

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted witness audits of Ecological Farming Control Organization's (ETKO) certified operations. Onsite witness audits were conducted, and the audit reports reviewed to determine ETKO's capability to continue operating as a USDA accredited certifier.

GENERAL INFORMATION

| | |
|---|---|
| Applicant Name | Ecological Farming Control Organization (ETKO) |
| Physical Address | 160 Sokak 13/3, Bornova – Izmir, 35100, Turkey |
| Mailing Address | 160 Sokak 13/3, Bornova – Izmir, 35100, Turkey |
| Contact & Title | Dr. Mustafa Akyuz, General and QMS Manager |
| E-mail Address | ma@etko.com.tr |
| Phone Number | 90 542 640 5944 |
| Reviewer(s) & Auditor(s) | Graham Davis, NOP Reviewer; Lars Crail, Onsite Auditor. |
| Program | USDA National Organic Program (NOP) |
| Review & Audit Date(s) | Corrective actions review: December 21, 2016 NOP assessment review: November 15, 2016 Onsite audit: October 6-7, 2016 |
| Audit Identifier | NP6279LCA |
| Action Required | No |
| Audit & Review Type | Witness Assessment |
| Audit Objective | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ETKO's certification system. |
| Audit & Determination Criteria | <i>7 CFR Part 205, National Organic Program as amended</i> |
| Audit & Review Scope | ETKO's certification services in carrying out the audit criteria. |

ORGANIZATIONAL STRUCTURE:

The Ecological Farming Controlling Organization is abbreviated as ETKO from their Turkish name (Ekolojik Tarım Kontrol Organizasyonu). ETKO is a for-profit, limited liability company with two shareholders. The main office for USDA organic certification is located in Bornova – Izmir, Turkey. All certification activities for the NOP are conducted at the Izmir office; there are no satellite offices that conduct USDA organic key activities. ETKO was initially accredited as a certifying agent on January 22, 2003 for crops, wild crops, and handling. ETKO currently certifies operations to the USDA organic regulations in the following countries: Turkey, Russia, Serbia, Korea, Kazakhstan, and the Ukraine.

SUMMARY OF WITNESS AND REVIEW AUDITS CONDUCTED:

The NOP auditor conducted a one-day witness audit of an annual announced inspection of an ETKO handler/trader/exporter located in Kiev, Ukraine. The operation trades organic grain and seed products and does not physically handle the products. The trading operation was first certified in December 1, 2014.

The NOP auditor conducted a half-day witness audit of an annual announced inspection of an ETKO handler/trader/exporter with an office in Kiev, Ukraine. This trader does not physically handle organic products. There are 18 grain products traded (or intended to be traded) as raw, processed, and as livestock feed. This trading operation was first certified on November 7, 2014.

NOP DETERMINATION:

NOP reviewed corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

Non-compliances Identified during the Current Assessment

NP6279LCA.NC1 – Accepted. 7 C.F.R. §205.501(a)(21) states, “Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2603, Organic Certificates, Section 3.1, indicates the elements of an organic certificate.

Comments: *The following organic certificate elements are incorrect or missing on the certificates issued to operations:*

1. *The certificate does not list an anniversary date.*
2. *There are two labeling categories (100% Organic, Organic, Made With Organic....) stated on the certificate when only one category should be listed.*
3. *The certificate states “Certification renewal must be done annually before the anniversary date;” however, there is no anniversary date on the certificate and “certification renewal” is not defined in the USDA organic regulations nor the NOP Handbook.*
4. *The certificate states, “NOP regulation Final Rule 7 CFR Part 205,” rather than “Certified to the USDA organic regulations, 7 CFR Part 205.”*

2016 Corrective Action: ETKO revised and submitted their certificate template. The certificate template lists an anniversary date, only one labelling category per product (i.e, 100% Organic, Organic, or Made with Organic), and “Certified to the USDA organic regulations, 7 CFR Part 205”. ETKO revised and submitted their NOP Certification Procedure (Section 7.5.2). Their procedure requires their certificates to have an anniversary date, one labelling category for each product certified under the handling/processing scope, and state, “Certified to the USDA organic regulations, 7 CFR Part 205.”

Henderson, Kristina - AMS

From: Yang, RobertH - AMS
Sent: Wednesday, April 05, 2017 12:34 PM
To: 'Valeriya Staykova'
Cc: McEvoy, Miles - AMS; Courtney, Cheri - AMS; Strzelecki, Kelly - FAS
Subject: RE: FINAL Minutes from the US-Canada Working Group on OEA- Feb.16, 2017 - NOP action items
Attachments: NP6279LCA CA Report ETKO 010317.pdf

Hello Valeriya:

The following are NOP's actions items resulting from the recent working group meeting:

2. National Organic Program (NOP) will share link to the NOSB Hydroponic and Aquaponic Task Force Report

<https://www.ams.usda.gov/sites/default/files/media/2016%20Hydroponic%20Task%20Force%20Report.PDF>

4. (b) NOP will share with CFIA any intelligence with regards to imports of the organic products to Canada and re-export to the US.

The NOP is currently in the process of collecting information, and will share any information applicable to organic products imported to Canada and re-exported to the U.S. with CFIA at a later date.

(d) NOP will share with CFIA link to the settlement agreement and the results from the compliance audit.

- Link to settlement agreement:
<https://www.ams.usda.gov/sites/default/files/media/NOPETKOAppealSettlementFinalRedacted.pdf>
- See attached final report from recent compliance audit (i.e. witness audits of ETKO's inspections in Ukraine)

6. NOP will provide additional information to CFIA in regards to this request.

A certifier in the U.S. that is COR and USDA-accredited currently certifies a handling operation located in Canada under COR. The certified handler would like to manufacture a "Made with Organic" (MWO) product to be certified under the USDA organic regulations solely for export to and sale in the US.

Question: Since the product's labeling category is outside the scope of the USCOEA, what is CFIA's understanding of whether the operation and its MWO product can be certified under the USDA organic regulations by the certifier?

If you have any questions, feel free to let me know. Thank you in advance for providing us with CFIA's response to our question in item 6.

Regards,

Robert Yang

Agricultural Marketing Specialist
Accreditation & International Activities Division

USDA National Organic Program | 1400 Independence Ave SW | Room 2640-South, Stop 0268
Washington, D.C. 20250-0268 | Office: 202.690.4540

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From: Valeriya Staykova [mailto:Valeriya.Staykova@inspection.gc.ca]
Sent: Friday, March 31, 2017 1:08 PM
To: Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>
Cc: Andrea Leclair <Andrea.Leclair@inspection.gc.ca>; Ashok Mengi <Ashok.Mengi@inspection.gc.ca>; Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; Gary Little <Gary.Little@inspection.gc.ca>; Heather Holland <Heather.Holland@inspection.gc.ca>; Strzelecki, Kelly - FAS <Kelly.Strzelecki@fas.usda.gov>; Marie-Claire Hurteau <Marie-Claire.Hurteau@inspection.gc.ca>; McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>
Subject: FINAL Minutes from the US-Canada Working Group on OEA- Feb.16, 2017

Hello Robert,

Thank you for your comments. These were incorporated in the final version of the minutes.

I have attached copy of the minutes for your file.

Regards,
Valeriya

Valeriya Staykova
Lead Auditor /Vérificatrice principale
Food Systems Evaluation/Évaluation des systèmes alimentaires
Canadian Food Inspection Agency | Agence canadienne d'inspection des aliments

1400 Merivale Road, Tower 2
Floor 6, Room 252
Ottawa, Ontario K1A 0Y9
Tel: (613) 773-6222, Fax 613-773 - 5961
valeriya.staykova@inspection.gc.ca

>>> "Yang, RobertH - AMS" <RobertH.Yang@ams.usda.gov> 2017-03-27 9:09 PM >>>

Hello Valeriya:

Please find attached the draft minutes with corrections made to #4a. With those changes, the US Team approves the minutes.

Regards,

Robert Yang

Agricultural Marketing Specialist

Accreditation & International Activities Division

USDA National Organic Program | 1400 Independence Ave SW | Room 2640-South, Stop 0268

Washington, D.C. 20250-0268 | Office: 202.690.4540

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From: Valeriya Staykova [<mailto:Valeriya.Staykova@inspection.gc.ca>]

Sent: Tuesday, February 28, 2017 12:29 PM

To: Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>; McEvoy, Miles - AMS <Miles.McEvoy@ams.usda.gov>

Cc: Andrea Leclair <Andrea.Leclair@inspection.gc.ca>; Gary Little <Gary.Little@inspection.gc.ca>; Heather Holland <Heather.Holland@inspection.gc.ca>; Marie-Claire Hurteau <Marie-Claire.Hurteau@inspection.gc.ca>

Subject: FOR REVIEW- Draft Minutes from the US-Canada Working Group on OEA- Feb.16, 2017

Dear Miles and Cheri,

Please find attached the draft minutes from our recent teleconference held on February 16, 2017 for your review. I would appreciate it if you and your team could review the minutes and provide any edits in "track changes" mode.

As discussed please note that the Government of Canada launched a public consultation on new rules to strengthen food safety. The proposed *Safe Food for Canadians Regulations* would better protect Canadian families by putting a greater emphasis on preventing food safety risks for all foods imported into Canada or sold across provinces. The regulations would also apply to foods prepared for export.

- The 90-day consultation closes on April 21, 2017.
- The proposal consolidates 14 sets of existing regulations into one. **The *Organic Products Regulations* form Part 14 of the SFCR** . I have attached copy of the proposed regulations for your review.
- The CFIA has consulted stakeholders on this initiative since 2013, including a targeted consultation with small businesses in 2015.
- Information and guidance is available to explain key elements of the proposal and what would be expected of food businesses, including videos, interactive tools, fact sheets, templates and a handbook.

Additional links

- ? [Pre-publication of the proposed regulations in the *Canada Gazette*, Part I - <http://www.gazette.gc.ca/rp-pr/p1/2017/2017-01-21/html/reg1-eng.php#reg>](http://www.gazette.gc.ca/rp-pr/p1/2017/2017-01-21/html/reg1-eng.php#reg)
- ? [Backgrounder: Proposed *Safe Food for Canadians Regulations*](#)
- ? [Safe Food for Canadians Act](#)

? [Learn more and have your say](https://inspection.gc.ca/safefood) at inspection.gc.ca/safefood

Kind regards,

Valeriya

Valeriya Staykova

Lead Auditor /Vérificatrice principale

Food Systems Evaluation/Évaluation des systèmes alimentaires

Canadian Food Inspection Agency | Agence canadienne d'inspection des aliments

1400 Merivale Road, Tower 2

Floor 6, Room 252

Ottawa, Ontario K1A 0Y9

Tel: (613) 773-6222, Fax 613-773 - 5961

valeriya.staykova@inspection.gc.ca

<CFIA_ACIA - #9082501 - v1 - COR- Minutes from the US-Canada WG on Organic
equivalency RY Comments.DOCX>

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Henderson, Kristina - AMS

From: Heather Holland <Heather.Holland@inspection.gc.ca>
Sent: Friday, February 17, 2017 9:42 AM
To: Yang, RobertH - AMS
Subject: Re: ETKO Appeal Settlement Documents

Thank you Robert, looking forward to working with you.

Heather

Sent from/Envoye du BlackBerry.

>>> "Yang, RobertH - AMS" <RobertH.Yang@ams.usda.gov> 17/02/2017 9:27:16 AM >>>
Hello Heather:

It was great speaking with you via teleconference yesterday.

The following is a link to the ETKO Appeal Settlement documents that were mentioned during yesterday's meeting:

<https://www.ams.usda.gov/sites/default/files/media/NOPETKOAAppealSettlementFinalRedacted.pdf>

If you have any questions about the information, let me know.

Regards,

Robert

Robert Yang

Agricultural Marketing Specialist
Accreditaiton & International Activities Division

USDA National Organic Program | 1400 Independence Ave SW | Room 2640-South, Stop 0268
Washington, D.C. 20250-0268 | Office: 202.690.4540

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Hayden, Beth

From: Robertson, Vickie
Sent: Friday, April 04, 2003 4:31 PM
To: ma@etko.org
Cc: Beth Hayden
Subject: ETKO Corrective Action Report

Dear Dr. Akyuz,

Attached is the corrective Action Report in response to the corrective actions submitted by ETKO to address the findings noted in the Quality System Audit Report dated January 9, 2003. Please notice that there is still one outstanding concern in the findings section regarding the costs for sampling required by ETKO. You may respond to this finding directly to me.

