ECOCERT CERTIFICATION PROCESS

Transitional Program
PREAMBLE:

ECOCERT has been delivering product certification and control services for over 20 years. Our proven experience enables us to operate a certification scheme for your products in compliance with organic farming requirements in a transitional period to the National Organic Program (NOP).

Thanks to a global network, worldwide offices and cross country audit pools, ECOCERT is able to operate such certification schemes in most countries. A detailed list of all subsidiaries and services is available on the official website www.ecocert.com

ECOCERT is accredited by the USDA for the certification of plant production, animal production, wild collection and processing/handling according to the NOP standard.

This expertise gives us a unique opportunity to make sure that you will respect the requirements to be NOP certified at the end of the required period and provide technical assistance as an added benefit in order to accomplish same.

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 transitional certification scheme.

This document aims at providing a description of the key stages of the certification process and under no circumstances supersedes applicable regulations. It is however a contractual document enabling you to familiarize yourself with the requirements to be met for transitional certification.
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I. DEFINITIONS

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

II. APPLICABLE SCHEME

ECOCERT operates the Transitional Program according to the standards set by 7 CFR Part 205 (with exception of 7 CFR 205.100, 205.101 and 205.102) and regulated by the US Department of Agriculture (USDA).
Documents associated to the scheme are available upon request or on the USDA website http://www.ams.usda.gov/AMSv1.0

In addition to the specific requirements of the above certification scheme, the requirements of the certification system must also complied with:

- The applicable certification process available on our website.
- ECOCERT Terms and Conditions.

III. ACCESS TO THE SERVICES PROVIDED BY ECOCERT

A. Service scope

The scope of the regulation extends to all stages of production and handling including the basic production of products (plant production, animal production) up to product processing and labelling.

a. Plant production

The transitional program aims at providing a certification to the farmers that want to comply with the National Organic Program during the 36 months transition period (7 CFR §205.202). After this period, the farmer can apply to the certification under the National Organic Program to Ecocert or any other certification agency accredited for this activity.

The compliance with ECOCERT Transitional Program doesn’t imply any guarantee of certification under the National Organic Program of USDA at the end of the transitional period.
b. Animal production

The transition program aims at providing a certification scheme to the livestock owners who want to commercialize transitional products.

In that specific case, transition period will not apply but other restrictions will apply (see below).

c. Processed products

The transition program aims at providing a certification scheme to the food processors who want to commercialize products containing transitional products.

In that specific case, transition period will not apply but other restriction will apply (see below).

B. Restrictions

ECOCERT may reject a certification application or refuse to sign a certification contract with an operator when there are proven reasonable grounds, e.g. in case of illegal activities, a history of recurrent non-conformities with certification requirements, inappropriate behaviors, or outstanding debts, etc.

a. Plant production

Certified transitional product must not be commingled with certified organic product. One time field conversion into transitional certification applies, leading to organic certification at or after 36 months.

There will be 2 options to enter into the Transitional Program for plant production:

- Option 1: Operator provide elements to prove the management of his land as organic in the past.

The field transition period starts when the land started to be managed as organic. Harvested products can be sold as « transitional » minimum 12 months from established date of last application of prohibited substance

An audit must happen before the harvest.

Example:
**Option 2**: Operator does not have the element to prove the management of his land as organic in the past.

The field transition period starts the date of contract with Ecocert. Harvested products can be sold as «transitional» minimum 12 months from date of registration with ECOCERT. An audit must happen before the harvest.

Example:

During this period of time, the operator will be responsible to comply with the requirements of the transitional certification program and not excluding all requirements of 7 CFR Part 205.

In case of faults or any particular reason that will put the operator out of the transitional program, ECOCERT reserves its right to assess the situation and allow the operator to reenter into the program. In any case, the operator will need to wait for a full year before starting again a transitional certification.
b. Animal production

Any livestock operation looking to obtain a “Transitional certification” will need to be certified organic and comply with the transitional certification requirements based on 7 CFR 205, except for § 205.237 a, for which the feed requirement will allow the use of transitional grains.

Organic grains may be used if transitional are unavailable.

**Warning: 3rd year livestock**
Those wishing to bring their livestock into the NOP must only feed transitional agricultural products appropriate to the livestock class/type produced by their operation alone. Any purchased agricultural feedstuff must be certified organic.

c. Processed products

Any processing operation looking to obtain a “Transitional certification” must be certified organic at all times during certified transitional production and comply with all sections 7 CFR 205 of the standards set by the National Organic Program (NOP). Transitional Certification does not expire for processors but is updated annually until Surrender, Suspension, or Revocation.

There will be a 100% transitional, 95% transitional, and 70% “Made With” status categories.

