



<b>APPLICATION FORM</b>		Doc Nr	GP 01 F 01
160 Sokak 13/3 35040 Bornova – İzmir		Date	25.05.2015
Tel: +90-232-3397606, Fax: 3397607, info@etko.org		Rev Nr	00
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10-Pest, Disease Management and Weed Control: Indicate YES for valid option			
Method applied	Pest management	Disease management	Weed Control
Biological methods			
Mechanical control			
No control is required			
Pesticide / Herbicide use			
Intercropping			
Crop rotation			
Pheromone / Traps			

11-Animal husbandry: Indicate the number and type of animal: Indicate YES for valid option			
Type	Number	Feeding is done fully own produce	Part of the feed material bought
Cattle			
Dairy cows			
Sheep			
Goat			
Beehives			
Poultry			
Other..			

12-Post-harvest processing in the farm, products: Indicate YES for valid option	
Type of process & handling in farm	Short description of process
Washing	
Drying	
Threshing	
Cutting	
Packing	
Brine	
Other	
Other	

13-Storage facilities and handling, type of packing material used for storing:	
How do you store your harvested produce	Bulk <input type="checkbox"/> , Jute sacks <input type="checkbox"/> , Cardboard boxes <input type="checkbox"/> , Plastic cases <input type="checkbox"/> , Other (explain):
you have the same storage facilities for organic products and / or conventional products	
How is the storage area cleaned, explain:	
Do you use other farms stores, warehouses, silos? If yes mention the address	

14-Wild Collection			
Location of the collection	Collected crops	Approximate hectare	Declaration present for past 3 years

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15-Certified material supply from other certified sources	YES	NO
We do not buy certified material from other suppliers	<input type="checkbox"/>	<input type="checkbox"/>
We buy certified raw material and re-process in our facility or subcontracted facility. Related certificates are present for raw material we buy	<input type="checkbox"/>	<input type="checkbox"/>
We buy already final prepared product and sell, only trade: Related certificates are present for raw material we buy	<input type="checkbox"/>	<input type="checkbox"/>

16	The documents listed below should be prepared before inspection and send to ETKO.
1	The last control report if the enterprise has worked with another control body (if valid)
2	A valid Chamber of Commerce registration document or comparable for the applicant
3	Name of authorized person and position
4	Producer & processor & store lists and agreements
5	Detailed and general maps, parcel numbers.
6	Agreements made with subcontracted processors
7	Process settlement plan and product process flow charts
8	Name of Food additives or processing aids list (if valid)
9	GMO Free Declaration (if valid)
10	If valid, name of the certified inputs (Fertilizer, protection product, fodder etc..)
11	Ownership document of the fields, rental agreement, title deeds something comparable.
12	Farm / Processing facility registration document
13	Organic system plan

17-DECLARATION by The APPLICANT
<p>By submitting this application for certification, the applicant acknowledges that he/she must comply with the applicable organic production and handling standards as defined by the Regulations 834/2007 &amp; 889/2008 (Art.63) and / or Equivalence to Reg. 834/2007 and 889/2008 (point A.5.6.) and / or USDA National Organic Program, Final Rule and must submit an organic production and handling system plan according to the requirements outlined in §205.201 of the NOP Final Rule.</p> <p>The applicant may withdraw the application prior to issuance of a notice of non-compliance and in this case will neither receive a notice of non-compliance nor a denial of certification. However, the applicant still must bear all costs for all services that have been delivered until the withdrawal.</p> <p>If the application for certification is accepted, the applicant must sign the ETKO inspection contract in which all deeds and obligations are specified before the inspection and certification procedure can be continued.</p>

18-Checklist: Please check following points and make sure they are all in place before you make this application.		
Do you have those mentioned Regulations in your operation? Yukarıda adı geçen yönetmeliklere sahip misiniz?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you check carefully your products are in compliance with those mentioned Regulations? Ürünlerinizin bu yönetmeliklere uygun bir şekilde üretildiğini kontrol ettiniz mi?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you identify any breach of the Regulations related to your products, ingredients etc? Ürünlerinizde yukarıda adı geçen yönetmeliklere aykırı herhangi bir durum tespit ettiniz mi?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you take corrective measures incase you identified any problems with your products for compliance?. Ürünlerinizle ilgili uyum açısından herhangi bir sorun tespit ettiyseniz, gerekli düzeltmeleri yaptınız mı?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Do you guarantee your products are in compliance with the mentioned Regulations above?. Ürünlerinizin yukarıda adı geçen yönetmeliklere uygun olduğunu teyit edermisiniz?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you set up your Quality Management System and system in compliance with the mentioned Regulations /Standards? If not prepared yet, you must provide minimum "Organic Compliance Plan" during the application phase. Organik yönetmelik / standartlara uygunlukla ilgili olarak Kalite Yönetim Sisteminizi oluşturduunuz mu? Şayet henüz hazır değilse en azından Organik Üretim Planını oluşturmuş olmanız gerekir.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

**From:** [Leonardi, Elizabeth V](#)  
**To:** [Crail, Lars - AMS](#); [Zuck, Penelope - AMS](#); [Sussman, Karen - AMS](#)  
**Subject:** FW: USDA Organic Accreditation Audits  
**Date:** Monday, June 20, 2016 10:39:13 AM  
**Attachments:** [image001.png](#)  
[MPIC-04132016\\_OFFLINE\\_FORM\\_.pdf](#)  
[\(1\) BLANK CONSENT FORM.PDF](#)

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Hi Lars and Penelope,

I wanted to just remind you that you'll need to complete step 3 below, in addition to doing your ECC. The forms are attached. The embassy will need to have these before they will grant final approval for travel.

Sorry this process is so cumbersome!

Best regards,

Elizabeth

This email is UNCLASSIFIED.

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**From:** Leonardi, Elizabeth V  
**Sent:** Thursday, June 02, 2016 2:36 PM  
**To:** 'Crail, Lars - AMS'  
**Cc:** Sawatzki, Kimberly S  
**Subject:** RE: USDA Organic Accreditation Audits

Hi Lars,

Thanks for your email. I am glad to hear you're thinking of coming to Turkey.

Regarding your question, the special rules applying to Izmir travel are not expected to be changed anytime soon. We as USDA's reps in Turkey would consider USDA's audits of NOP Certifying bodies as Mission Critical, and we will try to make the case to the Ambassador for approval for your proposed trip. Because your visit sounds like it would include Izmir as part of the itinerary, it will need to be reviewed by the Embassy and there is process to do that – see below for the full list of steps to travel here.

#### **Updated Turkey Travel Approval Request Process for USDA Travelers**

Effective March 29, 2016, the Department of State restricted official travel to Turkey to “mission-critical” travel only. There is a new rigorous approval process for official travel to Turkey (including for USDA travelers), and especially for travel to areas where USG personnel are on authorized departure status due to security concerns (provinces of Izmir, Mugla, and the whole South East of the country). Please follow this process to request approval:

1. Any U.S. government traveler who wishes to travel to Turkey must first **request Department of State Turkey Desk for travel Approval** - [EUR-SE-TurkeyTravel-DL@state.gov](mailto:EUR-SE-TurkeyTravel-DL@state.gov).
  - a. Please provide travel dates, number of USG employees traveling, and a detailed justification for the request. If approved, employees may then proceed with the eCC process.
2. **Submit ECC.** If a USDA traveler, please request clearance from **FAS Ankara**, and POC as Kim Sawatzki USDA/FAS - even if you are travelling to Istanbul, clearance comes from Ankara.
  - a. Ensure that your cell and email will work in Turkey- include those contact details in ECC
  - b. Put your US-based emergency contact and hotel information in your ECC.
3. **Complete a Missing Person Information Card (MPIC)** and the **consent form** (attached) and send to [Ankara-RSO-DL@state.gov](mailto:Ankara-RSO-DL@state.gov)  
Please let FAS know after you have sent these to the RSO address.

4. FAS Ankara will request Regional Security Office (RSO) and Ambassador approval for your trip through the **US Embassy Turkey Travel Notification System**.  
- You'll need your IMEI number from your cell phone (See it by pressing \*#06# and it should pop right up), so please send that to FAS Ankara or include on your ECC.
5. If your trip receives Ambassador approval and is thus deemed "mission critical" travel, then FAS Ankara can approve your ECC and you can travel.
6. Just before travelling, check latest [Department of State Travel Warnings](#) and enroll in [Smart Traveler Enrollment Program](#).
7. Keep Embassy and FAS contact information with you: U.S. Embassy Ankara: +90 (312) 455-5555, Kim Sawatzki cell: (b) (6), [sawatzkiks@state.gov](mailto:sawatzkiks@state.gov) Elizabeth Leonardi cell: (b) (6), [leonardiev@state.gov](mailto:leonardiev@state.gov), FAS Office: +90 (312) 457-7383. Be alert, be safe, and enjoy Turkey!

Please Note:

- **Istanbul Travel:** USG travelers to Istanbul on official business must choose hotels located in the neighborhoods where chief of mission personnel are housed, which include: SISLI/HARBIYE, ZINCIRLIKUYU/LEVENT, LEVENT/4LEVENT, TARABYA, or ATAKOY- ATATURK AIRPORT. The closest to downtown is the Sisli neighborhood. The closest to the US Consulate is the Tarabya neighborhood. The Department is taking this step to ensure that emergency accountability can be conducted in the shortest possible time, and to limit the geographic area in which the Regional Security Office could need to coordinate an emergency response in the event of a security incident or a natural disaster.
- **Minimize Delegation Size:** of In light of the heightened threat environment, heads of delegations and all USG agencies are expected to limit the size of delegations to the minimum number necessary to accomplish their policy objectives. This is not only a question of efficient use of USG resources; limiting delegation size would mean fewer official visitors are at risk and would allow Post to better focus its resources in the event of an emergency.

Best regards,

Elizabeth Leonardi

Agricultural Attaché

USDA Foreign Agricultural Service

U.S. Embassy Ankara, Turkey

Tel: +90 312 457 7318

[elizabeth.leonardi@fas.usda.gov](mailto:elizabeth.leonardi@fas.usda.gov)

SBU

This email is UNCLASSIFIED.

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**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]

**Sent:** Wednesday, June 01, 2016 5:01 PM

**To:** AgAnkara

**Subject:** USDA Organic Accreditation Audits

Hello,

The USDA National Organic Program has several accredited certifying bodies (CB) conducting certification activities in Turkey and one CB, ETKO, based in Izmir. We conduct regular compliance audits on these CBs and their activities. The State Department's website indicates that official travel to Turkey is allowed for "Mission Critical" activities. Can you provide any clarification if the travel restrictions for Izmir (city and region) will change soon?

Thanks for any information you can provide.

Regards,

**Lars Crail**

Lead Auditor

USDA National Organic Program

Room 2649-So. (Stop 0268)

1400 Independence Ave SW

Washington, DC 20250-0268

202-205-5536 Direct

(b) (6) Mobile

[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)



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CONSENT FORM 2

(v. 2 Sep 11)

CONSENT AGREEMENT

I, \_\_\_\_\_, hereby consent to the U.S. Government undertaking to seek and disseminate communications to, from or referencing me for the purpose of acquiring intelligence should I become missing, an isolated person, or taken hostage.

I understand that, unless specified otherwise in the purpose above, communications to, from or referencing me may also be sought and disseminated while I am in the U.S. during the effective period of my consent. This consent applies to administrative messages alerting elements of the U.S. Government to this consent, as well as to any reports that may relate to the purpose stated above.

Except as otherwise provided by law, to include applicable U.S. Government procedures, this consent covers only information that relates to the purpose stated above and is effective for the period \_\_\_\_\_ to \_\_\_\_\_.

Reports containing information derived from communications to, from or referencing me may only be disseminated to me and to the Intelligence Community and appropriate DOD elements except as otherwise permitted by law, to include applicable U.S. Government procedures.

My phone number(s):  
Handset number(s)/IMEI:  
SIM numbers (s):

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

PRIVACY ACT STATEMENT: Authority for collecting information is contained in Executive Order 12333, as amended; and procedures issued thereto. The Department of Defense Blanket Routine Uses found at: [http://privacy.defense.gov/blanket\\_uses.shtml](http://privacy.defense.gov/blanket_uses.shtml) apply to this information. Disclosure of requested information is voluntary, but refusal to provide requested information may prevent completion of actions to effect this consent form.

