

From: [FATIH AKSOY](#)
To: akachkovskiy@ukr.net
Cc: [Crail, Lars - AMS](#); akachkovskiy@ukr.net; "[Artem Chernysh](#)"
Subject: 3141 EKOLIUM OCP-PROCESSING-final-07.10.2016
Date: Friday, October 07, 2016 10:43:02 AM
Attachments: [3141 EKOLIUM OCP-PROCESSING-final-07.10.2016.doc](#)

Dear Alexey,

Please find evaluated OCP report during the inspection at the attachment

Regards

Fatih

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	1/11
				Inspector Comments	

Organic compliance plan is the basic document for certification. In this plan project describes how the production activities are organized according to Organic Production Regulations. All details of activities must be given through the control points mentioned below. It is important that all questions related to production must be explained. The control points which are not related to your processing could be answered as NA (Not Applicable). ETKO application division will verify this form before the inspection and ETKO inspector will assess during the inspection. **You must submit this compliance plan before inspection takes place**, therefore you need to start updating it earlier than starting processing. It is highly recommended that non compliances you described during your annual self-assessment must be cleared by your side, before ETKO inspection takes place. Otherwise certification decision of your production may be delayed or not approved due to necessity of follow up inspection. 205.201, 205.400.

The control points could be described as: YES=Complies, NO=Does not comply, NA=Not applicable.

NCR Non-Conformity Level (MA/MI/PoA) section will be filled in by ETKO inspector.

License holder must keep this report and related all documents at least for 5 years as auditable format. All documents must be open for ETKO, State officials in working hours and copying some documents must be allowed. 205.400(d)

This form must be filled in only for processing facilities where the product structure is changed such as "Processing. Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container"

Related to transport and storage activities.

Storage and transportation is still integrated in to the handling operations and covered by the Organic System Plan. The difference between processing units and these operations (storage/transport) we will not make separate certification like we do for processing facilities. Storage and transport will be evaluated under the responsibility of the licensee which we make contract and certification.

Statement: As operator I declare that I will perform the operations in accordance with IACB, TC, NOP, BIOSUISSE, KRAV, NOP and COR in the event of infringement or irregularities, I accept to inform in writing the buyers of the product in order to ensure that the indications referring to the organic production method are removed from this production.

NAME LICENSEE	Ekolium LLC. ETKO 3141		
NAME PROCESSOR	same		
PROCESSING SITE ADDRESS	9, Boryspil'ska Str, Kiev, 02099		
COUNTRY	UKRAINE		
PHONE-FAX-EMAIL	Mob.: (b) (6), akachkovskiy@ukr.net		
ACTIVITIES	Trading organic products since 2013		
CONTACT PERSON	Alexey Kachkovskiy		
APPLICABLE REGULATIONS	<input type="checkbox"/> TC	<input checked="" type="checkbox"/> NOP / COR	<input type="checkbox"/> IACB - EC <input type="checkbox"/> Other

1. PRODUCTS TO BE CERTIFIED

Product specification to be verified during the inspection and joined to the final report if not submitted with the OCP.

In case needed make a separate list.

Barley	Seeds, grouts, brans, flakes	Pumpkin	Kernel
Buckwheat	Seeds, grouts, flakes	Rapeseeds	Seeds, oil and cake/expeller
Corn	Seeds, grouts, flour meal, flakes	Rye	Seeds, grouts, flakes, brans, pasta, flour meal
Flax	Seeds, oil and cake/expeller	Sorghum	Seeds
Lupine	Seed	Soybean	Seeds, oil and cake/expeller
Millet	Seeds, grouts, flour meal, flakes	Spelt (wheat)	Seeds, grouts, flakes, brans, pasta, flour meal
Mustard	Seeds, oil and cake/expeller	Sunflower	Seeds, oil and cake/expeller
Oat	Seeds, grouts, flakes, brans, flour meal	Walnut	Kernel
Peas	Seeds, grouts, flakes	Wheat	Seeds, grouts, flakes, brans, pasta, flour meal

		General Principles	COMMENT	COMMENT
A1	205.201	Organic Compliance Plan Overview– If the information requested is available in other company documents, please provide a clear reference to the exact section of your appropriate record.		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A1.1	205.201(a)(e)	Facility Map: A complete facility plan is present and includes major equipment, rooms and building? PLEASE ATTACH FACILITY MAP	We are only office for Trading without	Ekolium is only Trading company, they will buy and

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	2/11
				Inspector Comments	
			physical contact with products	export organic certified products from certified sources	
A1.2	205.201(a)1 IACB 5.3	Production process diagram is present for each product (You need to provide a flow chart showing how the product moves in your plant including major equipment)? PLEASE ATTACH PROCESS DIAGRAM FOR EACH PRODUCT	-	"	
A1.3	IACB 5.3	A brief description of each process must be given? PLEASE ATTACH THE DOCUMENTS (PROCEDURES) SHOWING FULL DESCRIPTION OF THE PROCESS OF: LABELLING, PACKAGING, STORING, TRANSPORTATION PROCESS AND OTHER PROCESS IN THE FACILITY.	-	"	
A1.4	205.201 (a)1	A brief description of production practices and procedures including the estimated frequency and volume of these production runs are present? PLEASE EXPLAIN BRIEFLY PRODUCTION PRACTICES, FREQUENCY AND VOLUME	-	"	
A1.5	205.201 (a)2	Accurate Product Specifications were prepared and present for all complex products seeking certification? PLEASE ATTACH PRODUCT SPECIFICATIONS	We trade only singleingredient products. Specification for contract always provided by Clients.	Ekolium using local Ukrainian regulation for product specification, specifications will be given by the buyer	
A1.6	205.201 (a)3 889-Article 63 IACB 5.3	A brief description of your quality monitoring practices is prepared? PLEASE EXPLAIN HERE HOW DO YOU MONITOR ORGANIC PRODUCTION PRACTICES TO VERIFY THE ORGANIC PLAN IS EFFECTIVELY IMPLEMENTED	I'm personally 14 years in organic production business and all monitoring is done by myself based on my experience	Ekolium owns by Alexey Kachkovsky who has since many years' experience in organic agriculture assigned for different organic development projects. He deals himself with quality matters.	
A1.7	205.201 (a)4 889-Article 66 IACB 10.1	Do you have available for review by the inspector, an audit trail of documents that tracks product by identity and volume from receiving through distribution? PLEASE LIST WHICH DOCUMENTS YOU KEEP FOR AUDIT TRAIL	We didn't start with our own trade yet	No marketing took place yet,	
A1.8	205.201 (a)5 889-Article 26 IACB 7.2	A brief description of your management practices used to protect the organic commodities from potential co-mingling and contamination is present? PLEASE EXPLAIN HERE HOW DO YOU AVOID CO-MINGLING AND CONTAMINATION	We are not planning bulk deliveries. Always products will be packed in (b) (4) (b) (4) (b) (4) (b) (4)	Products are all certified from the origin (b) (4) (b) (4) (4) therefore the products are packed and sealed already in the origin where Ekolium buys the products, such (b) (4) factory.	
A1.9	889/08 Article 31.1 IACB 7.5.2	The operator shall check the closing of the packaging or container where it is required and the presence of the indications. The operator shall crosscheck the information on the label with the information on the accompanying documents. The result of these	We normally nominate (b) (4) (surveyor) for such procedures.	Surveyor body is contracted for the shipments and containers, checking and reporting to Ekolium.	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	3/11
				Inspector Comments	
		verifications shall be explicitly mentioned in the documentary accounts. PLEASE EXPLAIN HERE HOW DO YOU CHECK THE PACKAGE AND THE ACCOMPANYING DOCUMENTS OF THE ORGANIC PRODUCT		Ekolium will label the containers accordingly and the documents to be indicated the status of the product.	
A2		Product Protection – Please maintain, and make available, Product Protection Procedures for each on-site inspection.		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A2.1	205.301(f)(7)	Do you use exclusively <u>either</u> an organic or conventional form of any ingredient in each formula (e.g. organic raisins or conventional raisins, not both, in organic cake)? PLEASE EXPLAIN YOUR PRODUCT COMPOSITION	We trade single ingredient products only.	There is no complex product with different ingredients. Only single ingredient products are traded.	
A2.2	205.272(a) 889-Article 26 IACB 7.2	Do you take adequate measures to prevent, during all stages of production and storage? Commingling of organic and non-organic product and ingredients; and PLEASE EXPLAIN HERE HOW DO YOU AVOID	We have no any contact with products at any stage of production and storage	This is taken by the producer company and certified itself.	
A2.3	205.272(a) 889-Article 26 IACB 7.2	Contact of organic products and ingredients by prohibited substances or sanitation materials? PLEASE EXPLAIN HOW DO YOU AVOID	Na	NA	
A2.4	205.272(a) 889-Article 31 IACB 7.5.2	Are procedures and documentation used to protect the organic integrity of products under your control during transport? PLEASE EXPLAIN HOW DO YOU PROTECT ORGANIC INTEGRITY DURING TRANSPORT	We buy new (b) (4) and (b) (4) to protect products during transportation.	For oil new (b) (4) are used to protect the products from contamination. For grains usually (b) (4) are used. Also there is an alternative (b) (4) which could be up to 24 tons within a container.	
A3	205.201(a) 205.271 889-Article 63 IACB 5.3	Facility Pest Management – Please maintain, and make available, copies of your Facility Pest Management Program for each on-site inspection.		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A3.1	205.271(a)(b)	Is a structural pest management program in place that stresses sanitation and other preventive measures including mechanical traps, lures and repellants consistent with the National List? PLEASE EXPLAIN HERE YOUR PEST MANAGEMENT METHOD	We have only office for trading.	NA	
A3.2	205.271(c)	Are substances used inside the facility for pest control: On the National List? and PLEASE LIST HERE SUBSTANCES USED INSIDE THE FACILITY	Na	NA	
A3.3	205.271(c)	Used only when preventive and control measures are not effective? PLEASE EXPLAIN THE REASON OF USE	Na	NA	
A3.4	205.271(d)(e)	If inside facility pest control materials are used that do not appear on the National List: are they used only when prevention control measures and materials on the National List are not effective and PLEASE LIST MATERIALS USED AND NOT ON THE NATIONAL LIST	Na	NA	
A3.5	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	Na	NA	
A3.6	205.271(f)	Are you aware that you are responsible for using materials in compliance with all local, state and federal regulations?	Na	NA	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
			Inspector Comments		
		PLEASE EXPLAIN WHEN THERE IS ANY METHOD AGAINST THE ORGANIC REGULATION			
A3.7	205.201(a), 205.271	Does your pest management program include facility maps, incident logs and pesticide use charts? PLEASE EXPLAIN	Na		NA
A4	889-A834- Art.10, 26, 35 IACB 7.2, 7.5.4	Sanitation – Please maintain, and make available, Sanitation Procedures for each on-site inspection.			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A4.1	205.201(a)(5), 205.272(a)	Does this facility have a formalized sanitation program to protect the organic integrity of organic raw materials and finished goods during storage? PLEASE EXPLAIN	No own facilities		NA
A4.2	205.272(a)(2)	Is there a sanitation program to prevent contamination on food contact surfaces from cleansers and sanitizers? PLEASE EXPLAIN SANITATION METHOD	Na		NA
A4.3	205.272(b)(2)	If packaging materials or containers are re-used, are proper cleaning procedures maintained prior to organic use? PLEASE EXPLAIN CLEANING METHOD	No reuse of (b) or (b) (4) is possible		New (b) (4) are used and they are hygienic, no re-use is possible.
A4.4	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	Na		There is no possibility for contamination from other sources during the storage and transport. Because oil is kept in tanks always.
A4.5	889-Article. 35.4c	Suitable cleaning measures, the effectiveness of which has been checked, have been carried out before the storage of organic products? Are these operations recorded? EXPLAIN WHICH CLEANING MEASURES YOU TAKE and HOW IT IS CHECKED AND RECORDED	We buy from organic certified processings and they put product at their place in our new (b)		Storage of the oil is the responsibility of the producer but transport tanks responsibility belongs to Ekolium. Tanks are totally new.
A5	889-Article 63 IACB 5.3	Quality Assurance-Please maintain, and make available, Quality Procedures for each on-site inspection.			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>
A5.1	205.201(a)(1-6)	Does your quality management system adequately document and provide verification of its compliance with the organic regulations? PLEASE LIST DOCUMENTS RELATED TO QUALITY MANAGEMENT	At the moment Quality Management is based on own experiences		QM prepared provided during he inspections
A5.2	205.103(b)(4), 205.201(a)(1-6)	Is there a management system in place that covers all aspects of products (TQM, HACCP, ISO, etc.)? PLEASE INDICATE WHICH QUALITY SYSTEM CERTIFICATION PRESENT	No any yet		No
A5.3	205.103(b)(4), 205.201(a)(1-6)	Do you have a procedure for documenting and addressing complaints relating to compliance with organic standards? PLEASE INDICATE THE NAME OF THE PROCEDURE AND DOCUMENTS	We created register for future complaints where is mentioned complaint and taken actions and responsible person (attached). No complaints yet		Compliant Register document and compliant form provided during the inspection, but here is no any indication about informing to ETKO and the other authorities
A6	889-Article 66 IACB 10.1	Record Keeping (Audit Trail) – Please maintain, and make available all record keeping for each onsite inspection.			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A6.1	205.201 (a)(1-2), 205.103(a)	Are current organic certificates for all contracted handling operations maintained?	We will buy only from certified operators		Ekolium will buy from certified sources and

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	5/11
				Inspector Comments	
		PLEASE EXPLAIN IF ALL SUBCONTRACTED UNITS HAVE ORGANIC CERTIFICATION		will keep the certificates.	
A6.2	205.103(b)(4)	Is there a formal Audit Trail in place with sufficient records to show the following: a) Raw commodity receiving, b) Lot tracking & coding, c) Certification of organic materials, d) Purchasing receipts, e) Production records, f) Inventories and storage locations, g) Sales, shipping and distribution of organic materials and products? PLEASE LIST AND DESCRIBE RELATED DOCUMENTS OF YOUR SYSTEM	We only consultancy/trade company and such commercial docs we have	In Ekolium only commercial documents are available, for the moment no documents yet.	
A6.3	205.103(b)(3)	Do you maintain all records for at least five (5) years?	All the records are kept from the beginning.	They understood the rule.	
A6.4		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	NA, no sales for final consumer present.	
A7	834-Article 19, 23 IACB 7.4, 9.1	Product composition and labelling categories		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A7.1		For complex products product specifications were prepared and send to ETKO for approval? PLEASE ATTACH PRODUCTS SPECIFICATIONS	Na	NA, single ingredient products are traded.	
A7.2	205.105	100% organic products contains only organic ingredients except water and salt? Products are labelled "100% Organic product" PLEASE LIST 100% ORGANIC PRODUCTS	Na	"	
A7.3		95% organic products contains minimum 95% certified organic materials and the rest 5% material complies the organic regulations lists? Products are labelled as "organic" product. PLEASE LIST 95% ORGANIC PRODUCTS	Na	"	
A7.4	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	"	
A7.5		70% organic products contains minimum 70% organic certified ingredients and labelled as "Made with organic----" PLEASE LIST IF YOU HAVE 70% ORGANIC PRODUCTS	Na	"	
A7.6		Traceability of the multi ingredient products are set and kept in good order for inspections. PLEASE LIST MULTI INGREDIENT PRODUCTS	Na	"	
A7.8		In case use of conventional agriculture ingredients, you have enough evidence indicating non availability of related ingredients. , PLEASE LIST CONVENTIONAL INGREDIENTS USED IF ANY AND ATTACH NON-AVAILABILITY DECLARATIONS	Na	"	
A7.9		All non agricultural ingredients & processing aids are included in organic regulation PLEASE LIST AGRICULTURAL INGREDIENTS AND PROCESSING AIDS	Na	"	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	6/11
				Inspector Comments	
A7.1 0	205.605	If there is any specific situation maybe unique to your operation and you are planning to use a synthetic material, processing aid or ingredient, you always refer to regulations list? PLEASE LIST PROCESSING AIDS, MATERIAL OR INGREDIENT USED	Na	"	
A8	834-Article 19, 23 IACB 7.4, 9.1	Labelling		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>	
A8.1	205.307	When there is no labeling for bulk products do you identify organic products in the form of a lot number or other tracking device? PLEASE EXPLAIN INDICATION STATUS OF ORGANIC	The lot numbers will be generated for each lot for traceability if we will have any bulk deliveries.	New labels prepared and sent to ETKO, Artem Chernysh prepared assessment form and approved Ekolium's label. But during the last transaction (TK.14.3141-013-C) they did not use any label on the products or containers. There is no status of organic on the BL loading documents of last shipment (same TC number)	
A8.2	205.307	There is always label attached to raw material and is it visible? PLEASE EXPLAIN HOW DO YOU INDICATE	Na yet	"	
A8.3	205.307	There is always label attached to final packed product? PLEASE ATTACH THE LABELS USED or INDICATE THE LABEL CONTENT HERE	Na yet	"	
A9.4	205.307	Labels for raw material and final product complies the organic regulations and approved by ETKO before use? PLEASE ATTACH LABEL or INDICATE THE CONTENT HERE	Na yet. Will be created and sent for approval before use.	"	
A9.5	205.300-311	Labeling categories comply the organic regulation requirements and approved by ETKO? PLEASE INDICATE WHICH CATEGORIES YOU APPLIED FOR	Na yet	"	
A10		Packing Material		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A10.1	205.272b	Packing materials were evaluated against chemical contamination and there is no chemical pesticides or heavy metal applications to packing material? PLEASE EXPLAIN YOUR PROCEDURE TO EVALUATE PACKING MATERIAL	Only new (b) (4) . They are certified for food products.	New (b) (4) are used for oil. These tanks are certified for food grade and they are imported from Germany. For grains (b) (4) will be used.	
A10.2		Packing material was stored in a way that no pest-rodent can nest and reproduce, no physical pollutants are present? PLEASE EXPLAIN HOW YOU STORE PACKING MATERIAL	These (b) are stored packed and not possible for any pest-rodents to come inside.	Packing material is already packed and protected. One is 100 kgs heavy and not easy to handle.	
A11		Recertification		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A11.1		If you are intend to buy and export products from other certified sources by other certifiers, did you get inspection report and master certificate of the supplier?	Na yet	No transaction was made so far.	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	7/11
				Inspector Comments	
		PLEASE ATTACH CERTIFICATION DOCUMENTS OF THE SUPPLIER			
A11.2		The certifier of the supplier is accredited (USDA, ISO 65, EN 45011)? PLEASE ATTACH THE CERTIFIERS ACCREDITATION LETTER	Na yet		"
A11.3		Analyses report of the product is present? PLEASE ATTACH THE ANALYSES RESULTS OF THE ORGANIC PRODUCTS YOU BUY	Na yet		"
A12	889-Articles 27 and 27a; IACB 7.4.1	Water use			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A12.1		There are water analyses results if water is used for any steps of the processing and has contact to the product? PLEASE ATTACH WATER ANALYSES RESULT	We don't use any water		NA
A12.2		Only drinkable water is used as ingredient of the final product? PLEASE EXPLAIN THE SOURCE OF THE WATER	Na		"
A12.3		Chlor content of the water cannot exceed according to consumers country; eg NOP 4 ppm, Germany 0.3 ppm, does it comply? PLEASE ATTACH ANALYSES REPORT	Na		"
A12.4		Only drinkable water is used for washing products? PLEASE EXPLAIN THE SOURCE OF WATER	Na		"
A12.5		Boiler additives used are listed on the national list? PLEASE LIST IF ANY BOILER ADDITIVES USED	Na		"
A13		Complaints and Non conformities			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>
A13.1		In case there is a residue problem and complaint from a buyer, do processor informs ETKO immediately? PLEASE INDICATE THE COMPLAINTS YOU RECEIVED	Na yet		No marketing realized yet.
A13.2		Incase analyses results show that there is a residue of an organic product then an evaluation report is prepared by the project responsible to identify the causes and send to ETKO when finalized? PLEASE ATTACH THE ANALYSES RESULTS THAT YOU DETECTED RESIDUES	Na yet		No experience yet
A13.3		When there is a contamination / commingling during the product flow in the processing facility or transport immediate corrective actions are taken and contaminated lot is isolated and disqualified by the responsible. Operator informs ETKO for the incidence and keeps the records? PLEASE EXPLAIN WHAT HAPPENED	Na yet. Will act accordingly.		Complaint log and complaint form prepared and here is no indication about informing of ETKO and the other authorities
B1	889-Article 29, 30, 33 IACB 7.5.1, 7.5.3	Goods reception			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>
B1.1		Raw material and food ingredients were transported in a manner that integrity of organic product was not affected? PLEASE EXPLAIN TRANSPORT SYTEM	We have no contact with products and raw material		NA
B1.2		There is a raw, ingredient product receive procedure and all are registered in an auditable format, registration documents are ready for inspection? PLEASE EXPLAIN RECORDING SYSTEM	Na		NA
B1.3		In case there is a suspicion products are refused and not accepted for processing? PLEASE EXPLAIN REFUSAL SYSTEM	Na		NA