Thank You,

Vickie Robertson
Agricultural Marketing Specialist
United States Department of Agriculture
Agricultural Marketing Service
Phone: (909) 784-1910
Fax: (909) 784-1098
email: vickie.robertson@usda.gov

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<http://www.ams.usda.gov/lsg/arc/arcsurvey.htm>



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ort ETKO Bornc

ORGANIC FARMING COMMITTEE MEMBERS 2006-2007

| No | Name | Professions | Expertise - Task |
|-----------|-----------------|-----------------------------------|--------------------------------------|
| 1 | Ertan İLTER | Agriculture Engineer Prof. Dr. | President Horticulture, Lecturer |
| 2 | Azmi AKBAYTÜRK | Agriculture Engineer | Member representative of ministry |
| 3 | Selçuk AYTİMUR | Industrial Engineer | Member Quality Management Systems |
| 4 | Hüseyin CEYLAN | Agriculture Engineer | Member Zoo technology-Beekeeping |
| 5 | Tolga USKUÇ | Mining Engineer | Member Trader |
| 6 | Hakan PAMUK | Agriculture Engineer Dr. | Member Producer- Trader |
| 7 | Ülkü FİDAN | Agriculturist | Member Researcher |
| 8 | Ekrem KAVAKALAN | Producer | Member, Producer |



1400 Independence Avenue, SW.
Room 3071-S, STOP 0201
Washington, DC 20250-0201

SEP 27 2010

NOTICE OF ACCREDITATION RENEWAL

Dr. Mustafa Akyüz
Ekolojik Tarım Kontrol Organizasyonu
160 Sk. No. 13/7 35040
Bornova – Izmir
Turkey

Dear Dr. Akyüz:

The Department of Agriculture (USDA) has reviewed your application for re-accreditation as a certifying agent to perform certification activities on behalf of the USDA under the National Organic program (NOP). Your application has been approved, subject to the conditions listed on the enclosed Terms of Accreditation document.

Please carefully review and then sign, date, and return by facsimile the enclosed Terms of Accreditation document signifying your acceptance of the terms of your accreditation. Upon your signed acknowledgement of these conditions, the USDA will issue a formal Certificate of Accreditation. In the interim, this letter will serve as your notice of accreditation.

This accreditation to certify crops, wild crop and handling operations is granted pursuant to the provisions of the Organic Foods Production Act of 1990 (OFPA), as amended (7 U.S.C. 6501 *et seq.*), and the NOP Final Rule (7 CFR Part 205). This accreditation is effective January 22, 2008, and will terminate on January 22, 1013.

Thank you for your willingness to represent the USDA as an accredited certifying agent. Should you have any questions about the program or the NOP standards, please do not hesitate to contact the NOP staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Rayne Pegg", written over a horizontal line.

Rayne Pegg
Administrator

Enclosures



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

Accreditation Status Confirmation

May 27, 2014

To Whom This May Concern:

Ecological Farming Controlling Organization (ETKO) based in Turkey is a United States Department of Agriculture (USDA), National Organic Program (NOP) accredited certifying agent. Furthermore, ETKO is authorized to issue USDA NOP organic certification to agriculture producer and processor operations that comply with Title 7 Code of Federal Regulations (CFR) Part 205.

ETKO's accreditation certificate indicates a renewal date of January 22, 2013; however, its accreditation is in good standing and continues to be valid. USDA NOP granted ETKO an accreditation term extension until its accreditation renewal assessment is completed. USDA NOP expects the assessment process to conclude during 2014.

For questions concerning ETKO's status, please contact NOP at 202.720.3252.

Sincerely,

A handwritten signature in purple ink that reads "Cheri Courtney".

Cheri Courtney
Director, Accreditation & International Activities Division
National Organic Program

NOTICE OF PROPOSED SUSPENSION OF ACCREDITATION

DEC 18 2015

Mustafa Akyuz, PhD
Ecological Farming Control Organization
160 Sk. No. 13/7
35040 Bornova – Izmir
Turkey

Dear Dr. Akyuz:

As an accredited certifying agent for the USDA National Organic Program (NOP), Ecological Farming Control Organization (ETKO) is required to demonstrate its ability to fully comply with, and implement, its organic certification program. On May 13, 2015, the NOP issued ETKO a Notice of Noncompliance regarding the May 12-16, 2014, Renewal of Accreditation Audit Report. The Noncompliance Report included one outstanding noncompliance from a previous assessment and six new noncompliances.

In May, 2015, International Organic Accreditation Service (IOAS) suspended ETKO's ISO Guide 65 accreditation with the scope of a European Union equivalent standard for all scopes and all countries. In June, 2015, The European Commission removed ETKO's recognition as a 3rd country certification body for all European Union scopes and in all countries. In June, 2015, The Canadian Food Inspection Agency suspended ETKO's accreditation under the Canadian Organic Regime subject to subsection 2 of the Organic Products Regulations 2009.

Due to the number, and severity of the noncompliances issued during the NOP Renewal Assessment, the multiple inadequate submissions of corrective actions from ETKO, and the suspensions of organic program accreditations by IOAS, EU, and CFIA, I am proposing to suspend your accreditation as a certifying agent under 7 CFR §205.665(c) of the USDA Organic Regulations, *Proposed suspension or revocation*, and under §6515(i)(1) of the Organic Foods Production Act of 1990, which states "*If the Secretary or the governing State official (if applicable) determines that a certifying agent is not properly adhering to the provisions of this chapter, the Secretary or such governing State official may suspend such certifying agent's accreditation.*"

Copies of the NOP Noncompliance Report, and NOP Corrective Action Report are enclosed for your reference.

The NOP proposes to suspend ETKO's accreditation as a NOP certifying agent effective 30 days from receipt of this letter. If the NOP suspends ETKO's accreditation, you will be directed to cease all certification activities and make all client files available to the NOP pursuant to § 205.665(f) of the USDA organic regulations.

Pursuant to § 205.681 of the USDA organic regulations, ETKO has the right to file an appeal of this proposed action within 30 days of receipt of this letter. Appeals must be filed in writing to:



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

Administrator, USDA, AMS
c/o NOP Appeals Staff
1400 Independence Avenue, SW
Room 2095-S, STOP 0203
Washington, DC 20250

If the NOP suspends ETKO's accreditation you may, at any time, submit a request to the Secretary for reinstatement of your accreditation. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the Organic Foods Production Act and the USDA organic regulations.

If you have questions regarding this proposed action, please contact your Accreditation Manager, Robert Yang, at Robert.Yang@ams.usda.gov or (202) 690-4540.

Sincerely,

A handwritten signature in blue ink, appearing to read "Miles V. McEvoy", written over a large, stylized blue scribble or flourish.

Miles V. McEvoy
Deputy Administrator
National Organic Program

Enclosures: NOP Noncompliance Report
NOP Corrective Action Report

cc: NOP Appeals



United States
Department of
Agriculture

Marketing and
Regulatory Programs

Financial
Management
Division

Minneapolis Financial Services
Debt Management Team
100 N Sixth Street, Ste 510C
Minneapolis, MN 55403

Date

Name
Address / Fax

Thank you for your interest in sending your payment electronically. The USDA has implemented procedures for Electronic Fund Transfers (EFT) through the Federal Reserve Bank.

The following information should be included with your payment. We also request that you send an email or fax of this information to make sure we are able to identify the payment. The information can be sent to fax, (612) 336-3563, or e-mail, ABShelp@aphis.usda.gov.

- Organization Name / Company Name
- Account information
- Purpose of payment
- Contact name and number

Automated Clearing House (ACH) transactions are processed through Remittance Express by the Federal Reserve Bank of Richmond. The process accepts information in the Cash Concentration and Disbursement (CCD) or the Corporate Trade Exchange (CTX) formats. You will need the following information to remit a payment:

ABA: (b) (4)
 Name on Account: USDA, Marketing and Regulatory Programs (MRP),
 Agricultural Marketing Service (AMS)
 Account Number: (b) (4)

Wire transfers are processed through the Federal Reserve Bank of New York. You will need the following information to remit a payment.

ABA: (b) (4)
 Name on Account: USDA, Agricultural Marketing Service (AMS)
 Account Number: (b) (4)
 SWIFT: (b) (4)

international do not use SWIFT

International wire transfers, remitters should send through a US bank or a correspondent bank before going to the Federal Reserve.

Note: Any fees associated with the transfer are the responsibility of the remitter; please check with your financial institution to make sure there are no surprises.

Name
Title
Team



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ABA: (b) (4)
 Name on Account: USDA, Marketing and Regulatory Programs (MRP),
 Agricultural Marketing Service (AMS)
 Account Number: (b) (4)

Wire transfers are processed through the Federal Reserve Bank of New York. You will need the following information to remit a payment.

ABA: (b) (4)
 Name on Account: USDA, Agricultural Marketing Service (AMS)
 Account Number: (b) (4)
~~SWIFT~~

International do not use Swift

International wire transfers, remitters should send through a US bank or a correspondent bank before going to the Federal Reserve.

Please include in your payment the following:

- Organization Name / Company Name
- Account Information
- Purpose of payment
- Contact name and number

We also request that you send an email or fax of this information to make sure we are able to identify the payment. The information can be sent to fax, (612) 336-3563, or e-mail, ABShelpline@aphis.usda.gov.

Note: Any fees associated with the transfer are the responsibility of the remitter; please check with your financial institution to make sure there are no surprises.

From: ma@etko.org
To: [Crail, Lars - AMS](#); [Lusby, MaryLou - AMS](#)
Subject: FW: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate
Date: Monday, June 10, 2013 4:53:24 AM
Attachments: [Wire Information.pdf](#)
Importance: High

From: ma@etko.org [mailto:ma@etko.org]
Sent: Monday, June 10, 2013 11:05 AM
To: 'Zollicoffer, Cheryl - AMS'
Subject: RE: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate
Importance: High

Miss Zollicoffer

Our bank informed me with a different information that ABA Number corresponds a different address named **Import-Export Bank**.

When they check SWIFT Number as "(b) (4)", it corresponds to Federal Reserve Bank of New York.

In the past I did transfer for accreditation audit in 2009 according to following address with SWIFT and all was in order.

Could you please check once again if we send the money according to ABA number to IMPORT – EXPORT BANK or according to SWIFT number to FEDERAL RESERVE BANK? We are little confused what to do.

Best regards,

Mustafa Akyuz

| | |
|-----------------|--|
| Name Bank: | Federal Reserve Bank of New York |
| ABA: | (b) (4) |
| Name on Account | USDA, Agricultural Marketing Service (AMS) |
| Account Number | (b) (4) |
| SWIFT | (b) (4) |

From: Zollicoffer, Cheryl - AMS [mailto:Cheryl.Zollicoffer@ams.usda.gov]
Sent: Thursday, June 06, 2013 4:12 PM
To: ma@etko.org
Subject: RE: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate

Good Morning,

Everything on the form should be good. But, do not use the swift number. That is not needed for international customers.

Cheryl

From: ma@etko.org [mailto:ma@etko.org]
Sent: Wednesday, June 05, 2013 8:06 AM
To: Zollicoffer, Cheryl - AMS
Subject: RE: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate
Importance: High

Mis Zollicoffer

I am trying to transfer the money. Our bank asked if the Name and ABA number are good. They can see online that ABA number corresponds to "US TREASURY"
Please inform me if there is any problem if we transfer the Money to "US TREASURY", or maybe ABA is different?

Have a nice day.

Mustafa Akyuz

Name Bank: **Federal Reserve Bank of New York**
ABA: **(b) (4)**
Name on Account **USDA, Agricultural Marketing Service (AMS)**
Account Number **(b) (4)**

EXPLANATION

- **Organization Name / Company Name:** **ETKO LTD - TURKEY**
- **Account Information** **(b) (4)**
- **Purpose of payment:** **Renewal Assessment**
- **Contact name and number** **Mustafa Akyuz – T:+90-232-3397606**

From: Zollicoffer, Cheryl - AMS [mailto:Cheryl.Zollicoffer@ams.usda.gov]
Sent: Thursday, May 30, 2013 4:04 PM
To: ma@etko.org
Cc: Lopez, Mike - AMS
Subject: RE: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate

Good Morning,

I have attached information about wire transfers. I think you have to make the prepayment ahead of the audit. Please include Mike Lopez when you notify us of the pending payment.

Thank you and have a good week-end!