The balance of the ingredients in any certified transitional product that are not of agriculture origin must comply with all organic certification requirements and include as additional ingredients only those listed at 205.605.

The balance of Non organic agriculture ingredients in certified transitional products must comply with section 205.606.

Like ingredients should be of one category as required in 7 CFR 205. (ex. Coconut must be one of category as an ingredient, either certified organic or transitional). Certified transitional product must not be stored/commingled with products outside of its certified category, including commingling with certified organic products.

Final product will need to comply with labelling requirements described in the TS B “Guidance for labelling – ECOCERT transitional Program”.
IV. 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 a transitional certificate issuance enabling the operator to market products with a reference to the transitional certification by ECOCERT.

The main stages of the certification process are as follow:

A. Application for certification

a. Structure of the application

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

- Applicable version of the NOP standard and associated documents (for your reference)
- Present certification process document
- Certification application form
- Applicable price schedule

The operator is required to return the completed application form in order to provide the data needed to carry out the so-called “application review”. The application review encompasses a feasibility study and the definition of the project specifications, for the following purposes:

- Ensuring that the operator has familiarized himself with the standard requirements
- Checking that the required information has been provided
- Carrying out a feasibility study for the certification of the products based on the data provided

b. Causes for application rejection by Ecocert

The control and certification process cannot be implemented in the following cases:

- Proven nonconformities with the general regulation
- 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
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- Production practice impacting human and/or environmental rights
- Geographic locations associated with technical issues or high risk for traveling auditors
- Companies associated with high financial risk
- Lack of qualified and competent staff (technical skills, languages...) able to meet consumer demand

B. **Formal certification contract**

a. Issuance of a quote for the project

Based on the data provided by the operator, 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
- Type of internal management system
- Size of the facilities (number of acres, 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 and technical Terms and Conditions.
With the exception of complicated cases, a quote should be issued within 15 days upon receipt of the application.

b. Contractual documents

The contract for certification with ECOCERT encompasses the applicable versions of the following documents:

1. Terms and Conditions
2. Standard
3. Present certification process document
4. Certification rules and references
5. Quote

C. Formal commitment

Once the operator has signed General Information Form, he is contractually bound to ECOCERT with immediate effect. With the signature of the contract, the operator commits to
operate in compliance with our Terms and Conditions, 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, providing the following conditions are all met:

- the optimum audit time (depending of the type of operation: harvest time, etc.) falls between the contract start date and the end of the calendar year
- a detailed description of the operations (please refer to chapter C. Initial Evaluation) has been provided within a tight deadline
- the auditors availability has been confirmed to carry out the inspection
- full payment against the quote has been received before the inspection date.

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

**C. Initial evaluation**

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

a. Documentary requirements & preparation for the onsite audit

Once the company has signed a contract, ECOCERT will provide a form for the detailed description of the operation. This form is entitled “Transitional System Plan” (TSP) and must be completed to include the following data:

- Administrative details of the company
- Full description of the designated units and/or facilities and/or operations
- All procedures and actions implemented onsite in relation with the designated unit and/or operation
- Full list of agricultural inputs intended to be used for operation
- Prior land use affidavit/field history
- Description of monitoring procedures (if applicable)
- Precautionary measures implemented in order to minimize the contamination risks by non-permitted products or substances at storage sites and at all production stages
- Certification history (if applicable)
- Any other information required by Ecocert for the compliance assessment

This document must be duly signed and dated by the operator.

*Please note:* the operator is entitled to provide his own documents, if do not wish to use the template provided by ECOCERT, providing the above basic requirements are met.

Upon receipt, the TSP will be assessed by ECOCERT to check the compliance of listed practices and that all the data required have been provided. If any issues or non-conformities with
regards to compliance with production rules of transitional farming are identified, Ecocert will notify the operator in writing.

The operator is responsible for the implementation of all corrective actions in terms of practice and management system in order to achieve compliance. All changes must be notified to Ecocert with an updated TSP.

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

The onsite audit is to be scheduled once the TSP has been approved as complete and compliant.

Finally, the auditor assigned for the audit will liaise with the operator and plan a date for the onsite audit.

b. Onsite audit

In order to optimize the audit preparation, we recommend that the operator refers to the Ecocert guidelines available for download on our website. If need be, the relevant contact person at Ecocert may provide the operator with clarifications on the regulation requirements upon request.

The purpose of the onsite audits is to assess the product compliance with the requirements of the certification standard. Audits are carried out on all the sites associated with the production of the products to be certified: including processing, packing etc.

