

## **Processing agricultural products for use as food or feed**

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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 – NOP/COR Equivalence

**For Japan:** the organic JAS

For the certification of processing organic products, 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. 11, 14, Annex II part VI; Reg. (EU) 2021/1165 Art. 4, 6, 7, 10, Annex III, Annex V, Annex VI. Reg. (EU) 2021/771 Art. 1

The scope of this inspection program includes plant-based traditional herbal preparations, essential oils, natural gums, and resins which are listed in Annex I of the Reg. (EU) 2018/848.

**NOP** regulates processing in: § 205, -270, -271, -272, -605, -606.

**JAS** regulates processing in: Notification 1606

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 an upcoming 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.

### **2. Inspection of Processing Facilities**

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.

## **Processing agricultural products for use as food or feed**

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### **2.1. Organic Systems Plan**

In general the inspection is based on the verification of statements in the Organic Systems Plan and a comparison with the realities 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 production rooms as well as adjacent buildings and packaging facility, as well as infrastructure and production facilities
- Storage for raw materials, resp. post harvest treatment, separation of products
- Storage and use of input materials, cleaning of production equipment, tanks
- Storage and use of input materials, identification, infrastructure
- Comprehension of the general situation in relevant areas  
(internal/external factors) governmental regulations, markets, personnel, 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:

- Post harvest treatment
- Storage and treatment of raw materials and the processed products
- Any kind of processing such as: cleaning, washing, heating, sterilizing, pasteurizing, radiation, concentration, drying, thinning, separating, chemical, biological, enzymatic and mechanical processing, filtering, vacuuming, ripening, freezing, IQF, mixing etc.
- All ingredients of agricultural origin as well as non-agricultural origins as well as all processing aids
- Procedure for systematic identification of critical steps within the production process (Comingling, (Cross-)Contamination, Swapping)
- Separation of organic products from foreign materials and non-organic products.
- Traceability of products
- Packaging and identification (labels resp. shipping papers)
- Flow of goods and potential production quantities
- Precautionary measures in place to avoid risks of contamination of organic production and products with non-authorized products or substances

### **2.3. Document Verification**

The following documents are to be present at time of inspection and made available to the inspector:

- Layout Plan of the production facilities (insofar applicable with schematic draft of production lines and diagram of flow of goods in the facility), with adjacent buildings, warehouse, packaging and labeling facility
- Sample of used labels and identifications (also business papers: delivery papers/ invoice and advertising)

Access to the bookkeeping documents provides information about:

- Production program/item lists, products from organic and non-organic production
- Recipes
- Processing protocols
- Information about cleaning measures (intermediate cleaning, cleaning of rooms and facilities)
- Application of all (permitted and prohibited – according to standard) substances
- Listing of all (organically and conventionally) produced products
- Listing of all suppliers (including documents for traceability, such as valid organic certificates, bill of delivery, invoices, etc.

## **Processing agricultural products for use as food or feed**

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- Documentation of receipt of raw materials (receipts, purchasing log, lists or bookkeeping) as well as processing aids and additives
- Warehouse bookkeeping
- Documentation of shipping of finished products (Books, quantities, sales, identification, shipping papers, invoices, transport)
- Measures for traceability
- Product reclamations, customer information/ customer service procedure in the case of irregularities

### **2.4. Inspection Report**

- The inspection report is the final document which documents the results of an 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 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 is generally possible, but in moments of suspicion 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 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
- 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.