**From:** [ma@etko.com.tr](mailto:ma@etko.com.tr)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** NONC ETKO Ekolium  
**Date:** Monday, October 31, 2016 9:39:08 AM  
**Attachments:** [3141D-01 Ekolium - GP 18 F 10 Notification of Noncompliance NONC.pdf](#)

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	<b>Notification of Noncompliance</b> <b>3141D-01 Ekolium</b>	Nr	GP 18 F 10
		Date	<a href="#">15.07.2015</a>
		Rev	00
		Page	1/3

Dear Madam / Sir: [Alexey Khachkovskiy](#)

Date: **17.10.2016**

On the dates (**07.10.2016**) ETKO Inspector Mr **(b) (6), (b) (7)** realized a [surveillance inspection](#) to your operation. The objective of inspection was to determine the your organic operation's compliance against the regulation (s):

**USDA National Organic Program**

Based on the inspection report dated **07.10.2016** ETKO determined the outstanding noncompliance's in your operation(s)

Please note that, for each noncompliance you MUST act on in due time as indicated:

- Please record your corrective action on the boxes "Action Taken" for each noncompliance and also submit any supporting documents/records as required by the outstanding noncompliance.
- Or
- Send a rebuttal with the supporting documents/evidences

Failure to resolve the outstanding non-compliances will result in

1. suspension or revocation your certification, or
2. denial of your certification

Your response must be submitted to the following address, not later than **14.11.2016** (in 30 days, starting from the date of this notification)

ETKO  
160 Sok. 13/3 35100 Bornova – İzmir/TURKEY

If you have any questions regarding the inspection findings or of the suitability of any related corrective actions please contact to [Mr. Mustafa AKYUZ](#) from ETKO +90-232-3397606 or by email at: [ma@etko.com.tr](mailto:ma@etko.com.tr) [info@etko.com.tr](mailto:info@etko.com.tr) .

Sincerely

Enclosure: Inspection report number:

Cc: NOP appeals team [NOPACAAverseActions@ams.usda.gov](mailto:NOPACAAverseActions@ams.usda.gov)

	<b>Notification of Noncompliance</b> <b>3141D-01 Ekolium</b>	Nr	GP 18 F 10
		Date	15.07.2015
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**Non-compliances:**

Operator unit no.	3141	Unit name	Ekolium
Location - Address	9, Boryspilska Str, Kiev, 02099, Ukraine		

Initial Inspection	Surveillance Inspection	Report no 3141-2016.fa
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Subject of nonconformity	Record Keeping	Std or reg. Art. nr. IACB7.5.2.1d, NOP 205.103b2	NCR No 2016.1
Inspection Date	07.10.2016		
Date of Notification	14.10.2016	Due Date	14.11.2016
<b>Major</b>		<b>Minor M1-9.6</b>	
Factors causing risk on the product		Factors causing no risk on the condition of the product.	
Use of inputs which are not allowed by the regulations.		Production process plan partly implemented.	
Non-Organic product sales as organic.			
Requirements of regulation or standard not applied			
Frequent minor non-conformities on the same requirement of regulation.			
Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
Misuse of the licenses and certificates			
Production process plan not implemented.			

Description of Nonconformity by Inspector			
<p><b>§205.103 Recordkeeping by certified operations.</b></p> <p>(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."</p> <p>(b) Such records must:</p> <p>(1) Be adapted to the particular business that the certified operation is conducting;</p> <p><b>(2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;</b></p> <p>(3) Be maintained for not less than 5 years beyond their creation; and</p> <p><b>(4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.</b></p> <p>(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.</p> <p><b>Issues: - There is no status of organic on the BL loading documents and invoices of last shipment (last transaction number is TK.14.3141-013-C)</b></p>			
Inspector Name and signature	(b) (6), (b)	Operator name and signature	Alexey Khackovski
Corrective Action Plan by Operator			
Target date	14.11.2016	Operator name and signature	Alexey Khackovski
		Actual Completion date	
Verification of Operator's corrective action and implementation by ETKO			
Accepted:	YES	NO	Date
		ETKO approval	

	<b>Notification of Noncompliance</b> <b>3141D-01 Ekolium</b>	Nr	GP 18 F 10
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<b>Explanations</b>
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<b>Operator unit no.</b>	3141	<b>Unit name</b>	Ekolium
<b>Location - Address</b>	9, Boryspilska Str, Kiev, 02099, Ukraine		

<b>Initial Inspection</b>	<b>Surveillance Inspection</b>	<b>Report no</b> 3141-2016.fa
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<b>Subject of nonconformity</b>	Labelling	<b>Std or reg. Art. nr.</b> IACB7.5.2, NOP 205.307	<b>NCR No</b> 2016.2
<b>Inspection Date</b>	07.10.2016		
<b>Date of Notification</b>	14.10.2016	<b>Due Date</b>	14.11.2016
<b>Major M2-9.2</b>		Minor	
Factors causing risk on the product		Factors causing no risk on the condition of the product.	
Use of inputs which are not allowed by the regulations.		Production process plan partly implemented.	
Non-Organic product sales as organic.			
<b>Requirements of regulation or standard not applied</b>			
Frequent minor non-conformities on the same requirement of regulation.			
Customer complaints not handled, failure on taking remedial actions, or complaints and action records not available.			
Misuse of the licenses and certificates			
Production process plan not implemented.			

<b>Description of Nonconformity by Inspector</b>			
<p>§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))."</p> <p><b>(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:</b></p> <p>(1) The name and contact information of the certifying agent which certified the handler which assembled the final product;</p> <p>(2) Identification of the product as organic;</p> <p>(3) Special handling instructions needed to maintain the organic integrity of the product;</p> <p>(4) The USDA seal;</p> <p>(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.</p> <p><b>(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.</b></p> <p><b>Issues: - 205.102- The last transaction (TK.14.3141-013-C), 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)</b></p>			

<b>Inspector Name and signature</b>	(b) (6), (b)	<b>Operator name and signature</b>	Alexey Khackovskiy
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<b>Corrective Action Plan by Operator</b>			

<b>Target date</b>	14.11.2016	<b>Operator name and signature</b>	Alexey Khackovskiy	<b>Actual Completion date</b>	
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<b>Verification of Operator's corrective action and implementation by ETKO</b>					
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<b>Accepted:</b> YES	NO	<b>Date</b>		<b>ETKO approval</b>	
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<b>Explanations:</b>
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**From:** [Phillips, Susan B](#)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [Pinckaers, Marcel - FAS](#); [Bramhall, Emily - AMS](#); [Kurvink, MaryAnn - FAS](#)  
**Subject:** RE: eCC - [ACTION] - Itinerary #1765956/Crail REQUEST SUBMITTED, ARRIVAL: 2/13/2017  
**Date:** Monday, January 09, 2017 10:26:49 AM  
**Attachments:** [image001.png](#)

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Lars,

We are 6 hours ahead of you, so how about 4pm our time, 10am your time tomorrow. Unfortunately, Tuesday afternoon is the only option we have this week. I can call you from the Embassy on a toll free line. Should I use the office number you have below?

Susan

**Official**

**UNCLASSIFIED**

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**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]  
**Sent:** Monday, January 09, 2017 3:51 PM  
**To:** Phillips, Susan B  
**Cc:** Pinckaers, Marcel; Bramhall, Emily - AMS; Kurvink, Mary-Ann  
**Subject:** RE: eCC - [ACTION] - Itinerary #1765956/Crail REQUEST SUBMITTED, ARRIVAL: 2/13/2017

Hello Susan,

I provided Ms. Bramhall the additional information you requested and if she hasn't sent it along, she will soon. Happy to have you join me during the compliance audit. I suggest that we have a preliminary meeting via telephone and I can brief you on my proposed audit activities. I will be available this week, but traveling in the following two weeks.

Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile

USDA

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**From:** Phillips, Susan B [mailto:[Susan.Phillips@fas.usda.gov](mailto:Susan.Phillips@fas.usda.gov)]  
**Sent:** Monday, January 9, 2017 9:30 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Cc:** Pinckaers, Marcel - FAS <[Marcel.Pinckaers@fas.usda.gov](mailto:Marcel.Pinckaers@fas.usda.gov)>; Bramhall, Emily - AMS <[Emily.Bramhall@ams.usda.gov](mailto:Emily.Bramhall@ams.usda.gov)>; Kurvink, MaryAnn - FAS <[MaryAnn.Kurvink@fas.usda.gov](mailto:MaryAnn.Kurvink@fas.usda.gov)>  
**Subject:** FW: eCC - [ACTION] - Itinerary #1765956/Crail REQUEST SUBMITTED, ARRIVAL: 2/13/2017

**Importance:** High

Dear Mr. Crail,

Our office has received your request for a country clearance. Unfortunately, it was incomplete and additional information was requested from Ms. Bramhall. If you need any help with hotel reservations, please let us know.

We saw your country clearance and thought this might be a useful opportunity for us to learn more about this sector. Mr. Pinckaers and I would like to participate in your compliance audit in the Netherlands. We cover the organic market and it is often difficult to get relevant information. Please let us know if that would be acceptable for you.

Sincerely,

Susan Phillips

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*Susan Phillips, Agricultural Counselor*

Covering The Netherlands, Denmark, Sweden, Norway, Finland and Iceland  
 Foreign Agricultural Service, U.S. Department of Agriculture  
 U.S. Embassy The Hague  
 Tel: +31 (0)70 310 2300

**Official**  
**UNCLASSIFIED**

**From:** [EMILY.BRAMHALL@USDA.GOV](mailto:EMILY.BRAMHALL@USDA.GOV) [<mailto:ecc@state.gov>]  
**Sent:** Wednesday, January 04, 2017 4:09 PM  
**To:** Phillips, Susan B  
**Subject:** eCC - [ACTION] - Itinerary #1765956/Craill REQUEST SUBMITTED, ARRIVAL: 2/13/2017  
**Importance:** High

## Request Summary

**Itinerary #:**1765956

**Date Requested:**1/4/2017

Request Summary

Travel Itinerary				
Destination Country	Destination Cities	Start Date	End Date	Status
NETHERLANDS	Zwolle	2/13/2017	2/14/2017	PENDING
GERMANY	Nuremburg	2/14/2017	2/19/2017	PENDING
TURKEY	Istanbul and Izmir	2/19/2017	2/25/2017	PENDING

### Travelers

**Name:** Lars Crail

**Agency:** Department of Agriculture/AMS

**Contact Info:** 202.205.5536 office (b) (6) cell [lars.craill@ams.usda.gov](mailto:lars.craill@ams.usda.gov)

**Employment Type:** Direct Hire

**Country of Birth:** USA

**Passport Type:** Personal

**Emergency Contact:** Work Contact: Cheri Courtney; (202) 720-8491; Fax (202) 205-7808; Personal Contact: (b) (6) (Spouse), (b) (6)

**Passport #:** \*\*\*\*\*

**Clearance:** None

**Passport Country:** USA

**Request Unescorted CAA Access:** No

**Additional Info:**

**Other Group Members:**

None

### Carrier Information

Carrier and #	Mode	Departure Point	Departure Date/Time	Arrival Point	Arrival Date/Time
None					

Request Details

### NETHERLANDS

Clearance From	Agency/Section/Other	Arrival Date	Departure Date	Status
NETHERLANDS/THE HAGUE	FAS - FOREIGN AGRICULTURAL SERVICE	2/13/2017	2/14/2017	PENDING
Other Posts & Sections to be Informed				
Post	Section			

**Destination Cities:**Zwolle

**VIP Visit?** No

**Purpose of Visit:**This travel is two-fold: (1) To conduct

compliance audits of USDA National Organic Program (NOP) accredited certifying agent Ecological Farming Control Organization (ETKO) and Control Union Certification (CUC). Foreign based certifiers are authorized to certify organic farms and processing facilities, ensuring that operations and products meet all USDA organic regulations. Certified organic products are exported for sale in the US. These audits support the mission of the NOP and is required pursuant to NOP 2000, General Accreditation Policies and Procedures, Section 5.1. This audit is an important activity to ensure compliance to the USDA organic regulations. ETKO has also entered a settlement agreement with the USDA NOP to improve its control system and oversight of certified operations or face suspension of its accreditation. These audits' specific mission is to verify compliance to the terms of the settlement agreement. (2) The traveler is to present at BIOFACH 2017, an organic trade fair and located in Nuremburg, Germany, materials regarding NOP accreditation activities.