The audit process is as follow:

Opening Meeting
- The auditor presents the goals, the items to be checked, the documents to be submitted and confirms the audit scope and plan

Audit
- Assessment of the compliance of the operations with the requirements of the certification scheme: approval on the total area to be certified, data collection, general coherence, balance check, feasibility test etc...
- Assessment of the production sites and facilities, staff interviews
- Sample collection for analysis if applicable

Closing Meeting
- Conclusions of the onsite assessment
- The list of non-conformities noted during the audit is presented and signed by all parties after the audit
- Opportunity for the operator to put forward a list of corrective actions with implementation deadlines

Please note: onsite audits are not always “planned” in advance, some audits may be “unannounced”.

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

c. Audit conclusions

During the audit, findings with the requirements of the standard may be noted. These will require follow-up actions from the operator (so called “corrective actions”) in order to achieve compliance.
At the end of the audit, a detailed listing of all findings that may have been noted is to be signed by both the auditor and the operator.

Finally, the detailed audit report and test results (if applicable) will be submitted to ECOCERT for full review. When non-conformities have been noted, the operator will receive a written notice listing all non-conformities and the relevant further evaluation tasks required to check that the designated non-conformities have been duly corrected.

d. Evaluation of implemented corrective actions

At this stage, if the operator chooses to proceed with the certification process, he is required to provide corrective actions in relation to each noted non-conformities within a set deadline (provided in the notice sent to the operator). For the continuity of certification process, the proposed corrective actions must be relevant and exhaustive. Depending on the noted non-conformities, the operator will be required to identify the cause of non-conformity and the impact (products and activities impacted by the non-conformities).

If the items submitted are considered insufficient, the operator will be required to put forward new corrective actions within the deadline originally set.

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

- Carry out a new onsite audit
- Take new samples for testing
- Carry out a documentary assessment

D. Non-conformities and corrective action plan

a. “Minor” non-conformities

A non-conformity is considered to be minor when it does not impact the specifications of the product to be certified. This type of non-conformity may be addressed and does not prevent certification continuity.

The operator must implement corrective actions within a set deadline (e.g. 30 days) to achieve compliance and certification. Additional evaluation may be required: e.g. analysis, additional audit or a documentary review.
b. “Major” non-conformities

A non-conformity is considered to be major when it does impact or might impact the specifications of the product. This type of non-conformity cannot be addressed for products that have already been impacted and therefore prevents the continuity of the process for products to be certified.

In such cases, a notice will be sent out to the operator to clarify the impact on the products/operations.

c. Corrective action plan

The corrective action plan is a list of all potential non-conformities sorted according to their severity ("minor" or "major" non-conformities). Each non-conformity is associated to suggested corrective actions including measures to be implemented accordingly and implementation requirements. The corrective actions are suggested according to the nature and the severity of the non-conformity; fraudulent and recurrent non-conformities are also taken into account.

Follow up actions may include:
- Continuation of the certification with restrictions
- Suspension of the certification
- Withdrawal of the certification

E. Review of the evaluation conclusions and certification decision

A review of the evaluation phase, in terms of relevance and 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.

- If the certification decision is positive, certification documents will be issued and sent
- If the certification decision is negative, a written notification will be sent detailing the reasons. In such cases, the operator may apply for certification again, starting the process all over from step A (please refer to chapter A. Application)

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.

F. Certification documents

The certification documents will be issued providing that:
- A positive certification decision has been made
- Certification requirements have been met
a. Transitional certificate

A certificate will be issued, sent by post or email and will clearly state:

- The name and address of the certified operator
- The company name, address and contact details (website, telephone) of Ecocert
- The certificate issuance date
- The anniversary date for renewal (documentary update to be submitted)
- The type of operations (plant production, animal production, wild collection, processing/handling)
- The list of certified products with associated certification category
- The reference “Certified to the ECOCERT Transitional Program.

Ecocert cannot be held accountable for any operational costs incurred by the operator in anticipation on the basis of the certification decision, when the decision has not been made yet (e.g. starting production, printing labels etc.).

G. Surveillance and renewal of the certification process

a. Reminder of the requirements for certification and continuity

Please find below a reminder of the requirements for transitional certification and continuity:

- Compliance with NOP requirement at all times
- Implementation and annual update of an TSP submitted to Ecocert
- Full access for Ecocert to operational sites for inspection purpose, including the conventional operations, all sites, offices etc.
- Keeping records of all operations for at least 5 years and making records available during normal business hours for auditing and copying
- Payment of certification fees to Ecocert
- Immediate notification to Ecocert in the following cases
  - Non-permitted substances used on a plot of land, production or processing unit, on animals etc.
  - Change in a certified operation or any portion of a certified operation that may affect its compliance with the standard.

b. Periodic review process

The certification process will be automatically renewed each year, unless the operator has duly notified Ecocert of the termination of the certification contract within the deadline set in the applicable general and technical Terms and Conditions.

