

## **TECHNICAL STANDARD**

### **Inputs**

## **Suitable for use in Organic Agriculture**

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## PLAN

<b>1</b>	<b>FIELD OF APPLICATION</b>	<b>5</b>
1.1	Types of products	5
1.2	Mixed enterprise case	5
1.3	Case of admission refusal	5
<b>2</b>	<b>AUTHORIZED RAW MATERIALS</b>	<b>6</b>
<b>3</b>	<b>MANUFACTURING PROCEDURES</b>	<b>6</b>
3.1	Raw materials assembly	6
3.2	Harms elimination	6
<b>4</b>	<b>ANALYTICAL CONTROL</b>	<b>6</b>
4.1	Internal analyses program	6
4.2	External analyses program	6
4.3	Choice of laboratories	7
<b>5</b>	<b>QUALITY INSURANCE AND TRACEABILITY</b>	<b>7</b>
5.1	Quality insurance principle	7
5.2	Documents and registrations requirements	7
5.2.1	Legislation texts in effect	7
5.2.2	Accreditations and authorizations	7
5.2.3	Suppliers and raw material register	7
5.2.4	Production register	7
5.2.5	Analysis register	8
5.2.6	Complaints register	8
5.2.7	Accounting-material	8
5.2.8	Production lots numbering	8
5.3	Complaint processing	9
<b>6</b>	<b>COMMERCIALIZATION AND LABELLING</b>	<b>9</b>

## ABREVIATIONS

ECOCERT: ECOCERT SA

UOA: suitable for use in organic agriculture in accordance with either to (CE) regulation n° 834/2007 and 889/2008 (for raw material or finished product) or to regulation NOP or to regulation JAS or to a national regulation of organic agriculture equivalent to directive texts CAC/GL of *Codex Alimentarius*.

Non UOA: non suitable for use in organic agriculture in accordance with either the (CE) regulation n° 834/2007 and 889/2008 (for a raw material or finished product), or regulation NOP, or regulation JAS or to a national regulation of organic agriculture equivalent to directive texts CAC/GL of *Codex Alimentarius*.

## INTRODUCTION

The present reference system has as its objective the control of the following specifications:

- **the conformity of raw materials** for use in Organic Agriculture (in accordance with (CEE) regulation n° 834/2007 and 889/2008) or NOP regulation, or JAS regulation, or an equivalent national regulation of organic agriculture to the directive texts CAC/GL of the *Codex Alimentarius*.
- **quality insurance and its traceability** in the inspected company.

These characteristics are valuable not only on the market of Organic Agriculture but also for farmers and planters concerned about using dependable products and preserving their environment and their health.

### *Modifications of the reference system:*

ECOCERT may modify the present reference after discussion among the different interested parties and will inform applicable operators of these introduced modifications.

### *Respect of legislation in effect:*

All bidding companies implicitly agree to respect the legislation in effect in the country of commercialization of the products due for inspection.

The legislation being likely to evolve after the validation of this document, it is agreed that, if necessary, the applicable operators and ECOCERT will take into account these evolutions for the inspection. The modifications may notably concern the characteristics of the products, analysis methods or authorized labeling descriptions.

## **1 FIELD OF APPLICATION**

### **1.1 TYPES OF PRODUCTS**

The present reference system applies to the following products for domestic or professional use:

- **Annex I, II, VI, VII, VIII and VIIIa** of (EC) of regulations n° 834/2007 and 889/2008
- **§§ 205.600 – 205.601, 205.602, 205.603, 205.604 and 205.605** of NOP Rules
- **Positive lists** of JAS Rules
- **Articles and/or Annexes** of national regulation of organic agriculture equivalent to the directive texts CAC/GL of Codex Alimentarius

All concerned company sites for the products to inspect are (production site, administrative headquarters, conditioning site or bulk storage).

All intervening partners in the process of obtaining products to inspect (workers, sub-contractors) are audited by ECOCERT. It is then necessary that every one of them read about the reference system and agree in writing with the candidate company to respect and comply with the totality of the inspections (warned or random inspections, taking samples for analysis, access to the accounting, etc.).

For products of a distributor's brand : if the packaging code and lot number of an already inspected manufacturer appear on the packaging of a distributor' brand and if the products are not re-conditioned after the departure from the production site, then the distributor does not have the obligation to submit to an inspection.

### **1.2 MIXED ENTERPRISE CASE**

Companies producing and/or commercializing simultaneously products conforming to the reference system (suitable for use in Organic agriculture, designated UOA products) and « classic » products non-conforming to Organic Agriculture (designated not UOA) may be candidates for inspection. However, these companies must commit to put in place all separation measures necessary to avoid any overlap of the two types of production. They must also have available for ECOCERT the entirety of the production device in order to inspect the coherence of the flux (flow) of materials.