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	8/11
				Inspector Comments	
B1.4		Following product flow within the processing unit is completely separated and precautionary measures are taken against contamination? PLEASE EXPLAIN SEPARATION SYSTEM	Na	NA	
B1.5	889-Article 66 IACB 10.1	Status of the product are clearly mentioned on the documents kept during the organic products receive? PLEASE EXPLAIN HOW DO YOU RECORD	Will be checked and recorded	Ekolium prepared new label and ETKO approved. But Ekolium did not use any labels during the last shipment (TK.14.3141-013-C), organic	
B1.6	834-Article 23 IACB 9.1	Labels are attached to the incoming goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN INDICATION SYSTEM	Na . will be checked	Ekolium sen products from factory to last buyer	
B1.7	889-Article 66 IACB 10.1	Traceability of incoming products are possible and kept in good order for inspections? PLEASE EXPLAIN TREACEABILITY SYTEM	In our bookkeeping system possible to check what was bought and what was sold	All TC kept in separate file in Ekolium office	
B2	889-Article 35 IACB 7.5.4	Storage		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>	
B2.1		Stores are clean and there is no pollutants present which may damage the organic quality? PLEASE EXPLAIN HOW DO YOU KEEP STORES CLEAN	We have no own storages	NA, No storage is done by Ekolium	
B2.2		Stores where organic products are stored clearly indicated and visible? PLEASE EXPLAIN	Na	"	
B2.3		Stock inventory is kept always updated, ready for inspections anytime? PLEASE EXPLAIN	Na	"	
B2.4		Do you keep records for incoming-outgoing raw and processed products in auditable format? PLEASE EXPLAIN	Na	"	
B2.5		Labels are attached to the stored goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN THE LABEL USED	Na	"	
B3	834-Article 6 IACB 4.3, 4.4	Processing line		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B3.1	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	Na, no processing line.	No processing is done by Ekolium, Ekolium deals only trading.	
B3.2		Only allowed methods and materials were used during the processing, they comply the organic regulations? PLEASE LIST ALL MATERIAL USED	Na	NA	
B3.3	205.271	If there is pest control of the bulk or packed organic products used methods or substances comply the organic regulations? PLEASE EXPLAIN	Na	NA	
B3.4		Records related to processing times, quantities of raw and finished material are kept for organic products processing for inspections? PLEASE EXPLAIN	Na	NA	
B3.5		Quality control procedures are present and laboratory analyses are kept for inspections? PLEASE EXPLAIN YOUR PROCEDURES	Quality Manual in development	During the inspection Quality manual provided by Ekolium,	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	9/11
				Inspector Comments	
B4	205.105(e)	Excluded Methods		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>	
B4.1	834-Article 9 889-Article 69 IACB 5.9	GMO Free declarations are present for the processing aids if applicable? PLEASE ATTACH DECLARATIONS	Na	NA, only single ingredient products	
B4.2	834-Article 10 IACB 5.10	There is no ionizing radiation and sewage sludge use neither for any processing nor any raw material used for the composition of the product? PLEASE EXPLAIN	No	NA	
B5	NOP 205.272 NOP 205.201 889-Article 26 IACB 7.3	Separation in Split Operations		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B5.1		A procedure was developed and provided to each subcontracted processor for a good separation of organic products processing? PLEASE ATTACH PROCEDURE	We have no own processing, only Trade	It is only trade operation, no processing takes place.	
B5.2		Separation of organic raw material during receive is possible by documents, indication of status is present? PLEASE EXPLAIN YOUR SYSTEM	Na	"	
B5.3		Separation of organic products in store is present and visible. There is no contact to any conventional product or non-allowed material? PLEASE EXPLAIN	Na	"	
B5.4	205.605	Processing lines were completely cleaned with allowed substances and methods before organic processing? PLEASE LIST CLEANING MATERIAL	Na	"	
B5.5		Workers who are in charge were trained to handle organic products to avoid contamination and commingling? PLEASE EXPLAIN TRAINING	Na	"	
B5.6		Organic products certified according to different regulations were separately handled, labelled and stored? PLEASE EXPLAIN SEPARATION	Na	"	
B5.7		Do you secure organic integrity in a continuous process such as milling, oil or sugar production by giving away certain quantity of organic product for depuration? Do you have a procedure to guarantee separation? PLEASE EXPLAIN HOW DO YOU MAKE IT	Na, discussed with processors to take out first (b) after beginning of organic processing	They discussed with factory and Artem also explained they do need to separate first (b)	
C	205.103(b)(2)(4)	DOCUMENTS ALWAYS TO BE KEPT READY FOR INSPECTION BY LICENCE HOLDER			
		Following documents are part of your Organic Compliance Plan and always must be ready for inspection and must be submitted when it is required by ETKO or state officials. These documents must be kept at least 5 years as auditable.	YES	Y	
		Organic Compliance Plan is always present and updated regularly by the responsible	YES	Y	
		Production Process Diagram: (For each final product a separate one) is present	NA	NA	
		Samples of all labels to be used on products are present and approved by ETKO	YES	N	
		Receiving records are present and complete	YES	Y	
		Stock inventory records are present and complete	YES	NA	
		Production records are present and complete	NA	NA	
		Distribution records are present and complete	YES	Y	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	10/11
				Inspector Comments	
		Product and water analyses reports are present when applicable.	YES, When applies	NA	
		Product specifications for complex products means more than one ingredient are present	NA	NA	
		Processor agreements for subcontracted units are present	NA	NA	
		GMO Free Declarations for ingredients when applicable are present	NA	N	
		List of processing aids and raw materials is prepared and present	NA	NA	
		Cleaning and disinfection material list and specifications are present for all units	NA	NA	
		Pest-rodent control records are present for all units	NA	NA	
		If the supplier is different incoming raw material certificates are present	NA	NA	
		If the supplier is different inspection report and master certificate of the supplier are present.	YES	Y	
		Organic production regulations are present	YES	Y	
		ETKO file includes all ETKO documents such as contract, inspection report, correspondence, certificates, non-compliance, inspection documents, export documents	YES	Y	
		Complaint procedure is present and includes handling of complaints	YES	Y	
		Sanctions applied to products, subcontracted producers or processors are listed and ETKO is informed on time	NA	NA	
		When there is change of production, composition, products etc OCP is updated and send to ETKO for evaluation before starting process.	YES	OK	
		Contracted producers agreements, field maps are present and complete	NA	NA	
		If applicable; Internal Control System procedures, farmers' inspection and training records are present. Valid only for EC 834/2007, NOP Regulation and BIOSUISSE, not recognized by TC 25841/2005	NA	NA	
D	NOP 205.201(a)	Additional Information Deemed Necessary by ETKO to Evaluate the Compliance with the Regulations	NA	NA	

SECTION E CONFIRMATION

As operator I declare that on my part and on behalf of my subcontractor's where I and my subcontractors are inspected by different inspection bodies or authorities an agreement by the operator must be included on his behalf and that of his subcontractors, that the different inspection bodies or authorities can exchange information on the operations under their inspection and on the way this exchange of information can be implemented. I have understood this declaration.

I understand and accept that my above stated information will be treated by ETKO confidentially. Data will be only forwarded to third parties, if I submit a written agreement.

The above application and attached informal page listed above is true to the best of my knowledge. I understand that approval of certification will be contingent on additional unannounced plant visits, (by any person authorized by the Certifier and State Official), for which I hereby give permission.

Place, date: **07.10.2016**

Signature of the representative:

Name of the representative: **Alexey Kachkovskiy**

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	11/11
				Inspector Comments	

ETKO Results of Verification


NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		
POINT of ATTENTION		A5.3 - Complaint Register document and complaint form provided during the inspection, but there is no any indication about informing to ETKO and the other authorities
		A8.1 - New labels prepared and sent to ETKO, Artem Chernysh prepared assessment form and approved Ekolium's label. But during the last transaction (TK.14.3141-013-C) they did not use any label on the products or containers. There is no status of organic on the BL loading documents of last shipment (same TC number)
		A.13.3 - Complaint log and complaint form prepared and there is no indication about informing of ETKO and the other authorities
		B1.5 - Ekolium prepared new label and ETKO approved. But Ekolium did no used any labels during the last shipment (TK.14.3141-013-C)

Place, Date: **07.10.2016**

Name ETKO Representative

**Fatih
AKSOY**

Signature of ETKO representative

	Assessment of Label NOP		BELGE NO	OP 01 F 33
			TARİH	12.02.2016
			REV. NO	00
			SAYFA	1 / 5

Name of licensee/company	EKOLIUM LLC		
Licensee no	3141D-01	Date application	07.09.2016
Name of product(s)	Organic crops, Organic Sunflower Oil		
Form Prepared by	Alexey Kachkovskiy		

Please complete this form and send ETKO including the label you wish to use for your products. You can choose the applicable section for your purpose and skip the sections when not applicable.

APPLICANT SECTION

Does this operation create and apply its own labels? If Yes, how the labels are used (whether retail, bulk or both ways).	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Bulk
How are retail packages packed and labelled for storage and transport (e.g. cardboard boxes, etc.)?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	(b) (4) or (b) (4)
If bulk (non-retail) labels are used, do they include lot numbers? Bulk (non-retail) labelling not used	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Lot number is prepared
Does this operation apply labels at the direction of other entities? If Yes, list which entities	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	N/A
Are the other entities certified? If yes which certifying agency?	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	N/A
If No, does the ETKO name and/or seal appear on the labels?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	OK

SUBPART D Labels, Labeling, and Market Information

§205.301 Product composition.

(a) Products sold, labeled, or represented as “100 percent organic.” A raw or processed agricultural product sold, labeled, or represented as “100 percent organic” must contain (by weight or fluid volume, excluding water and salt) 100 percent organically produced ingredients. If labeled as organically produced, such product must be labeled pursuant to §205.303.

(b) Products sold, labeled, or represented as “organic.” A raw or processed agricultural product sold, labeled, or represented as “organic” must contain (by weight or fluid volume, excluding water and salt) not less than 95 percent organically produced raw or processed agricultural products. Any remaining product ingredients must be organically produced, unless not commercially available in organic form, or must be nonagricultural substances or non-organically produced agricultural products produced consistent with the National List in subpart G of this part. If labeled as organically produced, such product must be labeled pursuant to §205.303.

(c) Products sold, labeled, or represented as “made with organic (specified ingredients or food group(s)).” Multi-ingredient agricultural product sold, labeled, or represented as “made with organic (specified ingredients or food group(s))” must contain (by weight or fluid volume, excluding water and salt) at least 70 percent organically produced ingredients which are produced and handled pursuant to requirements in subpart C of this part. No ingredients may be produced using prohibited practices specified in paragraphs (f)(1), (2), and (3) of §205.301. Nonorganic ingredients may be produced without regard to paragraphs (f)(4), (5), (6), and (7) of §205.301. If labeled as containing organically produced ingredients or food groups, such product must be labeled pursuant to §205.304.

(d) Products with less than 70 percent organically produced ingredients. The organic ingredients in multi-ingredient agricultural product containing less than 70 percent organically produced ingredients (by weight or fluid volume, excluding water and salt) must be produced and handled pursuant to requirements in subpart C of this part. The nonorganic ingredients may be produced and handled without regard to the requirements of this part. Multi-ingredient agricultural product containing less than 70 percent organically produced ingredients may represent the organic nature of the product only as provided in §205.305.

	Assessment of Label NOP	BELGE NO	OP 01 F 33
		TARİH	12.02.2016
		REV. NO	00
		SAYFA	2 / 5

Applicant Section & ETKO Verification

	Applicant Section	ETKO Verification
§205.303 Packaged products labeled “100 percent organic” or “organic.”	YES <input checked="" type="checkbox"/> NA <input type="checkbox"/>	YES <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Agricultural products in packages described in §205.301(a) and (b) may display, on the principal display panel, information panel, and any other panel of the package and on any labeling or market information concerning the product, the following:		
(1) The term, “100 percent organic” or “organic,” as applicable, to modify the name of the product;	Yes	They just have deal only with simple products or simply processed goods without any ingredients (“100 percent organic”)
(2) For products labeled “organic,” the percentage of organic ingredients in the product; (The size of the percentage statement must not exceed one-half the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.)	N/A	Just simple products (grains, pressed oil)
(3) The term, “organic,” to identify the organic ingredients in multi-ingredient products labeled “100 percent organic”;	N/A	Just simple products as sunflower seeds, corn seeds, pressed oils etc.
(4) The USDA seal; and/or	Yes	Just USDA seal
(5) The seal, logo, or other identifying mark of the certifying agent which certified the production or handling operation producing the finished product and any other certifying agent which certified production or handling operations producing raw organic product or organic ingredients used in the finished product: Provided, That, the handler producing the finished product maintain records, pursuant to this part, verifying organic certification of the operations producing such ingredients, and: Provided further, That, such seals or marks are not individually displayed more prominently than the USDA seal	Yes	Just USDA seal used and ETKO seal not used
(b) Agricultural products in packages described in §205.301(a) and (b) must		
(1) For products labeled “organic,” identify each organic ingredient in the ingredient statement with the word, “organic,” or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced. Water or salt included as ingredients cannot be identified as organic.	N/A	No ingredients
(2) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, “Certified organic by * * *,” or similar phrase, identify the name of the certifying agent that certified the handler of the finished product and may display the business address, Internet address, or telephone number of the certifying agent in such label.	Yes	Information is presented at the panel
§205.304 Packaged products labeled “made with organic (specified ingredients or food group(s)).”	YES <input type="checkbox"/> NA <input checked="" type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
(a) Agricultural products in packages described in §205.301(c) may display on the principal display panel, information panel, and any other panel and on any labeling or market information concerning the product:		Just simple products as sunflower seeds, corn seeds, pressed oils etc.
(1) The statement:		
(i) “Made with organic (specified ingredients)”: Provided, That, the statement does not list more than three organically produced ingredients; or	N/A	
(ii) “Made with organic (specified food groups)”: Provided, That, the statement does not list more than three of the following food groups: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, and vegetables or processed milk products; and, Provided further, That, all ingredients of each listed food group in the product must be organically produced; and	N/A	
(iii) Which appears in letters that do not exceed one-half the size of the largest type size on the panel and which appears in its entirety in the same type size, style, and color without highlighting.	N/A	
(2) The percentage of organic ingredients in the product. The size of the percentage statement must not exceed one-half the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.	N/A	
(3) The seal, logo, or other identifying mark of the certifying agent that certified the handler of the finished product.	N/A	
(b) Agricultural products in packages described in §205.301(c) must:		
(1) In the ingredient statement, identify each organic ingredient with the word, “organic,” or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced. Water or salt included as ingredients cannot be identified as organic.	N/A	
(2) On the information panel, below the information identifying the handler or	N/A	

	Assessment of Label NOP	BELGE NO	OP 01 F 33
		TARİH	12.02.2016
		REV. NO	00
		SAYFA	3 / 5


distributor of the product and preceded by the statement, "Certified organic by * * * " or similar phrase, identify the name of the certifying agent that certified the handler of the finished product: Except, That, the business address, Internet address, or telephone number of the certifying agent may be included in such label.		
(c) Agricultural products in packages described in §205.301(c) must not display the USDA seal.		
§205.305 Multi-ingredient packaged products with less than 70 percent organically produced ingredients.	YES <input type="checkbox"/> NA <input checked="" type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
(a) An agricultural product with less than 70 percent organically produced ingredients may only identify the organic content of the product by:	N/A	Just simple products as sunflower seeds, corn seeds, pressed oils etc.
(1) Identifying each organically produced ingredient in the ingredient statement with the word, "organic," or with an asterisk or other reference mark which is defined below the ingredient statement to indicate the ingredient is organically produced, and	N/A	
(2) If the organically produced ingredients are identified in the ingredient statement, displaying the product's percentage of organic contents on the information panel.	N/A	
(b) Agricultural products with less than 70 percent organically produced ingredients must not display:		
(1) The USDA seal; and	N/A	
(2) Any certifying agent seal, logo, or other identifying mark which represents organic certification of a product or product ingredients.	N/A	
§205.306 Labeling of livestock feed.	YES <input type="checkbox"/> NA <input checked="" type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
(a) Livestock feed products described in §205.301(e)(1) and (e)(2) may display on any package panel the following terms:		
(1) The statement, "100 percent organic" or "organic," as applicable, to modify the name of the feed product;	N/A	
(2) The USDA seal;	N/A	
(3) The seal, logo, or other identifying mark of the certifying agent which certified the production or handling operation producing the raw or processed organic ingredients used in the finished product, Provided, That, such seals or marks are not displayed more prominently than the USDA seal;	N/A	
(4) The word, "organic," or an asterisk or other reference mark which is defined on the package to identify ingredients that are organically produced. Water or salt included as ingredients cannot be identified as organic.	N/A	
(b) Livestock feed products described in §205.301(e)(1) and (e)(2) must:		
(1) On the information panel, below the information identifying the handler or distributor of the product and preceded by the statement, "Certified organic by * * * ," or similar phrase, display the name of the certifying agent that certified the handler of the finished product. The business address, Internet address, or telephone number of the certifying agent may be included in such label.	N/A	
(2) Comply with other Federal agency or State feed labeling requirements as applicable.		
§205.307 Labeling of nonretail containers used for only shipping or storage of raw or processed agricultural products labeled as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."	YES <input checked="" type="checkbox"/> NA <input type="checkbox"/>	YES <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) Nonretail containers used only to ship or store raw or processed agricultural product labeled as containing organic ingredients may display the following terms or marks:		
(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;	Yes	Ok ETKO and website www.etko.org
(2) Identification of the product as organic;	Yes	Indicated
(3) Special handling instructions needed to maintain the organic integrity of the product;	NA	n/a
(4) The USDA seal;	Yes	USDA logo used correctly
(5) The seal, logo, or other identifying mark of the certifying agent that certified the organic production or handling operation that produced or handled the finished product.	Yes	Name of ETKO and website mentioned
(b) Nonretail containers used to ship or store raw or processed agricultural product labeled as containing organic ingredients must display the production lot number of the product if applicable.	Yes	Lot nr system is in place
(c) Shipping containers of domestically produced product labeled as organic intended for export to international markets may be labeled in accordance with any shipping container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer: Provided, That, the shipping containers and shipping documents accompanying such organic products are clearly marked "For Export Only" and: Provided further, That, proof of such container marking	NA	It is Ukranian, not US product