Cheryl A. Zollicoffer
USDA AMS LPSP
Grading and Verification Division

720.497.2535 (p)

720.497.0571 (f)

Cheryl.zollicoffer@ams.usda.gov

From: ma@etko.org [<mailto:ma@etko.org>]

Sent: Thursday, May 30, 2013 1:51 AM

To: Zollicoffer, Cheryl - AMS

Subject: RE: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate

Importance: High

Good Morning Ms Zollicoffer

I wonder if we need to pay before we receive an invoice from you? Could you please inform me how we proceed for the payment?

I want to know as well if we have any other due payments so I can do it at once.

Have a nice day

Mustafa Akyuz

From: Zollicoffer, Cheryl - AMS [<mailto:Cheryl.Zollicoffer@ams.usda.gov>]

Sent: Wednesday, May 08, 2013 9:17 PM

To: Lopez, Mike - AMS; ma@etko.org

Cc: Crail, Lars - AMS; Lusby, MaryLou - AMS; Harnett, Sheri - AMS; Ross, Steve - AMS; Courtney, Cheri - AMS; Hartley, Julie - AMS

Subject: RE: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate

Good Afternoon,

Have the prepayments been collected yet?

Thank you in advance.

Cheryl

From: Lopez, Mike - AMS

Sent: Wednesday, May 08, 2013 11:49 AM

To: ma@etko.org

Cc: Crail, Lars - AMS; Lusby, MaryLou - AMS; Harnett, Sheri - AMS; Zollicoffer, Cheryl - AMS; Ross, Steve - AMS; Courtney, Cheri - AMS; Hartley, Julie - AMS

Subject: ETKO NOP Renewal Assessment Audit Plan and Cost Estimate

Dear Dr. Akyuz,

Enclosed are three documents: (1) Letter Regarding Accreditation; (2) Estimate for Audit Services; and (3) LS-313 Application for Service. First, please review the letter and provide a response. Second, please review the audit plan itinerary. If any information is incorrect, please let me know so that I can make the necessary revisions before you sign.

Third, the LS-313 Application for Service must be completed and the signed form submitted to the GV Division. In addition, a copy of the signed Estimate for Audit Services must also be submitted to the GV Division. Please submit both documents to the address, email address, or fax number included in the letter.

Finally, we will be reviewing the bulk of your documents and files as a desk audit prior to the onsite audit. Therefore, we will need the requested documents to be translated into English. Please translate the documents and records as requested within the letter. Please submit to me the files and records/documents as requested in the letter no later than August 01, 2013. Additionally, please include your Quality Manual or Procedures Manual and any other guidance documents that will assist me in assessing your program.

If you have any questions on the information requested, please feel free to contact my office or me directly.

I must receive a response to this email as soon as possible but no later than May 22, 2013.

Thank You,

Michael E. Lopez ASQ-CQA
USDA, AMS, Livestock, Poultry & Seed Programs
Assistant National Supervisor, Poultry Grading Branch, Audit Section
4686 S. Westwood Dr.
Republic, MO 65738
501-766-4782

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From: ma@etko.org
To: Cheryl.zollicoffer@ams.usda.gov
Cc: [Lopez, Mike - AMS](#); [Crail, Lars - AMS](#); [Lusby, MaryLou - AMS](#)
Subject: FW: Talimat yenileme
Date: Thursday, June 27, 2013 7:29:36 AM
Attachments: [ETKO SWFT.tif](#)
Importance: High

Ms Zollicoffer

You can find attached swift message for remittance. I noticed they mentioned the old Account Number of ETKO as (b) (4) instead of (b) (4) .

I hope all is in order.

Have a nice day

Mustafa Akyuz

ETKO-TURKEY

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|--|---|---------|------------|
|  | SUSPENSION and WITHDRAWAL of CERTIFICATION | DOC.NR | GP 15 |
| | | DATE | 05.11.2009 |
| | | REV. NR | 5 |
| | | PAGE | 1/5 |

1. PURPOSE

This procedure describes the method and responsibilities to be followed for suspending, withdrawal, cancellation of the certificates and **surrender of certification**.

2. RESPONSIBILITIES

Managing director, CC and OM are responsible for the proper implementation of this procedure.

3. RECORDS

4. REFERENCES

GP 02 Certification procedure
 GP 04 Surveillance
 GP 05 Appeal Complaints procedure
 GP 10 Certification services
 GP 11 Use of Logo and certificate...
 GP 18 NOP certification
 OP 01 Inspection procedure

5. APPLICATION

In case of withdrawal or suspension, the client ceases to use the certification logo, certificate, document by all means. Certificate and certification documents are returned back to ETKO. Such clients are informed to other CB's.

5.1 General (NOP complementary provisions)

All non compliances to organic regulations are subject to immediate investigation by ETKO. If, as a result, evidence of non-compliance is found, an immediate meeting is scheduled between ETKO and the client. Based upon the findings of this meeting, ETKO, which has the sole discretion to do so, determines whether there are grounds for suspension.

Use of approvals, certificates and labels depend on the correction of the Notification of Non-compliances (See GP 18 art 5.24) provided to client. Otherwise, it is a subject to the withdrawal or suspension of the certificates. ETKO is free to insight all necessary actions taken for the Notification of Noncompliance provided to client in previous inspection and the ownership as well as the use and presentation of approvals, certificates and labels of conformity.

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| PREPARED | APPROVED |
| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |



**SUSPENSION and WITHDRAWAL
of CERTIFICATION**

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|---------|------------|
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For various reasons, as deemed appropriate by ETKO, suspension or revocation of certification may be imposed.

When a rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, ETKO sends to the client a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance. When correction of a noncompliance is not possible, the notification of noncompliance and the proposed suspension or revocation of certification may be combined in one notification. The notification of proposed suspension or revocation of certification shall state:

1. The reasons for the proposed suspension or revocation
2. The proposed effective date of such suspension or revocation
3. The impact of a suspension or revocation on future eligibility for certification; and
4. The right to request mediation pursuant to § 205.663 or to file an appeal pursuant to § 205.681 of NOP

- **Willful violations**

If ETKO has reason to believe that a certified operation has willfully violated the Act or regulations given in NOP and any other, **ETKO** sends the client a notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.

- **Suspension or revocation.**

If the certified operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal, ETKO sends a written notification of suspension or revocation.

ETKO will not send a notification of suspension or revocation to a certified operation that has requested mediation or filed an appeal, while final resolution of either is pending.

- **Eligibility**

1. A client whose certification has been suspended may at any time, unless otherwise stated in the notification of suspension, submit a request to the Secretary for reinstatement of its certification. The request must be accompanied by evidence demonstrating correction of each noncompliance and corrective actions taken to comply with and remain in compliance with the Act and the regulations in this part.

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| PREPARED | APPROVED |
| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |



SUSPENSION and WITHDRAWAL of CERTIFICATION

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2. A client or a person responsibly connected with an operation whose certification has been revoked will be ineligible to receive certification for a period of 5 years following the date of such revocation, Except, That, the Secretary may, when in the best interest of the certification program, reduce or eliminate the period of ineligibility.

5.2. Temporary Suspension of Certification

For various reasons, as deemed appropriate by ETKO, temporary suspension of certification may be imposed. For example:

- 1) If ongoing pesticide residue testing of a crop reveals an unacceptable level of pesticide in that crop, as a result of being grown in soil with remaining historical residues, that product would be immediately removed from certification in order to prevent any negative impact of a suspension or revocation on future eligibility for certification
- 2) If the NCRs raised on site inspections are not closed in a timely manner certification can be suspended until those requirements are met.
- 3) If payments are not made in a timely manner, and in accordance with the terms and conditions of the Certification Agreement, certification can be suspended until payments are returned to a current status.

5.3 Permanent Suspension of Certification

Unconditional suspension of certification will be imposed if the certified entity engages in any one of the practices violating the requirements of regulations, standards:

- Fraudulent misrepresentation of unauthorized materials used in the production of certified products.
- The sale or resale of any commodity, as being certified, when in fact it has not been produced from an ETKO certified lot.
- Misuse of the ETKO certification seal (logo) in violation of the trust bestowed upon the certified entity.
- Flagrant violation of ethical standards recognized and respected by the organic industry.
- As an affiliated operator, ceasing to supply a customer whose products are certified by ETKO
- Ceasing to purchase from suppliers whose products are certified by ETKO and selling private label products without itself owning a certificate.

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| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |

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|  | SUSPENSION and WITHDRAWAL of CERTIFICATION | DOC.NR | GP 15 |
| | | DATE | 05.11.2009 |
| | | REV. NR | 5 |
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Products suspected not satisfying the requirements of the Applicable Regulation where ETKO have a substantiated suspicion that an operator intends to place on the market a product not in compliance with this regulation but bearing a reference to the organic production method, ETKO can require that the operator may provisionally not market the product with this reference. This decision shall be supplemented by the obligation to withdraw from this product any reference to the organic production method if ETKO is sure that the product does not fulfill the requirements of the Applicable Regulation. However if the suspicion is not confirmed, the above decision shall be cancelled not later than a time period after having been taken. ETKO will define this time period. The operator shall cooperate fully with ETKO in resolving the suspicion.

In case a violation is proved, Operator accepts to inform in writing the buyers of the products in order to ensure that indications referring organic production method are removed from the particular production.

5.3. Voluntary Withdrawal of Application.

All certified entities have the prerogative to withdraw from this program, without prejudice. This program recognizes that real world situations can result in conditions, which would be non-compliant. Therefore, certified entities are encouraged to avail them to this voluntary withdrawal option if such becomes necessary.

Each request for voluntary withdrawal is reviewed with sensitivity. The particular reasons or conditions surrounding the request are given special attention because the objective of this option is not to penalize, but rather to encourage an entity to expeditiously rectify a problem and return to compliance as quickly as possible.

- Clients may withdraw their application at any time;
- Clients will be held liable for the costs of services provided up to the time of withdrawal of the application; and
- If clients voluntarily withdraw their application prior to the issuance of a notice of non-compliance or certification denial, they will not be issued a notice of non-compliance or certification of denial.

5.4 Surrender of certification

All certified entities have the prerogative to surrender their certification, without prejudice. In such cases client must inform ETKO to leave the certification program and return the original Certificate on time. ETKO needs some time period to complete the procedures such as closing the file and reporting to the authorities as required.

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| PREPARED | APPROVED |
| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |

**SUSPENSION and WITHDRAWAL
of CERTIFICATION**

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- Clients may Surrender their certification at any time and
- Clients will be held liable for the costs of services provided up to the time of Surrender of their certification
- In case there is no updates from the certified clients; ETKO will follow-up by communication means such as tel/fax/email/letter etc.. at least one month before the following years surveillance audits if they continue certification.

In case of surrender of certification, original certificate and all certification documents are returned back to ETKO and such clients are informed to the authorities as required.

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| PREPARED | APPROVED |
| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |

Ref No: 2015061201

Date: June 12, 2015

Subject: Proposed Corrective Action Plan related to Renewal Accreditation
Assessment Audit NCs

Dear Mrs Courtney

According to your letter May 13, 2015 and Noncompliance Report we prepared a
Corrective Action Plan as attached to this letter.

We will start corrective actions as an immediate effect in line with NOP 2608
Responding to Noncompliance's Instruction.

I hope the Corrective Action Plan is enough for the moment, otherwise please let
us know for further explanations.

Sincerely
Dr. Mustafa AKYÜZ

Documents send:

1-Corrective Action Plan

ETKO
EKOLOJİK TARIM KONTROL ORG.LTD.ŞTİ.
160 Sk.No:13/7 35040-Bornova
Tel:0232.339 76 06 Fax:339 76 07
023 281 023 6931 İZMİR

(b) (6)

Tel: 0232-3397606

Fax: 0232-3397607

Email: info@etko.org

http: www.etko.org

Tax office: Bornova
Tax No: 381 023 6931

Chamber of commerce
No: 92592.1

Bank
Türkiye İşbankası
Bornova Şubesi

Account
Euro: 3403 0535 690
T.lira: 3403 1122 346

Ref No: 2010031501

Date: March 15, 2010

Subject: Corrective Actions related to Deferred Surveillance Accreditation Renewal Audit NCs

Dear Mr Melvin

According to your letter September 09, 2009 and Audit Report we took Corrective Actions to the remaining part of the NCs as mentioned in attached document "Correction Plan and Corrections. By this submission we provided all corrective actions. We made two submission before as dated below;

December 02, 2009

December 28, 2009

Please inform me if you did not receive any of the submission.