### **1.3 CASE OF ADMISSION REFUSAL**

The company ECOCERT executes the inspections to the extent that it has the necessary technical means and may refuse to intervene in the following cases:

- non conformity to the legislation in effect,
- identified risk for the health of the user,
- production method putting in question the respect of human dignity,
- dangerous situation for the inspection.

## **2 AUTHORIZED RAW MATERIALS**

The products to inspect must contain raw materials which appear exclusively on the list of authorized raw materials in Organic Agriculture in accordance with (CE) regulation n° 834/2007 and 889/2008 (or in accordance with NOP regulation, or JAS regulation or in accordance with national regulations of organic agriculture equivalent to directive texts CAC/GL 32 of *Codex Alimentarius*).

Such regulations and related guides are available upon request from ECOCERT.

## **3 MANUFACTURING PROCEDURES**

### **3.1 RAW MATERIALS ASSEMBLY**

The physical or mechanical operations of raw materials assembly are admitted (ex : weighing, mixing, conditioning).

On a mixed activity production site (UOA and not UOA), all precautions must be taken to guarantee the separation of the two types of productions at each process level:

- physical separation and identification of the two types of raw materials (UOA/not UOA), notably for bulk processes,
- complete draining (and possible cleaning) of the circuit before production of product to inspect or specific circuit for each type of production,
- physical separation and identification of the two types of finished products (UOA/not UOA), notably for bulk processes.

These measures must be written in procedures and distributed to applicable personnel.

### **3.2 HARMS ELIMINATION**

All processing of raw materials currently in storage (disinfection, insect control, etc.) or during their implementation must be operated with authorized products of (CE) regulation n° 834/2007 and 889/2008 (or in accordance with NOP regulation , or JAS regulation or in accordance with National regulation of organic agriculture equivalent to directive texts CAC/GL 32 of *Codex Alimentarius*).

## **4 ANALYTICAL CONTROL**

### **4.1 INTERNAL ANALYSES PROGRAM**

The company agrees to carry out a internal analyses program for some raw materials and/or final products to be approved. At the same time, the company accepts an eventual sampling done by ECOCERT during the audits for the inputs attestations.

### **4.2 EXTERNAL ANALYSES PROGRAM**

Analyses are a tool that ECOCERT may eventually use in verify the conformity of the products inspected to be approved according to the standard. They can be done at the same time that habilitation or surveillance inspections.

### **4.3 CHOICE OF LABORATORIES**

For the internal analytical program, the company must use accredited laboratories and/or using official methods (normalized or experimental).

In the framework of an external analysis control, ECOCERT commits itself to use official methods (standardized or by experimental default) by calling upon only accredited laboratories according to the norm NF EN ISO/CEI 17025 « General prescriptions concerning the competency of calibration and testing laboratories» for the 108 program, except in cases where the research to be executed has never been the object of an accreditation. These laboratories are approved and evaluated systematically by ECOCERT. In case of litigation, the official methods have probative force.

## **5 QUALITY INSURANCE AND TRACEABILITY**

### **5.1 QUALITY INSURANCE PRINCIPLE**

The company agrees to put in place a certain number of registration and traceability measures; these tools will help insure a better quality of the products for the users at the same time as it facilitates the respect of legislation in effect and to facilitate the procedures of external inspection.

### **5.2 DOCUMENTS AND REGISTRATIONS REQUIREMENTS**

#### **5.2.1 Legislation texts in effect**

The company must have in its premises the legislation texts in effect for the products which it manufactures and/or commercializes.

#### **5.2.2 Accreditations and authorizations**

If necessary, the company must provide to ECOCERT a copy of accreditations or authorizations to put into the marketplace which the public authorities delivered concerning the inspected products.

#### **5.2.3 Suppliers and raw material register**

Under written or computerized form, this register establishes the list of suppliers for each raw material purchased or delivered during the last fiscal year and for the current fiscal year. It must be complete with all technical files for each raw material indicating the nature, declared measurement by supplier, source and specifications.

Delivery bills of raw materials (indicating nature, source, date, weight or volume) must be archived.

#### **5.2.4 Production register**

Under written or computerized form and in real time, this register establishes the list of daily production by the company:

- ↳ product reference (name, formula)
- ↳ production date
- ↳ weight or volume
- ↳ composition (nature of components and percentage in mass or volume)
- ↳ corresponding lot number

- ↳ invoice numbers and corresponding delivery bill (if possible)
- ↳ reports of discovery of non-conformity by production inspections, if any

In mixed enterprises, this register must be held for the two types of productions (UOA/not UOA) and available.