	Assessment of Label NOP	BELGE NO	OP 01 F 33
		TARİH	12.02.2016
		REV. NO	00
		SAYFA	4 / 5

and export must be maintained by the handler in accordance with recordkeeping requirements for exempt and excluded operations under §205.101.		
§205.308 Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as “100 percent organic” or “organic.”	YES <input type="checkbox"/> NA <input checked="" type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
(a) Agricultural products in other than packaged form may use the term, “100 percent organic” or “organic,” as applicable, to modify the name of the product in retail display, labeling, and display containers: Provided, That, the term, “organic,” is used to identify the organic ingredients listed in the ingredient statement.	N/A	
(b) If the product is prepared in a certified facility, the retail display, labeling, and display containers may use:	N/A	
(1) The USDA seal; and	N/A	
(2) The seal, logo, or other identifying mark of the certifying agent that certified the production or handling operation producing the finished product and any other certifying agent which certified operations producing raw organic product or organic ingredients used in the finished product: Provided, That, such seals or marks are not individually displayed more prominently than the USDA seal.	N/A	
§205.309 Agricultural products in other than packaged form at the point of retail sale that are sold, labeled, or represented as “made with organic (specified ingredients or food group(s)).”	YES <input type="checkbox"/> NA <input checked="" type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
(a) Agricultural products in other than packaged form containing between 70 and 95 percent organically produced ingredients may use the phrase, “made with organic (specified ingredients or food group(s)),” to modify the name of the product in retail display, labeling, and display containers.	N/A	
(1) Such statement must not list more than three organic ingredients or food groups, and	N/A	
(2) In any such display of the product’s ingredient statement, the organic ingredients are identified as “organic.”	N/A	
(b) If prepared in a certified facility, such agricultural products labeled as “made with organic (specified ingredients or food group(s))” in retail displays, display containers, and market information may display the certifying agent’s seal, logo, or other identifying mark.	N/A	
§205.310 Agricultural products produced on an exempt or excluded operation.	YES <input type="checkbox"/> NA <input checked="" type="checkbox"/>	YES <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
(a) An agricultural product organically produced or handled on an exempt or excluded operation must not:	N/A	
(1) Display the USDA seal or any certifying agent’s seal or other identifying mark which represents the exempt or excluded operation as a certified organic operation, or	N/A	
(2) Be represented as a certified organic product or certified organic ingredient to any buyer.	N/A	
(b) An agricultural product organically produced or handled on an exempt or excluded operation may be identified as an organic product or organic ingredient in a multi-ingredient product produced by the exempt or excluded operation. Such product or ingredient must not be identified or represented as “organic” in a product processed by others.	N/A	
(c) Such product is subject to requirements specified in paragraph (a) of §205.300, and paragraphs (f)(1) through (f)(7) of §205.301.	N/A	
§205.311 USDA Seal.	YES <input checked="" type="checkbox"/> NA <input type="checkbox"/>	YES <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
(a) 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.	Yes	The product is raw material
(b) The USDA seal must replicate the form and design of the example in figure 1 and must be printed legibly and conspicuously:	Yes	USDA Logo is legible and conspicuous
(1) On a white background with a brown outer circle and with the term, “USDA,” in green overlaying a white upper semicircle and with the term, “organic,” in white overlaying the green lower half circle; or	Yes	ok
(2) On a white or transparent background with black outer circle and black “USDA” on a white or transparent upper half of the circle with a contrasting white or transparent “organic” on the black lower half circle.	N/A	
(3) The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.	N/A	

ETKO APPROVAL (This section is ETKO use only)

Label can be approved <input checked="" type="checkbox"/>	Label cannot be approved; please send updated label to ETKO <input type="checkbox"/>
Date of Approval: 10.09.2016	Name and Signature - ETKO Responsible Artem Chernysh

	Assessment of Label NOP	BELGE NO	OP 01 F 33
		TARİH	12.02.2016
		REV. NO	00
		SAYFA	5 / 5

Approved Label:

100% Organic Sunflower Oil Ukraine
certified by "ETKO" Ltd, UA-BIO-109. www.etko.org
according to National Organic Program standard
Exporter: EKOLIUM LLC
9, Boryspilska Str, Kiev, 02099, Ukraine,
Tel/fax +380-50-3444265
Processor: Melitopol Oil Extraction Plant LLC
31, Frunze str, Melitopol city, Ukraine
Lot Nr.: OW /3/1/xx.xx.201x
Packing date: xx.xx.xxxx



From: [ETKO-UA](#)
To: [Crail, Lars - AMS](#)
Cc: [MUSTAFA AKYUZ](#)
Subject: 3141D-01 Ekolium - OP 01 F 33 Assesment Label NOP
Date: Friday, October 07, 2016 7:59:02 AM
Attachments: [3141D-01 Ekolium - OP 01 F 33 Assesment Label NOP.doc](#)

Hello, Lars, Mustafa.

--

Best rgrds, Artem Chernysh

ETKO Ltd.

Phone: +380-97-2743835

E-mail: etkoua@gmail.com , WEB: etko.org.ua

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	1/11
				Inspector Comments	

Organic compliance plan is the basic document for certification. In this plan project describes how the production activities are organized according to Organic Production Regulations. All details of activities must be given through the control points mentioned below. It is important that all questions related to production must be explained. The control points which are not related to your processing could be answered as NA (Not Applicable). ETKO application division will verify this form before the inspection and ETKO inspector will assess during the inspection. **You must submit this compliance plan before inspection takes place**, therefore you need to start updating it earlier than starting processing. It is highly recommended that non compliances you described during your annual self-assessment must be cleared by your side, before ETKO inspection takes place. Otherwise certification decision of your production may be delayed or not approved due to necessity of follow up inspection. 205.201, 205.400.

The control points could be described as: YES=Complies, NO=Does not comply, NA=Not applicable.

NCR Non-Conformity Level (MA/MI/PoA) section will be filled in by ETKO inspector.

License holder must keep this report and related all documents at least for 5 years as auditable format. All documents must be open for ETKO, State officials in working hours and copying some documents must be allowed. 205.400(d)

This form must be filled in only for processing facilities where the product structure is changed such as "Processing. Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container"

Related to transport and storage activities.

Storage and transportation is still integrated in to the handling operations and covered by the Organic System Plan. The difference between processing units and these operations (storage/transport) we will not make separate certification like we do for processing facilities. Storage and transport will be evaluated under the responsibility of the licensee which we make contract and certification.

Statement: As operator I declare that I will perform the operations in accordance with IACB, TC, NOP, BIOSUISSE, KRAV, NOP and COR in the event of infringement or irregularities, I accept to inform in writing the buyers of the product in order to ensure that the indications referring to the organic production method are removed from this production.

NAME LICENSEE	VIP Group LLC. ETKO 3188		
NAME PROCESSOR			
PROCESSING SITE ADDRESS	9, Boryspilska Str, Kiev, 02099		
COUNTRY	UKRAINE		
PHONE-FAX-EMAIL	Mob.: (b) (6), akachkovskiy@ukr.net		
ACTIVITIES	Trading organic products since 11.02.20104		
CONTACT PERSON	Alexey Kachkovskiy		
APPLICABLE REGULATIONS	<input type="checkbox"/> TC	<input checked="" type="checkbox"/> NOP / COR	<input type="checkbox"/> IACB - EC <input type="checkbox"/> Other

1.PRODUCTS TO BE CERTIFIED

Product specification to be verified during the inspection and joined to the final report if not submitted with the OCP.

Incase needed make a separate list.

Barley	Seeds, grouts, brans, flakes	Pumpkin	Kernel
Buckwheat	Seeds, grouts, flakes	Rapeseeds	Seeds, oil and cake/expeller
Corn	Seeds, grouts, flour meal, flakes	Rye	Seeds, grouts, flakes, brans, pasta, flour meal
Flax	Seeds, oil and cake/expeller	Sorghum	Seeds
Lupine	Seed	Soybean	Seeds, oil and cake/expeller
Millet	Seeds, grouts, flour meal, flakes	Spelt (wheat)	Seeds, grouts, flakes, brans, pasta, flour meal
Mustard	Seeds, oil and cake/expeller	Sunflower	Seeds, oil and cake/expeller
Oat	Seeds, grouts, flakes, brans, flour meal	Walnut	Kernel
Peas	Seeds, grouts, flakes	Wheat	Seeds, grouts, flakes, brans, pasta, flour meal

		General Principles	COMMENT	COMMENT
A1	205.201	Organic Compliance Plan Overview– If the information requested is available in other company documents, please provide a clear reference to the exact section of your appropriate record.		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A1.1	205.201(a)(6)	Facility Map: A complete facility plan is present and includes major equipment, rooms and building? PLEASE ATTACH FACILITY MAP	We are only office for Trading without physical contact with products	VIP Group is only Trading company. They just buy and export organic certified products from certified sources.
A1.2	205.201(a)(1) IACB 5.3	Production process diagram is present for each product (You need to provide a flow chart showing how the product moves in your plant including major equipment)?	-	N/A just trader but there is presented process flow for possible trading.

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	2/11
				Inspector Comments	
		PLEASE ATTACH PROCESS DIAGRAM FOR EACH PRODUCT			
A1.3	IACB 5.3	A brief description of each process must be given? PLEASE ATTACH THE DOCUMENTS (PROCEDURES) SHOWING FULL DESCRIPTION OF THE PROCESS OF: LABELLING, PACKAGING, STORING, TRANSPORTATION PROCESS AND OTHER PROCESS IN THE FACILITY.	-		N/A just trader, But they will control all stages of trading flow.
A1.4	205.201 (a)(1)	A brief description of production practices and procedures including the estimated frequency and volume of these production runs are present? PLEASE EXPLAIN BRIEFLY PRODUCTION PRACTICES, FREQUENCY AND VOLUME	-		N/A just trader
A1.5	205.201 (a)(2)	Accurate Product Specifications were prepared and present for all complex products seeking certification? PLEASE ATTACH PRODUCT SPECIFICATIONS	We trade only single ingredient products. Specification for contract always provided by Clients.		Ok. List of goods for possible trade is presented (above) There are just single ingredient products.
A1.6	205.201 (a)(3) 889-Article 63 IACB 5.3	A brief description of your quality monitoring practices is prepared? PLEASE EXPLAIN HERE HOW DO YOU MONITOR ORGANIC PRODUCTION PRACTICES TO VERIFY THE ORGANIC PLAN IS EFFECTIVELY IMPLEMENTED	I'm personally 14 years in organic production business and all monitoring is done by myself based on my experience		VIP Group owns by Alexey Kachkovsky who has since many years experience in organic agriculture assigned for different organic development projects.
A1.7	205.201 (a)(4) 889-Article 66 IACB 10.1	Do you have available for review by the inspector, an audit trail of documents that tracks product by identity and volume from receiving through distribution? PLEASE LIST WHICH DOCUMENTS YOU KEEP FOR AUDIT TRAIL	We didn't start with trade yet		Ok. There is no trading activity yet.
A1.8	205.201 (a)(5) 889-Article 26 IACB 7.2	A brief description of your management practices used to protect the organic commodities from potential co-mingling and contamination is present? PLEASE EXPLAIN HERE HOW DO YOU AVOID CO-MINGLING AND CONTAMINATION	We are not planning bulk deliveries. Always products will be packed in (b) (4) (b) (4) (b) (4)		They are planning trade just organic products. Aleksey checks all stages of trading and try to exclude possible risks. Products are all certified. Products will be packed for transportation in case trading.
A1.9	889/08 Article 31.1 IACB 7.5.2	The operator shall check the closing of the packaging or container where it is required and the presence of the indications. The operator shall crosscheck the information on the label with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts. PLEASE EXPLAIN HERE HOW DO YOU CHECK THE PACKAGE AND THE ACCOMPANYING DOCUMENTS OF THE ORGANIC PRODUCT	We normally nominate (b) (4) (surveyor) for such procedures.		Surveyor body and Control Body (EU commission requirements for Ukraine) will check packing of goods for the shipments and containers, checking and reporting to VIP Group. VIP Group will label the containers accordingly and the documents to be indicated the status of the product.
A2		Product Protection – Please maintain, and make available, Product Protection Procedures for each			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	3/11
				Inspector Comments	
on-site inspection.					
A2.1	205.301 (f)(7)	Do you use exclusively <u>either</u> an organic or conventional form of any ingredient in each formula (e.g. organic raisins or conventional raisins, not both, in organic cake)? PLEASE EXPLAIN YOUR PRODUCT COMPOSITION	We trade single ingredient products only.	Ok. List of goods for possible trade is presented (above) There are just single ingredient products. They have no plans now about trading complex products.	
A2.2	205.272(a) 889-Article 26 IACB 7.2	Do you take adequate measures to prevent, during all stages of production and storage? Commingling of organic and non-organic product and ingredients; and PLEASE EXPLAIN HERE HOW DO YOU AVOID	We have no any contact with products at any stage of production and storage	N/A just trader	
A2.3	205.272(a) 889-Article 26 IACB 7.2	Contact of organic products and ingredients by prohibited substances or sanitation materials? PLEASE EXPLAIN HOW DO YOU AVOID	Na	N/A	
A2.4	205.272(a) 889-Article 31 IACB 7.5.2 *PoA	Are procedures and documentation used to protect the organic integrity of products under your control during transport? PLEASE EXPLAIN HOW DO YOU PROTECT ORGANIC INTEGRITY DURING TRANSPORT	We buy new (b) (4) and (b) (4) to protect products during transportation.	Possible packing of organic goods for trading: - For oil new (b) (4) can be used to protect the products from contamination. - For grains (b) (4) can be used or (b) (4) which could be up to 24 tons within a container. They have no plans about transportation of goods in bulk. Instructions for transport companies about transportation organic goods are not in place (§205.272a)	
A3	205.201(a) 205.271 889-Article 63 IACB 5.3	Facility Pest Management – Please maintain, and make available, copies of your Facility Pest Management Program for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>	
A3.1	205.271(a)(b)	Is a structural pest management program in place that stresses sanitation and other preventive measures including mechanical traps, lures and repellants consistent with the National List? PLEASE EXPLAIN HERE YOUR PEST MANAGEMENT METHOD	We have only office for trading.	NA	
A3.2	205.271(c)	Are substances used inside the facility for pest control: On the National List? and PLEASE LIST HERE SUBSTANCES USED INSIDE THE FACILITY	Na	NA	
A3.3	205.271(c)	Used only when preventive and control measures are not effective? PLEASE EXPLAIN THE REASON OF USE	Na	NA	
A3.4	205.271(d)(e)	If inside facility pest control materials are used that do not appear on the National List: are they used only when prevention control measures and materials on the National List are not effective and PLEASE LIST MATERIALS USED AND NOT ON THE NATIONAL LIST	Na	NA	
A3.5	205.271(d)(e)	are measures taken to prevent contact of the organic products with the substance used?	Na	NA	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	4/11
				Inspector Comments	
		PLEASE EXPLAIN HOW TO PREVENT CONTACT TO ORGANIC PRODUCTS			
A3.6	205.271(f)	Are you aware that you are responsible for using materials in compliance with all local, state and federal regulations? PLEASE EXPLAIN WHEN THERE IS ANY METHOD AGAINST THE ORGANIC REGULATION	Na		NA
A3.7	205.201(a), 205.271	Does your pest management program include facility maps, incident logs and pesticide use charts? PLEASE EXPLAIN	Na		NA
A4	889-A834-Art.10, 26, 35 IACB 7.2, 7.5.4	Sanitation – Please maintain, and make available, Sanitation Procedures for each on-site inspection.			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>
A4.1	205.201(a)(5), 205.272(a)	Does this facility have a formalized sanitation program to protect the organic integrity of organic raw materials and finished goods during storage? PLEASE EXPLAIN	No own facilities		NA
A4.2	205.272(a)(2)	Is there a sanitation program to prevent contamination on food contact surfaces from cleansers and sanitizers? PLEASE EXPLAIN SANITATION METHOD	Na		NA
A4.3	205.272(b)(2)	If packaging materials or containers are re-used, are proper cleaning procedures maintained prior to organic use? PLEASE EXPLAIN CLEANING METHOD	No reuse of (b) (4) is possible		Just new packing materials will be used, no re-use is possible.
A4.4	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	Na		There is no possibility for contamination from other sources during the transport. Because oil is kept in tanks always.
A4.5	889-Article-35.4c	Suitable cleaning measures, the effectiveness of which has been checked, have been carried out before the storage of organic products? Are these operations recorded? EXPLAIN WHICH CLEANING MEASURES YOU TAKE and HOW IT IS CHECKED AND RECORDED	We buy from organic certified processings and they put product at their place in our new (b)		Storage of the oil is the responsibility of the producer but transport tanks responsibility belongs to VIP Group. Tanks will be totally new.
A5	889-Article 63 IACB 5.3	Quality Assurance-Please maintain, and make available, Quality Procedures for each on-site inspection.			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A5.1	205.201(a)(1-6)	Does your quality management system adequately document and provide verification of its compliance with the organic regulations? PLEASE LIST DOCUMENTS RELATED TO QUALITY MANAGEMENT	At the moment Quality Management is based on own experiences		Quality management system is presented. The system is based on AK own organic experience and on the NOP Guide for processors.
A5.2	205.103(b)(4), 205.201(a)(1-6)	Is there a management system in place that covers all aspects of products (TQM, HACCP, ISO, etc.)? PLEASE INDICATE WHICH QUALITY SYSTEM CERTIFICATION PRESENT	No any yet		No
A5.3	205.103(b)(4), 205.201(a)(1-6) *POA	Do you have a procedure for documenting and addressing complaints relating to compliance with organic standards? PLEASE INDICATE THE NAME OF THE PROCEDURE AND DOCUMENTS	We created register for future complaints where is mentioned complaint and taken actions and responsible person (attached). No complaints yet		No trading done yet. Registration form and register are presented but there is no complaint procedure
A6	889-Article 66 IACB 10.1	Record Keeping (Audit Trail) – Please maintain, and make available all record keeping for each onsite			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	5/11
				Inspector Comments	
inspection.					
A6.1	205.201 (a)(1-2), 205.103(a)	Are current organic certificates for all contracted handling operations maintained? PLEASE EXPLAIN IF ALL SUBCONTRACTED UNITS HAVE ORGANIC CERTIFICATION	We will buy only from certified operators	They have no organic trading yet. But VIP Group will plan to buy products from certified sources and will keep the certificates.	
A6.2	205.103(b)4)	Is there a formal Audit Trail in place with sufficient records to show the following: a) Raw commodity receiving, b) Lot tracking & coding, c) Certification of organic materials, d) Purchasing receipts, e) Production records, f) Inventories and storage locations, g) Sales, shipping and distribution of organic materials and products? PLEASE LIST AND DESCRIBE RELATED DOCUMENTS OF YOUR SYSTEM	We only consultancy/trade company and such commercial docs we have	In VIP Group only commercial documents are available (they made services for organization transport deliveries and some organic services). There is no trading documents for the moment.	
A6.3	205.103(b)3)	Do you maintain all records for at least five (5) years?	All the records are kept from the beginning.	ok	
A6.4		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	NA, no sales for final consumer present.	
A7	834-Article 19, 23 IACB 7.4, 9.1	Product composition and labelling categories		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/>	
A7.1		For complex products product specifications were prepared and send to ETKO for approval? PLEASE ATTACH PRODUCTS SPECIFICATIONS	Na	NA, just single ingredient products are planning for trade.	
A7.2	205.105	100% organic products contains only organic ingredients except water and salt? Products are labelled "100% Organic product" PLEASE LIST 100% ORGANIC PRODUCTS	Na	"	
A7.3		95% organic products contains minimum 95% certified organic materials and the rest 5% material complies the organic regulations lists? Products are labelled as "organic" product. PLEASE LIST 95% ORGANIC PRODUCTS	Na	"	
A7.4	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	"	
A7.5		70% organic products contains minimum 70% organic certified ingredients and labelled as "Made with organic----" PLEASE LIST IF YOU HAVE 70% ORGANIC PRODUCTS	Na	"	
A7.6		Traceability of the multi ingredient products are set and kept in good order for inspections. PLEASE LIST MULTI INGREDIENT PRODUCTS	Na	"	
A7.8		In case use of conventional agriculture ingredients, you have enough evidence indicating non availability of related ingredients. , PLEASE LIST CONVENTIONAL INGREDIENTS USED IF ANY AND ATTACH NON-AVAILABILITY DECLARATIONS	Na	"	
A7.9		All non agricultural ingredients & processing aids are	Na	"	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	6/11
				Inspector Comments	
		included in organic regulation PLEASE LIST AGRICULTURAL INGREDIENTS AND PROCESSING AIDS			
A7.10	205.605	If there is any specific situation maybe unique to your operation and you are planning to use a synthetic material, processing aid or ingredient, you always refer to regulations list? PLEASE LIST PROCESSING AIDS, MATERIAL OR INGREDIENT USED	Na		"
A8	834-Article 19, 23 IACB 7.4, 9.1	Labelling			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A8.1	205.307	When there is no labeling for bulk products do you identify organic products in the form of a lot number or other tracking device? PLEASE EXPLAIN INDICATION STATUS OF ORGANIC	The lot numbers will be generated for each lot for traceability if we will have any bulk deliveries.		Sample of label is approved by ETKO. There is indication of goods as 100% Organic on the label as mentioned in product list.
A8.2	205.307	There is always label attached to raw material and is it visible? PLEASE EXPLAIN HOW DO YOU INDICATE	Na yet		N/A
A8.3	205.307	There is always label attached to final packed product? PLEASE ATTACH THE LABELS USED or INDICATE THE LABEL CONTENT HERE	Na yet		Sample of label is approved by ETKO. Content of label: - Name of product - Status of product - Certifier (ETKO, UA-BIO-109) - Exporter - Producer - Lot number - Packing date - USDA logo
A9.4	205.307	Labels for raw material and final product complies the organic regulations and approved by ETKO before use? PLEASE ATTACH LABEL or INDICATE THE CONTENT HERE	Na yet. Will be created and sent for approval before use.		"
A9.5	205.300-311	Labeling categories comply the organic regulation requirements and approved by ETKO? PLEASE INDICATE WHICH CATEGORIES YOU APPLIED FOR	Na yet		"
A10		Packing Material			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A10.1	205.272b	Packing materials were evaluated against chemical contamination and there is no chemical pesticides or heavy metal applications to packing material? PLEASE EXPLAIN YOUR PROCEDURE TO EVALUATE PACKING MATERIAL	Only new (b) tanks. They are certified for food products.		Just new packing materials will be used. The (b) (4) are certified for food grade. For grains (b) (4) will be used.
A10.2		Packing material was stored in a way that no pest-rodent can nest and reproduce, no physical pollutants are present? PLEASE EXPLAIN HOW YOU STORE PACKING MATERIAL	These (b) are stored packed and not possible for any pest-rodents to come inside.		Packing material (b) (4) will be used just new and will be opened just before loading of goods. They are stored on the sellers storages.
A11		Recertification			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/>
A11.1		If you are intend to buy and export products from other certified sources by other certifiers, did you get inspection report and master certificate of the supplier?	Na yet		No transaction was made.