**Access to Building Required?** No  
**POC at post** *None*  
**Unescorted Access to PCC Required?** No  
**Fiscal Data:** *None*  
**Other Comments/Remarks:** *None*  
**Hotel Reservations?** No  
**Airport Assistance/Transportation?** No  
**Accompanying Pouch?** No  
**Appointment Request?** No  
**Other Needed Assistance?** No

Hotel Accommodations					
Hotel Name	Street Address	City	Rate	Local Telephone #	Confirmation #

[View Request](#)

**List of recipients:**

[ACTION]-REQUEST APPROVER:  
[maryann.kurvink@fas.usda.gov](mailto:maryann.kurvink@fas.usda.gov)  
[ingliskj@state.gov](mailto:ingliskj@state.gov)  
[marlowesl@state.gov](mailto:marlowesl@state.gov)  
[susan.phillips@fas.usda.gov](mailto:susan.phillips@fas.usda.gov)  
 [INFO]-AGENCY CC:  
[ecc@fas.usda.gov](mailto:ecc@fas.usda.gov)  
 [INFO]-GROUP CC:  
[thehagueccrsoinfo@state.gov](mailto:thehagueccrsoinfo@state.gov)  
 [INFO]-REQUESTOR CC:  
[emily.bramhall@ams.usda.gov](mailto:emily.bramhall@ams.usda.gov)  
[shirley.ickes@ams.usda.gov](mailto:shirley.ickes@ams.usda.gov)

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**From:** [Wilburn, Tammie - AMS](#)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** RE: Email addresses for Mustafa Akyuz - ETKO  
**Date:** Wednesday, January 11, 2017 1:26:52 PM  
**Attachments:** [image001.png](#)

---

[ma@etko.org](mailto:ma@etko.org) is what I used. I will resend.

---

**From:** Crail, Lars - AMS  
**Sent:** Wednesday, January 11, 2017 1:22 PM  
**To:** Wilburn, Tammie - AMS  
**Subject:** Email addresses for Mustafa Akyuz - ETKO  
[ma@etko.com.tr](mailto:ma@etko.com.tr) and  
MUSTAFA AKYUZ **(b) (6)** [com](#)

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



**From:** [Crail, Lars - AMS](#)  
**To:** [Stutts, Debra - AMS](#)  
**Subject:** RE: ETKO - (b) (4)  
**Date:** Monday, December 12, 2016 1:57:00 PM  
**Attachments:** [image001.png](#)  
[image003.jpg](#)

---

That email address is no longer valid – just recently I was notified.

You may use these:

[ma@etko.com.tr](mailto:ma@etko.com.tr)

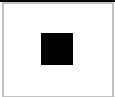
(b) (6) .com

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

**From:** Stutts, Debra - AMS  
**Sent:** Tuesday, December 06, 2016 9:50 AM  
**To:** Crail, Lars - AMS  
**Subject:** FW: ETKO - (b) (4)

Lars,

The email address I had for Etko kicked back as undeliverable. I had [Ma@etko.org](mailto: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 <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**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](mailto:Debra.Stutts@ams.usda.gov)>  
**Subject:** ETKO - (b) (4)

**Hi Debra,**

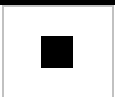
**Can you advise me if Ecological Farming Controlling Organization (ETKO), FMMI = (b) (4), has a credit or debit balance and the amount. Thanks.**

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile





**From:** [Crail, Lars - AMS](#)  
**To:** [Claypool, Rebecca E - AMS](#)  
**Subject:** RE: ETKO - Turkey audit  
**Date:** Friday, January 13, 2017 11:45:00 AM

---

Thanks.

Lars

---

**From:** Claypool, Rebecca E - AMS  
**Sent:** Thursday, January 12, 2017 5:45 PM  
**To:** Crail, Lars - AMS  
**Subject:** FW: ETKO - Turkey audit

Hi Lars,

Great training today.

Here is a forwarded email from C&E. I haven't heard back from them to update the Special Instructions, but everything else was already updated. I hope this helps.

Thanks,

Rebecca

---

**From:** Atkins, Patricia - AMS  
**Sent:** Tuesday, January 10, 2017 11:32 AM  
**To:** Wilburn, Tammie - AMS <[Tammie.Wilburn@ams.usda.gov](mailto:Tammie.Wilburn@ams.usda.gov)>  
**Cc:** Claypool, Rebecca E - AMS <[Rebecca.E.Claypool@ams.usda.gov](mailto:Rebecca.E.Claypool@ams.usda.gov)>  
**Subject:** FW: ETKO - Turkey audit

Hi Tammie – Kay would like your input on the upcoming ETKO-Turkey audit.

---

**From:** Claypool, Rebecca E - AMS  
**Sent:** Friday, December 30, 2016 6:13 PM  
**To:** Atkins, Patricia - AMS <[Patricia.Atkins@ams.usda.gov](mailto:Patricia.Atkins@ams.usda.gov)>  
**Subject:** ETKO - Turkey audit

Hello Trish,

Lars is conducting a Compliance audit on ETKO-Turkey in February of 2017. Are there any issues or cases that C&E would like the auditor to investigate or gather information on during the audit? Or are there any issues they should be aware of while conducting the audit?

Thanks so much!

Rebecca

**Rebecca Claypool**  
**Accreditation Manager**  
**USDA National Organic Program**  
**1400 Independence Ave SW**  
**Washington, DC 20250**  
**(202) 350-5706**  
[Get USDA Organic Insider updates!](#)

**From:** [ma@etko.com.tr](mailto:ma@etko.com.tr)  
**To:** [Crail, Lars - AMS; "MUSTAFA AKYUZ"](#)  
**Cc:** [Claypool, Rebecca E - AMS](#)  
**Subject:** RE: ETKO Audit - Proposed February 2017  
**Date:** Tuesday, December 20, 2016 11:22:33 AM  
**Attachments:** [image001.png](#)

---

Dear Lars

Yes that is possible after Biofach for ETKO audit. 20-24 February.

I will be attending Biofach as well so would like to participate the Panel.

Best regards

Mustafa

ETKO Turkey.

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]

**Sent:** Monday, December 19, 2016 8:31 PM

**To:** MUSTAFA AKYUZ; ma@etko.com.tr

**Cc:** Claypool, Rebecca E - AMS

**Subject:** ETKO Audit - Proposed February 2017

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

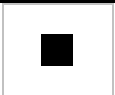


Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



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**From:** [Crail, Lars - AMS](#)  
**To:** [ma@etko.com.tr](mailto:ma@etko.com.tr); "MUSTAFA AKYUZ"  
**Cc:** [Claypool, Rebecca E - AMS](#)  
**Subject:** RE: ETKO Audit - Proposed February 2017  
**Date:** Tuesday, December 20, 2016 12:05:00 PM  
**Attachments:** [image001.png](#)

---

Hi Mustafa,

Thanks for the confirmation. I will send you further details and instructions regarding the on-site audit in the next couple of weeks.

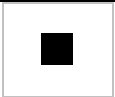
Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

**From:** [ma@etko.com.tr](mailto:ma@etko.com.tr) [mailto:[ma@etko.com.tr](mailto:ma@etko.com.tr)]  
**Sent:** Tuesday, December 20, 2016 11:22 AM  
**To:** Crail, Lars - AMS ; 'MUSTAFA AKYUZ'  
**Cc:** Claypool, Rebecca E - AMS  
**Subject:** RE: ETKO Audit - Proposed February 2017

Dear Lars

Yes that is possible after Biofach for ETKO audit. 20-24 February.

I will be attending Biofach as well so would like to participate the Panel.

Best regards

Mustafa

ETKO Turkey.

---

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]  
**Sent:** Monday, December 19, 2016 8:31 PM  
**To:** MUSTAFA AKYUZ; [ma@etko.com.tr](mailto:ma@etko.com.tr)  
**Cc:** Claypool, Rebecca E - AMS  
**Subject:** ETKO Audit - Proposed February 2017

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



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**From:** [ma@etko.com.tr](mailto:ma@etko.com.tr)  
**To:** [Crail, Lars - AMS](mailto:Lars.Crail@ams.usda.gov)  
**Cc:** "FATIH AKSOY"  
**Subject:** RE: ETKO Audit - Proposed February 2017  
**Date:** Wednesday, January 25, 2017 11:41:01 AM

---

OK have a nice day, we will speak with (b) (6) and inform you.

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]  
**Sent:** Wednesday, January 25, 2017 7:36 PM  
**To:** ma@etko.com.tr  
**Cc:** FATIH AKSOY  
**Subject:** Re: ETKO Audit - Proposed February 2017  
Please schedule. Thank you.

Lars Crail  
USDA National Organic Program  
(b) (6) mobile

On Jan 25, 2017, at 9:37 AM, "[ma@etko.com.tr](mailto:ma@etko.com.tr)" <[ma@etko.com.tr](mailto:ma@etko.com.tr)> wrote:

Dear Lars

In Istanbul we have only one operator (b) (4) dealing with trade of frozen fruits and vegetables. Although (b) (6) has a big list, not all was dealt with ETKO, we had frozen fruits and vegetables certifications realised for export.

If this option is good for you we could speak with (b) (6) to set the date for February 20. Please inform.

Best regards

Mustafa

ETKO Turkey.

---

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]

**Sent:** Monday, January 23, 2017 8:29 PM

**To:** ma

**Subject:** RE: RE: ETKO Audit - Proposed February 2017

Hello Mustafa,

I had hoped to get back to you sooner regarding the upcoming onsite audit. Attached is the most current schedule. According to the schedule, I plan to be in Istanbul for one day and then two days in ETKO's Izmir office. Is it possible to schedule a witness audit in Istanbul? I am not planning to conduct any witness or review audits while in Izmir; both days will be in your office.

Once we establish audit activities in Istanbul, I will finalize the schedule and send you an audit engagement letter and cost estimate. I am currently conducting an audit in South America for the remainder of the week, but I can be contacted via email, cellular phone, or by Skype if you have any questions.

Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile

---

**From:** ma [<mailto:ma@etko.com.tr>]

**Sent:** Tuesday, December 20, 2016 2:23 PM

**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>

**Subject:** YNT: RE: ETKO Audit - Proposed February 2017

Ok waiting the instructions. Have a nice day. Mustafa

Samsung Galaxy akilli telefonumdan gönderildi.

----- Orijinal mesaj -----

Baslangiç tarihi: "Crail, Lars - AMS" <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>

Tarih: 20.12.2016 20:05 (GMT+03:00)

Alici: [ma@etko.com.tr](mailto:ma@etko.com.tr), 'MUSTAFA AKYUZ' (b) (6) [\(b\)\(6\)@etko.com.tr](mailto:(b)(6)@etko.com.tr)

Cc: "Claypool, Rebecca E - AMS" <[Rebecca.E.Claypool@ams.usda.gov](mailto:Rebecca.E.Claypool@ams.usda.gov)>

Konu: RE: ETKO Audit - Proposed February 2017

Hi Mustafa,

Thanks for the confirmation. I will send you further details and instructions regarding the on-site audit in the next couple of weeks.

Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile

---

**From:** [ma@etko.com.tr](mailto:ma@etko.com.tr) [<mailto:ma@etko.com.tr>]

**Sent:** Tuesday, December 20, 2016 11:22 AM

**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>; 'MUSTAFA AKYUZ' (b) (6) [\(b\)\(6\)@etko.com.tr](mailto:(b)(6)@etko.com.tr)

**Cc:** Claypool, Rebecca E - AMS <[Rebecca.E.Claypool@ams.usda.gov](mailto:Rebecca.E.Claypool@ams.usda.gov)>

**Subject:** RE: ETKO Audit - Proposed February 2017

Dear Lars

Yes that is possible after Biofach for ETKO audit. 20-24 February.

I will be attending Biofach as well so would like to participate the Panel.

Best regards

Mustafa

ETKO Turkey.