### **5.2.5 Analysis register**

This register includes:

- ↳ annual program of internal inspection analysis (by civil year or production campaign) established in accordance with the requirements of legislation in effect;
- ↳ a collection of result analysis forms obtained or delivered by sub-contractors; for each sample the company should take care to indicate the nature of the product (raw material or finished product) and the applicable lot number.

### **5.2.6 Complaints register**

This real time register includes:

- ↳ date and complete wording of the claim (copy of the letter or summary of the telephone call),
- ↳ date and follow-up data to this claim (processing description and possible implemented corrective action, copy of response letter to client if necessary),
- ↳ statistical exploitation of claims, if any.

### **5.2.7 Accounting-material**

The bidding company must have an accounting-material allowing to identify the flux of raw materials and finished products in financial value and in volume (in tons or other units). It must permit identification at any moment or on a given period (1 year maximum) of:

- ↳ nature and quantity of purchased raw materials,
- ↳ nature and quantity of finished products sub-contracted or produced from outside,
- ↳ nature and quantity of sold finished products,
- ↳ nature and quantity of raw materials and finished products in stock.

For mixed enterprises, the accounting-material is particularly essential and must be available at any moment for ECOCERT, so much as for the activity submitted to certification (UOA) or for the « classic » activity (not UOA). The consultation of purchase/sales invoices and the ledger is complementary.

### **5.2.8 Production lots numbering**

A production lot is defined by a set of material constituting a unit having an assumed uniform specification (ex : same measurements, same raw materials, and same date of production).

Numbering of production lots is mandatory. The number must appear on the production register (or it must be linked) and on the purchase/sales invoices and/or delivery bills and/or packaging or labels.

The numbering system must allow identification of the production date as well as the premises if the company has several production sites, or requests to a sub-contractor.



### **5.3 COMPLAINT PROCESSING**

In case there is an incident linked to the use of a product and in case of a particularly insurmountable specification concerning the totality of the delivery, the company which owns certified products engages itself to insure:

1. A technical framework by telephone or other contact judged to be useful depending on the severity of the case.
2. The recall of defective lots which are still stored at the distributors right immediately upon knowledge of accidents or recognized severe disaster, the lots are located by their numbers.
3. Client compensation or replacement of the defective lot.

Whatever the case, the incident must be co-signed in the complaints register with data concerning the follow-up by the company (cf. § 5.2.6).

As a reminder, the complaint procedure may also be engaged by the client user against ECOCERT; in this case ECOCERT agrees to do all that is necessary with the certified supplier to respond to the complaint.

## **6 COMMERCIALIZATION AND LABELLING**

The bidding company implicitly agrees to respect the legislation in effect relative to labeling of products.

The reference to ECOCERT on the labeling or other communication supports is not authorized until the currently valid certification has been attributed and after ECOCERT validates these documents. The Client undertakes not to use the ECOCERT certification logo or any reference to ECOCERT "certification".

The ECOCERT "Inputs" inspection logo may be used on the labeling or other communication supports only if the requirements of the rules of use of ECOCERT's marks and logos are respected (cf. "*TS08(IU)v02en\_Rules of use for Ecocert marks and logos -Input Standard*").

The suitable for use description is the one appearing on the certificate of conformity:

**Product suitable for use in Organic Agriculture conforming to the annexes of the (CE) regulation n° 834/2007 and 889/2008 or of NOP Regulation, or of JAS Regulation or the National Regulation of Organic Agriculture equivalent to the directive texts CAC/GL of *Codex Alimentarius*.**

**Inspected by ECOCERT SA F - 32600**

(This description must be affixed in color on homogenous characters format)

**ATTENTION** : all labeling drafts or other documents making reference to ECOCERT must be submitted to ECOCERT for validation before distribution.

According to the marking possibilities permitted by the legislation in effect, ECOCERT requests that the following instructions be affixed on the packaging or the accompanying documents for the bulk of inspected products:

*"All precautions or possible necessary limitations on usage"*

According to the marking possibilities permitted by the legislation in effect, ECOCERT recommends that the following instructions be affixed on the packaging or the accompanying documents for the bulk of inspected products:

- exhaustive list of raw materials present in the product
- lot number

In case there is a difficulty to affix all or part of this information on the packaging or labeling, a reference may be made on the packaging for free documentation supplied by the manufacturer or distributor who will include all such additional information.