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	7/11
				Inspector Comments	
		PLEASE ATTACH CERTIFICATION DOCUMENTS OF THE SUPPLIER			
A11.2		The certifier of the supplier is accredited (USDA, ISO 65, EN 45011)? PLEASE ATTACH THE CERTIFIERS ACCREDITATION LETTER	Na yet		"
A11.3		Analyses report of the product is present? PLEASE ATTACH THE ANALYSES RESULTS OF THE ORGANIC PRODUCTS YOU BUY	Na yet		"
A12	889-Articles 27 and 27a; IACB 7.4.1	Water use			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A12.1		There are water analyses results if water is used for any steps of the processing and has contact to the product? PLEASE ATTACH WATER ANALYSES RESULT	We don't use any water		NA
A12.2		Only drinkable water is used as ingredient of the final product? PLEASE EXPLAIN THE SOURCE OF THE WATER	Na		"
A12.3		Chlor content of the water cannot exceed according to consumers country; eg NOP 4 ppm, Germany 0.3 ppm, does it comply? PLEASE ATTACH ANALYSES REPORT	Na		"
A12.4		Only drinkable water is used for washing products? PLEASE EXPLAIN THE SOURCE OF WATER	Na		"
A12.5		Boiler additives used are listed on the national list? PLEASE LIST IF ANY BOILER ADDITIVES USED	Na		"
A13		Complaints and Non conformities			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A13.1		In case there is a residue problem and complaint from a buyer, do processor informs ETKO immediately? PLEASE INDICATE THE COMPLAINTS YOU RECEIVED	Na yet		No marketing realized yet.
A13.2		Incase analyses results show that there is a residue of an organic product then an evaluation report is prepared by the project responsible to identify the causes and send to ETKO when finalized? PLEASE ATTACH THE ANALYSES RESULTS THAT YOU DETECTED RESIDUES	Na yet		No experience yet
A13.3		When there is a contamination / commingling during the product flow in the processing facility or transport immediate corrective actions are taken and contaminated lot is isolated and disqualified by the responsible. Operator informs ETKO for the incidence and keeps the records? PLEASE EXPLAIN WHAT HAPPENED	Na yet. Will act accordingly.		N/A
B1	889-Article 29, 30, 33 IACB 7.5.1, 7.5.3	Goods reception			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>
B1.1	POA	Raw material and food ingredients were transported in a manner that integrity of organic product was not affected? PLEASE EXPLAIN TRANSPORT SYSTEM	We have no contact with products and raw material		VIP is trader company. They just control transportation company.
B1.2		There is a raw, ingredient product receive procedure and all are registered in an auditable format, registration documents are ready for inspection? PLEASE EXPLAIN RECORDING SYSTEM	Na		NA
B1.3		In case there is a suspicion products are refused and not accepted for processing? PLEASE EXPLAIN REFUSAL SYSTEM	Na		NA
B1.4		Following product flow within the processing unit is completely separated and precautionary measures are taken against contamination? PLEASE EXPLAIN SEPARATION SYSTEM	Na		NA

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	8/11
				Inspector Comments	
B1.5	889-Article 66 IACB 10.1	Status of the product are clearly mentioned on the documents kept during the organic products receive? PLEASE EXPLAIN HOW DO YOU RECORD	Will be checked and recorded	VIP Group will make sure the labelling and the documents related to transaction for status of the product, when transactions made.	
B1.6	834-Article 23 IACB 9.1	Labels are attached to the incoming goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN INDICATION SYSTEM	Na . will be checked	"	
B1.7	889-Article 66 IACB 10.1	Traceability of incoming products are possible and kept in good order for inspections? PLEASE EXPLAIN TREACEABILITY SYTEM	In our bookkeeping system possible to check what was bought and what was sold	VIP Group will keep a separate file for organic transactions.	
B2	889-Article 35 IACB 7.5.4	Storage		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>	
B2.1		Stores are clean and there is no pollutants present which may damage the organic quality? PLEASE EXPLAIN HOW DO YOU KEEP STORES CLEAN	We have no own storages	NA, No storage is done by VIP Group	
B2.2		Stores where organic products are stored clearly indicated and visible? PLEASE EXPLAIN	Na	"	
B2.3		Stock inventory is kept always updated, ready for inspections anytime? PLEASE EXPLAIN	Na	"	
B2.4		Do you keep records for incoming-outgoing raw and processed products in auditable format? PLEASE EXPLAIN	Na	"	
B2.5		Labels are attached to the stored goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN THE LABEL USED	Na	"	
B3	834-Article 6 IACB 4.3, 4.4	Processing line		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>	
B3.1	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	Na, no processing line.	No processing is done by VIP Group, VIP Group deals only trading.	
B3.2		Only allowed methods and materials were used during the processing, they comply the organic regulations? PLEASE LIST ALL MATERIAL USED	Na	NA	
B3.3	205.271	If there is pest control of the bulk or packed organic products used methods or substances comply the organic regulations? PLEASE EXPLAIN	Na	NA	
B3.4		Records related to processing times, quantities of raw and finished material are kept for organic products processing for inspections? PLEASE EXPLAIN	Na	NA	
B3.5		Quality control procedures are present and laboratory analyses are kept for inspections? PLEASE EXPLAIN YOUR PROCEDURES	Quality Manual in development	Quality management system is presented. The system is based on the NOP Guide for processors.	
B4	205.105(e)	Excluded Methods		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/>	
B4.1	834-Article 9 889-Article 69 IACB 5.9	GMO Free declarations are present for the processing aids if applicable? PLEASE ATTACH DECLARATIONS	Na	N/A there is no GMO-declarations because organic trading is not started yet.	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	9/11
				Inspector Comments	
				AK is responsible to check the GMO contamination possibilities and to avoid from possible contaminations. In quality procedure he prepared a section for this requirement.	
B4.2	834-Article 10 IACB 5.10	There is no ionizing radiation and sewage sludge use neither for any processing nor any raw material used for the composition of the product? PLEASE EXPLAIN	No	NA	
B5	NOP 205.272 NOP 205.201 889-Article 26 IACB 7.3	Separation in Split Operations		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/>	
B5.1		A procedure was developed and provided to each subcontracted processor for a good separation of organic products processing? PLEASE ATTACH PROCEDURE	We have no own processing, only Trade	It is only trade operation, no processing takes place.	
B5.2		Separation of organic raw material during receive is possible by documents, indication of status is present? PLEASE EXPLAIN YOUR SYSTEM	Na	"	
B5.3		Separation of organic products in store is present and visible. There is no contact to any conventional product or non-allowed material? PLEASE EXPLAIN	Na	"	
B5.4	205.605	Processing lines were completely cleaned with allowed substances and methods before organic processing? PLEASE LIST CLEANING MATERIAL	Na	"	
B5.5		Workers who are in charge were trained to handle organic products to avoid contamination and commingling? PLEASE EXPLAIN TRAINING	Na	"	
B5.6		Organic products certified according to different regulations were separately handled, labelled and stored? PLEASE EXPLAIN SEPARATION	Na	"	
B5.7		Do you secure organic integrity in a continuous process such as milling, oil or sugar production by giving away certain quantity of organic product for deuration? Do you have a procedure to guarantee separation? PLEASE EXPLAIN HOW DO YOU MAKE IT	Na, discussed with processors to take out first (b) after beginning of organic processing	NA	
C	205.103(b)(2)(4)	DOCUMENTS ALWAYS TO BE KEPT READY FOR INSPECTION BY LICENCE HOLDER			
		Following documents are part of your Organic Compliance Plan and always must be ready for inspection and must be submitted when it is required by ETKO or state officials. These documents must be kept at least 5 years as auditable.	YES		
		Organic Compliance Plan is always present and updated regularly by the responsible	YES		
		Production Process Diagram: (For each final product a separate one) is present	Yes	Possible trading flow	
		Samples of all labels to be used on products are present and approved by ETKO	YES	Approved	
		Receiving records are present and complete	N/A		

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	10/11
				Inspector Comments	
		Stock inventory records are present and complete	NA		
		Production records are present and complete	NA		
		Distribution records are present and complete	NA		
		Product and water analyses reports are present when applicable.	N/A		
		Product specifications for complex products means more than one ingredient are present	NA		
		Processor agreements for subcontracted units are present	NA		
		GMO Free Declarations for ingredients when applicable are present	NA		
		List of processing aids and raw materials is prepared and present	NA		
		Cleaning and disinfection material list and specifications are present for all units	NA		
		Pest-rodent control records are present for all units	NA		
		If the supplier is different incoming raw material certificates are present	NA		
		If the supplier is different inspection report and master certificate of the supplier are present.	N/A		
		Organic production regulations are present	YES		
		ETKO file includes all ETKO documents such as contract, inspection report, correspondence, certificates, non-compliance, inspection documents, export documents	YES		
		Complaint procedure is present and includes handling of complaints	*No		Registration form and register are presented but there is no complaint procedure
		Sanctions applied to products, subcontracted producers or processors are listed and ETKO is informed on time	NA		
		When there is change of production, composition, products etc OCP is updated and send to ETKO for evaluation before starting process.	YES		
		Contracted producers agreements, field maps are present and complete	NA		
		If applicable; Internal Control System procedures, farmers' inspection and training records are present. Valid only for EC 834/2007, NOP Regulation and BIOSUISSE, not recognized by TC 25841/2005	NA		
D	NOP 205.201(a)	Additional Information Deemed Necessary by ETKO to Evaluate the Compliance with the Regulations	NA		

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	11/11
				Inspector Comments	

SECTION E CONFIRMATION

As operator I declare that on my part and on behalf of my subcontractor's where I and my subcontractors are inspected by different inspection bodies or authorities an agreement by the operator must be included on his behalf and that of his subcontractors, that the different inspection bodies or authorities can exchange information on the operations under their inspection and on the way this exchange of information can be implemented. I have understood this declaration.

I understand and accept that my above stated information will be treated by ETKO confidentially. Data will be only forwarded to third parties, if I submit a written agreement.

The above application and attached informal page listed above is true to the best of my knowledge. I understand that approval of certification will be contingent on additional unannounced plant visits, (by any person authorized by the Certifier and State Official), for which I hereby give permission.

Place, date: **09.09.2016**

Signature of the representative:

Name of the representative: **Alexey Kachkovskiy**

ETKO Results of Verification

NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		
POINT of ATTENTION	2	A5.3 Registration form of complaints and register are presented but there is no complaint procedure (205.201a1)
		A2.4 Instructions for transport companies about transportation organic goods are not in place (§205.272a)

Place, Date: **07.10.2016, Kiev**

Name ETKO Representative **Artem Chernysh**

Signature of ETKO representative

From: [Artem Chernysh](#)
To: akachkovskiy@ukr.net
Cc: [Crail, Lars - AMS](#)
Subject: 3188D-01 VIP Group - OCP-PROCESSING 2016
Date: Friday, October 07, 2016 6:20:23 AM
Attachments: [3188D-01 VIP Group - OCP-PROCESSING \(1\).doc](#)

Hello, .

--

Best rgrds,

Artem Chernysh mailto:chernysh_artem@mail.ru

+380 97 274 3835

From: [MUSTAFA AKYUZ](#)
To: tov-belagro@ukr.net; akachkovskiy@ukr.net; [Crail, Lars - AMS](#)
Subject: Belagro OCP Processing
Date: Thursday, October 06, 2016 10:48:37 AM
Attachments: [BELAGRO OCP-PROCESSING \(1\).pdf](#)

Today's inspection results.

Mustafa

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	1/10
				Inspector Comments	

Organic compliance plan is the basic document for certification. In this plan project describes how the production activities are organized according to Organic Production Regulations. All details of activities must be given through the control points mentioned below. It is important that all questions related to production must be explained. The control points which are not related to your processing could be answered as NA (Not Applicable). ETKO application division will verify this form before the inspection and ETKO inspector will assess during the inspection. **You must submit this compliance plan before inspection takes place**, therefore you need to start updating it earlier then starting processing. It is highly recommended that non compliances you described during your annual self-assessment must be cleared by your side, before ETKO inspection takes place. Otherwise certification decision of your production may be delayed or not approved due to necessity of follow up inspection. 205.201, 205.400.

The control points could be described as: YES=Complies, NO=Does not comply, NA=Not applicable.

NCR Non-Conformity Level (MA/MI/PoA) section will be filled in by ETKO inspector.

License holder must keep this report and related all documents at least for 5 years as auditable format. All documents must be open for ETKO, State officials in working hours and copying some documents must be allowed. 205.400(d)

This form must be filled in only for processing facilities where the product structure is changed such as "Processing. Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container"

Related to transport and storage activities.

Storage and transportation is still integrated in to the handling operations and covered by the Organic System Plan. The difference between processing units and these operations (storage/transport) we will not make separate certification like we do for processing facilities. Storage and transport will be evaluated under the responsibility of the licensee which we make contract and certification.

Statement: As operator I declare that I will perform the operations in accordance with IACB, TC, NOP, BIOSUISSE, KRAV, NOP and COR in the event of infringement or irregularities, I accept to inform in writing the buyers of the product in order to ensure that the indications referring to the organic production method are removed from this production.

NAME LICENSEE	BEL-AGRO LLC			
NAME PROCESSOR				
PROCESSING SITE ADDRESS	2, Lisova str., Brovary city, Kiev region, 07400, Ukraine			
COUNTRY	UKRAINE			
PHONE-FAX-EMAIL	+380674047123 Vyacheslav Belov, +380503388805 Boutros Iskander. Tov-belagro@ukr.net (b) (6)			
ACTIVITIES	Trading organic products			
CONTACT PERSON	Vyacheslav Belov			
APPLICABLE REGULATIONS	<input type="checkbox"/> TC	<input checked="" type="checkbox"/> NOP / COR	<input type="checkbox"/> IACB - EC	<input type="checkbox"/> Other

1. PRODUCTS TO BE CERTIFIED

Product specification to be verified during the inspection and joined to the final report if not submitted with the OCP.

Incase needed make a separate list.