Sincerely

Dr. Mustafa AKYÜZ

ETKO
EKOLOJİK TARIM KONTROL ORG.LTD.ŞTİ.
160 Sk.No:13/7 35040-Bornova
Tel:0232.339 76 06 Fax:339 76 07
023 6931 İZMİR

(b) (6)

Documents send:

- 1- Correction Implementation March 15, 2010
- 2- GP 15 Suspension and Withdrawal Rev05
- 3- GP 18 NOP Certification Rev09
- 4- TI 30 NOP Accreditation Requirements
- 5- Review Evaluation report FINE FOOD

Tel: 0232-3397606

Fax: 0232-3397607

Email: info@etko.org

http: www.etko.org

Tax office: Bornova

Chamber of commerce

Bank

Account

Tax No: 381 023 6931

No: 92592.1

Türkiye İşbankası
Bornova Şubesi

Euro: 3403 0535 690

T.lira: 3403 1122 346



Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report

Applicant: Ekolojik Tarım Kontrol Organizasyonu Ltd. Pti (ETKO)
Program/Audit Type: National Organic Program/Accreditation for Organic Certification Organizations- Initial Desk Audit, Review of Corrective Actions
Location(s): Bornova –Izmir, Turkey
Audit Date(s): April 04, 2003
Audit File Number: NP2073GA CA
Action Required: Yes
Auditor(s): Vickie Robertson
Contact: Dr. Mustafa Akyuz

AUDIT ACTIVITIES

On April 04, 2003 a representative of the USDA, AMS, LS, Audit, Review, and Compliance (ARC) Branch conducted a review of the corrective actions submitted by Ekolojik Tarım Organizasyonu Ltd. Pti. (ETKO) in response to the findings noted in the Quality System Audit Report dated January 9, 2003 for compliance to the USDA, AMS 7 CFR Part 205, National Organic Program, Final Rule.

OBSERVATIONS

ETKO submitted corrective actions on March 10, 2003 to address the findings noted in the Quality System Audit Report dated January 9, 2003. The review of the corrective actions found that ETKO has updated the Quality Manual Forms and Procedures to adequately address the findings of the audit report dated January 9, 2003 except as noted in the findings section of this report.

FINDINGS

CLEARED-Who is responsible to perform the QMR?

ETKO has named Mr. Seluck Aytimur, an independent expert, as the person responsible to perform the Quality Management Review and has provided his curriculum vita as evidence of his expertise.

CLEARED-Employee contracts should be submitted in English so that they can be assessed.

The Quality Manual Forms now include an English translation of the Personnel Contract.

CLEARED-New conflict of interest forms submitted after March 2002 do not contain the confidentiality clause. Is this the form that will be used? If so confidentiality forms will need to be submitted for all reasonably connected persons after March 2003.

Current signed Confidentiality Agreements for all responsibly connected employees were submitted to the auditor.

OUTSTANDING-The responsibility for costs of testing and sampling needs to be clear throughout the QMP.

ETKO submitted updated Quality Manual Procedures noting the sections referencing charges for sampling; however, sections 3.7.5 and 4.4 specify that ETKO will be responsible for the costs of "additional testing for unannounced, random and surveillance or additional selective tests". The referenced sections do not address the costs of the routine or annual sampling required by ETKO. A certifying agent cannot require testing and / or sampling unless the certifying agent is responsible for all the costs incurred.

CLEARED-ETKO requires clients to maintain a complaint file, which is not a NOP requirement. *ETKO submitted updated Quality Manual Procedures referencing section 7.0 which has removed all references to a complaint file being maintained by clients.*

In addition the following sections of the NOP Final Rule were not addressed, not fully addressed or could not be found in the submitted materials:

CLEARED-205.662(c)-not fully addressed-proposed suspension/revocation contains requirements above those of NOP

The updated Quality Manual Procedures referenced sections 5.8, 5.10 and 7.0, effectively removed all requirements above those of the NOP.

CLEARED-205.662(f)-not fully addressed-reinstatement by Secretary, ineligibility for 5 years.

The updated Quality Manual Procedures referenced section 5.8.3 includes the information concerning reinstatement by the Secretary and the 5-year ineligibility.

CLEARED-205.671-not fully addressed-cause investigation

The updated Quality Manual Procedures referenced section 5.3.5 includes the information relating to investigation for the cause of contamination.

RECOMMENDATIONS

I recommend that ETKO address the above noted outstanding finding and submit the information requested to the reviewer. An on-site audit should be performed by USDA to verify that ETKO's procedures and forms are in compliance with NOP.



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

Applicant: Ekolojik Tar`ym Kontrol Organizasyonu Ltd. Pti (ETKO)
Program/Audit Type: National Organic Program/Accreditation for Organic Certification Organizations- Initial Desk Audit, Review of Corrective Actions
Location(s): Bornova –Izmir, Turkey
Audit Date(s): April 28, 2003
Audit File Number: NP2073GA CA2
Action Required: No
Auditor(s): Vickie Robertson
Contact: Dr. Mustafa Akyuz

AUDIT ACTIVITIES

On April 28, 2003 a representative of the USDA, AMS, LS, Audit, Review, and Compliance (ARC) Branch conducted a review of the corrective actions submitted by Ekolojik Tar`ym Organizasyonu Ltd. Pti. (ETKO) in response to the findings noted in the Quality System Corrective Action Audit Report dated April 4, 2003 for compliance to the USDA, AMS 7 CFR Part 205, National Organic Program, Final Rule.

OBSERVATIONS

ETKO submitted corrective actions on April 14, 2003 to address the outstanding non-conformance noted in the Quality System Corrective Action Audit Report dated April 4, 2003. The review of the corrective actions found that ETKO has updated the Quality Manual to adequately address the findings of the audit report dated April 4, 2003.

FINDINGS

CLEARED-The responsibility for costs of testing and sampling needs to be clear throughout the QMP. *ETKO submitted updated Quality Manual Procedures noting the sections referencing charges for sampling; however, sections 3.7.5 and 4.4 specify that ETKO will be responsible for the costs of "additional testing for unannounced, random and surveillance or additional selective tests". The referenced sections do not address the costs of the routine or annual sampling required by ETKO. A certifying agent cannot require testing and / or sampling unless the certifying agent is responsible for all the costs incurred.*

Corrective Action: ETKO has revised the quality manual to specify that ETKO is responsible for all testing costs.

RECOMMENDATIONS

I recommend an on-site audit be performed by USDA to verify that ETKO's procedures and forms are in compliance with NOP.



Livestock and Seed
Program

Quality System Audit Report

Applicant: Ekolojik Tar`ym Kontrol Organizasyonu Ltd. Pti (ETKO)
Program/Audit Type: National Organic Program/Accreditation for Organic Certification
Organizations- Initial Desk Audit
Location(s): Bornova –Izmir, Turkey
Audit File Number: NP2073GA
Action Required: Yes
Auditor(s): Vickie Robertson
Audit Date(s): May 16, 2002-January 9, 2003
Contact: Dr. Mustafa Akyuz

AUDIT ACTIVITIES

On various days between May 16, 2002 and January 9, 2003 a representative of the USDA, AMS, LS, Audit, Review, and Compliance (ARC) Branch conducted a review of updated documents submitted by Ekolojik Tar`ym Organizasyonu Ltd. Pti. (ETKO) for compliance to the USDA, AMS 7 CFR Part 205, National Organic Program, Final Rule.

OBSERVATIONS

ETKO Ecological Farming Controlling Organization is an independent, for profit service organization developed specifically for the purpose of verifying the authenticity of foods and food products which are organically grown under a management policy of organic agriculture and which are processed under goals of protecting, enhancing and extending the value invested in the organic product. ETKO is a limited company with two shareholders. ETKO has a partnership with LACON, a German company, to provide certification to the EEC. ETKO's activities concerning the inspection and certification process especially in cases of revocation or suspension is controlled by the ETK "Ecological Farming Committee of the Republic of Turkey the Ministry of Agriculture and Rural Affairs Research and Co-ordination Council." ETKO is ISO Guide 65 accredited by the "Committee of Organic Farming, The Ministry of Agriculture and Rural Affairs". ETKO currently certifies clients in Turkey and neighboring countries of Romania, Bulgaria and the Ukraine to the EEC 2092/91 standards, and those clients export products worldwide. ETKO anticipates expanding its services to other neighboring countries like Iraq, Iran, Syria, Greece and etc. Their application for accreditation estimates 50 crop, 0 livestock, 36 wild crop and 50 handling clients.

ETKO provides an application packet to all applicants upon request for certification, which contains the fee schedule, NOP Final Rule, Quality Manual Procedures, required documentation and other information deemed pertinent to certification. The cost for the packet is the one hundred Euro application fee, however; anyone may request a packet by paying the fee. The NOP Final Rule is provided in its entirety and in the language of the client. The fee schedule, which is expressed in Euros, is based on the size and complexity of the operation and appears to be reasonable when compared with other certifying agents. The fee schedule clearly defines under what circumstances and to what amount fees are refundable or non-refundable. Upon acceptance of an application the client is given an applicant number and asked to sign a Certification Agreement. The Certification Agreement contains a complete itemized estimate of the certification fees, and becomes a contract between ETKO and the client.

ETKO has provided curriculum vitas on all personnel directly connected to the certification process. All
QSS_AREP 3/00

possess a very knowledgeable background and education in agriculture and organic production practices. The inspectors used by ETKO are independent third party professionals. A brief description of educational requirements and responsibilities for each position within the ETKO certification program is provided in Document 5.9 in the Forms manual. An evaluation of Personnel and their competence is performed as part of the Quality Management Review. (QMR) The documentation submitted does not assign the responsibility for the performance of the QMR to any individual, however the Managing Director is responsible for personnel. Employee contracts submitted were not in English and therefore could not be assessed. Conflict of interest disclosure reports that also contain a confidentiality statement dated March 2002 were submitted for all personnel directly connected to the certification process. ETKO conducted a training session in March 2002 pertaining to organic agriculture requirements at which the NOP requirements were discussed as part of the agenda. ETKO provided a list signed by all of the employees that attended the training.

ETKO will certify clients to the NOP standards as evidenced by the organic production/processing questionnaires and certification procedures outlined in the Quality Manual Forms (QMF) and the Quality Manual Procedures (QMP). The certification procedure is as follows: it begins with receipt of the application; a designated member of the ETKO staff reviews the application; once the application is accepted an on-site inspection is scheduled and performed; the Certification Committee reviews the application and inspection report to make the final determination for certification; and the certificate is issued. The inspector is provided with all necessary documents prior to the inspection and uses a comprehensive checklist, the Farm Inspection Questionnaire or the Manufacture-Distributor Questionnaire, that indicate the applicable NOP requirements. The inspector is responsible for verification of all information contained in the organic production plan including all labeling information and collection of any required samples. The certification committee is comprised of two (2) persons, ETKO's Director and a non-affiliated, person independent from inspection and document review. The forms utilized in the certification decision process do not indicate any requirements additional to those of NOP. The procedures for denial, suspension and revocation of certification are contained in the QMP, and the clients are informed of their rights and responsibilities. There are some contradictions to NOP contained in the QMP in the sanctions, suspension and revocation areas of the manual, for example, the QMP states that "flagrant violation of ethical standards recognized and respected by the organic industry" is cause for unconditional suspension. There are some additional costs to the client associated with the appeal process. ETKO also requires its clients to maintain a complaint file.

ETKO certifies individuals and Small Farmer Organizations. The criteria and procedures established for certifying Small Farmer Organizations are contained in the QMP appendix D. The primary requirement is that a contract or "Internal Control System" exists between the farmers and the organization to which they belong that details the management, inspection and documentation required for certification. The QMP clearly defines the procedures to be used concerning compliance, including minor non-compliances and complaints for all clients. ETKO performs an annual program review including an internal audit as outlined in the QMP appendix G. The contents of the annual review are outlined in the QMP Section 8 Internal and External Audits. Appendix H contains the procedures for the submission of the annual report to the Secretary, and also the record keeping and retention requirements and all are in compliance with NOP. ETKO requires a variety of samples annually to ascertain base residue levels and improvements in soil and water quality. The QMP states that all costs for sampling and residue testing will be born by ETKO, however this is not clear through out the manual.

FINDINGS

ETKO has provided sufficient evidence that they possess the knowledge and expertise to certify clients to the NOP Standards and that they have the forms, procedures, and documents in place to do so.

ETKO should provide clarification for the following:

Who is responsible to perform the QMR?