---

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]

**Sent:** Monday, December 19, 2016 8:31 PM

**To:** MUSTAFA AKYUZ; [ma@etko.com.tr](mailto:ma@etko.com.tr)

**Cc:** Claypool, Rebecca E - AMS

**Subject:** ETKO Audit - Proposed February 2017

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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

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<9962387001\_OperationProfile.pdf>



**From:** [Claypool, Rebecca E - AMS](#)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** RE: ETKO Auditor Special Instructions  
**Date:** Wednesday, June 22, 2016 12:54:27 PM  
**Attachments:** [image001.png](#)

---

Hi Lars,

I heard back from C&E today and was able to update the Special Instructions for ETKO. Take a peek whenever you get a chance and let me know if I completed the fields correctly.

Thanks,  
Rebecca

---

**From:** Crail, Lars - AMS  
**Sent:** Thursday, June 16, 2016 1:15 PM  
**To:** Claypool, Rebecca E - AMS  
**Subject:** ETKO Auditor Special Instructions

Rebecca,

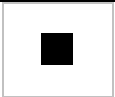
Penny and I are expected to conduct a compliance audit of ETKO in July. I've started the Auditor Special Instructions for you to complete: [Z:\AIA\ACA-Active\ETKO-Turkey\2016 Compliance\NP6199LCA Auditor Special Instructions 06 16 16.docx](#)

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



**From:** [Crail, Lars - AMS](#)  
**To:** [Claypool, Rebecca E - AMS](#)  
**Subject:** RE: ETKO Auditor Special Instructions  
**Date:** Wednesday, June 22, 2016 3:35:00 PM  
**Attachments:** [image001.png](#)

---

This looks good. Thank you.

Lars

---

**From:** Claypool, Rebecca E - AMS  
**Sent:** Wednesday, June 22, 2016 12:54 PM  
**To:** Crail, Lars - AMS  
**Subject:** RE: ETKO Auditor Special Instructions

Hi Lars,

I heard back from C&E today and was able to update the Special Instructions for ETKO. Take a peek whenever you get a chance and let me know if I completed the fields correctly.

Thanks,

Rebecca

---

**From:** Crail, Lars - AMS  
**Sent:** Thursday, June 16, 2016 1:15 PM  
**To:** Claypool, Rebecca E - AMS <[Rebecca.E.Claypool@ams.usda.gov](mailto:Rebecca.E.Claypool@ams.usda.gov)>  
**Subject:** ETKO Auditor Special Instructions

Rebecca,

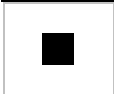
Penny and I are expected to conduct a compliance audit of ETKO in July. I've started the Auditor Special Instructions for you to complete: [Z:\AIA\ACA-Active\ETKO-Turkey\2016 Compliance\NP6199LCA Auditor Special Instructions 06 16 16.docx](#)

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



**From:** [ma@etko.org](mailto:ma@etko.org)  
**To:** [Crail, Lars - AMS](mailto:Lars.Crail@ams.usda.gov)  
**Subject:** RE: ETKO Clients Ukraine  
**Date:** Friday, August 12, 2016 6:20:01 PM  
**Attachments:** [image001.png](#)

---

Dear Lars sorry for late answer,  
I received the confirmation from the clients this evening. They confirm the annual inspection for the dates 6-7 October incase you choose them to be witnessed.  
Viip Agro and Bel-Agro did not have activities so far for NOP products but Ekolium did.  
They are all located nearby Kiev.  
Ekolium traded himself sunflower oil directly to the importers in the EU and USA. No Vendors used or any other intermediary.  
Please inform if you need any other information  
Best regards  
Mustafa

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]  
**Sent:** Tuesday, August 09, 2016 6:35 PM  
**To:** ma@etko.org  
**Cc:** fa@etko.org  
**Subject:** RE: ETKO Clients Ukraine

Thank you Mustafa; the information is very helpful. I am attempting to audit two other certifiers during the trip to Ukraine. I would like to select the following traders:

3141 – Ekolium  
3188 – VIP Group LLC  
3214 – Bel-Agro

All are located in Kiev. Are all these traders actively trading NOP products? What type of products? Are any of their vendors/clients ETKO certified? If vendors certified by ETKO, please identify the names of those operations.

I can dedicate two days to observe audits of these traders. I would prefer to do so either Monday and Tuesday (Oct 3-4) or Thursday and Friday (Oct 6-7).

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

USDA

---

**From:** [ma@etko.org](mailto:ma@etko.org) [mailto:[ma@etko.org](mailto:ma@etko.org)]  
**Sent:** Tuesday, August 09, 2016 10:56 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Cc:** [fa@etko.org](mailto:fa@etko.org)  
**Subject:** ETKO Clients Ukraine

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

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**From:** [Crail, Lars - AMS](mailto:Crail.Lars@AMS)  
**To:** [ma@etko.org](mailto:ma@etko.org)  
**Subject:** RE: ETKO Clients Ukraine  
**Date:** Sunday, August 14, 2016 4:15:00 PM  
**Attachments:** [image001.png](#)

---

Dear Mustafa,

Thank you for the response.

We will plan to conduct the three inspections during Oct 6-7.

Once I confirm and establish dates from the other certifiers regarding their inspections in Ukraine, I will send ETKO an engagement letter and audit cost estimate.

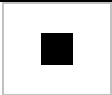
Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

**From:** [ma@etko.org](mailto:ma@etko.org) [mailto:[ma@etko.org](mailto:ma@etko.org)]

**Sent:** Saturday, August 13, 2016 2:20 AM

**To:** Crail, Lars - AMS

**Subject:** RE: ETKO Clients Ukraine

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They are all located nearby Kiev.

Ekolium traded himself sunflower oil directly to the importers in the EU and USA. No Vendors used or any other intermediary.

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Best regards

Mustafa

---

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**Cc:** [fa@etko.org](mailto:fa@etko.org)

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Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

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**Subject:** ETKO Clients Ukraine

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

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

**From:** [Claypool, Rebecca E - AMS](#)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** RE: ETKO Compliance Audit - Feb 2017  
**Date:** Friday, December 30, 2016 6:16:59 PM  
**Attachments:** [image001.png](#)

---

Hi Lars,

I updated the ETKO Special Instructions and saved it in the 2016 Compliance Pre-audit folder. It has today's date. I'm waiting to hear from Appeals and C&E, but will update it again when I do, but wanted you to know that it is about ready.

Thanks!

Rebecca

---

**From:** Crail, Lars - AMS  
**Sent:** Friday, December 30, 2016 1:05 PM  
**To:** Claypool, Rebecca E - AMS  
**Subject:** ETKO Compliance Audit - Feb 2017

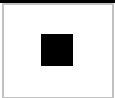
Rebecca, Attached is the Auditor Special Instructions for a compliance audit of ETKO in February. Also attached are Instructions you completed in June 2016 for the same audit that was to be conducted by Penny and I. It was cancelled. See if there are any updates from the June Instructions and add them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

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



**From:** [Kuhn, Meg - AMS](#)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** RE: ETKO Compliance Audit  
**Date:** Tuesday, July 05, 2016 11:28:10 PM  
**Attachments:** [image001.png](#)  
**Importance:** High

---

Hi Lars,

Sorry for my delayed response; this email got buried! From what I understand – and Cheri might be a better resource for this question – the auditors are meant to review ETKO’s audit reports that resulted in the conditional loss of accreditation for the three accreditations listed – ISO 17065, COR, and EU’s 3<sup>rd</sup> country list. In addition to reviewing the reports that resulted in those conditional accreditation losses, the auditors need to review any corrective and preventive actions that have been implemented to address nonconformances from those reports. BASED ON the comparative review between those two reviews, auditors would then cite ETKO for any NOP accreditation requirements that emerge as a result.

I am available tomorrow (Weds) if you want to talk; otherwise, I should be around Thursday and Friday as well.

Thanks,

Meg

Meg Kuhn

Appeals Specialist

USDA-NOP-ODA

(202) 205-9644

---

**From:** Crail, Lars - AMS  
**Sent:** Sunday, June 26, 2016 3:47 PM  
**To:** Kuhn, Meg - AMS  
**Subject:** ETKO Compliance Audit

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 3<sup>rd</sup> country recognition as a certifying body, as well as corresponding corrective and preventive actions implemented to address nonconformances.*

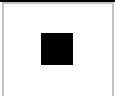
Can you provide clarification as to what is expected actions of the auditors for the above? We can discuss via telephone or in person. I am tele-working on Monday and Wednesday. Thanks.

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile





**From:** [Crail, Lars - AMS](#)  
**To:** [Kuhn, Meg - AMS](#)  
**Subject:** RE: ETKO Compliance Audit  
**Date:** Wednesday, July 06, 2016 8:34:00 AM  
**Attachments:** [image001.png](#)

---

Thanks for the response Meg. I did get some clarification from Cheri.

Lars

---

**From:** Kuhn, Meg - AMS  
**Sent:** Tuesday, July 05, 2016 11:28 PM  
**To:** Crail, Lars - AMS  
**Subject:** RE: ETKO Compliance Audit  
**Importance:** High

Hi Lars,

Sorry for my delayed response; this email got buried! From what I understand – and Cheri might be a better resource for this question – the auditors are meant to review ETKO’s audit reports that resulted in the conditional loss of accreditation for the three accreditations listed – ISO 17065, COR, and EU’s 3<sup>rd</sup> country list. In addition to reviewing the reports that resulted in those conditional accreditation losses, the auditors need to review any corrective and preventive actions that have been implemented to address nonconformances from those reports. BASED ON the comparative review between those two reviews, auditors would then cite ETKO for any NOP accreditation requirements that emerge as a result.

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Thanks,

Meg

Meg Kuhn

Appeals Specialist

USDA-NOP-ODA

(202) 205-9644

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**From:** Crail, Lars - AMS  
**Sent:** Sunday, June 26, 2016 3:47 PM  
**To:** Kuhn, Meg - AMS <[Meg.Kuhn@ams.usda.gov](mailto:Meg.Kuhn@ams.usda.gov)>  
**Subject:** ETKO Compliance Audit

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 3<sup>rd</sup> country recognition as a certifying body, as well as corresponding corrective and preventive actions implemented to address nonconformances.*

Can you provide clarification as to what is expected actions of the auditors for the above? 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



**From:** [ma@etko.org](mailto:ma@etko.org)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [Zuck, Penelope - AMS](#); [""Fatih Aksoy""](#)  
**Subject:** RE: NOP Audit - Postponed  
**Date:** Thursday, June 30, 2016 6:11:55 PM  
**Attachments:** [image001.png](#)

---

Dear Lars

I am sorry for inconvenient environment in and around Turkey in these days. I hope the situation will be settled soon and you can come over for ETKO audit.

Best regards, Mustafa

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]

**Sent:** Thursday, June 30, 2016 11:53 PM

**To:** ma@etko.org

**Cc:** Zuck, Penelope - AMS; 'Fatih Aksoy' (fa@etko.org)

**Subject:** NOP Audit - Postponed

Dear Mustafa,

Our request for travel to Turkey was not approved; therefore, we are postponing the audit. Please suspend submitting the documents I requested for the audit. Once I receive further guidance from NOP Management how to proceed with ETKO's audit, I will notify you.

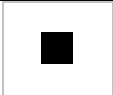
Best Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



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**From:** [ma@etko.org](mailto:ma@etko.org)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [""Fatih Aksoy""](#); [Claypool, Rebecca E - AMS](#)  
**Subject:** RE: NOP Audit Option  
**Date:** Friday, July 15, 2016 11:22:32 AM  
**Attachments:** [image001.png](#)

---

Dear Lars

Thank you for information, we are ready for any option you choose. We do not have any conflict with your proposal.

Best regards

Mustafa Akyuz

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]  
**Sent:** Friday, July 15, 2016 4:49 PM  
**To:** ma@etko.org  
**Cc:** "Fatih Aksoy"; Claypool, Rebecca E - AMS  
**Subject:** RE: NOP Audit Option

Hello Mustafa,

The submitted information is very helpful. Thank you.

I will briefly explain how I propose to conduct ETKO's audit.

- I am able to conduct witness audits in Ukraine during the week of October 2<sup>nd</sup>. Witness Audits are to observe ETKO conducting inspections of certification applicants or certified operators.
- NOP proposes to hire a private (non-governmental) contractor to conduct a portion of the onsite audit at ETKO's Turkey office. There may also be a witness audit conducted in Turkey by this organization. Although NOP has not determined what organization or individual would do this onsite audit, I have been in contact with IOAS. They mentioned that they are planning to be in Turkey during November and can possibly conduct audit verification activities for NOP at that time.
- For this assessment, I would be the lead auditor and direct all audit/assessment activities. Some of the audit may be completed remotely using electronic systems (e.g. Skype, file transfer, etc....). Details have yet to be determined.