Corn	Seeds		
Flax	Seeds		
Mustard	Seeds		
Peas	Seeds		
Rapeseeds	Seeds, oil		
Soybean	Seeds, oil		
Sunflower	Seeds, oil and cake/expeller		

		General Principles	COMMENT	COMMENT
A1	205.201	Organic Compliance Plan Overview– If the information requested is available in other company documents, please provide a clear reference to the exact section of your appropriate record.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>
A1.1	205.201(a)(6)	Facility Map: A complete facility plan is present and includes major equipment, rooms and building? PLEASE ATTACH FACILITY MAP	We are only office for Trading without physical contact with products	Belagro is only Trading company, they will buy and export organic certified products from certified sources
A1.2	205.201(a)(1) IACB 5.3	Production process diagram is present for each product (You need to provide a flow chart showing how the product moves in your plant including major equipment)? PLEASE ATTACH PROCESS DIAGRAM FOR EACH PRODUCT	-	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	2/10
				Inspector Comments	
A1.3	IACB 5.3	A brief description of each process must be given? PLEASE ATTACH THE DOCUMENTS (PROCEDURES) SHOWING FULL DESCRIPTION OF THE PROCESS OF: LABELLING, PACKAGING, STORING, TRANSPORTATION PROCESS AND OTHER PROCESS IN THE FACILITY.	-		
A1.4	205.201 (a)(1)	A brief description of production practices and procedures including the estimated frequency and volume of these production runs are present? PLEASE EXPLAIN BRIEFLY PRODUCTION PRACTICES, FREQUENCY AND VOLUME	-		
A1.5	205.201 (a)(2)	Accurate Product Specifications were prepared and present for all complex products seeking certification? PLEASE ATTACH PRODUCT SPECIFICATIONS	We trade only single ingredient products. Specification for contract always provided by Clients.	Belagro using local Ukrainian regulation for product specification, specifications will be given by the buyer	
A1.6	205.201 (a)(3) 889-Article 63 IACB 5.3	A brief description of your quality monitoring practices is prepared? PLEASE EXPLAIN HERE HOW DO YOU MONITOR ORGANIC PRODUCTION PRACTICES TO VERIFY THE ORGANIC PLAN IS EFFECTIVELY IMPLEMENTED	Alexey Kachkovskiy is responsible as consultant for organic production.	Belagro has consultant Alexey Kachkovskiy who has since many years' experience in organic agriculture assigned for organic integrity checks.	
A1.7	205.201 (a)(4) 889-Article 65 IACB 10.1	Do you have available for review by the inspector, an audit trail of documents that tracks product by identity and volume from receiving through distribution? PLEASE LIST WHICH DOCUMENTS YOU KEEP FOR AUDIT TRAIL	We didn't start with trade yet	No marketing took place yet, as they are planning to start with 2015 crop later in the season.	
A1.8	205.201 (a)(5) 889-Article 26 IACB 7.2	A brief description of your management practices used to protect the organic commodities from potential co-mingling and contamination is present? PLEASE EXPLAIN HERE HOW DO YOU AVOID CO-MINGLING AND CONTAMINATION	We are not planning bulk deliveries. Always products will be packed in (b) (4) and (b) (4) / (b) (4).	Products are all certified from the origin (b) (4) (b) (4), therefore the products are packed and sealed already in the origin where Belagro buys the products, such (b) (4) factory.	
A1.9	889/08 Article 31.1 IACB 7.5.2	The operator shall check the closing of the packaging or container where it is required and the presence of the indications. The operator shall crosscheck the information on the label with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts. PLEASE EXPLAIN HERE HOW DO YOU CHECK THE PACKAGE AND THE ACCOMPANYING DOCUMENTS OF THE ORGANIC PRODUCT	We normally nominate (b) (4) (surveyor) for such procedures.	Surveillance body is contracted for the shipments and containers, checking and reporting to Belagro. Belagro will label the containers accordingly and the documents to be indicated the status of the product.	
A2		Product Protection – Please maintain, and make available, Product Protection Procedures for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A2.1	205.301 (f)(7)	Do you use exclusively either an organic or conventional form of any ingredient in each formula (e.g. organic raisins or conventional raisins, not both, in organic cake)?	We trade single ingredient products only.	There is no complex products with different ingredients. Only single ingredient products are	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	3/10
				Inspector Comments	
		PLEASE EXPLAIN YOUR PRODUCT COMPOSITION		traded.	
A2.2	205.272(a) 889-Article 26 IACB 7.2	Do you take adequate measures to prevent, during all stages of production and storage? Commingling of organic and non-organic product and ingredients; and PLEASE EXPLAIN HERE HOW DO YOU AVOID	We have no any contact with products at any stage of production and storage	This is taken by the producer company and certified itself.	
A2.3	205.272(a) 889-Article 26 IACB 7.2	Contact of organic products and ingredients by prohibited substances or sanitation materials? PLEASE EXPLAIN HOW DO YOU AVOID	Na	NA	
A2.4	205.272(a) 889-Article 31 IACB 7.5.2	Are procedures and documentation used to protect the organic integrity of products under your control during transport? PLEASE EXPLAIN HOW DO YOU PROTECT ORGANIC INTEGRITY DURING TRANSPORT	We buy new (b) tanks and (b) (4) to protect products during transportation.	New (b) tanks are used to protect the products from contamination.	
A3	205.201(a) 205.271 889-Article 63 IACB 5.3	Facility Pest Management – Please maintain, and make available, copies of your Facility Pest Management Program for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A3.1	205.271(a)(b)	Is a structural pest management program in place that stresses sanitation and other preventive measures including mechanical traps, lures and repellants consistent with the National List? PLEASE EXPLAIN HERE YOUR PEST MANAGEMENT METHOD	We have only office for trading.	NA	
A3.2	205.271(c)	Are substances used inside the facility for pest control: On the National List? and PLEASE LIST HERE SUBSTANCES USED INSIDE THE FACILITY	Na	NA	
A3.3	205.271(c)	Used only when preventive and control measures are not effective? PLEASE EXPLAIN THE REASON OF USE	Na	NA	
A3.4	205.271(d)(e)	If inside facility pest control materials are used that do not appear on the National List: are they used only when prevention control measures and materials on the National List are not effective and PLEASE LIST MATERIALS USED AND NOT ON THE NATIONAL LIST	Na	NA	
A3.5	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	Na	NA	
A3.6	205.271(f)	Are you aware that you are responsible for using materials in compliance with all local, state and federal regulations? PLEASE EXPLAIN WHEN THERE IS ANY METHOD AGAINST THE ORGANIC REGULATION	Na	NA	
A3.7	205.201(a), 205.271	Does your pest management program include facility maps, incident logs and pesticide use charts? PLEASE EXPLAIN	Na	NA	
A4	889-A834- Art.10, 26, 35 IACB 7.2, 7.5.4	Sanitation – Please maintain, and make available, Sanitation Procedures for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A4.1	205.201(a)(5), 205.272(a)	Does this facility have a formalized sanitation program to protect the organic integrity of organic raw materials and finished goods during storage? PLEASE EXPLAIN	No own facilities	NA	
A4.2	205.272(a)(2)	Is there a sanitation program to prevent contamination on food contact surfaces from cleansers and sanitizers? PLEASE EXPLAIN SANITATION METHOD	Na	NA	
A4.3	205.272(b)(2)	If packaging materials or containers are re-used, are proper cleaning procedures maintained prior to	No reuse of (b) or (b) (4) is possible	New (b) tanks are used and they are	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	4/10
				Inspector Comments	
		organic use? PLEASE EXPLAIN CLEANING METHOD		hygienic, no re-use is possible.	
A4.4	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	Na	There is no possibility for contamination from other sources during the storage and transport. Because oil is kept in tanks always.	
A4.5	889-Article 35.4c	Suitable cleaning measures, the effectiveness of which has been checked, have been carried out before the storage of organic products? Are these operations recorded? EXPLAIN WHICH CLEANING MEASURES YOU TAKE and HOW IT IS CHECKED AND RECORDED	We buy from organic certified processing and they put product at their place in our new (b)	Storage of the oil is the responsibility of the producer but transport tanks responsibility belongs to Belagro. Tanks are totally new.	
A5	889-Article 63 IACB 5.3	Quality Assurance-Please maintain, and make available, Quality Procedures for each on-site inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A5.1	205.201(a)(1-6)	Does your quality management system adequately document and provide verification of its compliance with the organic regulations? PLEASE LIST DOCUMENTS RELATED TO QUALITY MANAGEMENT	At the moment Quality Management is based on own experiences	There is Guide for Organic Procsors but no local language quality system not present	
A5.2	205.103(b)(4), 205.201(a)(1-6)	Is there a management system in place that covers all aspects of products (TQM, HACCP, ISO, etc.)? PLEASE INDICATE WHICH QUALITY SYSTEM CERTIFICATION PRESENT	No any yet	None	
A5.3	205.103(b)(4), 205.201(a)(1-6)	Do you have a procedure for documenting and addressing complaints relating to compliance with organic standards? PLEASE INDICATE THE NAME OF THE PROCEDURE AND DOCUMENTS	We created register for future complaints where is mentioned complaint and taken actions and responsible person (attached). No complaints yet	Complaint register and handling complaint is there but how to handle the product with issue not clear.	
A6	889-Article 66 IACB 10.1	Record Keeping (Audit Trail) – Please maintain, and make available all record keeping for each onsite inspection.		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A6.1	205.201(a)(1-2), 205.103(a)	Are current organic certificates for all contracted handling operations maintained? PLEASE EXPLAIN IF ALL SUBCONTRACTED UNITS HAVE ORGANIC CERTIFICATION	We will buy only from certified operators	They will buy from certified sources and they will keep the certificates.	
A6.2	205.103(b)(4)	Is there a formal Audit Trail in place with sufficient records to show the following: a) Raw commodity receiving, b) Lot tracking & coding, c) Certification of organic materials, d) Purchasing receipts, e) Production records, f) Inventories and storage locations, g) Sales, shipping and distribution of organic materials and products? PLEASE LIST AND DESCRIBE RELATED DOCUMENTS OF YOUR SYSTEM	We only consultancy/trade company and such commercial docs we have	In Belagro only commercial documents are available, for the moment no documents yet.	
A6.3	205.103(b)(3)	Do you maintain all records for at least five (5) years?	All the records are kept from the beginning.	They understood the rule.	
A6.4		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	NA, no sales for final consumer present.	
A7	834-Article 19, 23 IACB 7.4, 9.1	Product composition and labelling categories		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A7.1		For complex products product specifications were	Na	NA, single ingredient	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	5/10
				Inspector Comments	
		prepared and send to ETKO for approval? PLEASE ATTACH PRODUCTS SPECIFICATIONS		products are traded.	
A7.2	205.105	100% organic products contains only organic ingredients except water and salt? Products are labelled "100% Organic product" PLEASE LIST 100% ORGANIC PRODUCTS	Na		
A7.3		95% organic products contains minimum 95% certified organic materials and the rest 5% material complies the organic regulations lists? Products are labelled as "organic" product. PLEASE LIST 95% ORGANIC PRODUCTS	Na		
A7.4	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		
A7.5		70% organic products contains minimum 70% organic certified ingredients and labelled as "Made with organic----" PLEASE LIST IF YOU HAVE 70% ORGANIC PRODUCTS	Na		
A7.6		Traceability of the multi ingredient products are set and kept in good order for inspections. PLEASE LIST MULTI INGREDIENT PRODUCTS	Na		
A7.8		In case use of conventional agriculture ingredients, you have enough evidence indicating non availability of related ingredients. , PLEASE LIST CONVENTIONAL INGREDIENTS USED IF ANY AND ATTACH NON-AVAILABILITY DECLARATIONS	Na		
A7.9		All non agricultural ingredients & processing aids are included in organic regulation PLEASE LIST AGRICULTURAL INGREDIENTS AND PROCESSING AIDS	Na		
A7.10	205.605	If there is any specific situation maybe unique to your operation and you are planning to use a synthetic material, processing aid or ingredient, you always refer to regulations list? PLEASE LIST PROCESSING AIDS, MATERIAL OR INGREDIENT USED	Na		
A8	834-Article 19, 23 IACB 7.4, 9.1	Labelling		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A8.1	205.307	When there is no labeling for bulk products do you identify organic products in the form of a lot number or other tracking device? PLEASE EXPLAIN INDICATION STATUS OF ORGANIC	The lot numbers will be generated for each lot for traceability if we will have any bulk deliveries.	Label is there with referenc to Lot and status. Invoice only with status, B/L is no status no lot number	
A8.2	205.307	There is always label attached to raw material and is it visible? PLEASE EXPLAIN HOW DO YOU INDICATE	Na yet	It is applicable but not correctly commented.	
A8.3	205.307	There is always label attached to final packed product? PLEASE ATTACH THE LABELS USED or INDICATE THE LABEL CONTENT HERE	Na yet	"	
A9.4	205.307	Labels for raw material and final product complies the organic regulations and approved by ETKO before use? PLEASE ATTACH LABEL or INDICATE THE CONTENT HERE	Na yet. Will be created and sent for approval before use.	"	
A9.5	205.300-311	Labeling categories comply the organic regulation	Na yet	"	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	6/10
				Inspector Comments	
		requirements and approved by ETKO? PLEASE INDICATE WHICH CATEGORIES YOU APPLIED FOR			
A10		Packing Material		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A10.1	205.272b	Packing materials were evaluated against chemical contamination and there is no chemical pesticides or heavy metal applications to packing material? PLEASE EXPLAIN YOUR PROCEDURE TO EVALUATE PACKING MATERIAL	Only new (b) tanks. They are certified for food products.	New (b) tanks are used for oil. These tanks are certified for food grade and they are imported from Germany. Check (b) tanks requirement if there is specific requirement.	
A10.2		Packing material was stored in a way that no pest-rodent can nest and reproduce, no physical pollutants are present? PLEASE EXPLAIN HOW YOU STORE PACKING MATERIAL	These (b) are stored packed and not possible for any pest-rodents to come inside.	Packing material is already packed and protected. One is 100 kgs heavy and not easy to handle.	
A11		Recertification		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A11.1		If you are intend to buy and export products from other certified sources by other certifiers, did you get inspection report and master certificate of the supplier? PLEASE ATTACH CERTIFICATION DOCUMENTS OF THE SUPPLIER	Na yet	No transaction was made so far.	
A11.2		The certifier of the supplier is accredited (USDA, ISO 65, EN 45011)? PLEASE ATTACH THE CERTIFIERS ACCREDITATION LETTER	Na yet	/	
A11.3		Analyses report of the product is present? PLEASE ATTACH THE ANALYSES RESULTS OF THE ORGANIC PRODUCTS YOU BUY	Na yet	/	
A12	889-Articles 27 and 27a; IACB 7.4.1	Water use		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A12.1		There are water analyses results if water is used for any steps of the processing and has contact to the product? PLEASE ATTACH WATER ANALYSES RESULT	We don't use any water	NA	
A12.2		Only drinkable water is used as ingredient of the final product? PLEASE EXPLAIN THE SOURCE OF THE WATER	Na	/	
A12.3		Chlor content of the water cannot exceed according to consumers country; eg NOP 4 ppm, Germany 0.3 ppm, does it comply? PLEASE ATTACH ANALYSES REPORT	Na	/	
A12.4		Only drinkable water is used for washing products? PLEASE EXPLAIN THE SOURCE OF WATER	Na	/	
A12.5		Boiler additives used are listed on the national list? PLEASE LIST IF ANY BOILER ADDITIVES USED	Na	/	
A13		Complaints and Non conformities		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
A13.1		Incase there is a residue problem and complaint from a buyer, do processor informs ETKO immediately? PLEASE INDICATE THE COMPLAINTS YOU RECEIVED	Na yet	No marketing realized yet.	
A13.2		Incase analyses results show that there is a residue of an organic product then an evaluation report is prepared by the project responsible to identify the causes and send to ETKO when finalized? PLEASE ATTACH THE ANALYSES RESULTS THAT YOU DETECTED RESIDUES	Na yet	No experience yet	
A13.3		When there is a contamination / commingling during	Na yet. Will act		

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	7/10
				Inspector Comments	
		the product flow in the processing facility or transport immediate corrective actions are taken and contaminated lot is isolated and disqualified by the responsible. Operator informs ETKO for the incidence and keeps the records? PLEASE EXPLAIN WHAT HAPPENED	accordingly.		
B1	889-Article 29, 30, 33 IACB 7.5.1, 7.5.3	Goods reception		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B1.1		Raw material and food ingredients were transported in a manner that integrity of organic product was not affected? PLEASE EXPLAIN TRANSPORT SYSTEM	We have no contact with products and raw material	NA	
B1.2		There is a raw, ingredient product receive procedure and all are registered in an auditable format, registration documents are ready for inspection? PLEASE EXPLAIN RECORDING SYSTEM	Na	NA	
B1.3		In case there is a suspicion products are refused and not accepted for processing? PLEASE EXPLAIN REFUSAL SYSTEM	Na	NA	
B1.4		Following product flow within the processing unit is completely separated and precautionary measures are taken against contamination? PLEASE EXPLAIN SEPARATION SYSTEM	Na	NA	
B1.5	889-Article 66 IACB 10.1	Status of the product are clearly mentioned on the documents kept during the organic products receive? PLEASE EXPLAIN HOW DO YOU RECORD	Will be checked and recorded	New labels are ok approved now, but the last delivery was without label.	
B1.6	834-Article 23 IACB 9.1	Labels are attached to the incoming goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN INDICATION SYSTEM	Na . will be checked	"	
B1.7	889-Article 66 IACB 10.1	Traceability of incoming products are possible and kept in good order for inspections? PLEASE EXPLAIN TRACEABILITY SYSTEM	In our bookkeeping system possible to check what was bought and what was sold	Belagro keeps a separate file for organic transactions.	
B2	889-Article 35 IACB 7.5.4	Storage		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B2.1		Stores are clean and there is no pollutants present which may damage the organic quality? PLEASE EXPLAIN HOW DO YOU KEEP STORES CLEAN	We have no own storages	NA, No storage is done by Blegaro	
B2.2		Stores where organic products are stored clearly indicated and visible? PLEASE EXPLAIN	Na	"	
B2.3		Stock inventory is kept always updated, ready for inspections anytime? PLEASE EXPLAIN	Na	"	
B2.4		Do you keep records for incoming-outgoing raw and processed products in auditable format? PLEASE EXPLAIN	Na	"	
B2.5		Labels are attached to the stored goods and it is understandable and visible which regulation it belongs to? PLEASE EXPLAIN THE LABEL USED	Na	"	
B3	834-Article 6 IACB 4.3, 4.4	Processing line		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B3.1	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	Na, no processing line.	No processing is done by Belagro, Belagro deals only trading.	
B3.2		Only allowed methods and materials were used during the processing, they comply the organic	Na	NA	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	8/10
				Inspector Comments	
		regulations? PLEASE LIST ALL MATERIAL USED			
B3.3	205.271	If there is pest control of the bulk or packed organic products used methods or substances comply the organic regulations? PLEASE EXPLAIN	Na	NA	
B3.4		Records related to processing times, quantities of raw and finished material are kept for organic products processing for inspections? PLEASE EXPLAIN	Na	NA	
B3.5		Quality control procedures are present and laboratory analyses are kept for inspections? PLEASE EXPLAIN YOUR PROCEDURES	Quality Manual in development	Guide for organic processors is there but local language guide is not present.	
B4	205.105(e)	Excluded Methods		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B4.1	834-Article 9 889-Article 69 IACB 5.9	GMO Free declarations are present for the processing aids if applicable? PLEASE ATTACH DECLARATIONS	Na	Guide for organic processors is there but local language guide is not present.	
B4.2	834-Article 10 IACB 5.10	There is no ionizing radiation and sewage sludge use neither for any processing nor any raw material used for the composition of the product? PLEASE EXPLAIN	No	NA	
B5	NOP 205.272 NOP 205.201 889-Article 26 IACB 7.3	Separation in Split Operations		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	
B5.1		A procedure was developed and provided to each subcontracted processor for a good separation of organic products processing? PLEASE ATTACH PROCEDURE	We have no own processing, only Trade	It is only trade operation, no processing takes place.	
B5.2		Separation of organic raw material during receive is possible by documents, indication of status is present? PLEASE EXPLAIN YOUR SYSTEM	Na	"	
B5.3		Separation of organic products in store is present and visible. There is no contact to any conventional product or non-allowed material? PLEASE EXPLAIN	Na	"	
B5.4	205.605	Processing lines were completely cleaned with allowed substances and methods before organic processing? PLEASE LIST CLEANING MATERIAL	Na	"	
B5.5		Workers who are in charge were trained to handle organic products to avoid contamination and commingling? PLEASE EXPLAIN TRAINING	Na	"	
B5.6		Organic products certified according to different regulations were separately handled, labelled and stored? PLEASE EXPLAIN SEPARATION	Na	"	
B5.7		Do you secure organic integrity in a continuous process such as milling, oil or sugar production by giving away certain quantity of organic product for depuration? Do you have a procedure to guarantee separation? PLEASE EXPLAIN HOW DO YOU MAKE IT	Na, discussed with processors to take out first (b) after beginning of organic processing	NA As a general information oil mills needs to disqualify (b) of daily production capacity.	
C	205.103(b)(2)(4)	DOCUMENTS ALWAYS TO BE KEPT READY FOR INSPECTION BY LICENCE HOLDER			
		Following documents are part of your Organic Compliance Plan and always must be ready for	YES		