Employee contracts should be submitted in English so that they can be assessed.

New conflict of interest forms submitted after March 2002 do not contain the confidentiality clause. Is this the form that will be used? If so, confidentiality forms will need to be submitted for all reasonably connected persons after March 2003.

The responsibility for costs of testing and sampling needs to be clear throughout the QMP.

ETKO requires clients to maintain a complaint file, which is not a NOP requirement.

In addition, the following sections of the NOP Final Rule were not addressed, not fully addressed, or could not be found in the submitted materials:

205.662(c)-not fully addressed-proposed suspension/revocation contains requirements above those of NOP

205.662(f)-not fully addressed-reinstatement by Secretary, ineligibility for 5 years.

205.671-not fully addressed-cause investigation

RECOMMENDATIONS

It is the recommendation of the auditor that ETKO be granted initial accreditation. I further recommend that ETKO address the above noted findings and submit the information requested to the reviewer. An on-site audit should be performed by USDA to verify that ETKO's procedures and forms are in compliance with NOP.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) received Ecological Farming Control Organization's (ETKO) renewal application to maintain its U.S. Department of Agriculture (USDA) National Organic Program accreditation in June 2012. The NOP has reviewed ETKO's application, conducted an onsite audit, and reviewed the audit report to determine ETKO's capability to operate as a USDA accredited certifier.

GENERAL INFORMATION

| | |
|---|---|
| Applicant Name | ETKO – Ecological Farming Control Organization |
| Physical Address | 160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey |
| Mailing Address | 160 Sk. No. 13/7, 35040, Bornova - Izmir, Turkey |
| Contact & Title | Dr. Mustafa Akyuz General and QMS Manager |
| E-mail Address | ma@etko.org |
| Phone Number | +90-232-3397606 |
| Reviewer(s) & Auditor(s) | Penny Zuck, NOP Reviewer Lars Crail, Onsite Auditor |
| Program | USDA National Organic Program (NOP) |
| Review & Audit Date(s) | Corrective Action review: September 10 – November 3, 2015 NOP assessment review: April 29, 2015 Onsite Audit: May 12-16, 2014 |
| Audit Identifier | NP4132LCA |
| Action Required | See Notice of Proposed Suspension |
| Audit & Review Type | Renewal Assessment |
| Audit Objective | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ETKO's certification system. |
| Audit & Determination Criteria | <i>7 CFR Part 205, National Organic Program as amended</i> |
| Audit & Review Scope | ETKO's certification services in carrying out the audit criteria for Crops, Wild Crops, and Handling |

Organizational Structure:

The Ecological Farming Control Organization is abbreviated as ETKO from their Turkish name (Ekolojik Tarım Kontrol Organizasyonu). ETKO is a for-profit, limited liability company with two shareholders. The main office for USDA organic certification for ETKO is located in Bornova – Izmir, Turkey. All certification activities for the NOP are conducted at the Izmir office; there are no satellite offices that conduct USDA organic key activities.

ETKO was initially accredited as a certifying agent on January 22, 2003 to the USDA National Organic Program (NOP) for crops, wild crops, and handling. ETKO currently certifies operations to the USDA organic regulations in the following countries: Turkey, Russia, Serbia, Korea, Kazakhstan, and the Ukraine. As of May 2014, ETKO's NOP client list had 40 certified operations with 22 crops, 3 wild crops, and 39 handling operations. ETKO certifies to the Turkish Organic Standard under the legal authority of the Organic Farming Committee of the Republic of Turkey the Ministry of Agriculture and Rural Affairs Research Planning and Co-ordination Council (TURKAK). ETKO is also accredited by TURKAK to perform conformity assessments for Turkey's Good Agricultural Practices (GAP). At the time of the renewal audit, ETKO was accredited to ISO 17065 by the International Organic Accreditation Service (IOAS) in the areas of agricultural production, processing and imports of organic agricultural products according to the EEC, GlobalGap, and the Global Organic Textile Standard (GOTS).

ETKO employees ^{(b) (4)} staff members that are involved in USDA organic certification. The staff consists of five administrative personnel and ^{(b) (4)} technical personnel which also conduct inspections. No contract inspectors are used.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether ETKO's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

Non-compliances from Prior Assessments

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Outstanding**" indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance.

NP719900A.NC3 – Cleared
NP719900A.NC5 – Cleared
NP719900A.NC6 – Cleared
NP805000A.NC1 – Cleared
NP805000A.NC2 – Cleared
NP9222ZZA.NC1 – Cleared
NP9222ZZA.NC2 – Cleared
NP9222ZZA.NC3 – Cleared
NP9222ZZA.NC4 – Cleared
NP9222ZZA.NC5 – Cleared
NP9222ZZA.NC6 – Withdrawn
NP9222ZZA.NC7 – Cleared
NP9222ZZA.NC8 – Cleared
NP9222ZZA.NC9 – Cleared
NP9222ZZA.NC10 – Cleared

NP9222ZZA.NC11 – Cleared
NP9222ZZA.NC12 – Cleared
NP9222ZZA.NC13 – Cleared
NP9222ZZA.NC14 – Cleared
NP9222ZZA.NC15 – Cleared
NP9222ZZA.NC16 – Cleared
NP9222ZZA.NC17 – Cleared
NP9222ZZA.NC18 – Cleared
NP9222ZZA.NC19 – Cleared
NP9222ZZA.NC20 – Cleared

NP9222ZZA.NC21 - 7 CFR §205.501(a)(4) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part.” *Interviews conducted, records reviewed, and witness inspections observed, verified a general lack of understanding of the NOP standards. While personnel had sufficient experience and education in organic agricultural production and handling practices, there was insufficient understanding on the application of the NOP standards as evidenced by inadequate information in the approved organic compliance (system) plans with no issues of concern or non-compliances being identified over multiple years of certification. The primary Certification Committee (CC) member with expertise in crops was not familiar with basic requirements such as the 90/120 day rule for raw manure application, did not know where to reference in the NOP Rule to determine if an input is permitted, and did not know when commercially available seeds and planting stock could be used. Additionally, while it was stated that the Certification Committee (CC) had received training there were no training records for any of the CC members prior to 2009.*

Corrective Action: ETKO conducted training of inspectors, reviewers, and Certification Committee members on November 21, 2009 and March 12-14, 2010 which covered NOP standards, review, inspection, and certification procedures. ETKO has designed a 2010 training plan to ensure periodic training on the NOP is completed. ETKO submitted records of training for all inspectors, reviewers, and Certification Committee members.

2014 Verification of Corrective Action: The NOP auditor found the following issues of concern that demonstrated an insufficient understanding of the USDA organic regulations and NOP policies:

1. Label review – the label review checklist did not include USDA organic regulation label requirements to be verified.
2. Inspectors during the witness audits used incorrect regulation citations during exit interviews to identify findings.
3. OCP templates state the incorrect USDA organic regulations.
4. Inspectors are using outdated USDA organic regulations (2010).
5. Inspectors and reviewers not readily able to look up regulations.
6. ETKO personnel have an incomplete understanding of the noncompliance and adverse action notification procedures.
7. Several crop operation OCPs reviewed by the NOP auditor indicated “Not Applicable” for Crop Rotation practice standard (205.205).

8. ETKO personnel did not understand and document buffer zone requirements (205.202(c)).

2015 Corrective Action: ETKO submitted PowerPoint presentations, updated forms, training agenda, and training log of the training that was conducted for inspectors, staff, and advisory committee members. The documentation submitted also included copies of completed OCPs with documented buffer zones, and crop rotation practices.

ETKO has designated a responsible person to follow up on NOP updates to the Program Handbook and regulations. This person will translate all updates and provide them to staff members and inspectors by email and/or hardcopy. When necessary, related staff members will be trained for specific updates. The training will be recorded in the training register (new document) and the register will be provided to USDA with ETKO's annual reporting. A copy of the training register form was submitted to NOP.

Non-compliances Identified during the Current Assessment

NP4132LCA.NC1 –7 CFR §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670.” Furthermore, NOP 4009, Instruction – Who Needs to be Certified?, states “The OFPA requires that agricultural products sold or labeled as organically produced must be produced only on certified farms and handled only through certified handling operations (see 7 USC § 6506(a)(1)). The USDA organic regulations reiterate these requirements (see 7 CFR 205.100).”

Comments: *ETKO certifies projects that contain uncertified operations (i.e. contractors) that produce or handle organic products that are not certified entities.*

Corrective Action: ETKO stated it will certify each subcontracted processing facility during the 2015 production period. ETKO sent a letter to all clients in August 2015 informing them of this requirement. ETKO issued a new instruction for staff, NOP Certification of Subcontracted Operators (TI 48), which describes the basic rules of subcontracted facilities under NOP certification requiring separate certification. ETKO updated the NOP procedure section 7.2.2.3 Processing and Handling Facilities, which requires subcontractors to be certified separately and refers to the instruction (TI 48) for details. ETKO staff was trained during the annual training in July 2015.

NP4132LCA.NC2 –7 CFR §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.”

Comments: *Certificates do not adequately indicate the certification scopes of Crop, Wild Crop, and Handling/Processing.*

Corrective Action: ETKO submitted copies of corrected certificates identifying the scopes of certification. To prevent this from recurring, ETKO has updated the certificate template and the corrected form will now be used. ETKO submitted a copy of the revised template document with the correct NOP scopes of certification.

NP4132LCA.NC3 –7 CFR §205.662(c) states, “When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent... shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance....The notification of proposed suspension or revocation of certification shall state: (1) The reasons for the proposed suspension or revocation; (2) The proposed effective date of such suspension or revocation; (3) The impact of a suspension or revocation on future eligibility for certification; and (4) The right to request mediation pursuant to §205.663 or to file an appeal pursuant to §205.681.”

Comments: *ETKO suspended an operation without issuing a Notice of Proposed Suspension. The same operation after receiving the Notice of Suspension effective for 30 days was issued a Notice of Proposed Revocation and subsequently a Notice of Revocation. The sequence of issued notices and contents of the notifications demonstrate that ETKO does not fully comprehend the process of issuing notifications for noncompliances and adverse actions.*

Corrective Action: ETKO has updated their procedures and trained staff and inspectors on the following: NOP 4002 Instruction Enforcement of the USDA Organic Regulations: Penalty Matrix, NOP Penalty Matrix 2612 and NOP 4011 Adverse Action Appeal Process for the NOP. These documents were translated into Turkish in order to provide better understanding of the procedures by NOP involved ETKO staff members. The translated documents, training documents and agenda were submitted to NOP. Further, ETKO will check the NOP Handbook regularly and pertinent documents will be translated immediately. Translated documents will be studied with related staff and inspectors. ETKO submitted NOP Handbook documents to NOP as they were being translated.

NP4132LCA.NC4 –7 CFR §205.403(c) states, “The on-site inspection of an operation must verify: (1) The operation’s compliance or capability to comply with the Act and the regulations of this part; (2) That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; (3) That prohibited substances have not been and are not being applied to the operation through means which, at the discretion of the certifying agent, may include the collection and testing of soil; water; waste; seeds; plant tissue; and plant, animal, and processed products samples.”

Comments: *The following issues were identified by the NOP auditor during a review of the operation files and witness audits:*

- 1. Inspectors did not completely verify the information stated in the Organic Compliance Plans. If observations and interviews at the onsite inspection did not align with the Organic Compliance Plan, the inspector failed to state this finding as an issue of concern.*
- 2. ETKO inspectors are responsible for collecting large amounts of information about the operations when the Organic Compliance Plan (OCP) is incomplete or in error. The inspector did not note the finding as an issue of concern, failing to indicate that the OCP is incomplete. The inspector did not record these findings in the inspection report. Minor updates or adjustments to the OCP during the onsite inspection is acceptable and can be noted in the inspector’s report.*

3. *The inspection reports did not include a description and the outcome of the reconciliation activities (e.g. mass balance and audit trail audit) conducted by inspectors.*

Corrective Action: ETKO submitted documentation from the training it conducted with inspectors on the following topics: “1) Using and evaluation of OCP during onsite inspection; 2) Review of organic compliance plans and identifying noncompliances before inspections, in order to avoid losing time to collect large amount of information and documents; and 3) How to make input-output balance and report it.” ETKO also submitted examples of completed inspection reports from inspectors showing input-output balance and updates to the inspection forms.