Do you have any issues or conflicts with this proposal? If you wish, I am happy to discuss any of these details with you via Skype.

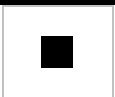
Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

**From:** [ma@etko.org](mailto:ma@etko.org) [mailto:ma@etko.org]  
**Sent:** Tuesday, July 12, 2016 11:51 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Cc:** "Fatih Aksoy" <[fa@etko.org](mailto:fa@etko.org)>  
**Subject:** RE: NOP Audit Option

Dear Lars

You can find attached operators which ETKO will work this year in Ukraine. Unfortunately due to no marketing possibilities (as only NOP certification) many operators left for EU Program certification to other accredited certifiers.

I hope we can manage to find operators for your inspection. I indicated especially the ones which had NOP activity last years crop, the ones already inspected and planned inspections. There is one group of producers as applicant they are not ready yet for application.

Best regards

Mustafa Akyuz

ETKO Turkey

---

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]

**Sent:** Friday, July 08, 2016 6:50 PM

**To:** [ma@etko.org](mailto:ma@etko.org)

**Cc:** "Fatih Aksoy"

**Subject:** RE: NOP Audit Option

Yes, absolutely. Please respond on Monday or Tuesday.

Best Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

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

**Sent:** Friday, July 08, 2016 11:48 AM

**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>

**Cc:** "Fatih Aksoy" <[fa@etko.org](mailto:fa@etko.org)>

**Subject:** RE: NOP Audit Option

Dear Lars

Actually this week was public holiday for Ramadan and Office will be open on Monday. Can I respond you on Monday?

Best regards

Mustafa

---

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]

**Sent:** Friday, July 08, 2016 5:34 PM

**To:** [ma@etko.org](mailto:ma@etko.org)

**Cc:** "Fatih Aksoy"

**Subject:** NOP Audit Option

Hello Dr. Akyuz,

I am considering some other options in order to conduct the audit of ETKO.

ETKO has several certified operations in Ukraine. Does ETKO have inspections scheduled or could schedule inspections for the week of August 8th in Ukraine for me to witness?

Regards,

Lars Crail

USDA NOP  
202.205.5536 office  
(b) (6) mobile



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**From:** [ma@etko.org](mailto:ma@etko.org)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [""Fatih Aksoy""](#); [Claypool, Rebecca E - AMS](#)  
**Subject:** RE: NOP Audit Option  
**Date:** Friday, August 05, 2016 11:04:53 AM  
**Attachments:** [image001.png](#)

---

Dear Lars,

Sorry I was out for inspections. I will send you the list of the operators in Ukraine with details, distances to big cities Kiev-Odessa etc, so you can decide which one is more convenient. As far as I know you need one operator to witness the audit of ETKO inspector.

Best regards, Mustafa

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]  
**Sent:** Monday, August 01, 2016 9:45 PM  
**To:** ma@etko.org  
**Cc:** "Fatih Aksoy"; Claypool, Rebecca E - AMS  
**Subject:** RE: NOP Audit Option

Hello Mustafa,

Are any of the Ukraine operations near the city of Rivne / Rovno? If so, please indicate which ones.

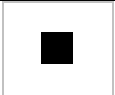
Thank you.

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

**From:** [ma@etko.org](mailto:ma@etko.org) [mailto:ma@etko.org]  
**Sent:** Friday, July 15, 2016 11:22 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Cc:** "Fatih Aksoy" <[fa@etko.org](mailto:fa@etko.org)>; Claypool, Rebecca E - AMS <[Rebecca.E.Claypool@ams.usda.gov](mailto:Rebecca.E.Claypool@ams.usda.gov)>  
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Best regards

Mustafa Akyuz

---

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**Sent:** Friday, July 15, 2016 4:49 PM  
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**Cc:** "Fatih Aksoy"; Claypool, Rebecca E - AMS  
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Do you have any issues or conflicts with this proposal? If you wish, I am happy to discuss any of these details with you via Skype.

Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

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**Sent:** Tuesday, July 12, 2016 11:51 AM

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**Subject:** RE: NOP Audit Option

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Mustafa Akyuz

ETKO Turkey

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**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]

**Sent:** Friday, July 08, 2016 6:50 PM

**To:** [ma@etko.org](mailto:ma@etko.org)

**Cc:** "Fatih Aksoy"

**Subject:** RE: NOP Audit Option

Yes, absolutely. Please respond on Monday or Tuesday.

Best Regards,

Lars Crail

USDA NOP

202.205.5536 office



(b) (6) mobile



---

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**Sent:** Friday, July 08, 2016 11:48 AM  
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**Subject:** RE: NOP Audit Option

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Mustafa

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**Sent:** Friday, July 08, 2016 5:34 PM  
**To:** [ma@etko.org](mailto:ma@etko.org)  
**Cc:** "Fatih Aksoy"  
**Subject:** NOP Audit Option

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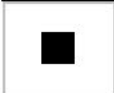
Regards,

Lars Crail

USDA NOP

202.205.5536 office

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**From:** [ma@etko.org](mailto:ma@etko.org)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [""Fatih Aksoy""](#); [Zuck, Penelope - AMS](#); [Claypool, Rebecca E - AMS](#)  
**Subject:** RE: NOP Audit Schedule Attached  
**Date:** Sunday, June 26, 2016 6:18:45 AM  
**Attachments:** [image001.png](#)

---

Mr Crail

I would like to clarify the Office situation of Efal in Istanbul.

Efal has different activities such as yacht construction and farming. They do not use the office they registered in Istanbul, it was used for company registration, no personnel working. No documents are kept in related to farming/trading activities in that place. Actually mainly they stay in their yacht construction facility in Ortaca – Dalaman / Mugla which is about 250 km south-east part of Izmir.

During farm inspection we are able to check record keeping/documents and trade activities.

For other records you requested my colleague Fatih will provide them. Meanwhile some documents are in Turkish and could be translated in English. In case you need all English please inform so we can translate them before sending to you.

Best regards

Mustafa Akyuz

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]

**Sent:** Thursday, June 23, 2016 11:33 PM

**To:** ma@etko.org

**Cc:** 'Fatih Aksoy' (fa@etko.org); Zuck, Penelope - AMS; Claypool, Rebecca E - AMS

**Subject:** NOP Audit Schedule Attached

Hello Dr. Mustafa Akyuz,

Ms. Zuck and I will observe ETKO conducting inspections of the following operations:

- Ares Organic (Trader/Handler) in Istanbul
- Efal Farm (Crop) in Istanbul (office) and Kula, Manisa (farm)
- Susitas (Processor/Handler) in Cigil/Izmir

These witness audits are reflected on the attached schedule. Let me know if there any issues with ETKO conducting the inspections and the USDA auditors observing them on the specified dates. If necessary, we may be able to adjust the schedule.

With the audit schedule agreed upon, I will be able to create and send ETKO a formal audit engagement letter and an audit cost estimate.

In the meantime, please send me the following records for each of the three operations above:

- Organic System Plan
- Internal Control System (ICS) quality manual(s) or document(s) (only for grower groups)
- Most recent Inspection Report
- All notifications to the operation since the last inspection.
- Organic certificate
- Inspector's resume or CV (for Witness Audits only)
- Inspector's current contact information (for Witness Audits only)
- Inspector instructions.

Ms. Rebecca Claypool will set up a folder on the USDA Cloudvault for you to upload those documents. Instructions for uploading will also be provided. You, may zip files and upload them onto the USDA Cloudvault.

Contact me if you have questions or need clarification. Thank you for the quick responses to my questions and requests.

Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



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**To:** [Crail, Lars - AMS](#)  
**Cc:** [""Fatih Aksoy""](#); [Zuck, Penelope - AMS](#); [Claypool, Rebecca E - AMS](#); [AMS - QAD AuditService](#); [AMS - AIAinbox](#)  
**Subject:** RE: NOP Audit Schedule Attached  
**Date:** Tuesday, June 28, 2016 12:24:31 PM  
**Attachments:** [image001.png](#)

---

Mr Crail

Thank you for information, plan and offer.

We will prepare and provide them as required.

Best regards

Mustafa Akyuz

ETKO Turkey

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]

**Sent:** Monday, June 27, 2016 10:09 PM

**To:** ma@etko.org

**Cc:** "Fatih Aksoy"; Zuck, Penelope - AMS; Claypool, Rebecca E - AMS; AMS - QAD AuditService; AMS - AIAinbox

**Subject:** RE: NOP Audit Schedule Attached

Dear Dr. Mustafa Akyuz,

Attached is an official audit engagement letter with related documents for your consideration. If you have any questions about the documents including how to complete them, please contact me.

I was not able to select two files that I would like to review during the audit. Would you send me a list of grower group operations certified since the prior audit. Please include on the list the following:

- Name of operation
- Certification scopes
- Number of members
- Location
- Certified products
- Certification effective date
- Date surrendered, suspended, or revoked (if applicable)

I would also ask for you to send me a list of unannounced inspections conducted during 2014, 2015, and 2016 to include:

- Name of operations
- Certification scopes
- Location
- Certified products
- Reason for unannounced inspection

How many days do you estimate will be necessary to provide me the above lists? Thank you.

Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



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**From:** [ma@etko.org](mailto:ma@etko.org)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** "[Fatih Aksoy](#)"; [Zuck, Penelope - AMS](#)  
**Subject:** RE: NOP Onsite Audit Scheduling  
**Date:** Monday, June 20, 2016 11:10:03 AM  
**Attachments:** [image001.png](#)

---

Dear Lars

OK we plan Skype call for Tuesday 19.15 h.

Meanwhile we will update the database in these days.

Taxi may cost approximately 30 USD from airport to the hotel.

Best regards

Mustafa

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]

**Sent:** Monday, June 20, 2016 4:21 PM

**To:** ma@etko.org

**Cc:** 'Fatih Aksoy'; Zuck, Penelope - AMS

**Subject:** RE: NOP Onsite Audit Scheduling

Hello Dr. Mustafa Akyüz

Thank you for the information; this is very helpful.

May we plan a Skype call on Tuesday at 19:15 hrs your time?

I would like to discuss in more detail the proposed schedule regarding travel and inspection times for each day of the week.

Can you also provide me the approximate cost of a taxi from the airport to the two hotels you recommended. Thank you.

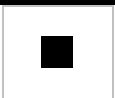
Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

**From:** [ma@etko.org](mailto:ma@etko.org) [mailto:ma@etko.org]

**Sent:** Saturday, June 18, 2016 8:00 AM

**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>; Zuck, Penelope - AMS <[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>

**Cc:** 'Fatih Aksoy' <[fa@etko.org](mailto:fa@etko.org)>

**Subject:** FW: NOP Onsite Audit Scheduling

Mr Lars

Thank you for information, we are happy to receive you once again and Ms Zuck.

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The program you scheduled we will Follow.

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campus.) I see a small pool in the picture their website.

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3-Hotel reservation in Istanbul we should communicate with the operator (Ares) to choose the closest one. This we will make when the program is fixed.

Please inform if you need any other information, documents etc.

For Skype call it is good for us Monday or Tuesday Turkish time 18.00 or 19.00 hours. You can inform me which day/hour is good for you.

Best regards

Mustafa Akyüz

Actual addresses changed for EFAL and ARES as follows:

Operator	Adress	Last Inspection date	Distance to Izmir
Arif Gurdal farm	<b>Farm:</b> Hamzabali Mevkii Baltaköy Vedat Çiftçi Çiftligi Çine Yolu 8.km - AYDIN	02.10.2015	120 km, 1 hour 10 min drive
Efal farm	<b>Office:</b> Atatürk Cad. Gonca Sk. No: 1-9 Kadikoy, Istanbul – TURKEY. <b>Farm:</b> Aktas koyu, Kula, MANISA - TURKEY	05.11.2015	150 km, 1 hour 30 min drive
Ares Office (trading)	<b>Office:</b> Altintepe Mah. Istasyon yolu sok. No:3 Maltepe/ ISTANBUL - TURKEY	30.10.2015	Istanbul 1 hour by flight

**From:** FATİH AKSOY [<mailto:fa@etko.org>]

**Sent:** Saturday, June 18, 2016 2:02 PM

**To:** [ma@etko.org](mailto:ma@etko.org)

**Subject:** RE: NOP Onsite Audit Scheduling

Mustafa abi

Bilgiler su sekilde

2044 Arif Gürdal, son kontrol tarihi: 02.10.2015, adres bilgileri database ile uyumlu

2325 Efal, son kontrol tarihi: 05.11.2015, firma adresi bu yıl degismis dogru adres: **Atatürk Cad.**

**Gonca Sk. No: 1-9 Kadikoy, Istanbul – TURKEY**, Ciftlik adresi: **Aktas koyu, Kula, Manisa - TURKEY**

2387 Ares, son kontrol tarihi: 30.10.2015, adres bilgileri databasde farkli dogru adres: **“Altintepe**

**Mah. Istasyon yolu sok. No:3 Maltepe/ Istanbul - TURKEY**

Database de düzeltme bölümü kapatılmış, su an herhangi bir düzeltme yapilamiyor, denemeye devam edeceğim, açilir ise düzeltmelerini yapacağım.

