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



Wild Collection

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 implementing acts

For the USA: the NOP Final Rule

For Japan: the organic JAS

For the certification of wild collection, specifically, the following rules will be considered by Kiwa BCS, in line with the above-mentioned norms:

For the EU: The Organic Council Regulation (EC) 2018/848, as applicable to the articles mentioned in

chapters II, III, IV, Annex II part I. Reg. (EU) 2021/771 Art. 1

For USA: NOP Final Rule - in particular §205.207

For Japan: Organic JAS - in particular Notification 1605 and 1830 for wild collections.

The following inspection procedure is structured as follows:

- a) Description of practices of wild collection (similar to Organic Systems Plan)
- b) Inspection
- c) Certification

1. Organic Systems Plan

The Organic Systems Plan (analogous to the wild collection description) is to be compiled by the operation and submitted to Kiwa BCS for verification before the inspection. This description 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 an upcoming inspection.

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

- Conformity Declaration of the collector for the respective standard
- Complete description of the operation and its facilities
- Description of all collection 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.

2. Inspection of Wild Collection 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. Description of Operation

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

2.2. On-site Inspection

- The on-site inspection encompasses all parts of the operation, resp. collection area, storage, collection stations, processing/packaging site
- Storage and application of input materials
- Separation of products

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Wild Collection

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:

- Annual collection times and other activities in the collection areas
- Assessment of collection potential and ecological effects of the collection
- Presentation of collection methods and their effects on the stability of the natural habitat and the
 preservation of the species in the collection area
- Handling after collection
- Separation of organic products from prohibited substances and non-organic products
- Traceability
- Identification (Labels and shipping papers) and packaging of wild collection products
- Flow of goods (quantities)
- 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 must be kept ready for inspection and made available to the inspector:

Description of the collection area

- Map with identification of collection areas
- Any nature conservation laws or regulations or permits that permit the collection activity (if applicable)
- Description of any in the collection areas lying or adjacent agricultural or silvicultural areas, especially regarding type and intensity of usage
- Last conventional activity (especially forest pesticides, confirmation by authorities)
- Map of buildings with indication of processing and storage

Bookkeeping has to give insight into:

- Collection area, collection date, collectors, yield/production quantities, if applicable, losses
- Listing of all collected crops
- Listing of all collectors, including documents for traceability
- Listing of all products in storage
- Documentation of receipt of goods (receipts, purchasing log, lists or bookkeeping)
- Documentation of shipping (books, quantities, cash, identification, shipping documents, invoices, transport)
- Traceability
- Product reclamations, customer information/customer service procedure in the case of irregularities

2.4. Inspection Report

- The inspection report is the final document describing the result of the inspection. It is compiled by the inspector and has to be signed by the operation manager.
- It documents the detected non-compliances with the respective standard and determines measures for correction of non-compliances to be implemented by the inspected party.

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

2.5. Possible other Procedures

- Sampling
- Sampling of packaging and/or labeling materials
- Inspection of additional parts of the operation
- Interviews with experts
- Interviews of other companies that are active in the collection area
- Additional inspections

3. Certification

- Certification is based on the inspection report and the Operation Description
- If needed, conditions are imposed and communicated in written form
- If needed, measures according to the catalogue of measures are imposed and communicated
- Tracking of implementation of conditions by Kiwa BCS

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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.