NP4132LCA.NC5 –7 CFR § 205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *During a crop witness audit observation, the NOP auditor noted that the inspector was not equipped and possibly not adequately trained to conduct sampling for pesticide residues. Product samples were collected during the crop inspection; however, the inspector collected the samples with bare hands potential exposing the samples to contamination and jeopardizing sample integrity.*

Corrective Action: ETKO submitted training slides and updated forms used to conduct training for NOP inspectors, staff, and advisory committee members on the following topics: OP 03 Testing, TI 05 Sampling Method, TI 40 NOP Guide Testing & Enforcement Action. Training took place July 6-9, 2015.

NP4132LCA.NC6 –7 CFR § 205.501(a)(21) states “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms or conditions determined by the Administrator to be necessary.” NOP Policy Memo (PM) 11-10 (dated 01/21/11) states, “Grower group certification...accredited certifying agents should use the National Organic Standards Board (NOSB) recommendations of October 2002 and November 2008 as the current policies.”

Comments: *Grower Groups certified by ETKO do not have documented and functioning Internal Control Systems.*

Corrective Action: ETKO created a form to be used for inspection of Internal Control Systems for grower groups and revised the OCP to include the grower group Internal Control System requirement. ETKO updated its NOP Certification Procedure Manual with the requirements to document and verify Internal Control Systems. These forms and procedures will be implemented this year for all grower groups. The forms and revised NOP Certification Procedure Manual were submitted to NOP. ETKO conducted training on this topic July 7, 2015. The training materials and an agenda were submitted to NOP.



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

| | |
|-----------------------------|--|
| Applicant Name: | ETKO – Ecological Farming Controlling Organization |
| Est. Number: | N/A |
| Physical Address: | 160 Sk. No. 13/7 35040, Bornova-Izmir, Turkey |
| Mailing Address: | 160 Sk. No. 13/7 35040, Bornova-Izmir, Turkey |
| Contact & Title: | Dr. Mustafa Akyuz |
| E-mail Address: | ma@etko.org |
| Phone Number: | +90-232-3397606 |
| Auditor(s): | Darrell Wilson |
| Program: | USDA National Organic Program (NOP) |
| Audit Date(s): | January 9 and 22, 2009 |
| Audit Identifier: | NP7199OOA |
| Action Required: | No |
| Audit Type: | Corrective Action Audit |
| Audit Objective: | To verify that corrective actions adequately address the non-compliances identified during the Desk – Accreditation Renewal Audit. |
| Audit Criteria: | 7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; updated December 12, 2007. |
| Audit Scope: | Submitted corrective actions |
| Location(s) Audited: | Desk |

ETKO – Ecological Farming Controlling Organization submitted corrective actions dated December 12, 2008 for the non-compliances identified during the Desk – Accreditation Renewal Audit.

FINDINGS

ETKO has submitted corrective actions which adequately addressed the six non-compliances identified during the 2007 Desk - Accreditation Renewal Audit (NP7199OOA).

NP7199OOA.NC1 – Adequately Addressed – NOP §205.311 (a) states, “The USDA seal described in paragraphs (b) and (c) of this section may be used only for raw or processed agricultural products described in paragraphs (a), (b), (e)(1), and (e)(2) of §205.301.” *ETKO document number GP 11, Labeling, Section 5.6 states that “Clients shall use the USDA Seal...” The use of the word “shall” implies that it is required to use the USDA seal. Corrective Action:* ETKO has revised the document to say “may” rather than shall.



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

NP719900A.NC2 – Adequately Addressed – NOP §205.402 (a)(2) states, “Upon acceptance of an application for certification, a certifying agent must: Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part.” *A review of the Mezo Elolijik ur ve Tar file revealed that according to the organic system plan, manure was applied to Thyme fields in August. The system plan also indicated that Thyme was produced both organically and as a wild crop. There was no indication in the system plan as to which fields the manure was applied to. This was not identified at any phase of the certification process.* **Corrective Action:** Additional information was obtained from the producer indicating which areas that manure was applied. The additional documentation verifies that manure was not applied to Thyme crops.

NP719900A.NC3 – Adequately Addressed – NOP §205.501 (a)(1) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part.” *Qualifications for the Certification Committee were not submitted for review.* **Corrective Action:** Qualifications for the Certification Committee were submitted. The submitted material verified that personnel serving on the Certification Committee have adequate qualifications.

NP719900A.NC4 – Adequately Addressed – NOP §205.501 (a)(6) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.” *Performance evaluations were not submitted for the Certification Committee.* **Corrective Action:** Performance evaluations from 2006 and 2007 were submitted for the Certification Committee and found to be adequate.

NP719900A.NC5 – Adequately Addressed – NOP §205.501 (a)(11)(v) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest disclosure report.” *Conflict of interest disclosure reports were not submitted for the Certification Committee.* **Corrective Action:** Signed Conflict of Interest Disclosure Reports for 2006 and 2007 were submitted for the Certification Committee.

NP719900A.NC6 – Adequately Addressed – NOP §205.662 (b) states, “When a certified operation demonstrates that each noncompliance has been resolved, the certifying agent or the State organic program's governing State official, as applicable, shall send the certified operation a written notification of noncompliance resolution.” *Non-compliance resolutions were not addressed in the policies or procedures submitted.* **Corrective Action:** ETKO has submitted a template of the non-compliance resolution.

Review acc. EN 45011 chapter 12.1 / NOP §205.404

Review report based on inspection and evaluation report

| | |
|--|---|
| Dated 22.05.2009 | Inspector: (b) (6), (b) (7)(C), (b) (7)(D) |
| Operator: Name and Code 2314 FINE FOOD | OCP-PROCESS and OCP-AGRICULTURE |

Report compiled by inspector/producer including evaluation and all additional files sent have been reviewed for following regulations;

- TC **NOP** **EC** COR BIOSUISSE GOTS
 I TU-GG ETKO COSMETIC OE OTHER (please specify.....)

A - Following issues must be explained / completed before the certification decision taken.
Please answer below each question indicated as red and update the attached OCP-Process and OCP-Agriculture reports. You must provide answers and updated OCP reports for certification decision.

A - OCP-Processing

| | | | | |
|------|--|---|-----|--------------------------|
| A1.6 | | Processor(s) have Organic Production Regulation which are applicable? PLEASE LIST WHICH REGULATIONS YOU HAVE AND VERSION NUMBER | Yes | NOP 10 MARCH 2008 |
|------|--|---|-----|--------------------------|

1-NOP New version from 10 March 2008, OK SOLVED

| | | | | |
|------|---------------|---|-----|--|
| A5.2 | 205.272(a)(2) | Is there a sanitation program to prevent contamination on food contact surfaces from cleansers and sanitizers? PLEASE EXPLAIN SANITATION METHOD | Yes | Before processing, lines are cleaned. Cases are washed. |
|------|---------------|---|-----|--|

2-As sanitation is there any other material used such as alcohols, disinfectants, detergents etc.. or only clean water is used??

OK SOLVED

| | | | | |
|--|--|---|----|--|
| | | Every producer, processor or operator in the organic project who sells their organic product to the final consumer will be responsible to hold an account on daily basis on the quantity that is sold. Daily account records? | NA | |
|--|--|---|----|--|

3-This question is related to producers marketing their goods directly to the consumers, such as retailers, markets etc.. Do you sell your products directly to the final consumer?? If not the answer should be NA.

OK SOLVED

| | | | | |
|------|---------|--|----|--|
| A8.4 | 205.302 | All ingredients were evaluated as how many % of organic content they have. So the percentages were calculated correct. Example: 99.5% organic sultanas + 95% organic flour+100% organic sugar+1% not certified but allowed vanilla flavour= how many percent it makes the composition? PLEASE LIST HERE OR A SEPARATE SHEET THE INGREDIENTS WITH PERCENTAGES | NA | |
|------|---------|--|----|--|

4-Is citric acid allowed by the NOP National List? For which reason it is used? Pls explain shortly.

OK SOLVED

| | | | | |
|-------|--|---|-----|--|
| A10.2 | | At least for the final product chemical analyses were done to evaluate pesticide and heavy metal residues? PLEASE ATTACH ANALYSES RESULTS FOR PESTICIDE and/or WHEN APPLICABLE HEAVY METALS | Yes | |
|-------|--|---|-----|--|

OK SOLVED

| | | | | |
|-------|--|---|-----|---|
| A10.7 | | Analyses results were evaluated and the results comply the importer country regulations? PLEASE ATTACH ANALYSES RESULTS | Yes | GALAB LABORATORIES GmbH IN GERMANY |
|-------|--|---|-----|---|

OK SOLVED

5-If you made analyses indicate in which lab and the results shortly such as "No detection of residues" or residue detected of asppm and this complies the 5% of EPA Tolerance for this substance. EPA Tolerance for this substance is..... ppm.


**OK SOLVED FOR STRAWBERRY, AS YOU PROVIDED STRAWBERRY ANALYSES
FOR OTHER CROPS YOU MUST DELIVER ANALYSES RESULTS FOR EACH TRANSACTION WHEN YOU APPLY !!**

| | | | | |
|-------|--|--|-----|--|
| A15.1 | | There is water analyses results if water is used for any steps of the processing and has contact to the product? PLEASE ATTACH WATER ANALYSES RESULT | Yes | |
|-------|--|--|-----|--|

6-Indicate when and where you made the water analyses and the results in this section.

OK SOLVED

| | | | | |
|-------|--|--|-----|---|
| A15.3 | | Chlor content of the water can not exceed according to consumers country; eg NOP 4 ppm, Germany 0.3 ppm, does it comply? | Yes | Before the processing of organic products don't |
|-------|--|--|-----|---|

| | | |
|---|------------------------------------|-----------------------------------|
|  | Review of evaluation report | Report nr: 2314.2009.hk |
|---|------------------------------------|-----------------------------------|

| | | | |
|--|--|--------------------------------------|--|
| | | PLEASE ATTACH ANALYSES REPORT | content chlorinated water. Attached you will receive the result of analysis. This value is currently for each product. Results of the analyses is "NO CHLOR CONTENT" |
|--|--|--------------------------------------|--|

7-Indicate chlor content as it is not found any in analyses.

OK SOLVED

| | | | | |
|--|---------------|---|-----------|--|
| | PART B | PROCESSING UNITS You need to fill in this section for each processing unit (Maybe subcontracted unit). You can duplicate this section to use as many as you needed. | NA | |
|--|---------------|---|-----------|--|

8-You indicated NA for this section but you must fill all the questions related to Fine Food processing unit.

B - OCP-AGRICULTURE

| | | | | |
|-----|--|---|-----|------------------------------|
| 1.5 | | Producer(s) have Organic Production Regulation which is applicable? PLEASE LIST WHICH REGULATIONS YOU HAVE AND VERSION NUMBER | Yes | NEW VERSION 10 MARCH 2008 |
|-----|--|---|-----|------------------------------|

1-This is the old version of NOP ((01.05.2004), NOP (7 CFR 205)), There is recent one from 10 March, 2008

OK, SOLVED

2-There is no agricultural production, any crop? Or you produced other vegetables later in the season?

OK we see the product list from the inspection report prepared by the inspector HK.

OK SOLVED

| | | | |
|-----|---|-----|---|
| 7.8 | In your crop rotation plan, are the legumes used? PLEASE INDICATE WHICH LEGUMINOUS CROPS ARE PRODUCED IN ROTATION AND % | Yes | ORG. PEPPERS(2008/2009),ORG ONIONS(2008),BROCCOLI(2009) |
|-----|---|-----|---|

3-This year 2009 what is the crop rotation, must be indicated, if present of course?

OK SOLVED

| | | | |
|-------|------------|---|--------------------------|
| 110.2 | 205.206(d) | Do you use a biological or botanical substance, or a substance consistent with the National List only when: | (b) (4) The reason of |
|-------|------------|---|--------------------------|

| | | | |
|--|--|--|---|
| | | <input type="checkbox"/> Preventive measures and <input checked="" type="checkbox"/> Non-toxic measures are insufficient to prevent or control crop pests, weeds, and diseases? PLEASE EXPLAIN WHICH MATERIALS YOU USE AND THE REASON | (b) (4) are prevent for crps pest,weeds and diseases. |
|--|--|--|---|

| annex | Name input | Origin of ingredients | Composition of ingredients | Where it will be used | Document commercially availability is present | Input is permitted by the regulation? Which ones? | |
|-------|------------|-----------------------|----------------------------|----------------------------------|---|---|--|
| | (b) (4) | (b) (4) | %98 (b) (4) | Fungal diseases | Yes | | The aim of use to protect against maggot shell of products and provide leave the position awakening. |
| | (b) (4) | (b) (4) | %98 (b) (4) | Pest control and fungal diseases | Yes | | To protect colour. |

4-Explain (b) (4), how are they used, dosage, frequency and for which pest and diseases?