*Saygilarimizla/ Best Regards*

Fatih AKSOY

ETKO Ekolojik Tarim Kontrol Org. Ltd. Sti.

160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06 (PBX), Fax: +90 (232) 339 76 07

**Email/eposta:** [fa@etko.org](mailto:fa@etko.org), **Web:** [www.etko.org](http://www.etko.org)

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Please help to save the planet and only print this email if you really need to. Thank you.

---

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

**Sent:** Saturday, June 18, 2016 1:00 PM

**To:** 'Fatih Aksoy'

**Subject:** FW: NOP Onsite Audit Scheduling

**Importance:** High

Fatih Larsin istedigini bilgi ve belgeleri ekleyip bana gönderirmisin,

Send me their current certificate, the date of their last inspection, and confirm that their physical locations are in the cities indicated in the database.

---

**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]

**Sent:** Thursday, June 16, 2016 5:43 PM

**To:** [ma@etko.org](mailto:ma@etko.org)

**Cc:** Zuck, Penelope - AMS

**Subject:** NOP Onsite Audit Scheduling

Dear Dr. Mustafa Akyuz,

I hope you are well.

I have been assigned to conduct an onsite audit of ETKO according to the terms of the Settlement Agreement signed on April 6, 2016. I propose to conduct the onsite audit with NOP Auditor Ms.

Penny Zuck starting on July 18<sup>th</sup> and concluding by July 22<sup>nd</sup>.

The proposed dates are one month away and I seek your cooperation to quickly establish the logistic details of the audit. I've reviewed the Organic Integrity Database and identified several certified operations for which I request additional information:

1. Ares organic Gida
2. Arif Gurdal Tarim Isletmesi
3. Efal Tarim

I am proposing to conduct Witness Audits of these operations. A Witness Audit is an activity where we observe ETKO conducting an inspection. The inspection can be an annual or additional (unannounced, announced, etc...) inspection. Please confirm that these operations are currently certified. Send me their current certificate, the date of their last inspection, and confirm that their physical locations are in the cities indicated in the database.

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My proposed audit itinerary is as follows:

Sunday, July 17: Arrive Istanbul.

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Wednesday, July 20: ETKO office audit

Thursday, July 21: Conduct Witness Audit

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Friday, July 22 or Saturday, July 23, Depart Izmir

There is some flexibility in this proposed itinerary; however, if you suggest changes, I will need to know of these soon.

I'll need a hotel recommendation from you. A hotel that is within walking distance of your office.

Please update the Organic Integrity Database with current information and advise me when you do



so. I will send you additional information to complete for the preparation of the audit along with an audit engagement letter and audit cost estimate.

I suggest we conduct a Skype call to discuss the above information and other details of the audit.

Please advise me when you are ready to do so. My Skype ID: (b) (6).

I am looking forward to seeing you again.

Regards,

**Lars Crail**

Lead Auditor

USDA National Organic Program

Room 2649-So. (Stop 0268)

1400 Independence Ave SW

Washington, DC 20250-0268

202-205-5536 Direct

(b) (6) Mobile

[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)



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**From:** [ma@etko.org](mailto:ma@etko.org)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** RE: NOP Onsite Audit Scheduling  
**Date:** Tuesday, June 21, 2016 12:02:56 PM  
**Attachments:** [image001.png](#)

---

Dear Lars

My Skype is: (b) (6)

Expecting your call 19.15.

rgrds

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]

**Sent:** Monday, June 20, 2016 4:21 PM

**To:** ma@etko.org

**Cc:** 'Fatih Aksoy'; Zuck, Penelope - AMS

**Subject:** RE: NOP Onsite Audit Scheduling

Hello Dr. Mustafa Akyüz

Thank you for the information; this is very helpful.

May we plan a Skype call on Tuesday at 19:15 hrs your time?

I would like to discuss in more detail the proposed schedule regarding travel and inspection times for each day of the week.

Can you also provide me the approximate cost of a taxi from the airport to the two hotels you recommended. Thank you.

Regards,

Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



---

**From:** [ma@etko.org](mailto:ma@etko.org) [mailto:ma@etko.org]

**Sent:** Saturday, June 18, 2016 8:00 AM

**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>; Zuck, Penelope - AMS

<[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>

**Cc:** 'Fatih Aksoy' <[fa@etko.org](mailto:fa@etko.org)>

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*Saygilarimizla/ Best Regards*

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160 sk. No:13/3 35100, Bornova/IZMIR- TURKEY

Tel: +90 (232) 339 76 06 (PBX), Fax: +90 (232) 339 76 07

**Email/eposta:** [fa@etko.org](mailto:fa@etko.org), **Web:** [www.etko.org](http://www.etko.org)

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Lead Auditor

USDA National Organic Program

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Washington, DC 20250-0268

202-205-5536 Direct

(b) (6) Mobile

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**Cc:** [fa@etko.org](mailto:fa@etko.org)  
**Subject:** RE: NOP Witness Audit Engagement Ltr and Cost Esti - October 2016 in Ukraine  
**Date:** Friday, September 09, 2016 9:42:42 AM  
**Attachments:** [image001.png](#)  
(b) (6), (b) (7)(C)

---

Dear Lars

We decided to assign 3 inspectors for each of the operators.

I will send operators files within today.

Have a nice day

Mustafa Akyuz

ETKO Turkey

T:+90-232-3397606

F:+90-232-3397607

Mobile (b) (6)

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]

**Sent:** Friday, August 26, 2016 9:17 PM

**To:** ma@etko.org

**Cc:** fa@etko.org; Claypool, Rebecca E - AMS; AMS - AIAinbox; AMS - QAD AuditService

**Subject:** NOP Witness Audit Engagement Ltr and Cost Esti - October 2016 in Ukraine

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Let me know if you have any questions.

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Lead Auditor

USDA National Organic Program

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202-205-5536 Direct

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USDA



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## EU CV FORMAT


**ROLE IN PROJECT  
PERSONEL INFO**

Name  
Address  
Telefon  
Faks  
Email  
Nationality  
Birthday

**INSPECTOR**

(b) (6), (b) (7)(C)

(b) (6)

Mobile: (b) (6)

(b) (6)

UA

(b) (6)

**JOB EXPERIENCE**

- Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role

- Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role

- Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role

**EDUCATION**

- Dates (start-finish)
- Institution name and type
- Subjects studied/work abilities
  - Diplome/ Title
- Degree according to national grade  
(if present)
  - Dates (start-finish)
  - Institution name and type
- Subjects studied/work abilities
  - Diplome/ Title
- Degree according to national grade  
(if present)

**PERSONAL ABILITIES AND  
TALENTS**

Abilities which do not need to be proved  
by certificate or diplomes

**MOTHER LANGUAGE**

(b) (6)

(b) (6), (b)

OTHER

- Reading
- Writing
- Speaking

- Reading
- Writing
- Speaking

SOCIAL ABILITIES AND TALENTS

*Living and working together in multi cultural environments communication and team work is essential etc..*

COOPERATIVE ABILITIES AND TALENTS

*Work or voluntarial jobs ( for example: cultural and sport activities) and home, etc. personnel, project and budgeted management and coordination*

TECHNICAL ABILITIES AND TALENTS

*Computer, Tools, Machinery etc..*

ART ABILITIES AND TALENTS

*Muzic, writing, design etc.*

OTHER ABILITIES AND TALENTS

*Other then not mentioned above*

DRIVING LICENSE

ADDITIONAL INFO

ANNEXES

(b) (6)

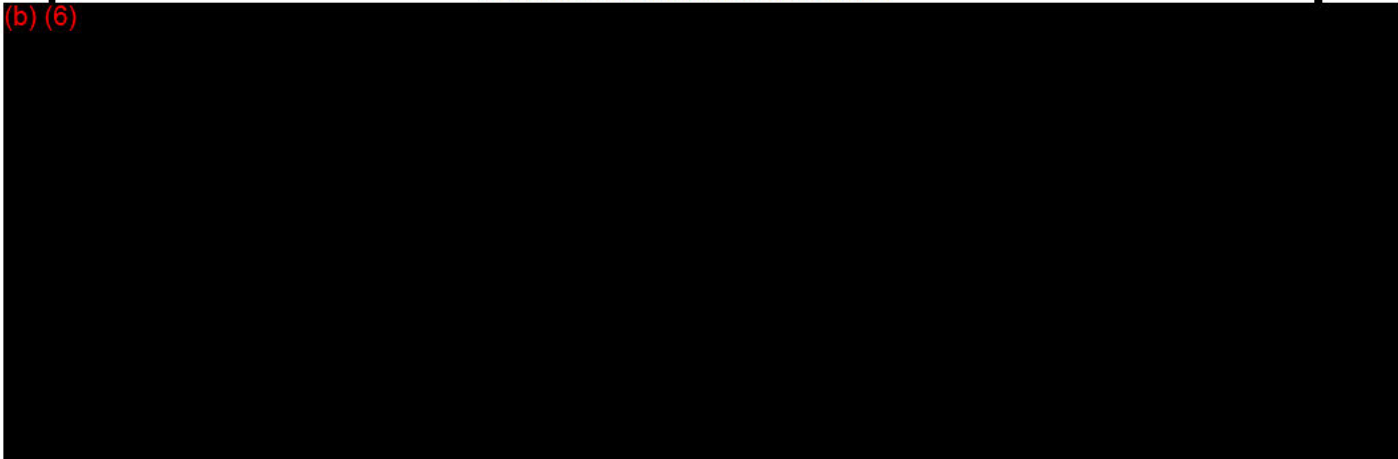
(b) (6), (b)



