operations or all your operations.

To correct this non-conformity, you will have to provide the required items within the deadline set for you.





In all cases, the impacted products can no longer be sold with a reference to the organic certification until the suspension is lifted. The designated products will be removed from the list of certified products of your certification documents during the period of suspension

Keeping on producing/manufacturing these products during the suspension period is not prohibited (except if clearly stated by Ecocert), however it would occur under your sole responsibility, bearing the full the risks.

During suspension, the contract with Ecocert is maintained and Ecocert will have the possibility to perform an onsite audit to check for example the implementation of corrective actions and the disruption of sales of the suspended products as organic.

(iv) The reduction of certification

It implies

- 1- The permanent cessation of certification for all or part of the products and/or lots and/or
- 2- Within the frame of plant production, that parcels are downgraded back to conventional

The downgraded product(s) can no longer be sold with reference to organic certification, they are to be removed from your certification documents.

(v) The withdrawal of certification

This implies a definitive interruption of the certification of all products upon receipt of Ecocert's decision. You can no longer refer to organic certification for any of your products. This decision is also associated with a contract termination with Ecocert SA, at the end of the delay of appeal.

A product that is not associated to a certificate or for which the certification has been suspended, reduced or withdrawn, may not be sold as organically certified. Any reference to organic certification must be removed from all company communication materials. In some cases, Ecocert may ask you to inform your clients concerned with this decision.

The suspension or withdrawal of certification implies the immediate end of validity of the corresponding supporting documents (organic certificate and others). You also use the benefit of using the previously issued compliance documents.





J. Changes affecting certification

a. Changes in the certification scheme (news or requirements updates)

Ecocert SA is committed to notifying you in writing about all documentary changes pertaining to the EOS organic farming certification scheme or to the scheme implementation requirements.

Depending on cases, requirements may be amended with immediate effect or a transition plan may be set by Ecocert SA.

You are responsible for implementing the required changes in order for Ecocert to check the implementation. If no changes are made, Ecocert may notify you of the non-conformities. If these are not addressed, it may lead to a certification reduction, suspension or even a withdrawal (please refer to §. IV.I).

b. Change in the certification scope

Ecocert must be notified of all changes that may impact the compliance of the operation with the certification requirements.

E.g. changes may include:

- Change in the organization (change of owner, status, purchase of new land...)
- Change in the management process
- o Change affecting products (inputs, recipe, etc.) or production process
- Change of contact details
- o Doubts raised in relation to the organic status of the products or purchased products
- A planned termination affecting part of the products.
- o Etc.

These changes may lead to questioning your certification as well as potentially lead to an additional/extension audit (addition of new products/process). Certification documents will be updated accordingly.

c. Certification postponement

If you request to postpone the certification process of your operation (disruption of the operation) or if, due to unforeseen circumstances, you are unable to implement the certification process (instability in the area...), ECOCERT may agree to postpone the certification process for a set period of time upon review depending on the circumstance of each case.

The contract binding all parties remains valid over this period of time, <u>although certificates</u> <u>previously issued by ECOCERT are no longer valid, as with a contract termination</u>. References to the certification and/or to ECOCERT are no longer permitted; this applies to all communication materials (labelling, website, invoices, advertising etc.).





At the end of the postponement period, the certification process will resume and be handled as a first-time application

K. Surrender of certification and contract termination

a. Conditions and impact of a contract termination

You may choose to surrender organic certification for all or part of the products at any time. If you are planning to drop the certification of all products as well as terminate the contract, this should be done in compliance with the general conditions for certification.

Furthermore, should the termination request be sent while the certification process is ongoing, Ecocert reserves the right to postpone the effective date of termination to the end of the process (for example review of the non-conformities).

Giving up the certification for all or part of the products, and the termination of your contract if applicable, will automatically imply the end of validity of previous certificates issued for the concerned products.

Consequently, with effect from the end date of the certification (and termination date of your contract if applicable) on, you may no longer produce or market the impacted products with references to the certification and/or Ecocert. The certification of products that have already been sold or still being marketed is not impacted.

b. Special cases of stock clearance and stock audits

When you can account for a remaining stock of compliant products referring to the certification and/or to Ecocert SA, requiring extra time beyond the validity date of your certificate or contract, you must contact Ecocert to discuss the estimated time required for clearance purpose.

Further to a full review, your contract end date may possibly be extended and you will be allowed to exhaust within the set deadline provided that Ecocert can carry out an annual audit as distributor, invoiced to stock audit applicable to "distributors" – the charge of the stock audit will be set in accordance with our price schedule.

The contract and certificate will remain valid until the deadline estimated by you to use up the stocks of certified products.

We recommend that you contact Ecocert to discuss the applicable terms of a contract termination depending on your organization.