Explain how many times you sprayed (b) (4) ?

| | | | |
|------|--|-----|---|
| 12.1 | Do you take adequate measures to prevent, during all stages of production and storage to avoid contamination: PLEASE EXPLAIN HOW YOU AVOID CONTAMINATION FROM ANY SOURCE | Yes | The Organic Products are separated cautionary and separator tapes in Raw Material Storage. During the processing, to relevant production line, we produce just organic products. After processing, Organic products are put in 10 kg boxes /10 kg blue bag and hanging Pallet cards. These pallets cards involved "organic product" expression. The storage of organic products is obtained different stack line. |
| 12.3 | Contact of organic crops by prohibited substances or sanitation materials is not possible PLEASE EXPLAIN HOW YOU AVOID CONTACT FROM PROHIBITED SUBSTANCES | Yes | There is enough distance between organic and conventional products. Transporting cases are washed before loading. Transport vehicles are cleaned. OK SOLVED |

5-Enough distance means how many meters? Be specific and indicate the distance, or if there is any other buffer zone situation.
OK SOLVED

B - Following issues must be completed until next inspection.

C – Attention must be paid for the following points from now on:

For each delivery of organic NOP/EU certified lots analyses results must be provided to ETKO to issue sales certificates.

Izmir, Date: 22/12/2009

(b) (6), (b) (7)(C), (b) (7)(D), (Head Inspector, Inspection Manager)

| | | | | |
|------|------------|--|-----|--|
| A4.3 | 205.271(c) | Used only when preventive and control measures are not effective? PLEASE EXPLAIN THE REASON OF USE | YES | Although we have lightened (b) (4) We sometimes apply to System Medicine. |
|------|------------|--|-----|--|

Buradaki System Medicine sanıyorum sizing böcek – kemirgen kontrolü yapan kuruluşun ismi oluyor, yoksa siz kendiniz bir ilaçlama yapıyorsunuzuz?

**İLAÇLAMA FİRMASI SİSTEM İLAÇLAMA
OK SOLVED**

| | | | | |
|------|---------------|--|-----|---|
| A4.5 | 205.271(d)(e) | Are measures taken to prevent contact of the organic products with the substance used? PLEASE EXPLAIN HOW TO PREVENT CONTACT TO ORGANIC PRODUCTS | YES | While we were sometimes applying to insecticide to production area, We never leave raw material. After the applying to insecticide all production line and all equipments have to be swilled. |
|------|---------------|--|-----|---|

Burada işletmede ilaçlamanın yapıldığını yazmışsınız, sorun değil ancak organik ürünlerin işletmeye girişi ile ilaçlama arasında ne kadar süre oluyor, bulaşmayı önlemek için suyla yıkamak yeterli oluyormu? Oranik ürünlere ilaç temas ediyormu?

İŞLETMEYE İLAÇLAMA;İŞLETMEDEKİ OFİSLERİN CAMLARINA YAPILYOR.VE ORGANİK OLSUN,OLMASIN İÇERİDE HAMMADDE VARKEN ASLA İLAÇLAMA YAPILMIYOR.HAMMADDE ÖN SOĞUTMA DEPOSUNDA AYRI TUTULMAKTADIR.

OK SOLVED

| | | | | |
|------|---------------|---|-----|---|
| A5.4 | 205.272(b)(1) | Are all packaging materials and containers free of prohibited synthetic fungicides, preservatives, fumigants and other contaminants? PLEASE INDICATE HOW DO YOU SECURE THAT | Yes | Attached you may find the Food Certificate of Conformity. |
|------|---------------|---|-----|---|

Burada bahsettiğiniz Food Certificate of Conformity ne anlama geliyor? Paketleme malzemeleri için bir sertifikanızı var? Sizden istenen şey paketleme malzemelerinin ilaçsız olduğundan nasıl emin olduğunuz.

PAKETLEME MALZEMELERİ İÇİN ÖZELLİKLE ÜRÜNLE BİRİNCİ DERECEDE TEMAS EDEN PE TORBALARLA İLGİLİ GIDA İLE TEMASTA BULUNAN MATERYALLERE AİT ÜRETİM İZİN BELGESİ VAR.EKTEDİR

OK SOLVED

| | | | | |
|------|--|---|-----|---------|
| B1.5 | | Sanitation material used for cleaning transport, stores and processing lines complies the organic regulation? PLEASE EXPLAIN YOUR SANITARY METHOD | YES | (b) (4) |
|------|--|---|-----|---------|

Chlor NOP 205 & 600 de bahsedilen listede yer alıyor ancak limit verilmiş o nedenle organik ürünlerin işlendiği ve ürünün temas ettiği hatların dozu aşmayacak şekilde kullanılmasını istiyor. Doz miktarını nasıl ayarlıyorsunuz. Bu ürün chlor sanıyorum yoksa başka bir materyalde içeriyormu? Sadece klor ise sorun görünmüyor ancak burada kullanım sıklığını belirtirmeniz gerekiyor?

**ÖNCELİKLE İŞLETMEDE KULLANILAN KLOR İÇİN %2 LİK KLOR ÇÖZELTİSİ İÇEREN BİDONLAR HAZIRLIYORUZ.DOZAJ BU ŞEKİLDE AYARLANIYOR.ÜRÜN SADECE KLOR İÇERİYOR.KULLANIM SIKLIĞI İSE VARDIYA ARALARINDA TEMİZLİK YAPILIRKEN.
OK SOLVED**

| | | | | | | |
|------|--|---|-----|--|--|--|
| B1.8 | | Maximum capacity of the processing and storage is present and documented? | YES | | | WE PRODUCED AND STORED UNTIL ACTUAL CAPACITY OF STORAGE AND PROCESSING. STORAGE STOCKS ARE FALLOW WITH COMPUTER SYSTEMS. |
|------|--|---|-----|--|--|--|

Deponun kapasitesi ton olarak belirtilmemiş? Kaç tondur?

**FINE FOOD DEPOLARI 10.000 TON KAPASİTEDEDİR.
OK SOLVED**

| | | | | | | |
|------|---------|--|-----|--|--|---------|
| B4.1 | 205.271 | Processing line is regularly cleaned with materials allowed by the organic regulations. Specifications of the cleaning and disinfection materials are present for inspection? PLEASE LIST DISINFECTION MATERIALS | YES | | | (b) (4) |
|------|---------|--|-----|--|--|---------|

Hangi sıklıkta temizlik yapıyor? (b) (4) sadece chlor mu içeriyor? Bu ürünün spesifikasyonunu bize iletmeniz gerekir.

**FINE FOOD'DA TEMİZLİK; TEMİZLİK PLANI DOĞRULTUSUNDA HER VARDIYA ARASINDA YAPILMAKTADIR. NORMAL KONVANSİYONEL ÜRÜN ÜRETİLİRKEN (b) (4), ORGANİK ÜRETİMİNDEN ÖNCE İSE SADECE KLOR İLE HATLAR TEMİZLENMEKTEDİR.
OK SOLVED**

OCP-AGRICULTURE

| | | | | | |
|------|-------------|--|-----|--|----------------------|
| 16.2 | 205.204a(1) | Organic propagation material must be used for organic production. In case of unavailability of organic sources, you have to prepare an evidence to prove that is true. Seedlings must be produced organically. PLEASE INDICATE IF YOU USE CONVENTIONAL PROPAGATION MATERIAL and ATTACH DOCUMENT AS A PROVE OF UNAVAILABILITY WHEN ORGANIC IS NOT AVAILABLE | Yes | | |
| 16.3 | 205.204a(1) | Did you look for organic propagation material sources before deciding to buy conventional? PLEASE INDICATE WHICH SOURCES YOU LOOKED FOR | Yes | | Research institutes. |

NOP sertifikasını sebzeler içinde talep ediyormusunuz? Sadece meyve içinse bu durum sorun teşkil etmeyebilir, ancak sebzelerde NOP olacaksa o zaman tohum konusunu cevaplamanız gerekir. Organik sebze tohumunu Türkiyede temin edemediyse bu belgelendirmeniz gerekecek, Biber, Brokkoli ve Soğan tohumlarını nereden temin ediyorsunuz?

**SADECE MEYVA İÇİN OLUCAK.
OK SOLVED**

| |
|-----------------------------|
| Pepper CW (2008 Harvest) |
| Pepper Capia (2008 Harvest) |
| Strawberry (2009 Harvest) |
| Strawberry (2008 Harvest) |
| Apricot (2008 Harvest) |
| Cherry (2009 Harvest) |
| Onion (2008 Harvest) |
| Sour Cherry (2009 Harvest) |
| Pepper CW (2009 Harvest) |
| Pepper Capia (2009 Harvest) |

Broccoli (2009 Harvest)

| | | | | | | | | |
|------|---|---|-----------------------------|-----------------------|-------------|-------------------|--|--|
| 23.3 | 205.201 (a)(2) Fill in propagation material approval form | *Propagation materials, (origin, treated / untreated, organic / conventional, GMO free) are suitable for organic farming. (Materials to be used must be approved by ETKO before use) PLEASE EXPLAIN IF YOU USE CONVENTIONAL PROPAGATION MATERIAL, SOURCE and REASON | | | | | | |
| | | Crops | Origin: local, bought | Treated, Untreated | GMO Free | Organic, Conv. | | |
| | | - | - | - | - | - | | |

Gübrelemede bütün arazileremi hayvan gübresi kullanılıyor? Yoksa belirli parselleremi? Belirli parsellere ise hangi parsellere? Parsel numaralarını belirtiniz.

BÜTÜN ARAZİLERE KULLANILYORMUŞ
OK SOLVED

| | | | | | | | |
|--|--|--|---------|--|--|--|--|
| | | Soil fertility and crop nutrient management PLEASE EXPLAIN SOIL FERTILITY MANAGEMENT | (b) (4) | | | | |
|--|--|--|---------|--|--|--|--|

| | | | | | | | |
|------|-------------------|---|--|--|--|--|--|
| 23.5 | 205.201 (a)(2) | *Fertilization methods as green manuring, rotation, animal excrements or organic fertilizers used are appropriate for organic farming. *Manure comes from organic or extensive animal keeping. PLEASE EXPLAIN THE SOURCE OF MANURE OR COMPOST USED | | | | | |
|------|-------------------|---|--|--|--|--|--|

Klor kullanımını burada da açıklamak gerekecek, ne sıklıkta?

FINE FOOD'DA TEMİZLİK; TEMİZLİK PLANI DOĞRULTUSUNDA HER VARDİYA ARASINDA YAPILMAKTADIR.NORMAL KONVANSİYONEL ÜRÜN ÜRETİLİRKEN NILCO,ORGANİK ÜRETİMİNDEN ÖNCE İSE SADECE KLOR İLE TEMİZLENMEKTEDİR
OK SOLVED

| | | | | | | | |
|-------|--|--|-----|--|--|--|--|
| 23.11 | | Cleaning measures are in compliance with the organic regulation PLEASE EXPLAIN CLEANING AND SANITATION METHODS | Yes | | | | |
| 23.12 | | Cleaning agents used for stores, processing, transport tools are in compliance with the organic regulation. PLEASE LIST THE CLEANING AGENTS USED | yes | | | | |

EC Organik ve NOP organic ürünlerini nasıl ayırıyorsunuz? İşleme öncesi ve sonrasında depolamada vs, etiketleremi ayırıyorsunuz yoksa ayrı depolarımı kullanılıyor?

BU SORUNUZA SAĞLIK BİR CEVAP VEREBİLMEK İÇİN SİZDEN BİLGİ ALMAM GEREK.ÜRETİMLE İLGİLİ SORULARINIZDA STOK BİLGİLERİMİZİ İLETİRKEN ŞU ANDA STOKTAKİ TÜM ÜRÜNLERİN MİKTARINI KOMPLE BELİRTTİM.ÖRNEĞİN BENİM ELİMDE 150 TON VIŞNE VAR VE BENİM SATIŞ YAPACAĞIM ÜLKE GRUBU BELLİ DEĞİL.KANADA'YA DA YAPABİLİRİM AVRUPAYADA FAKAT BEN KOMPLE TÜM ÜRÜNÜMÜ NOP SERTİFİKALI VE EC OLARAK YAPTIRMAK İSTİYORUM.BU ÜRÜNÜN İKİ SERİTİFİKAYADA SAHİPSEK DEPOLAMAYI NEYE GÖRE YAPMAMIZ GEREK?

| | | | | | | | |
|-------|--|---|-----|--|--|--|--|
| 23.16 | | Different regulation products are separated by physical | Yes | | | | |
|-------|--|---|-----|--|--|--|--|

| | | | | | | |
|--|--|---|--|--|--|--|
| | | matters, such as different rooms, indicators, timing of the harvest, transport, store etc PLEASE EXPLAIN SEPARATION OF DIFFERENT REGULATIONS PRODUCTS | | | | |
|--|--|---|--|--|--|--|

NOP ve EC olarak hazırladığınız etiket örneklerini bana iletebilirmisiniz?