Date from - Date to	Location	Company	Position	Description
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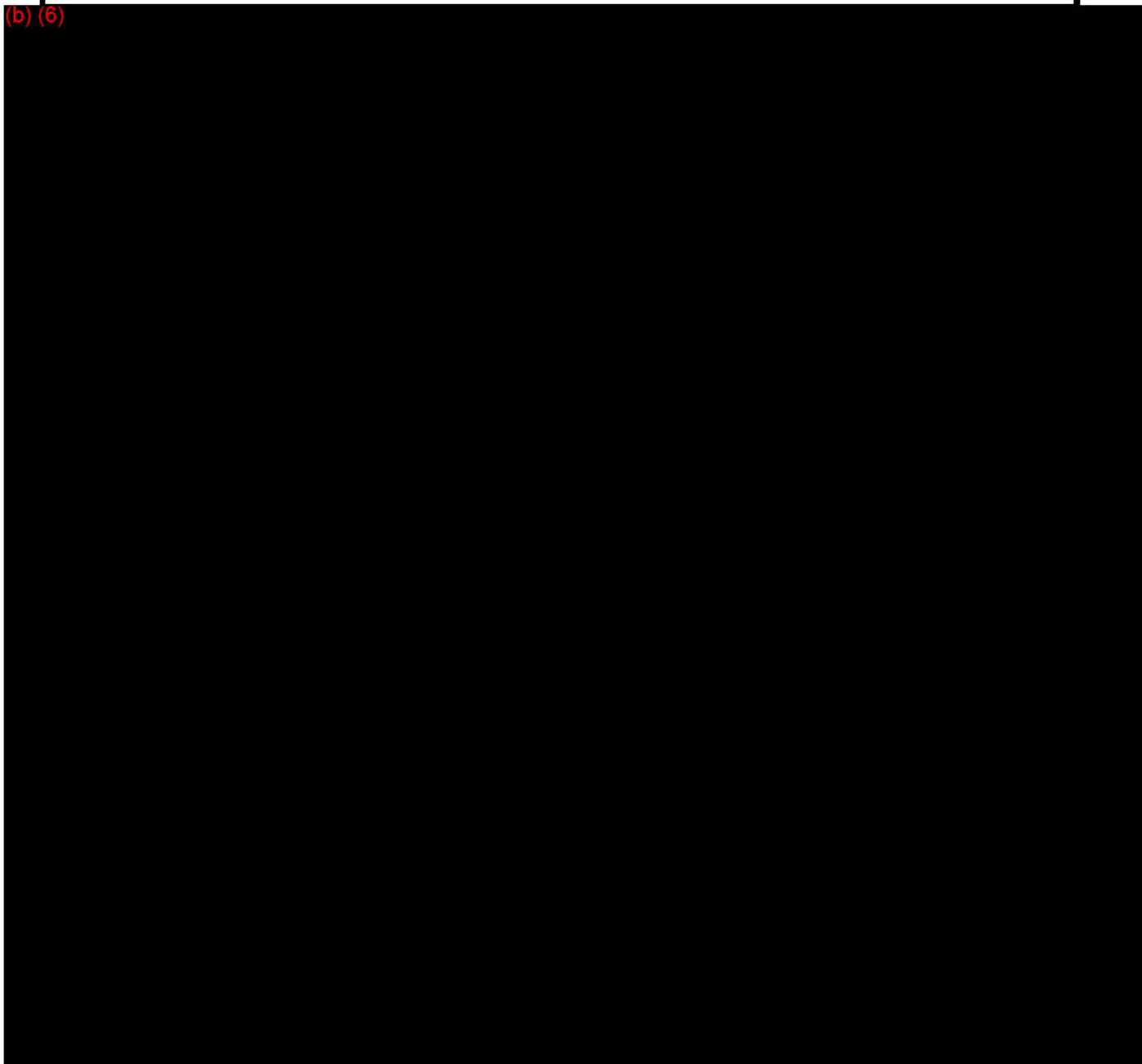
**Inspection and Certification Experiences**

(b) (6)



**COURSES & TRAININGS RECEIVED**

(b) (6)



(b) (6)



(b) (6), (b)

EU CV FORMAT



ROLE IN PROJECT  
PERSONEL INFO

Name

(b) (6), (b) (6)

Address

(b) (6) [redacted]

Telephone

(b) (6) [redacted], Mobile: (b) (6) [redacted]

Fax

(b) (6) [redacted]

Email

(b) (6) [redacted]

Nationality

T.C

Birthday

(b) (6) [redacted]

JOB EXPERIENCE

- Dates (start-finish)
- Employer Name and Address
- Type of job or sector
- Position

(b) (6) [Large redacted area]

- Dates (start-finish)
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- Essential responsibilities and role

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- Employer Name and Address
- Type of job or sector
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- Essential responsibilities and role

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  - Diploma/ Title
- Degree according to national grade (if present)

PERSONAL ABILITIES AND TALENTS

*Abilities which do not need to be proved by certificate or diplomas*

MOTHER LANGUAGE

OTHER

- Reading
- Writing
- Speaking

(b) (6), [redacted]

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*Computer, Tools, Machinery etc..*

ART ABILITIES AND TALENTS

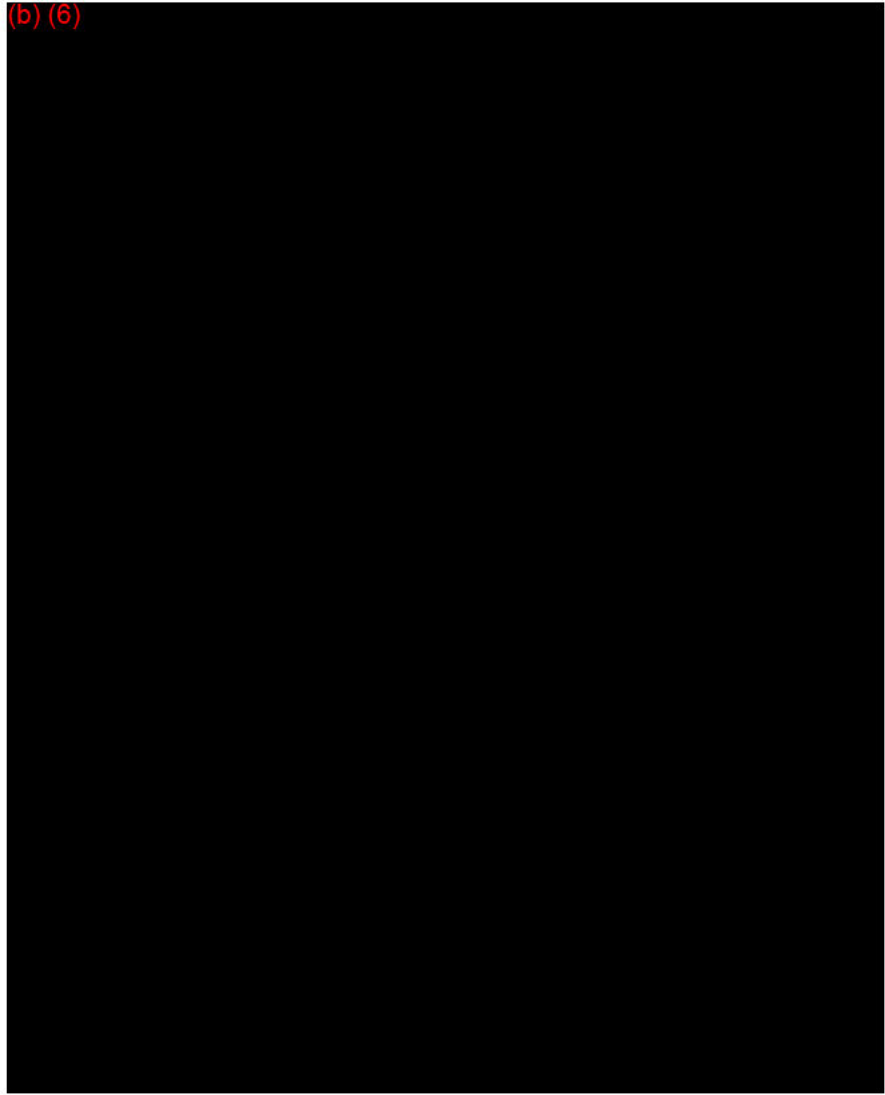
*Music, writing, design etc.*

OTHER ABILITIES AND TALENTS

*Other then not mentioned above*

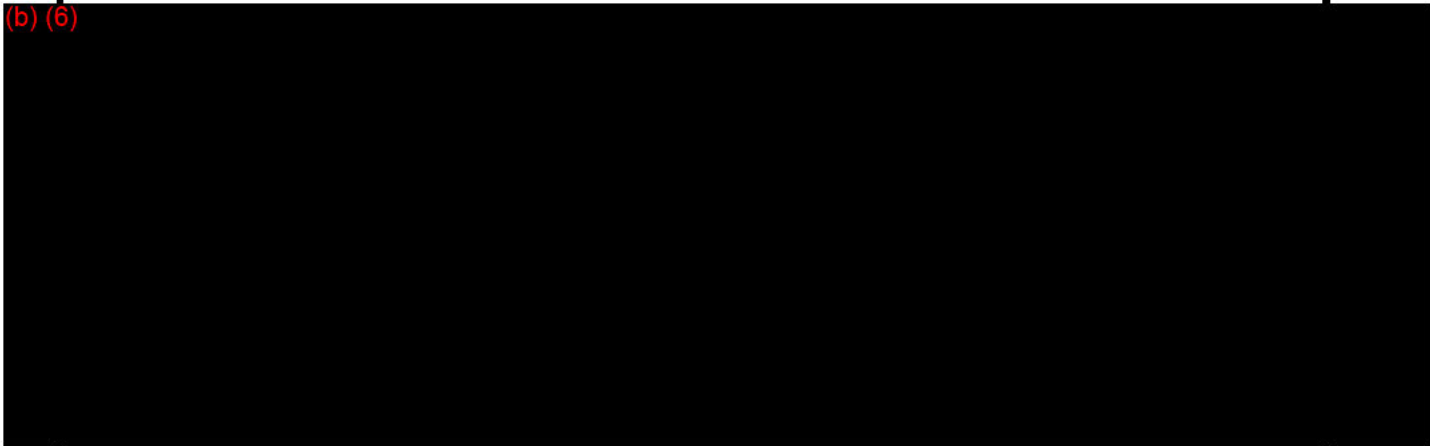
DRIVING LICENSE

ADDITIONAL INFO

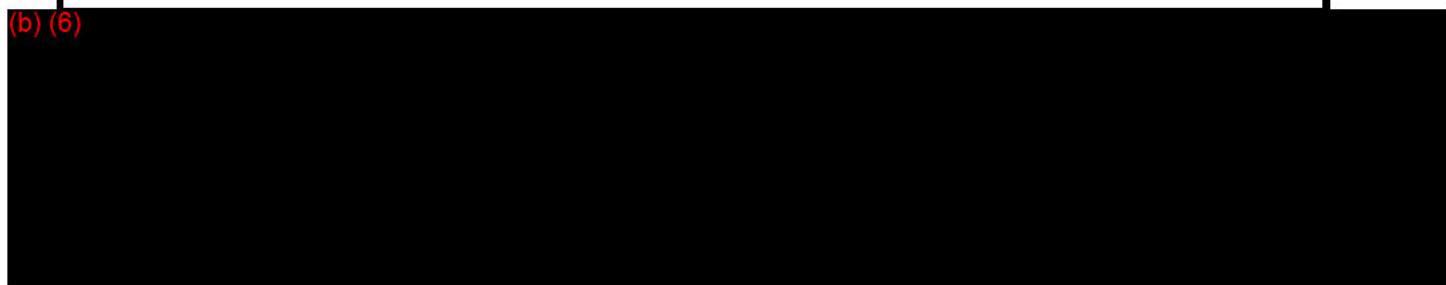


ANNEXES

Date from - Date to	Location	Company	Position	Description
<b>Research and Official Work Experiences</b>				



**Inspection and Certification Experiences**



(b) (6)



TRAINING EXPERIENCES

(b) (6)



COURSES & TRAININGS RECEIVED

(b) (6)



(b) (6),

(b) (6)



(b) (6),

(b) (6)



(b) (6),

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**To:** [Crail, Lars - AMS](mailto:Crail, Lars - AMS)  
**Cc:** [fa@etko.org](mailto:fa@etko.org); [Claypool, Rebecca E - AMS](mailto:Claypool, Rebecca E - AMS); [AMS - AIAinbox](mailto:AMS - AIAinbox); [AMS - QAD AuditService](mailto:AMS - QAD AuditService)  
**Subject:** RE: NOP Witness Audit Engagement Ltr and Cost Esti - October 2016 in Ukraine  
**Date:** Friday, September 09, 2016 9:40:55 AM  
**Attachments:** [image001.png](#)  
[NP6279LCA 1415 ETKO Izmir, Turkey 08 25 16 signed.pdf](#)  
[ETKO ACCOUNT SUMMARY.PDF](#)  
**Importance:** High

---

Dear Lars

Thank you for the documents and the audit program. We will be there in Kiev for the audits. Please find attached signed Cost Estimate. FYI we had credit as you also mentioned with your estimate form, so we do not need to transfer the cost. If different please inform me. I attached the statement of ETKO Account.

Have a nice day

Mustafa Akyuz

ETKO Turkey

T:+90-232-3397606

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Mobile: (b) (6)

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**Date:** Friday, September 09, 2016 7:34:25 PM  
**Attachments:** [image001.png](#)  
[3188 VIP FILE.zip](#)  
[3214 BELAGRO FILE.zip](#)  
[3141 EKOLIUM FILE.zip](#)

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Best regards  
Mustafa

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# MISSING PERSON INFORMATION CARD

## INTERAGENCY / OFFLINE FORM

- SENSITIVE BUT UNCLASSIFIED // FOR OFFICIAL USE ONLY -

**INSTRUCTIONS.** Please fill in the below information to the best of your ability. If you are deploying to Post and do not have your information at the initial time of completion, be certain to enter "TBD" in appropriate fields and fill-in the information as you receive it when you are at Post. Enter "N/A" for any fields that do not apply to you but are marked as required. All fields marked with a red asterisk (\*) require a response.