In any case, during this contract extension time, you may not proceed to any production of new products referring to certification and/or Ecocert SA.



c. Transfer of certification data

You may choose to change control body at any time. The change process implies the transfer of certification data from the previous certification body to the new selected one.

If this is your case, you were previously contracted with another certification body and you are moving to Ecocert, your previous certification body will disclose the certification data to Ecocert for review. Your certification status may remain the same at Ecocert under conditions.

Ecocert will also share your certification data upon written request from your side or from the new certification body.

However, should Ecocert receive the transfer request while the certification process is ongoing, Ecocert reserves the right to postpone the effective date of the termination to the end of the process (e.g review of non-conformities).

V. SUBCONTRACTORS

Ecocert SA subcontracts all analyses to external laboratories. Subcontracted laboratories have all been duly approved by Ecocert SA and listed on our website www.ecocert.com/en/organic-farming-analysis. Any claim with regards to the laboratory list should be notified to Ecocert in writing.

VI. COMPLAINTS AND APPEALS

You may lodge service complaints with Ecocert or appeals against decisions made by Ecocert. Ecocert will acknowledge receipt of all service complaints or appeals against a decision made by Ecocert and will process them within the deadlines set by internal complaints and appeals procedures.

A. Complaints

Anyone may submit a complaint concerning approvals, services or clients in writing to Ecocert. A reply will be sent to the complainant by Ecocert within an appropriate deadline.

All complaints and subsequent actions are recorded by the Quality manager. A review of complaints is conducted on a regular basis to ensure your satisfaction as customer.





B. Appeals

Appeals against a certification decision may be lodged with Ecocert and in order to be admissible must be submitted as follows:

- In writing (letter or email)
- Within 30 days of receipt of the relevant decision notification
- Well-argued and documented.

If the appeal has been deemed admissible, it will be dealt with by an internal committee composed of staff experienced in certification issues.

Lodging an appeal does not mean the suspension of previous decisions. Initial decisions apply as long as a new decision has not been made with regards to your operation, until the appeal has been processed

C. Your obligation on third party complaints

You are responsible for handling third party claims that are submitted directly to you. All complaints with regards to the compliance with certification requirements must be recorded and available to Ecocert. Records must also include the appropriate measures taken and measure should be documented.

VII. REFERENCES TO CERTIFICATION, TO ECOCERT AND TRADEMARKS (ECOCERT AND OTHERS) IN RELATION TO THE SERVICE PROVIDED

The rules of references to the certification, to Ecocert SA and to the trademarks associated to the service provision are set in the following Ecocert guidelines: TS17 "Rules for the reference to Ecocert certification and certification trademark - agricultural and food products" (available upon request or on our website www.ecocert.com/en).

Trademark infringement and incorrect references to the certification or to Ecocert by a client will be dealt with appropriate measures such as certification reduction, suspension or withdrawal. Ecocert SA may also be required to notify the Competent Authority.

Examples of trademark infringement and incorrect references:

- The certification logo or reference to the certification or to Ecocert is showing on products non complying with the certification requirements





- The certification logo or reference to the certification or to Ecocert is showing on products that have not never been submitted for certification or that are in the process of being certified
- The rules on certification references are not complied with (please refer to the TS17 rules, available upon request or on our website).

* *

Wishing you a successful certification. Ecocert SA remains available should you have questions.



ANNEXE 1: Definitions

Corrective action: action aiming at suppressing the origin of a non-conformities or of another identified unwanted situation.

Appeal: written request from a client to the Ecocert group for the reconsideration of a certification decision.

Client: legal person or entity (signatory) who/that has contracted the Ecocert group for the provision of services.

Certification document: document issued for the client to confirm the compliance of products with the scheme.

Certification requirement: specific requirement that must be met by the client in order to achieve or maintain certification.

Non-conformity: non-compliant practice/incoherence that doesn't necessarily point out a failure in the implementation of the requirements of the scheme yet needing corrective actions to be set up

Evaluation plan: description of the number and type of evaluations required during the assessment cycle in order to ensure the compliance of a product with the requirements associated to specific client types.

Complaint: discontent (not including appeal) expressed to the Ecocert group in relation with the group operations by a person or organization and requiring a reply

Corrective action plan: list of non-conformities with the certification requirements and associated impacts on the certification decision. Required additional evaluation tasks may be listed as a complement to the plan in order to address the non-conformities.

Certification scheme: set of requirements, rules and procedures defined by the scheme originator that are to be implemented by Ecocert group.

Certification standard: technical document defining the product requirements to be met, terms of assessment and communication process with regards to the certification process.

Surveillance: recurrent assessment, review and decision of certification, in compliance with the certification scheme in order to maintain the validity of the certification.

ANNEXE 2 : certification process flow chart





CERTIFICATION PROCESS

