# <u>Inspection Program</u> according to Regulation (EU) 2018/848 and NOP-Final Rule and Organic JAS for



## Plant production including seeds and other plant reproductive material

The certification procedure for organic production is regulated by the norms for the respective standard.

For EU-certification in third countries: Reg. (EU) 2018/848 + delegated and implemented acts

For the USA: the NOP Final Rule

For Japan: the organic JAS

For the certification of plant production on agricultural operations, and seeds and other plant reproductive material, specifically, the following rules will be considered by Kiwa BCS, in line with the above-mentioned norms:

#### For EU-certification in Third Countries:

- Reg. (EU) 2018/848 as applicable to the articles mentioned in chapters II, III, IV, especially Art. 9, Annex II part I; Reg. (EU) 2021/1165 Art. 1, 2, 10, Annex I, Annex II, Annex IV and Annex VI; Reg. (EU) 2021/1698 Art. 9, 10, 24, 25. Reg. (EU) 2021/771 Art. 1

In addition, this inspection program covers the production of mate, sweetcorn, vine leaves, palm hearts, hop shoots, and other similar edible parts of plants and products produced therefrom, natural gums, resins, and cotton, which are listed in Annex I of Reg. (EU) 2018/848.

For NOP regulates plant production in: § 205.200 –201,-202,-203,-204,-205,-206. For JAS regulates plant production in: Notification 1605, 1830

The operator could be a single producer or a group of operators. In the last case, the inspection program for the group of operators (ICS) also applies.

The inspection program is structured as follows:

- a) Organic Systems Plan
- b) Inspection
- c) Certification

#### 1. Organic Systems Plan

The Organic Systems Plan has to be compiled and submitted to Kiwa BCS Öko-Garantie for verification before inspection. The Organic Systems Plan has to be updated continuously to reflect the current state of the operation. Changes always have to be communicated to the certification body, but no later than before the next inspection.

An Organic Systems Plan template is provided by Kiwa BCS. It consists of the following elements:

- Conformity Declaration of the Operation Manager for the respective standard
- Complete description of the operation and its facilities
- Description of all production procedures and -means, so Kiwa BCS can verify their compliance with the respective standard.

In case the operator is interested in being certified under Reg. (EU) 2018/848, it is mandatory to provide a preventive measure plan mentioned in Reg. (EU) 2021/1698 Art. 10, 1. a) iii.

On the other side, under NOP a Fraud Prevention Plan is mandatory to be provided in this stage.

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## 2. Inspection of Agricultural Operations

During inspection the compliance of the operation/part of the operation with the requirements of the respective standard is verified. An announced inspection takes place at least once per year. Further announced and/or unannounced inspections can be part of the certification procedure. The inspector is obliged and authorized to request and verify all documents, records and amenities as deemed necessary for the inspection.

### 2.1. Organic Systems Plan

In general, the inspection is based on the verification of statements in the Organic Systems Plan and on a comparison with the findings in the facility. If needed, adjustments have to be made to the Organic Systems Plan.

#### 2.2. On-Site Inspection

The on-site inspection encompasses all parts of the operation:

- On-site inspection/Assessment of all agricultural fields, permanent crops, greenhouses, seedling cultivation, pastures, fallow lands or other relevant areas
- Infrastructure for improvement measures, vehicle fleet, machinery, workshops and irrigation systems.
- All agricultural buildings on the premises, including barns and stables.
- Storage for harvested crops, e.g. silage, round bales, drying and dry storage, storage in the ground, hangers
- Crop processing/handling/packaging, separation of crops
- Storage and application of input materials for the maintenance of soil fertility: fertilizers, manure storage, liquid manure operation, biogas plant, tanks, machinery for application to the fields
- Storage and application of input materials for plant protection: pesticides, storage of substances, security identification, infrastructure for application on the field, machinery for application
- Comprehension of the general situation of the operation in relevant areas (internal/external factors), national regulations, markets, unusual climate, personal factors, etc.

Subject to inspection are all production procedures and – facilities of the operation, as well as all concrete measures regarding a compliance of the standard regarding:

- Agricultural procedures, e.g. soil improvement measures
- Measures of fertilization and for maintenance of fertility
- Measures of plant protection
- Use of seeds and seedlings in terms of quality, origin and GMO status
- Use of other input materials
- Measures against drift
- Treatment of crops after harvest
- Separation of organic products and non-organic products
- Traceability of products
- Packaging and identification of organic products (labels and delivery papers)
- Flow of goods with regard to quantities (potentially) harvested and quantities sold
- Precautionary measures in place to avoid risks of contamination of organic production and products with non-authorized products or substances

#### 2.3. Verification of Documents

The following documents have to be made available to the inspector, if applicable:

Field maps

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Maps of premises with adjacent buildings, storage, processing, packaging

Access to the bookkeeping documents provides information about:

- All fields, location, size, ownership and field history
- Annual crop planning; planted crops, crop rotation, green manure and nurse crops
- Application of all permitted/ prohibited substances according to the standard
- Listing of all organically and conventionally produced products
- Listing of all suppliers, including documents for tracing, e.g. valid organic certificates, shipping papers, invoices, etc.
- Listing of all products in storage
- Date and quantities of harvest/production
- Documentation of receipt of goods (receipts, purchasing log: lists or bookkeeping)
- Documentation of shipping (books, numbers, cash, identification, shipping documents, invoices, transport)
- Measures for traceability
- Product reclamations, customer information/ customer service procedure in the case of irregularities

The above-mentioned requirements concerning record-keeping apply to ALL and ANY certified product (listed on the certificate) regardless if they are sold with reference to organic or no. Therefore, also in case that certified products are sold without any reference to organic agriculture (sale as non-organic) full traceability and documentation must be available.

#### 2.4. Inspection Report

- The inspection report is the final document that describes the results of the inspection. It is compiled by the inspector and has to be signed by the operation manager.
- It documents detected non-compliances with the respective standard and which measures for correction of non-compliances have been determined.

The results of the inspection report are basis for the certification.

## 2.5. Possible other Procedures

- Sampling is always possible, but in moments of suspicion it is mandatory.
- Sampling of packaging and/or labeling materials
- Inspection of additional parts of the operation
- Additional inspections

#### 3. Certification

- Certification is based on the inspection report and the Organic Systems Plan
- If needed, conditions are imposed and communicated in written form
- If needed, notification is given with measures according to the catalogue of measures
- Tracing of implementation of conditions by Kiwa BCS
- Certification decision / issuance of certificate

The Inspection Program is a model and not conclusive. Specific situations in the operations can lead to variances from the described program. It serves for orientation during the execution of the certification procedure according to the respective standard by Kiwa BCS Öko-Garantie GmbH. The Inspection Program is subject to modifications.