ETİKETLERİ KALİTEDEN İSTEDİM TARAFINIZA FAXLIYCAM.

| | | | | | | |
|--|--|--|------------|--|--|--|
| | | Do you have available for review by the inspector, an audit trail that tracks products by identity and volume from field of origin to final product distribution? PLEASE EXPLAIN TRACEABILITY OF YOUR PRODUCTS | Yes | | | Labels are used on plastic cases. Labels include production place, harvest year, regulation number. |
|--|--|--|------------|--|--|--|

B - Following issues must be completed until next inspection.

C – Attention must be paid for the following points from now on:

1-For each delivery of organic NOP/EU certified lots analyses results must be provided to ETKO to issue sales certificates.

2-Send labels before using to ETKO for approval

3-Explain how you separate NOP and EU organic products in store and after processing

Izmir, Date: **19/01/2010**

(b) (6), (b) (7)(C), (b) (7)(D), (Head Inspector, Inspection Manager)



United States
Department of
Agriculture

Agricultural
Marketing
Service

STOP 0264 - Room 1098-S
1400 Independence Avenue, SW.
Washington, D.C. 20250-0264

MAR 16 2009

Mustafa Akyüz, Managing Director
ETKO-Ecological Farming Controlling Organization
160 SK. No. 13/7
35040, Bornova-Izmir
Turkey

Dear Dr. Akyüz:

The Department of Agriculture (USDA) has reviewed your application for renewal of accreditation as a certifying agent to perform certification activities under the National Organic Program (NOP). Attached you will find a copy of the auditor's report. This report includes the corrective actions you proposed in response to the most recent desk accreditation renewal audit findings. Based on our findings to date, we are deferring a decision on your accreditation renewal pending the outcome of an on-site audit.

In the interim, your current accreditation remains effective. Please review and then sign, date, and return by facsimile the enclosed Terms of Accreditation document signifying acceptance of the terms of continued accreditation. Upon our receipt of your signed acknowledgement, the Audit, Review, and Compliance (ARC) Branch will contact your office to schedule the audit and arrange for payment.

It is our intention to conduct this audit within the next 12 months. Renewal of accreditation is contingent on: 1) full implementation of approved proposed corrective actions, and 2) submission of adequate proposed corrective actions to any noncompliances found during the on-site audit. Upon successful completion of the accreditation renewal process, USDA will issue a formal certificate of accreditation for the period January 22, 2008, through January 22, 2013.

As an alternative, you may choose to withdraw your application for renewal of accreditation. Should you choose to withdraw your application for renewal, your current accreditation will be considered expired. As a result, you will be directed to cease all certification activities and transfer to the Secretary all records concerning your certification activities.

If you have any questions about the NOP or the standards to which you are certifying, please do not hesitate to contact Mark Bradley, Chief, Accreditation, Auditing, & Training Branch, by email at mark.bradley@usda.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barbara C. Robinson".

Barbara C. Robinson
Acting Director
National Organic Program

Enclosures

| | | | |
|--|---|---------|------------|
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1. PURPOSE

This instruction describes the basics of NOP accreditation.

2. RESPONSIBILITIES

MD, OM are responsible for the proper implementation of this procedure.

3. APPLICATION

3.1 Annual report

ETKO prepares the **annual program review report** and submits to AMS latest on **or before the anniversary date of the issuance of the notification of accreditation** each year, conveying the information about the previous year activities. Reporting is done in accordance with the format supplied by USDA “**Annual Update of NOP Accredited Certifying Agents Checklist**” The report is submitted in electronic media and as hardcopy to the following address:

USDA/AMS/TMP/NOP, 1400 Independence Ave, SW, Room 4008-South Building,
Washington, DC 20250

The cost of document review by AMS is paid by ETKO and submitted together with the report.

The report includes:

- A complete and accurate update of application information and evidence of expertise and ability.
- Information supporting any changes being requested in the areas of accreditation.
- A description of the measures implemented in the previous year and any measures to be implemented in the coming year to satisfy any terms and conditions determined by the AMS Administrator to be necessary, as specified in the most recent notification of accreditation or notice of renewal of accreditation.
- The results of the most recent performance evaluations and annual program review and a description of adjustments to the ETKO’s operation and procedures implemented or to be implemented in response to the performance evaluations and program review.
- Appeals and a copy of the adverse decision and a statement of the appellant’s reasons for believing that the decision was not proper or made in accordance with applicable program regulations, policies, or procedures.

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| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |

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- Any notice of denial of certification issued as discussed in §205.405, notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation sent pursuant to the noncompliance procedures stated in §205.662 simultaneously with its issuance; and
- A list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year;
- List of Certified Operations including the name, type, products, and effective date during the preceding year.
- Certificates issued in the last 12 months
- Laboratory results for ETKO certification program
- Changes of ownership, management and structure of ETKO
- Certificates & Diplomas of new personnel employed
- Description of the training provided or to be provided to personnel to ensure that they comply with regulations
- Results of internal and external audits
- New or updated version of ETKO Procedures and Forms

3.2 Record keeping and Information to Clients

ETKO maintains records according to the following schedule:

- Records obtained from applicants for certification and certified operations shall be maintained for at least 5 years beyond their receipt.
- Records created by ETKO regarding applicants for certification and certified operations shall be maintained for at least 10 years beyond their creation.
- Records created or received by ETKO pursuant to the accreditation requirements excluding any records covered by §205.510(b)(2), shall be maintained for at least 5 years beyond their creation or receipt.

ETKO provides the following information to clients:

- Any person may petition the National Organic Standard Board for the purpose of having a substance evaluated by the Board for recommendation to the Secretary for inclusion on or deletion from the National List.
- A person petitioning for amendment of the National List should request a copy of the petition procedures from USDA at the address below.
- A petition to amend the National List shall be submitted to: Program Manager, USDA/AMS/TMP/NOP, 1400 Independence Ave, SW, Room 4008-South Building, Washington, DC 20250

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3.3 Information update

When there is a change in the following areas, ETKO will provide updated information to USDA

- (a) The business name, primary office location, mailing address, name of the person(s) responsible for the ETKO's day-to-day operations, contact numbers (telephone, facsimile, and Internet address)
- (b) The name, office location, mailing address, and contact numbers (telephone, facsimile, and Internet address) for each of its organizational units, such as chapters or subsidiary offices, and the name of a contact person for each unit.
- (c) Each area of operation (crops, wild crops, livestock, or handling) for which accreditation is requested and the estimated number of each type of operation anticipated to be certified annually by ETKO along with a copy of the applicant's schedule of fees for all services to be provided under these regulations by ETKO.
- (d) The type of entity of ETKO (e.g., government agricultural office, for-profit business, not-for-profit membership association).
- (e) As a private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and its date of establishment.
- (f) A list of each State or foreign country in which ETKO currently certifies production and handling operations and a list of each State or foreign country in which ETKO intends to certify production or handling operations.

3.4 Areas of high importance for accreditation and its maintenance

For the maintenance of accreditation, the following documents, records shall be submitted to USDA.

- A copy of the policies and procedures for training, evaluating, and supervising personnel;
- The name and position description of all personnel to be used in the certification operation, including administrative staff, certification inspectors, members of any certification review and evaluation committees, contractors, and all parties responsibly connected to ETKO;
- A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for each inspector to be used and each person designated to review or evaluate applications for certification; and

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- A description of any training that has been provided or is intended to be provided to personnel to ensure that they comply with and implement the requirements of the Act and the relevant part of regulations.
- Administrative policies and procedures:
 - A copy of the procedures used to evaluate certification applicants, make certification decisions, and issue certification certificates;
 - A copy of the procedures used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations in this part to the Administrator;
 - A copy of the procedures used for complying with the recordkeeping requirements set forth in § 205.501(a)(9);
 - A copy of the procedures used for maintaining the confidentiality of any business-related information as set forth in § 205.501(a)(10);
 - A copy of the procedures used, including any fees to be assessed, for making the following information available to any member of the public upon request:
 - Certification certificates issued during the current and 3 preceding calendar years;
 - A list of producers and handlers whose operations it has certified, including for each the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and 3 preceding calendar years;
 - The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and 3 preceding calendar years; and
 - Other business information as permitted in writing by the producer or handler; and
 - A copy of the procedures used for sampling and residue testing pursuant to § 205.670.
 - A copy of procedures implemented to prevent the occurrence of conflicts of interest, as described in § 205.501(a)(11).
 - A conflict of interest disclosure report for all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to ETKO. The report must identify any food- or agriculture-

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| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |

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related business interests, including business interests of immediate family members, that cause a conflict of interest

- Current certification activities.
 - A list of all production and handling operations currently certified by ETKO;
 - Copies of at least 3 different inspection reports and certification evaluation documents for production or handling operations certified by ETKO during the previous year for each area of operation for which accreditation is requested;

GUIDANCE: This should include 3 files for each area in which accreditation has been granted, as applicable: crop, livestock, wild crop and handling. Each file should include all of the documents used to make the most recent certification or update of certification decision.

- The results of any accreditation process of the applicant's operation by an accrediting body during the previous year for the purpose of evaluating its certification activities.

Other information. Any other information that may assist in the Administrator's evaluation of ETKO's expertise and ability.

- If a change in accreditation scope is requested, information supporting the change must be provided to USDA

GUIDANCE: This would include evidence that the individuals performing the document review, inspection and certification decision have the expertise necessary to verify compliance to the NOP. It also would include any forms or other documents used in the certification process.

- For the outstanding non compliances from the accreditation audit, the site evaluation or the annual update, a description of the measures implemented in the previous year and any measures to be implemented in the coming year to satisfy them shall be provided to USDA
- Most recent performance evaluations and annual program review and a description of adjustments to ETKO's operation and procedures implemented or to be implemented in response to the performance evaluations and program review are also included in the report. The proposed changes shall satisfy the NOP requirements.

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Note: In ETKO quality system, the a/m performance evaluation and program review means Mangement Review

3.5. Other

ETKO

1. Accepts the certification decisions made by another certifying agent accredited or accepted by USDA.
2. Refrains from making false or misleading claims about its accreditation status, the USDA accreditation program for certifying agents, or the nature or qualities of products labeled as organically produced;
3. Conducts an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services;
4. Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.
5. Holds the Secretary harmless for any failure on ETKO to carry out the provisions of the Act and the regulations.
6. Furnish reasonable security, in an amount and according to such terms as the Administrator may by regulation prescribe, for the purpose of protecting the rights of production and handling operations certified by such certifying agent under the Act and the regulations in this part; and
7. Transfer to the Administrator and make available to the applicable State organic program's governing State official all records or copies of records concerning the ETKO's certification activities in the event that ETKO dissolves or loses its accreditation; Provided, that such transfer shall not apply to a merger, sale, or other transfer of ownership of ETKO.

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| PREPARED | APPROVED |
| QUALITY MANAGEMENT RESPONSIBLE | MANAGING DIRECTOR |

MAR 16 2009

SHIPPED MAR 16 2009

Mustafa Akyüz, Managing Director
ETKO-Ecological Farming Controlling Organization
160 SK. No. 13/7
35040, Bornova-Izmir
Turkey

Dear Dr. Akyüz:

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Sincerely,

Barbara C. Robinson
Acting Director
National Organic Program

OK!
DEFERRED

Enclosures

cc: James Riva, Chief ARC Branch, L&S
Mark Bradley, Chief AAT Branch, NOP

FINAL:AMS:TM:NOP:JDMELVIN:sn:2-6-2009:720-3252:N:\Certifier Files\ETKO\2009
ETKO\Reaccreditation Reports and Letters\ETKO Deferred Decision requiring initial on-site JDM
020609 Draft final.doc

MAB 2/10/09

[Signature]
BCR 2/16/09