The surveillance process applies to all changes impacting regulation requirements and/or the operation and/or the range of products to be certified. The operator is therefore required to update the unit description accordingly, if any modifications to the management system
(practices, production tool, representatives...) or the range of products to be certified are foreseen.

The renewal process follows all stages of the certification process after the operator has provided an update:

**c. Audit plan**

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

- In all cases, the eligible operator applying for organic certification is required to be **fully audited on all operations at least once a year** in order to maintain the validity of the certification status.
- In addition, additional evaluations may apply to high risk operators as mentioned above.

In case of suspicions by Ecocert with regards to the organic status of the product (e.g. further to a notification from another control body etc.), additional evaluation may be required.

**d. Surveillance evaluation**

After payment of the cost estimation, as with the initial evaluation, the evaluation plan is implemented.

Documentary and onsite evaluations will include the review of corrective actions pertaining to the non-conformities noted during 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 cases set in chapter IV.A.b

A diagram summarizing the certification process is available in Annex II.

**H. Certification renewal**

When no non-conformities have been identified during the surveillance process, the validity of the certification status is maintained and Ecocert will issue the operator with new certification documents.
When non-conformities have been noted either during the surveillance or the certification process, Ecocert will review the extent and the severity of the non-conformities (based on the corrective action plan) and take the following measures accordingly:

(i) Certification validity is maintained with conditions
E.g. conditions may include:
- reinforced surveillance via additional audit or analysis,
- a set deadline for the implementation of corrective actions
- etc.

In this case, a non-compliance notice will be sent first. If the set requirements are not met within the set deadlines, Ecocert will initially send a notice of proposed suspension or revocation to the operator. If the non-conformities have still not been addressed within deadlines at this stage, Ecocert will then send a notice of suspension.

(ii) Suspension
This implies the interruption of the certification with effect from the suspension date and for a duration set by Ecocert (at least one year).
The suspension will affect the whole operation.
In all cases, the company can no longer sale products with a reference to the transitional certification.

1. Changes impacting the certification

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

ECOCERT will notify the operator in writing of all documentary changes pertaining to the transitional 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 or by the USDA.

The operator is responsible for implementing the required changes in order for Ecocert to check the implementation. If no changes are made, Ecocert may notify the operator of the non-conformities. If these are not addressed, it may lead to a certification suspension

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
- Change affecting products (inputs, etc.) or production process
o Change of contact details
o Doubts raised in relation to the organic status of the products or purchased products
o A planned termination affecting part of the products.
  o Etc.

In some cases, these changes may affect the certification process and lead to additional audits or an audit for extension purpose (addition of new products/process). Certification documents will be updated accordingly.

J. **Contract termination**

a. Conditions and impact of a contract termination

The operator may choose to surrender transitional certification for all or part of the products at any time. If the operator is planning to drop the certification of all products as well as terminate the contract, this should be done in compliance with the general and technical Terms and Conditions.

A break in the certification for all or part of the products, and the termination of the contract if applicable, will automatically imply the end of validity of previous certificates issued for the impacted products.

Consequently, with effect from the end date of the certification (and termination date if applicable) the operator 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 & stock audit

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

When the certification has been terminated (as well as the contract if applicable), the operator may no longer start a new production with reference to the certification and/or Ecocert.

V. **COMPLAINTS**

Operators may lodge service complaints with Ecocert against decisions made by Ecocert. Ecocert will acknowledge the receipt of all service complaints against a decision made by Ecocert and will process them within the deadlines set by internal complaints and appeals procedures.
Complaints regarding Ecocert approvals, services or clients etc. must be submitted in writing. A reply will be sent 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 customer’s satisfaction.
VI. REFERENCES TO THE CERTIFICATION, TO ECOCERT AND TRADEMARKS (ECOCERT & OTHERS) IN RELATION TO THE SERVICE PROVIDED

The rules of references to the certification, to Ecocert and to the trademarks associated to the service provision are set in the following Ecocert guidelines:

- TSA Rules of Use for ECOCERT logo – ECOCERT Transitional program
- TSB Guidance for labelling – ECOCERT Transitional program.

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 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 compliant with the guidelines.

* * *

Please contact your ECOCERT representative for further query.
ANNEX I: Definitions

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

Certification: issuance of a certification document.

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.

Conversion period: a period of time that must be 12 months from the date of last application of prohibited substance/practices.

Non-conformities: non-compliance to a requirement

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.

Transition. The act of establishing organic management practices in accordance with the Act and the regulations in this part.

Transition period. The time between the start of organic management and when an operation or portion of an operation is eligible for organic certification.
Transitional product: A product from an operation or portion of an operation which has completed one or more years of transition period toward becoming a certified organic operation and is certified by an accredited certifying agency as operating in accordance with the Act and the regulations in 7 CFR 205.