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	9/10
				Inspector Comments	
		inspection and must be submitted when it is required by ETKO or state officials. These documents must be kept at least 5 years as auditable.			
		Organic Compliance Plan is always present and updated regularly by the responsible	YES		
		Production Process Diagram: (For each final product a separate one) is present	NA		
		Samples of all labels to be used on products are present and approved by ETKO	YES		
		Receiving records are present and complete	YES		
		Stock inventory records are present and complete	NA		
		Production records are present and complete	NA		
		Distribution records are present and complete	YES		
		Product and water analyses reports are present when applicable.	YES		When applies
		Product specifications for complex products means more than one ingredient are present	NA		
		Processor agreements for subcontracted units are present	NA		
		GMO Free Declarations for ingredients when applicable are present	NA		
		List of processing aids and raw materials is prepared and present	NA		
		Cleaning and disinfection material list and specifications are present for all units	NA		
		Pest-rodent control records are present for all units	NA		
		If the supplier is different incoming raw material certificates are present	NA		
		If the supplier is different inspection report and master certificate of the supplier are present.	YES		
		Organic production regulations are present	YES		
		ETKO file includes all ETKO documents such as contract, inspection report, correspondence, certificates, non-compliance, inspection documents, export documents	YES		
		Complaint procedure is present and includes handling of complaints	YES		
		Sanctions applied to products, subcontracted producers or processors are listed and ETKO is informed on time	NA		
		When there is change of production, composition, products etc OCP is updated and send to ETKO for evaluation before starting process.	YES		
		Contracted producers agreements, field maps are present and complete	NA		
		If applicable; Internal Control System procedures, farmers' inspection and training records are present. Valid only for EC 834/2007, NOP Regulation and BIOSUISSE, not recognized by TC 25841/2005	NA		
D	NOP 205.201(a)	Additional Information Deemed Necessary by ETKO to Evaluate the Compliance with the Regulations	NA		

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
				Date	29.08.2015
				Rev No	06
				Page	10/10
				Inspector Comments	

SECTION E CONFIRMATION

As operator I declare that on my part and on behalf of my subcontractor's where I and my subcontractors are inspected by different inspection bodies or authorities an agreement by the operator must be included on his behalf and that of his subcontractors, that the different inspection bodies or authorities can exchange information on the operations under their inspection and on the way this exchange of information can be implemented. I have understood this declaration.

I understand and accept that my above stated information will be treated by ETKO confidentially. Data will be only forwarded to third parties, if I submit a written agreement.

The above application and attached informal page listed above is true to the best of my knowledge. I understand that approval of certification will be contingent on additional unannounced plant visits, (by any person authorized by the Certifier and State Official), for which I hereby give permission.

Place, date: **09.09.2016**

Signature of the representative:

Name of the representative: **Vyacheslav Belov**

ETKO Results of Verification

NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		
POINT of ATTENTION		A5.1: There is Guide for Organic Procsors but no local language quality system not present
		A.5.3 Complaint register and handling complaint is there but how to handle the product with issue not clear.
		A.8.1 Label is there with references to Lot and status. Invoice only with status, B/L is no status no lot number
		A.8.2, 8.3 It is applicable but not correctly commented.
		A.10.1 New (b) tanks are used for oil. These tanks are certified for food grade and they are imported from Germany. Check (b) tanks requirement if there is specific requirement.
		B.1.5 New labels are ok approved now, but the last delivery was without label.
		B.3.5, B.4.1 Guide for organic processors is there but local language guide is not present.

Place, Date: **06.10.2016**

Name ETKO Representative

Mustafa Akyüz

Signature of ETKO representative

From: [Winter Julia](#)
To: aude.bonnet@ecocert.com
Cc: [Crail, Lars - AMS](#); [Erkan Emel](#); [Zdralek Ulrike](#)
Subject: Biofach meeting NOP corn handler
Date: Tuesday, February 07, 2017 1:30:00 PM
Attachments: [image005.jpg](#)

Dear Aude

nice to meet you at the NOP training in Portland. I hope you had a save trip home.

I have ask our responsible persons about the meeting at Biofach. Would it be possible for your responsible person to meet on Thursday at 11:15 a.m. on our booth 585 in hall I?

On the Integrity Database I saw that there are a few other certifying agents in Turkey:

BioAgriCert

CAAE

Control Union

Kiwa

Etko (?)

Ceres

CCBP

ICEA

I think it would be too much if we invite all of them. But if you know somebody you can tell him/her about the meeting.

Thank you very much for your answer.

Kind regards,

Julia Winter

bio.inspecta AG

Department Processing and Trade

Tel +41 62 865 63 24

Fax +41 62 865 63 01

julia.winter@bio-inspecta.ch

www.bio-inspecta.ch

BIS_MiniFlyer_Biofach17_EmailSig_v01



From: [Crail, Lars - AMS](#)
To: [Stutts, Debra - AMS](#)
Subject: ETKO - (b) (4)
Date: Monday, June 27, 2016 1:43:00 PM
Attachments: [image001.png](#)

Hi Debra,

Can you advise me if Ecological Farming Controlling Organization (ETKO), FMMI = (b) (4) has a credit or debit balance and the amount. Thanks.

Lars Crail
USDA NOP
202.205.5536 office
(b) (6) mobile



From: [Crail, Lars - AMS](#)
To: [MUSTAFA AKYUZ; ma@etko.com.tr](#)
Cc: [Rebecca Claypool](#)
Subject: ETKO Audit - Proposed February 2017
Date: Monday, December 19, 2016 12:31:00 PM
Attachments: [image001.png](#)

Hello Mustafa,

I'll be attending BioFach 2017 and will be part of a panel on Wednesday from 15:00-16:30 covering the topic of Accreditation of organic certifiers – systems, experiences and risk-oriented surveillance. I also hope to schedule individual meetings with certifiers while attending the conference. A NOP Organic Insider will be issued to certifiers to contact me and make individual appointments.

I'd like to coordinate with you audit activities while in Europe and we had previously discussed an on-site audit in Izmir and other parts of Turkey. Would the week after BioFach conference be acceptable, that is, February 20 – 24?

Please contact me via Skype if you care to discuss.

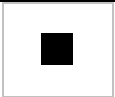
Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile

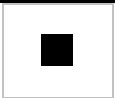


Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



From: ma@etko.org
To: [Crail, Lars - AMS](#)
Cc: fa@etko.org
Subject: ETKO Clients Ukraine
Date: Tuesday, August 09, 2016 10:56:54 AM
Attachments: [Map with distance indication.png](#)
[2016 - ETKO - List of operators - UA 2016-08-06 AC.xls](#)

Dear Lars

You can find attached list for present situation of the operators.

The cities Kiev, Dnepropetrovsk, Odessa there are airports which you can fly from major cities in Europe.

Kherson there is airport but I think you can fly only via Istanbul by Turkish airlines. However if you choose operators there in Kherson; Odessa is the option, we could arrange transport from Odessa to Kherson.

In Rivne area, nearest operator is farm Volyn Agro which is 260 kms from Rivne, driving takes about 4 hours depending on the road conditions.

The conflict area where Russian troops are is indicated on the map. None of the operators are in the neighborhood, so there is no risk to travel any of them in the list.

I hope this information is helpful.

Best regards,

Mustafa

ETKO Turkey

2016 ETKO - LIST NOP

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3080 - Sadeko	3080D-01	SADEKO ltd.	UA	Kherson		Kherson	Trader	8/6/2016	Kherson
	3080F-03	Rin-Agro	UA	Kherson	Chaplynskiy	Chaplynka	1,235	8/4/2016	150km to Kherson
	3080F-04	FG Diana	UA	Kherson	Bilozerka	Stanislav	386	8/5/2016	50km to Kherson
	3080F-05	TOV "PREOBRAZHENSKE"	UA	Zaporizhya	Orikhivskiy	Chervona krynytsa	5,300	8/3/2016	240 km to Kherson

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3130 - AF Agros	3130D-01	Agrofirna "Agros"	UA	Dnipropetrovsk	Magdalinovka	Magdalinovka	Trader	7/21/2016	50km to Dnepropetrovsk
	3130F-01	Agrofirna "Agros"	UA	Dnipropetrovsk	Magdalinovka	Magdalinovka	1,500	7/22/2016	50km to Dnepropetrovsk

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3141 - Ekolium	3141D-01	Ekolium	UA	Kiev			Trader	not yet	Kiev

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3188 - VIP Group LLC.	3188D-01	VIP Group LLC.	UA	Kiev			Trader	not yet	Kiev

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3214 - BEL-AGRO LLC	3214D-01	BEL-AGRO LLC	UA	Kiev			Trader	not yet	Kiev

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3204 - PJSC "Melitopol Oil Extraction Plant"	3204D-01	PJSC "Melitopol Oil Extraction Plant"	UA	Zaporozhye	Melitopol	Melitopol	Trader, Oil Factory	not yet	200km to Kherson, 220km to Dnepropetrovsk

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3216 - Syavo	3216D-01	"Syavo" ltd.	UA	Dnipropetrovsk		Dnipropetrovsk	Trader	6/2/2016	in Dnipropetrovsk
	3216F-01	Heliantus LLC	UA	Dnipropetrovsk	Novomoskovsk	Pereshepino	1,114	5/30/2016	70km to Dnepropetrovsk
	3216F-02	PE "ACE Dovira"	UA	Dnipropetrovsk	Novomoskovsk	Mikhaylovka	1,263	5/30/2016	70km to Dnepropetrovsk
	3216F-03	PE "Zhytnitsa"	UA	Dnipropetrovsk	Shirokoe	Karpovka	391	5/31/2016	180km to Dnepropetrovsk
	3216F-04	TOV "Volyn-Agro"	UA	Volyn	Turiysk	Perevaly	4,327	12-13.05 2016	1000km to Dnepropetrovsk, 500km to Kiev, 260km to Rivne

Project	No	Name farm	Country	Region	District	Village	Field, HA	Inspection date	Distance to
3220 - Ukrfield	3220D-01	Ukrfield LLC	UA	Odessa		Odessa	Trader	not yet	in Odessa

	3220D-02	Dniproyske HPP	UA	Kherson		Nova Kakhovka	Terminal	not yet	70km to Kherson
	3220F-01	"Maryanivske" LTD	UA	Odessa	Shiryaevo	Maryanivka	3258	not yet	130km to Odessa
	3220F-02	CSP "Rodina"	UA	Odessa	Srata	Plahteivka	10896	not yet	150km to Odessa
	3220F-03	"Agro-DIS" LTD	UA	Odessa	Ananiev	Kohovka	3100	not yet	150km to Odessa
	3220F-04	CSP 'Svitanok Stari Mayaki'	UA	Odessa	Shiryaevo	Stari Mayaki	4969	not yet	110km to Odessa

From: [Crail, Lars - AMS](#)
To: [Rebecca Claypool](#)
Subject: ETKO Compliance Audit - Feb 2017
Date: Friday, December 30, 2016 1:05:00 PM
Attachments: [NP7051LCA \(ETKO\) Auditor Special Instructions 12 30 16.docx](#)
[NP6199LCA Auditor Special Instructions 06 16 16.docx](#)
[image001.png](#)

Rebecca, Attached is the Auditor Special Instructions for a compliance audit of ETKO in February. Also attached are Instructions you completed in June 2016 for the same audit that was to be conducted by Penny and I. It was cancelled. See if there are any updates from the June Instructions and add them to the current Instructions with the carryover items from the June copy. Thanks.

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



National Organic Program: Auditor Special Instructions

How to complete this audit planning worksheet – see instructions below the section tables.

Section 1: General Audit Information (Completed by Lead Auditor)

Date: June 16, 2016

Audited Party	ETKO	Accreditation Mgr.(AM)	Rebecca Claypool
State/Country	Izmir, Turkey	Lead Auditor	Lars Crail
Audit ID	NP6199LCA	2 nd Auditor	Penny Zuck
Audit or Assessment Type (Renewal, Compliance, Mid-term, etc...)	Compliance	Technical Assistant	NA
Audit Activity Dates	Jul 18 – 22, 2016	Evaluator	NA
Audit Plan and Cost Estimate Review Date (Completed by NOP Lead Auditor, NOP Management, or LPS Supervisor)		Reviewer's name: (Completed by NOP Lead Auditor, NOP Management, or LPS Supervisor)	

Section 2: Audit Planning Information (Completed by Lead Auditor)

Accreditation Activity Focus (e.g. Handling, Crops, Livestock, Material review, Adverse Action Procedures, Residue sampling actions, Annual Audit Priorities, etc...)	Terms of the Settlement Agreement signed April 6, 2016
Commodity Focus (grains, wine, fruit, dairy products, etc...)	NA
Certified Operation Type Focus (e.g. Fruit Packing facilities, Brokers, Reinstated operations, Dairies, Grower groups, etc...)	NA

National Organic Program: Auditor Special Instructions

Proposed Audit Methods or Activities (e.g. Corrective Actions Verification, Witness and/or Review Audits, Desk Audits, etc.)	Conduct at least 2 witness audits.
--	------------------------------------

Section 3: Noncompliance Corrective Action Verification (Completed by AM)

Completed by the AM Date: _____

NC ID	Audit, Settlement Agreement or other	Description of NC/CA or hyperlink
AIA6155PZ	NoNC Ann Rept	..\Compliance\2016\AIA6155PZ ETKO AR NoNC 06 21 16.pdf
NP4132LCA	2013 Renewal Audit	..\2013 Renewal\Corr Action\NP4132LCA CA Report 12 18 15 final.docx

Section 4: Compliance & Enforcement Division (Completed by AM)

Discussed with C&E Division staff: Kristin Thornblad Date: 6/6/16

Case ID	Description of issue, hyperlink, and specific request
-	No issues to address

Section 5: NOP Appeals Input (Completed by AM)

Discussed with NOP Appeals staff: _____ Date: _____

Case ID	Description of issue, hyperlink, and specific request
16-008 ETKO	Auditors will be able to review and verify/clear some, but not all, of the terms in the attached agreement. If the auditors have any questions, they can reach out to Appeals, or Cheri, for guidance. If the auditors have any questions about what the corrective actions are that are referenced in term 5.A.a., please let Meg Kuhn know. P:\Appeals\1 CLOSED Appeals\FY 2016\16-008 ETKO\Settlement.ETKO.APL-008-16.pdf

Section 6: Other AM Notes (Completed by AM)

Date: _____

Reference ID	Description of issue

National Organic Program: Auditor Special Instructions

2016 Ann Rept	..\Ann Repts\2016
	Annual Report for 2016 is in process. NC sent 6/21/16

AM must insert links to the current certifier annual report folder, prior Auditor Checklists (NOP 2005 series) folder. AM may include other materials and links relevant to certifying agent that are deemed essential. For example: Any correspondence between AIA and ACA related to policy decisions or certifier questions that may be relevant to the audit.

Purpose of Planning Worksheet:

This completed planning document serves as a record of the purpose, scope, objectives, and priorities of the audit or review.

This document will:

1. Record special instructions to the Lead Auditor in order for the Lead Auditor to plan and execute an audit or review of certifiers or other entities.
2. Be submitted by the Lead Auditor along with the completed NOP 2005 series checklists to the NOP or QAD upon completion of the audit or review.

Instructions:

1. Lead Auditor is assigned.
2. Lead Auditor retrieves a blank template of the Auditor Special Instructions:
Z:\AIA\Templates\Audits\Planning and Preparation\Auditor Special Instructions 03 25 16.docx
3. Lead Auditor partially completes Section 1, Auditor Special Instructions, with available information.
4. Lead Auditor sends a copy of the Auditor Special Instructions to the NOP Accreditation Manager (AM). The List of Accreditation Managers and their assigned certifying agents is located here: Z:\AIA\Management\ACA-AM List
5. AM will place the received copy of the Auditor Special Instructions into the Certifying Agent's electronic folder and will provide the Lead Auditor a link (full directory path) to the location of the document.
6. AM to complete Sections 3, Auditor Special Instructions, and will contact the various representatives of the NOP Divisions or sections (e.g. Appeals) to obtain information necessary to complete Sections 4, 5, and 6, Auditor Special Instructions. In Section 6, the AM identifies the most recent Annual report materials and the most recent audit checklists (NOP 2005 series). The AM may place links in the Sections of the Auditor Special Instructions document allowing the Lead Auditor to connect to the various documents and/or folders.
7. The AM will inform the Lead Auditor when Step 6 is complete.

National Organic Program: Auditor Special Instructions

8. The Lead Auditor reviews the information in the Auditor Special Instructions provided by the AM. The Lead Auditor uses the information and any information obtained from contact with the certifier (email or telephone) to draft Section 2 of the Auditor Special Instructions. When drafting Section 2, the Lead Auditor should use all available resources: Organic Integrity Database, Prior Auditor Checklists, Most Recent Annual Report, Audit Priorities, etc...)
9. Lead Auditor contacts AM to explain and discuss the proposed components of Section 2, Auditor Special Instructions. The AM may provide suggestions or guidance to the Lead Auditor. This step is the opportunity for the AM to clarify with the Lead Auditor any of the materials provided and any special instructions.
10. The Lead Auditor finalizes the Auditor Special Instructions.
11. The Lead Auditor submits the Auditor Special Instructions along with a draft engagement letter and draft QAD 1415 to the NOP Lead Auditor (Lars Crail) for review.
12. NOP Lead Auditor (Lars Crail) will review the draft documents and may request clarification of the information and/or request modifications and conduct an additional review if necessary.
13. NOP Lead Auditor (Lars Crail) will complete the bottom row of Section 1, Special Auditor Instructions, and will notify the Lead Auditor and AM when this is completed.

National Organic Program: Auditor Special Instructions

How to complete this audit planning worksheet – see instructions below the section tables.

Section 1: General Audit Information (Completed by Lead Auditor)

Date: 30 Dec 16

Audited Party	ETKO	Accreditation Mgr.(AM)	Rebecca Claypool
State/Country	Turkey	Lead Auditor	Lars Crail
Audit ID	NP7051LCA	2 nd Auditor	NA
Audit or Assessment Type (Renewal, Compliance, Mid-term, etc...)	Compliance	Technical Assistant	NA
Audit Activity Dates	20 – 23 February 2017. See below.	Evaluator	NA
Audit Plan and Cost Estimate Review Date (Completed by NOP Lead Auditor, NOP Management, or LPS Supervisor)		Reviewer's name: (Completed by NOP Lead Auditor, NOP Management, or LPS Supervisor)	

Section 2: Audit Planning Information (Completed by Lead Auditor)

Accreditation Activity Focus (e.g. Handling, Crops, Livestock, Material review, Adverse Action Procedures, Residue sampling actions, Annual Audit Priorities, etc...)	Compliance Audit: (1) Auditor to review terms of the Settlement Agreement. (2) Auditor to review the status of all accepted corrective actions for uncleared noncompliances. One full day (20 Feb) conducting witness audits in Istanbul of traders/brokers. Feb 21-24, the auditor will visit ETKO's main office in Izmir, Turkey. There will be at least one additional witness audit conducted in Western Turkey.
Commodity Focus (grains, wine, fruit, dairy products, etc...)	NA
Certified Operation Type Focus (e.g. Fruit Packing facilities, Brokers, Reinstated operations, Dairies, Grower groups, etc...)	NA

National Organic Program: Auditor Special Instructions

Proposed Audit Methods or Activities (e.g. Corrective Actions Verification, Witness and/or Review Audits, Desk Audits, etc.)	See notes/comments above.
--	---

Section 3: Noncompliance Corrective Action Verification (Completed by AM)

Completed by the AM Date: _____

NC ID	Audit, Settlement Agreement or other	Description of NC/CA or hyperlink

Section 4: Compliance & Enforcement Division (Completed by AM)

Discussed with C&E Division staff: _____ Date: _____

Case ID	Description of issue, hyperlink, and specific request

Section 5: NOP Appeals Input (Completed by AM)

Discussed with NOP Appeals staff: _____ Date: _____

Case ID	Description of issue, hyperlink, and specific request

Section 6: Other AM Notes (Completed by AM)

Date: _____

Reference ID	Description of issue

AM must insert links to the current certifier annual report folder, prior Auditor Checklists (NOP 2005 series) folder. AM may include other materials and links relevant to certifying agent that are deemed essential. For example: Any correspondence between AIA and ACA related to policy decisions or certifier questions that may be relevant to the audit.

National Organic Program: Auditor Special Instructions

Purpose of Planning Worksheet:

This completed planning document serves as a record of the purpose, scope, objectives, and priorities of the audit or review.

This document will:

1. Record special instructions to the Lead Auditor in order for the Lead Auditor to plan and execute an audit or review of certifiers or other entities.
2. Be submitted by the Lead Auditor along with the completed NOP 2005 series checklists to the NOP or QAD upon completion of the audit or review.

Instructions:

1. Lead Auditor is assigned.
2. Lead Auditor retrieves a blank template of the Auditor Special Instructions:
Z:\AIA\Templates\Audits\Planning and Preparation\Auditor Special Instructions 03 25 16.docx
3. Lead Auditor partially completes Section 1, Auditor Special Instructions, with available information.
4. Lead Auditor sends a copy of the Auditor Special Instructions to the NOP Accreditation Manager (AM). The List of Accreditation Managers and their assigned certifying agents is located here: Z:\AIA\Management\ACA-AM List
5. AM will place the received copy of the Auditor Special Instructions into the Certifying Agent's electronic folder and will provide the Lead Auditor a link (full directory path) to the location of the document.
6. AM to complete Sections 3, Auditor Special Instructions, and will contact the various representatives of the NOP Divisions or sections (e.g. Appeals) to obtain information necessary to complete Sections 4, 5, and 6, Auditor Special Instructions. In Section 6, the AM identifies the most recent Annual report materials and the most recent audit checklists (NOP 2005 series). The AM may place links in the Sections of the Auditor Special Instructions document allowing the Lead Auditor to connect to the various documents and/or folders.
7. The AM will inform the Lead Auditor when Step 6 is complete.
8. The Lead Auditor reviews the information in the Auditor Special Instructions provided by the AM. The Lead Auditor uses the information and any information obtained from contact with the certifier (email or telephone) to draft Section 2 of the Auditor Special Instructions. When drafting Section 2, the Lead Auditor should use all available resources: Organic Integrity Database, Prior Auditor Checklists, Most Recent Annual Report, Audit Priorities, etc...)
9. Lead Auditor contacts AM to explain and discuss the proposed components of Section 2, Auditor Special Instructions. The AM may provide suggestions or guidance to the Lead Auditor. This step is the opportunity for the AM to clarify with the Lead Auditor any of the materials provided and any special instructions.

National Organic Program: Auditor Special Instructions

10. The Lead Auditor finalizes the Auditor Special Instructions.
11. The Lead Auditor submits the Auditor Special Instructions along with a draft engagement letter and draft QAD 1415 to the NOP Lead Auditor (Lars Crail) for review.
12. NOP Lead Auditor (Lars Crail) will review the draft documents and may request clarification of the information and/or request modifications and conduct an additional review if necessary.
13. NOP Lead Auditor (Lars Crail) will complete the bottom row of Section 1, Special Auditor Instructions, and will notify the Lead Auditor and AM when this is completed.

From: [Crail, Lars - AMS](#)
To: [Kuhn, Meg \(Meg.Kuhn@ams.usda.gov\)](mailto:Meg.Kuhn@ams.usda.gov)
Subject: ETKO Compliance Audit
Date: Sunday, June 26, 2016 3:47:00 PM
Attachments: [image001.png](#)

Hi Meg,

I'm preparing for the ETKO compliance audit. The Settlement Agreement states that: *ETKO agrees that the site-evaluation will also review nonconformances issued by international accreditation bodies that resulted in the conditional losses of accreditation to the ISO 17065 Standard, the Canadian Food Inspection Agency's Canada Organic Regime, and the European Union Commission's 3rd country recognition as a certifying body, as well as corresponding corrective and preventive actions implemented to address nonconformances.*

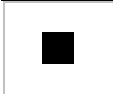
(b) (5) We can discuss via telephone or in person. I am tele-working on Monday and Wednesday. Thanks.

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



Ref Nr: 2016101401
Subject: Notification of Minor Issues

Date: 17.10.2016

Dear Mr Khachkovskiy,

I would like to take your attention to the below mentioned Minor Issues for urgent consideration.

As explained below necessary procedures and/or information must be prepared within 30 days of this letter.

We hope to inform you sufficiently in this way.

Best regards
Ceren BAYAZIT
Certification International Programs

A	Inspector Section: List in this section the points you described as possible deficiency/Point of Attention. (Extend this table to add all points deemed necessary)	Reviewer section: Deficiencies must be reviewed by a different person than the inspector. Name reviewer:		
		Evidence Provided Explain shortly evidence provided	Review results of Deficiencies:	
Possible Deficiencies "Point of Attention" to be reported:	Complies		No Compliance	Annex No
No 1	205.201.A1-6: - Complaint Register document and complaint form provided during the inspection, but there is no any indication about informing to ETKO and the other authorities			

Bornova Tax Office: 3810236931 İzmir Chamber of Commerce: 92592.1	Bank: Türkiye İş Bankası Bornova Branch/Şubesi Bank Adres :Mustafa Kemal Cad. No 95/A 35040 Bornova-İZMİR-TURKEY SWIFT:İSBKTRISAccountNo:EURO : 3403 0535 690 – USD : 3403 0594 407 – T.LIRA : 3403 1122 346
IBAN	EURO: TR9000 0640 0000 2340 3053 5690 TL: TR3100 0640 0000 1340 3112 2346 USD : TR0200 0640 0000 2340 3059 4407

From: ma@etko.com.tr
To: [Crail, Lars - AMS](#)
Subject: ETKO Ekolium Mino Issu Letter
Date: Monday, October 31, 2016 9:40:14 AM
Attachments: [Letter 3141D-01 Ekolium Minor Issues.pdf](#)

From: [Crail, Lars - AMS](#)
To: [Mann, Renee - AMS](#)
Cc: [AMS - AIAinbox](#); [Gebel, Kelley - AMS \(Kelley.Gebel@ams.usda.gov\)](#)
Subject: ETKO Witness Audit Documents attached
Date: Monday, October 31, 2016 4:56:00 PM
Attachments: [NP6279LCA Checklist-4 \(Handling\)\(Bel-Agro\) ETKO Kiev Ukraine 10.06.16.doc](#)
[NP6279LCA Checklist-4 \(Handling\)\(Ekolium\) ETKO Kiev Ukraine 10.07.16.doc](#)
[NP6279LCA ETKO Engagement Ltr 08.25.16.pdf](#)
[NP6279LCA 1415 ETKO Izmir, Turkey 08.25.16 signed.pdf](#)
[image001.png](#)

Renee,

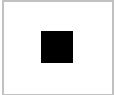
I do not have access to the Share Drive. Attached are the final audit documents for the ETKO Witness Audits conducted in Ukraine. You may assigned the processing to AIA staff.

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile





Agricultural Marketing Service
Livestock, Poultry and Seed Program
Quality Assessment Division

QAD 1415 Form
Page 1 of 4

Company Information:	
Company Name:	ETKO - Ecological Farming Controlling Organization
Est. No.:	NP6279LCA
Street Address:	160 Sk. No. 13/3
City, State, Zip:	35100 Bornova-Izmir, Turkey
Contact:	Dr. Mustafa Akyuz
Phone:	90 232 339 76 06
Email:	ma@etko.org
Program:	National Organic Program (NOP)
Comments:	Witness Audit

Audit Objectives:
To verify ongoing compliance to the audit criteria.

Audit Scope:
ETKO's Organic Certification Program (NOP) and their inspection activities of a certified operation located in Ukraine.

Audit Criteria & Reference Documents:
1) 7 CFR Part 205 National Organic Program, Final Rule, dated December 21, 2000; As amended; and, 2) NOP 2005 Auditor Checklist series 3) NOP 2000 General Accreditation Policies and Procedures



**Agricultural Marketing Service
Livestock, Poultry and Seed Program
Quality Assessment Division**

**QAD 1415 Form
Page 2 of 4**

Company Name: ETKO - Ecological Farming Controlling Organization

Audit Team and Responsibilities		
<i>Auditor:</i>	<i>Title:</i>	<i>Responsibility:</i>
Lars Crail	Team Leader	Conduct witness audit.
	Team Member	
	Technical Expert	
	Observer	

Audit Schedule				
<i>Date:</i>	<i>Time:</i>	<i>Activity:</i>	<i>Location:</i>	<i>Auditor</i>
10/6 - 7/2016		See Attached Audit Schedule	Kiev, Ukraine	Crail



**Agricultural Marketing Service
Livestock, Poultry and Seed Program
Quality Assessment Division**

QAD 1415 Form
Page 3 of 4

Company Name: ETKO - Ecological Farming Controlling Organization

Cost Estimate				
<i>Audit Time:</i>	<i>Auditor 1:</i>	<i>Auditor 2:</i>	<i>Rate:</i>	<i>Amount:</i>
Onsite Audit				
Travel	15.20		\$ 108.00	\$ 1,641.60
Pre-Audit	1.60		\$ 108.00	\$ 172.80
Audit	16.00		\$ 108.00	\$ 1,728.00
Post-Audit	1.60		\$ 108.00	\$ 172.80
Desk Audit Only			\$ 108.00	\$ -
<i>Per Diem:</i>	<i>Auditor 1:</i>	<i>Auditor 2:</i>	<i>Rate:</i>	<i>Amount:</i>
Per Diem Days			n/a	
Lodging	512.00			\$ 512.00
M&IE	389.00			\$ 389.00
<i>Associated Costs:</i>	<i>Auditor 1:</i>	<i>Auditor 2:</i>	<i>Cost:</i>	<i>Amount:</i>
Airfare	440.00		\$ 440.00	\$ 440.00
Local Transportation			\$ -	\$ -
Room Tax			\$ -	\$ -
Rental Car	260.00		\$ 260.00	\$ 260.00
Parking			\$ -	\$ -
POV Miles	17.00		\$ 0.560	\$ 9.52
Administrative	1.00		\$ 108.000	\$ 108.00
Miscellaneous	50.00		\$ 50.00	\$ 50.00
Credit	n/a			\$ (13,965.67)
GRAND TOTAL				\$ (8,481.95)

I have reviewed the audit plan and cost estimate; and agree to them. I realize that the actual audit and cost may differ from this document. Additionally, I realize that audit costs associated with a corrective action audit are not included in this estimate.

Client (Auditee) Name:	Client (Auditor) Name:	Date:
ETKO Turkey. Mustafa ACYUZ	(b) (6)	08 Sept 2016
Lead Auditor Signature:		Date:
		25-Aug-16



*The QA Division meets the requirements outlined in 5 CFR 2635.703, Use of nonpublic information.



**Agricultural Marketing Service
Livestock, Poultry and Seed Program
Quality Assessment Division**

**QAD 1415 Form
Page 4 of 4**



NP6279LCA 1415 ETKO Izmir, Turkey 08 25 16

Approved by SER SR
Date Approved: 03 05 14



National Organic Program Witness Audit Checklist

Witness Audit - General Information	
This checklist is used in conjunction with Tables 1, 2, 3, 6a, 6b, 6c, and 7b of NOP 2005 Accreditation Assessment Checklist. This checklist is used to record evaluation information for each witness audit with the exception of grower groups. NOP 2005-5 Witness Audit Checklist for Grower Groups shall be used for witness audits of grower groups.	
Name of auditor(s):	Lars Crail
Inspection date; initial or annual?	October 6, 2016, Annual announced inspection.
Name of operation:	Bel-Agro, LLC
Location of operation:	2, Lisova str., Brovary City, Kiev region 07400, Ukraine.
Scope(s) of certification requested:	Handler/Trader.
Inspector's name:	(b) (6), (b) (7)(C), ETKO Inspector.
Inspector conflict of interest or confidentiality concerns:	Not verified. No apparent conflict of interest.
Operation representative (knowledgeable):	Vyacheslav Belov, Owner
Other inspection attendees:	Alexey Kackhovsky, Bel-Agro Consultant; Lyudmila Moros, Bel-Agro office administrator.
Time inspection started: 2:00 pm	Time inspection completed: 5:30 pm
General information: Crops grown, acreage, fields and field location(s) (1 site or 2 or more); Wild Crops : products collected, harvest site locations, collector training; Livestock operation type, number of animals, identification methods, products; Handling operation, products processed, facilities, etc...	



Report Narrative:

The NOP auditor conducted a one-day witness audit of an ETKO annual announced inspection of Bel-Agro, LLC (Bel- Agro). Bel-Agro is a handler/trader/exporter with an office in Kiev, Ukraine. Bel-Agro trades organic products and does not physically handle products. The products traded (or intended to traded) are: corn, flax, mustard, peas, rapeseeds, soybean, and sunflower (seeds); rapeseeds, soybean, and sunflower (oil); and sunflower (cake/expeller). The oil products are processed at a separate certified facility: (b) (4) Factory. There was one shipment of sunflower oil during 2016.

Bel-Agro was first certified in December 1, 2014. The inspection was conducted in English with the company's consultant present. There was one sale of sunflower oil during 2016.

Auditor Comments – Do not include as part of the NC Report:

Certificate:

Effective Date: December 1, 2014

Issue: December 17, 2015

Next renewal date: December 17, 2016. **There is no Anniversary date indicated.**

Last Inspection date: September 26, 2015

Under “Scopes” the certificate states “100%” organic, but in the status box, it lists products as “org.”

The certificate states, “NOP regulation Final Rule 7 CFR Part 205,” not ““Certified to the USDA organic regulations, 7 CFR Part 205.”

“Certification renewal must be done annually before the anniversary date.”

See F1.

There was only one transaction of sunflower oil in 2016 which consisted of eight container loads of product.

ETKO's review of OSP (update) occurred on August 1, 2016.

The auditor conducted the closing meeting with ETKO personnel on October 31, 2016.



General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.

None. Not applicable.

Did the inspector and the on-site inspection verify that the organic system plan (OSP) complies with the USDA organic regulations for: (§ 205.403(c))

General	
Maintain or improve natural resources (§ 205.200)	NA
Crops	Section N/A X
Land requirements (§ 205.202)	
Soil fertility and crop nutrient management practice standard (§ 205.203)	
Seeds and planting stock practice standard (§ 205.204)	
Crop rotation practice standard (§ 205.205)	
Crop pest, weed, and disease management practice standard (§ 205.206)	
Approved temporary variance practices? (§ 205.290)	
Wild Crops	Section N/A X
Wild-crop harvesting practice standard (§ 205.207)	
Livestock	Section N/A X
Origin of livestock (§ 205.236)	
Livestock feed (§ 205.237)	
Livestock health care practice standard (§ 205.238)	
Livestock living conditions (§ 205.239)	
Pasture practice standard (§ 205.240)	
Approved temporary variance practices? (§ 205.290)	
Handler	Section N/A
Organic handling requirements (§ 205.270)	Yes
Facility pest management practice standard (§ 205.271)	Na
Commingling and contact with prohibited substance prevention practice standard (§ 205.272)	Yes
Did the inspector verify product composition for all products? (§ 205.301)	NA
Approved temporary variance practices? (§ 205.290)	NA.

Labels (§ 205.403(c))	Section N/A
Were labels verified during the on-site inspection? (§ 205.403(c)(2))	Labels are wholesale with lot numbers.
Were the labels being used the same as those approved	No. The container that was shipped



by the certifier?	did not have a label. Identified as an issue by the inspector.
How was the inspector made aware of which labels were approved by the certifier?	Inspector was aware that no labels had been approved by ETKO.
Sampling	Section N/A X
Did the operation provide access to all products?	
Was a sample collected during the inspection? (§ 205.670) (pre- or post-harvest?) (periodic residue testing?)	
Why was sample pulled? (Directed by the certifier or NOP, or inspector decision?)	
For what was sample to be tested?	
Verify sampling procedures, chain of control, etc. (§ 205.670(e))	
Did the inspector provide the applicant with a receipt for any samples taken? (§ 205.403(e)(1))	
Did the sampling process follow the certifier's sampling procedure?	
Was the inspector charged for the samples? (§ 205.403(e))	
Did the certifier pay for the testing? (§ 205.670(b), (c))	

Exit Interview (§ 205.403(d))	
Document information addressed or requested by the inspector during the exit interview: 1. Bel-Agro shipped a container without affixing a label.	
Was the exit interview conducted with a knowledgeable representative?	Yes
Did the exit interview address the accuracy and completeness of the inspection observations?	Yes
Did the exit interview address the need for additional information?	No
Did the exit interview address issues of concern identified during the inspection?	Yes

Questions for the inspector: As the inspection progresses insert additional questions to ask the inspector on areas of the inspection/operation that need clarification.	
What did the inspector receive from the certifier in order to conduct the inspection?	Reviewed document of the OSP (update), OSP (update), annual application, prior inspection reports, and current certificate.
Does the inspector have a copy of the USDA organic regulations?	Yes. Inspector has access to regulations and the NOP Handbook.



If applicable, was the inspector knowledgeable of recent updates to the regulations or policy clarifications?	Yes
How is the inspector informed of the certifier's policies and procedures and changes to them?	Yes
What is the inspector's background (experience, training, and education) in relation to the operation being inspected?	See CV. The inspector is very experienced in the organic industry. (b) (6)

Questions for the Applicant/Certified Operation:	
As the inspection progresses insert additional questions to ask the operation's representative on areas of the operation that need clarification.	
Did the certified operation receive a copy of the previous inspection report, if applicable?	Yes
Did the operation receive a certificate from the certifier?	Yes.
Does the client have a current copy of the USDA organic regulations?	Yes. The owner/operator knows how to access the website.
If applicable, how did the operation receive information on temporary variances?	NA

Overall did the inspection verify:	
That the operation was in compliance or was able to comply with the Organic Foods Production Act and the regulations? (§ 205.403(c)(1))	Yes.
That the OSP accurately reflected the practices used by the operation? (§ 205.403(c)(2))	Yes
That prohibited substances had not been and were not being applied to the operation? (§ 205.403(c)(3))	Yes
Does the inspector provide consulting services of any kind? (§ 205.501(a)(11)(iv))	No
If so, how is this information provided to the certifier?	NA
Was there enough time allocated for the inspection?	Yes
Did the inspector verify the corrective actions on previous noncompliances?	Yes.
Was the inspection scheduled when land, facilities, and production practices demonstrate compliance with NOP requirements?	Yes
Did the inspector collect new or revised OSP information?	Yes



Days or months between submission of application (annual update) and date of inspection? If length of time is unreasonable, why?	Less than a month.
International Agreements	
Does the operation participate in any international agreements, such as: <ul style="list-style-type: none"> • EU equivalency • Canada equivalency • Japan or Taiwan export arrangement 	None yet, but may ship to Canada in the future.
If yes for equivalency arrangements and the operation is shipping out , did the inspector verify specific program requirements, including: <ul style="list-style-type: none"> • Critical variances • Labeling requirements of the destination country • Documentation requirements, including compliance of incoming ingredients, as applicable 	NA
If yes for equivalency arrangements and the operation has received EU or Canada product in , did the inspector verify incoming product was accompanied by: <ul style="list-style-type: none"> • NOP Import Certificate (EU) • Attestation statement (Canada)? 	NA
If yes for Japan export arrangement , did the inspector verify program requirements, including material use?	NA
Was the inspector aware of international agreement requirements?	Yes.
How is the inspector informed of the international agreements? What information or training is provided by the certifier?	Training with certifier. NOP website.



Does the OSP indicate participation in international agreements (i.e., would the inspector know of international agreement participation before arriving onsite)?	Yes
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Witness Audit – Auditor findings and citations

Finding 1
NP6279LCA.F1 -- 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.”*

Auditor Note: Statements made on the certificate:
 Next renewal date: December 17, 2016. No Anniversary date.
 Last Inspection date: September 26, 2015
 Under Scopes it states “100%” organic, but in status box, it lists products as “org.”
 “Certification renewal must be done annually before the anniversary date.”



Finding 2

Witness Audit – Auditor follow up requests or activities



National Organic Program Witness Audit Checklist

Witness Audit - General Information	
This checklist is used in conjunction with Tables 1, 2, 3, 6a, 6b, 6c, and 7b of NOP 2005 Accreditation Assessment Checklist. This checklist is used to record evaluation information for each witness audit with the exception of grower groups. NOP 2005-5 Witness Audit Checklist for Grower Groups shall be used for witness audits of grower groups.	
Name of auditor(s):	Lars Crail
Inspection date; initial or annual?	October 7, 2016, Annual announced inspection.
Name of operation:	Ekolium, LLC
Location of operation:	9, Boryspilska Str, Kiev, 02099, Ukraine.
Scope(s) of certification requested:	Handler/Trader/Exporter.
Inspector's name:	(b) (6), (b) (7)(C), ETKO Inspector.
Inspector conflict of interest or confidentiality concerns:	Not verified. No apparent conflict of interest.
Operation representative (knowledgeable):	Alexey Kackhovsky, Owner (15%).
Other inspection attendees:	ETKO staff: Mustafa Akyuz and Artem Chernysh
Time inspection started: 2:30 pm	Time inspection completed: 5:00 pm
General information: Crops grown, acreage, fields and field location(s) (1 site or 2 or more); Wild Crops : products collected, harvest site locations, collector training; Livestock operation type, number of animals, identification methods, products; Handling operation, products processed, facilities, etc...	



Report Narrative:

The NOP auditor conducted a half-day witness audit of an ETKO annual announced inspection of Ekolium, LLC (Ekolium). Ekolium is a handler/trader/exporter with an office in Kiev, Ukraine and does not physically handle organic products. There are 18 grain products traded (or intended to be traded) as raw, processed, and as livestock feed.

Ekolium was first certified in November 7, 2014. The inspection was conducted in English with the operation's owner.

Auditor Comments – Do not include as part of the NC Report:

Certificate:

Effective Date: November 7, 2013

Issue: December 31, 2015

Next renewal date: December 31, 2016. **No Anniversary date stated on certificate.**

Last Inspection date: December 24, 2015

Under Scopes it states "100%" organic, but in status box, it lists products as "org."

The certificate states, "NOP regulation Final Rule 7 CFR Part 205," not "Certified to the USDA organic regulations, 7 CFR Part 205."

"Certification renewal must be done annually before the anniversary date."

See F1.

Certified to the NOP standards only.

Crops to be purchased directly from certified producers and processing plants.

Review of OSP on August 1, 2016.

The auditor conducted the closing meeting on October 31, 2016 with EKTO personnel.



General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.

None. Not applicable.

Did the inspector and the on-site inspection verify that the organic system plan (OSP) complies with the USDA organic regulations for: (§ 205.403(c))

General	
Maintain or improve natural resources (§ 205.200)	NA
Crops	Section N/A X
Land requirements (§ 205.202)	
Soil fertility and crop nutrient management practice standard (§ 205.203)	
Seeds and planting stock practice standard (§ 205.204)	
Crop rotation practice standard (§ 205.205)	
Crop pest, weed, and disease management practice standard (§ 205.206)	
Approved temporary variance practices? (§ 205.290)	
Wild Crops	Section N/A X
Wild-crop harvesting practice standard (§ 205.207)	
Livestock	Section N/A X
Origin of livestock (§ 205.236)	
Livestock feed (§ 205.237)	
Livestock health care practice standard (§ 205.238)	
Livestock living conditions (§ 205.239)	
Pasture practice standard (§ 205.240)	
Approved temporary variance practices? (§ 205.290)	
Handler	Section N/A
Organic handling requirements (§ 205.270)	Yes
Facility pest management practice standard (§ 205.271)	Na
Commingling and contact with prohibited substance prevention practice standard (§ 205.272)	Yes
Did the inspector verify product composition for all products? (§ 205.301)	NA
Approved temporary variance practices? (§ 205.290)	NA.

Labels (§ 205.403(c))	Section N/A
Were labels verified during the on-site inspection? (§ 205.403(c)(2))	Labels are wholesale with lot number.
Were the labels being used the same as those approved	There is one approved label.



by the certifier?	
How was the inspector made aware of which labels were approved by the certifier?	Yes.
Sampling	Section N/A <u>X</u>
Did the operation provide access to all products?	
Was a sample collected during the inspection? (§ 205.670) (pre- or post-harvest?) (periodic residue testing?)	
Why was sample pulled? (Directed by the certifier or NOP, or inspector decision?)	
For what was sample to be tested?	
Verify sampling procedures, chain of control, etc. (§ 205.670(e))	
Did the inspector provide the applicant with a receipt for any samples taken? (§ 205.403(e)(1))	
Did the sampling process follow the certifier's sampling procedure?	
Was the inspector charged for the samples? (§ 205.403(e))	
Did the certifier pay for the testing? (§ 205.670(b), (c))	

Exit Interview (§ 205.403(d))	
Document information addressed or requested by the inspector during the exit interview: 1. There is no status of organic on the BL loading documents and invoices of last shipment 2. Ekolium did not use any label on the products or containers. There is no status of organic on the BL loading documents of last shipment (same TC number). 3. Complaint Register document and complaint form provided during the inspection, but there is no any indication about informing to ETKO and the other authorities	
Was the exit interview conducted with a knowledgeable representative?	Yes
Did the exit interview address the accuracy and completeness of the inspection observations?	Yes
Did the exit interview address the need for additional information?	No
Did the exit interview address issues of concern identified during the inspection?	Yes

Questions for the inspector:	
As the inspection progresses insert additional questions to ask the inspector on areas of the inspection/operation that need clarification.	
What did the inspector receive from the certifier in order to conduct the inspection?	Review document of the OSP, OSP, prior inspection reports, and current certificates.
Does the inspector have a copy of the USDA organic	Yes. Inspector has access to



regulations?	regulations and the NOP Handbook.
If applicable, was the inspector knowledgeable of recent updates to the regulations or policy clarifications?	Yes
How is the inspector informed of the certifier's policies and procedures and changes to them?	Yes
What is the inspector's background (experience, training, and education) in relation to the operation being inspected?	See CV. The inspector is very experienced in the organic industry.

Questions for the Applicant/Certified Operation:	
As the inspection progresses insert additional questions to ask the operation's representative on areas of the operation that need clarification.	
Did the certified operation receive a copy of the previous inspection report, if applicable?	Yes
Did the operation receive a certificate from the certifier?	Yes.
Does the client have a current copy of the USDA organic regulations?	Yes. The owner/operator knows how to access the website.
If applicable, how did the operation receive information on temporary variances?	NA

Overall did the inspection verify:	
That the operation was in compliance or was able to comply with the Organic Foods Production Act and the regulations? (§ 205.403(c)(1))	Yes.
That the OSP accurately reflected the practices used by the operation? (§ 205.403(c)(2))	Yes
That prohibited substances had not been and were not being applied to the operation? (§ 205.403(c)(3))	Yes
Does the inspector provide consulting services of any kind? (§ 205.501(a)(11)(iv))	No
If so, how is this information provided to the certifier?	NA
Was there enough time allocated for the inspection?	Yes
Did the inspector verify the corrective actions on previous noncompliances?	Yes.
Was the inspection scheduled when land, facilities, and production practices demonstrate compliance with NOP requirements?	Yes
Did the inspector collect new or revised OSP information?	Yes



Days or months between submission of application (annual update) and date of inspection? If length of time is unreasonable, why?	Less than one month.
International Agreements	
Does the operation participate in any international agreements, such as: <ul style="list-style-type: none"> • EU equivalency • Canada equivalency • Japan or Taiwan export arrangement 	None yet, but may ship to Canada.
If yes for equivalency arrangements and the operation is shipping out , did the inspector verify specific program requirements, including: <ul style="list-style-type: none"> • Critical variances • Labeling requirements of the destination country • Documentation requirements, including compliance of incoming ingredients, as applicable 	NA
If yes for equivalency arrangements and the operation has received EU or Canada product in , did the inspector verify incoming product was accompanied by: <ul style="list-style-type: none"> • NOP Import Certificate (EU) • Attestation statement (Canada)? 	NA
If yes for Japan export arrangement , did the inspector verify program requirements, including material use?	NA
Was the inspector aware of international agreement requirements?	Yes.
How is the inspector informed of the international agreements? What information or training is provided by the certifier?	Training with certifier. NOP website.



Does the OSP indicate participation in international agreements (i.e., would the inspector know of international agreement participation before arriving onsite)?	Yes
---	-----

Witness Audit – Auditor findings and citations

Finding 1
NP6279LCA.F1 -- 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.”*

Auditor Note: Statements made on the certificate:
 Next renewal date: December 31, 2016. No Anniversary date.
 Last Inspection date: December 24, 2015
 Under Scopes it states “100%” organic, but in status box, it lists products as “org.”
 “Certification renewal must be done annually before the anniversary date.”



Finding 2

Witness Audit – Auditor follow up requests or activities



August 26, 2016

Mustafa Akyuz
Ecological Farming Controlling Organization (ETKO)
160 Sk. No. 13/3
35100 Bornova-Izmir
Turkey

Dear Dr. Mustafa Akyuz:

The Quality Assessment Division (QAD) has received notification from the National Organic Program (NOP) to conduct a witness audit of the Ecological Farming Controlling Organization (ETKO) organic certification program in accordance with the USDA organic regulations (7 CFR Part 205).

If ETKO agrees to this assessment, the attached document, *GVD 1415A Form, Estimate of Audit Service*, needs your immediate attention. Costs incurred to conduct the assessment are the responsibility of ETKO. The attached estimate outlines the projected cost for the assessment.

The QAD must receive full payment for the amount indicated in the estimate prior to the assessment. Payment may be made by cashier's check, money order, credit card, or electronic fund transfer. Specific information about the payment options is included as an attachment to this letter. **Please be sure to include your FMMI Customer Number (b) (4) with your payment.**

To assist the QAD in scheduling the assessment in a timely and cost effective manner, the completed and signed copy must be received by **Friday, September 9, 2016**:

1. Estimate of Audit Services, QAD 1415

If this document is not received by the indicated date, then the assessment cannot proceed, and the QAD will notify the NOP. Please submit the signed copies to the AIAInBox@ams.usda.gov , Lars.Crail@ams.usda.gov , and QAD.AuditService@ams.usda.gov).

We request the following items prior to arrival at the grower group location. Please submit the following items electronically by **Friday, September 9, 2016** to the Lars.Crail@ams.usda.gov .

1. The following certification file:
 - a. 3141D-01 – Ekolium, Kiev, Ukraine (Handler)
 - b. 3188D-01 – VIP Group LLC, Kiev, Ukraine (Handler)
 - c. 3214D-01 – Bel-Agro LLC, Kiev, Ukraine (Handler)

NOTE: For the purpose of the audit, the files should contain at a minimum the following items (limited to the most recent 1-2 years):



- a. Complete OSP (including labels, material/input lists, product(s) composition, etc...)
- b. Current Organic Certificate.
- c. Most recent inspection report(s)
- d. Notices issued during the last certification cycle (e.g. Minor Issues, Noncompliances, Proposed Adverse Actions, etc...)
- e. Review Checklist(s) and certification decision for the last certification cycle (e.g. initial review, certification decision documentation, label reviews, materials reviews, etc...)
- f. Initial application (if applicable)
- g. Internal Control System (ICS) quality manual(s) or document(s) (only for grower groups)
- h. Inspector's resume or CV (for Witness Audits only)
- i. Inspector's current contact information (for Witness Audits only)
- j. Inspector instructions.

Requested documents must be in English. If you have questions or concerns regarding this request, please contact me at Lars.Crail@ams.usda.gov .

Sincerely,

Lars Crail
Auditor
USDA, AMS, LPS, QAD Attached

Enclosure: QAD 1415A Form "Estimate of Audit Services"

CC: AIAInbox
Quality Assessment Division (QAD)
Rebecca Claypool, NOP AIA Accreditation Manager



Payment Options

Clients have four payment options: (1) check; (2) money order; (3) credit card; and (4) electronic funds transfer. Information about each option is outlined below.

Check or Money Order: Checks and money orders must be made payable to "USDA, AMS, LPS, QAD." Your FMMI Customer Number **must** be placed on the memo section of the check or money order.

Checks and money orders are mailed to a lock box at the U.S. Bank. Checks and money orders may be sent by overnight mail or regular mail, using the appropriate mailing address below. Please note that checks and money orders sent by regular mail may not be received in a timely manner. Questions may be directed to US Bank Customer Service at (314) 418-6635.

Overnight Mailing Address:

U.S. Bank
Attn: Government Lock Box 790304
1005 Convention Plaza
St. Louis, MO 63101

Regular Mail Address:

USDA, AMS, LPS, QAD
PO Box 790304
St. Louis, MO 63179-0304

Please note: Effective October 1, 2012 the lockbox bank (U.S. Bank in St. Louis) no longer processes checks drawn from foreign banks with no identifiable U.S. affiliated bank or those with the words "Payable in U. S. Dollars" or "U.S. Dollars" imprinted on them. When the lockbox bank receives these checks, they are sent to the Billings and Collections Team (BCT) in Minneapolis, MN. BCT bundles these checks together and sends them to CITI Bank for processing. CITI Bank will not confirm the deposit of any such check until all of the checks in the bundle have fully cleared. This process may take anywhere from 3 to 21 business days.

Payments that are not cleared in a timely manner may result in the issuance of dunning notices, demand letters, and/or the assessment of interest fees. Clients that make payments by checks drawn from foreign banks are encouraged to make future payments using other options such as issuing checks from U.S. banks (or foreign banks with U.S. affiliates), paying via credit card, or using the Pay.Gov system.

Credit Card:

Credit card, debit card and bank account payments are now being accepted through PAY.GOV. If you need assistance please contact the National Billing Office, (501)312-2962 or QAD.BusinessOps@ams.usda.gov

Be advised of the following Pay.Gov payment limits:

Credit Cards



- Up to a total of \$24,999.99 for all transactions with one or more U.S. Government agencies conducted on the same day using the same credit card.

Debit Cards

- No limit except for the funds available in your account.

Bank Accounts

- Up to \$99,999.999.99 per transaction, limited by the funds available in the account.

To submit payment, follow these steps:

Step 1: Go to www.pay.gov

Step 2: Click on “Make a Payment”

Step 3: Enter “AMS” in the search box under #2 at the bottom of the screen

Step 4: Select “continue to the form” under USDA AMS Account Statements

Step 5: On Accepted Payment Methods screen, click on “continue to the Form”.

Step 6: Fill out the AMS form

Step 7: Select payment method

Step 8: Enter payment information.

Step 9: Review and submit payment

Step 10: Check box to receive email confirmation

Step 11: Enter all email addresses to receive payment confirmation

Step 12: Check the payment authorization box.

Step 13: Click “Submit”

Please enter this address for payment confirmation to AMS, LPS, QAD:
QAD.BusinessOps@ams.usda.gov

Electronic Fund Transfers (EFT):

The USDA has implemented procedures for Electronic Fund Transfers (EFT) through the Federal Reserve Bank. 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.

The following information should be included with your payment. We also request that you send an email of this information to make sure we are able to identify the payment. The information can be sent to ABShelpline@aphis.usda.gov:



1. Organization Name / Company Name
2. **FMMI Customer number**
3. Purpose of payment
4. 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)

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

From: [Stutts, Debra - AMS](#)
To: [Crail, Lars - AMS](#)
Subject: FW: ETKO - (b) (4)
Date: Tuesday, December 06, 2016 9:50:26 AM
Attachments: [image002.jpg](#)

Lars,

The email address I had for Etko kicked back as undeliverable. I had Ma@etko.org. Do you have another address for them?

From: Stutts, Debra - AMS
Sent: Monday, June 27, 2016 12:55 PM
To: Crail, Lars - AMS
Subject: RE: ETKO - (b) (4)
They have a credit of (b) (4)

From: Crail, Lars - AMS
Sent: Monday, June 27, 2016 12:44 PM
To: Stutts, Debra - AMS <Debra.Stutts@ams.usda.gov>
Subject: ETKO - (b) (4)

Hi Debra,

Can you advise me if Ecological Farming Controlling Organization (ETKO), FMMI = (b) (4), has a credit or debit balance and the amount. Thanks.

Lars Crail
USDA NOP
202.205.5536 office
(b) (6) mobile