**NOTICE.** This information is used exclusively to help save your life in an isolating event abroad. The accuracy and timeliness of the information that you provide may prove critical in assisting you or your family members in an isolating event abroad.

### PERSONAL INFORMATION

LAST NAME \* FIRST NAME \* MIDDLE INITIAL

OTHER NAMES (Last Name, First Name, MI; Separate by ";")

DATE OF BIRTH \* LAST 4 OF SSN \* GENDER \* See Appendix A AGENCY/SECTION/DEPARTMENT

PERSONAL E-MAIL CELL PHONE NUMBER #1 IMEI NUMBER #1

PROFESSIONAL E-MAIL CELL PHONE NUMBER #2 IMEI NUMBER #2

How to find your IMEI Number? Type \*#06# in your phone to display your IMEI number.

### PHYSICAL DESCRIPTION

(Please use U.S. Customary Units, i.e. feet, inches, pounds)

HEIGHT (5'10") \* WEIGHT \* HAIR COLOUR \* EYE COLOUR \*

SHIRT SIZE PANT SIZE SHOE SIZE

ETHNIC GROUP BLOOD TYPE RhD Antigen

SCARS / MARKS / TATTOOS (If none indicate by "N/A")



PHOTOGRAPH

Please attach a photograph of yourself. Click image to upload.

# MISSING PERSON INFORMATION CARD

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### PERSONAL INFORMATION

LAST NAME \*

FIRST NAME \*

MIDDLE INITIAL

OTHER NAMES (Last Name, First Name, MI; Separate by ";")

DATE OF BIRTH \*

LAST 4 OF SSN \*

GENDER \* See Appendix A

AGENCY/SECTION/DEPARTMENT

PERSONAL E-MAIL

CELL PHONE NUMBER #1

IMEI NUMBER #1

PROFESSIONAL E-MAIL

CELL PHONE NUMBER #2

IMEI NUMBER #2

How to find your IMEI Number? Type \*#06# in your phone to display your IMEI number.

### PHYSICAL DESCRIPTION

(Please use U.S. Customary Units, i.e. feet, inches, pounds)

HEIGHT (5'10") \*

WEIGHT \*

HAIR COLOUR \*

EYE COLOUR \*

SHIRT SIZE

PANT SIZE

SHOE SIZE

ETHNIC GROUP

BLOOD TYPE

RhD Antigen

SCARS / MARKS / TATTOOS (If none indicate by "N/A")



PHOTOGRAPH

Please attach a photograph of yourself. Click image to upload.

## MEDICAL CONDITIONS

**CAUTION.** Providing this medical information is optional and completely voluntary. The information is stored on the Department of State SBU network with access limited to certain security personnel. It is not part of your medical record and the risk of inadvertent release is very small but present. It may be disclosed to rescue and support personnel and assist them if you are involved in an emergency incident.

Reference: 12 FAH-1 Annex G 9.1 (U) Instructions for Completing Exemplar

---

I have read the above statement of caution and understand that SECTION 4.0 is *optional and completely voluntary*.

KNOWN MEDICAL CONDITIONS (*comma-separated value(s)*)

KNOWN MEDICAL PRESCRIPTIONS (*comma-separated value(s)*)

ALLERGIES (*comma-separated value(s)*)

## CAPABILITY / TRAINING INFORMATION

---

*SPECIALIZED BRIEFING/TRAINING*

*In the aforementioned field, describe any specialized briefings or trainings you have received such as Post Security Briefings, Hostage Survival Training, DoD Survival, Evasion, Resistance and Escape training, etc.*

LANGUAGE CAPABILITIES (*reading, writing, speaking*)

## AUTHENTICATION INFORMATION

---

**DURESS INDICATOR.** Select an easily remembered word that an individual can use during a normal conversation as a covert signal to alert other personnel of their duress. An example of a duress word would be: "Sunglasses." A person is being carjacked and sets off a 911 function from their personal travel locator. RSO calls the person and asks if they are OK. The person in distress (possibly being held at gunpoint and is being told not to say anything) could respond "I hit the panic button by accident trying to find my sunglasses."

---

DURESS WORD

# EU CV FORMAT



## ROLE IN PROJECT PERSONEL INFO

### MD / CERTIFIER / INSPECTOR

Name (b) (6), (b) (7)(C)  
 Address (b) (6)  
 Telefon (b) (6) : (b) (6)  
 Faks (b) (6)  
 Email (b) (6)  
 Nationality T.C  
 Birthday (b) (6)

### JOB EXPERIENCE

- Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role
  - Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role
  
- Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role
  
- Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role
  
- Dates (start-finish)
- Employer Name and Adress
  - Type of job or sector
  - Position
- Essential responsibilities and role

(b) (6)

[Redacted content]

### EDUCATION

- Dates (start-finish)
- Institution name and type

(b) (6), (b)

- Subjects studied/work abilities
  - Diplome/ Title
- Degree according to national grade (if present)
  - Dates (start-finish)
  - Institution name and type
- Subjects studied/work abilities
  - Diplome/ Title
- Degree according to national grade (if present)
  - Dates (start-finish)
  - Institution name and type
- Subjects studied/work abilities
  - Diplome/ Title
- Degree according to national grade (if present)

#### PERSONAL ABILITIES AND TALENTS

*Abilities which do not need to be proved by certificate or diplomes*

#### MOTHER LANGUAGE

#### OTHER

- Reading
- Writing
- Speaking

- Reading
- Writing
- Speaking

#### SOCIAL ABILITIES AND TALENTS

*Living and working together in multi cultural environments commuicaion and team work is essential etc..*

#### COOPERATIVE ABILITIES AND TALENTS

*Work or voluntarial jobs ( for eaxample: cultural and sport activities) and home, etc. personnel, project and butged management and coordination*

#### TECHNICAL ABILITIES AND TALENTS

*Computer, Tools, Machinery etc..*

#### ART ABILITIES AND TALENTS

*Muzic, writing, design etc.*

#### OTHER ABILITIES AND TALENTS

*Other then not mentioned above*

#### DRIVING LICENSE

#### ADDITIONAL INFO

#### ANNEXES

(b) (6)

(b) (6), (b)

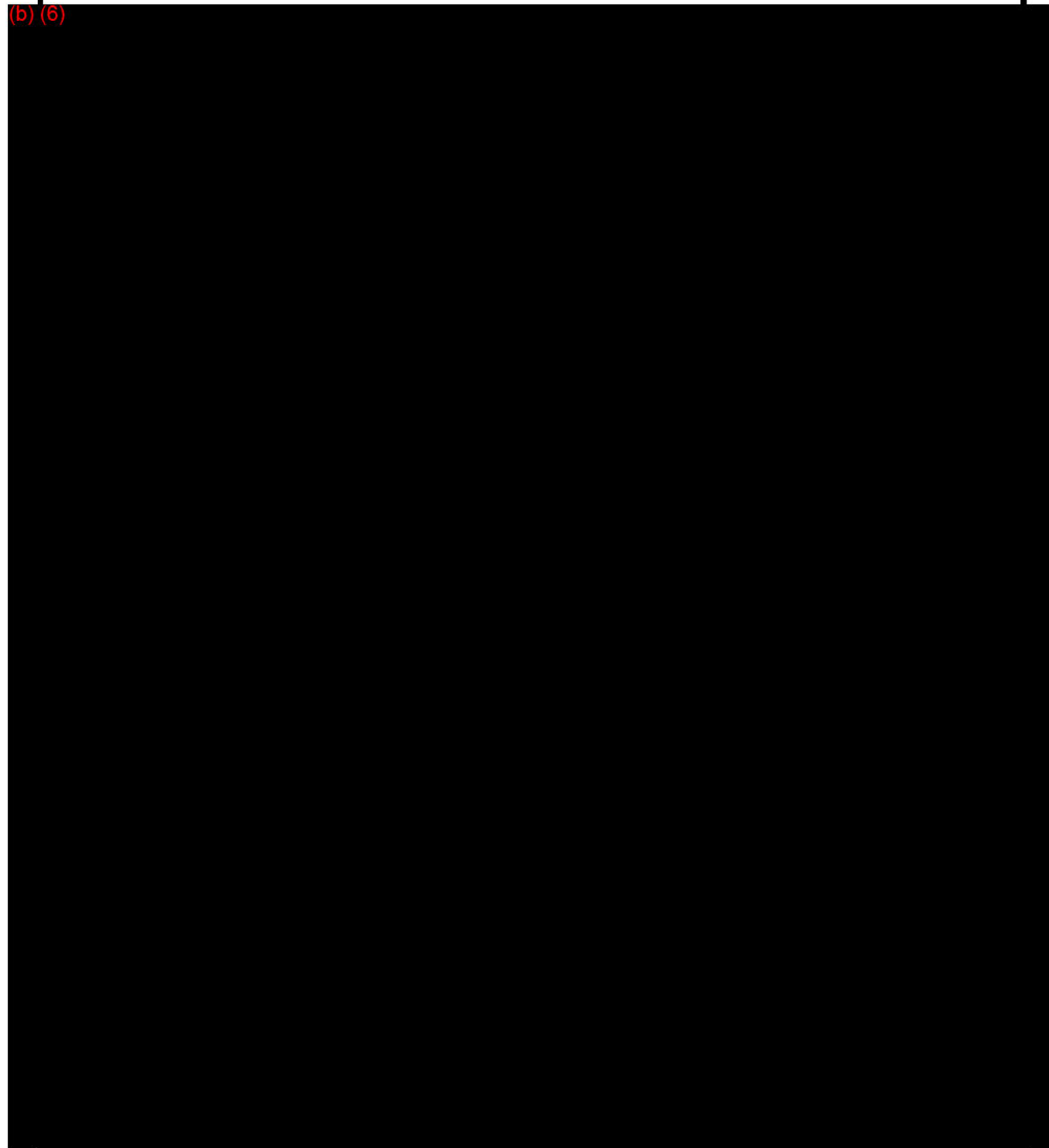
Date from - Date to	Location	Company	Position	Description
<b>Consultancy Experiences</b>				

(b) (6)

A large black rectangular redaction box covering the entire content of the 'Consultancy Experiences' section.

**Inspection and Certification Experiences**

(b) (6)

A very large black rectangular redaction box covering the entire content of the 'Inspection and Certification Experiences' section.

(b) (6)



TRAINING EXPERIENCES

(b) (6)





<b>COURSES &amp; TRAININGS RECEIVED</b>				

(b) (6)



(b) (6)



(b) (6), (b)

(b) (6)



(b) (6), (b)

(b) (6)



(b) (6), (b)

**U.S. DEPARTMENT OF AGRICULTURE  
 AGRICULTURAL MARKETING SERVICE  
 USDA, AMS, LIVESTOCK**

ACCOUNT NUMBER                      PAYMENT DUE                      BALANCE DUE                      AMOUNT ENCLOSED  
 (b) (4)                                      AUG 25, 2016                      \$ (b) (4)                      \$ \_\_\_\_\_

000375

REMIT TO:

ETKO EKOLOJIK TARIM KONTROL OR  
 160 SOKAK NO 13/7  
 35040 BORNOVA  
 IZMR TURKEY

USDA, AMS, LIVESTOCK  
 PO BOX 790304  
 ST LOUIS

MO 63179-0304

-----  
 RETURN THIS PORTION WITH YOUR PAYMENT  
 -----

**ACCOUNT SUMMARY**

<u>ACCOUNT NUMBER</u>	<u>CLOSING DATE</u>	<u>PAYMENT DUE DATE</u>	<u>BALANCE DUE</u>
(b) (4)	JUL 31, 2016	AUG 25, 2016	\$ (b) (4)
PREVIOUS BALANCE	\$ (b) (4)	TOTAL DEPOSIT	\$ .00
PREVIOUS ON APPEAL (+)	\$ .00	INTEREST CHARGES (+)	\$ .00
CHARGES/DEBTS (+)	\$ .00	PENALTY CHARGES (+)	\$ .00
PAYMENTS/CREDITS (-)	\$ .00	ADMINISTRATIVE CHARGES (+)	\$ .00
AMOUNT ON APPEAL (-)	\$ .00	NEW BALANCE (=)	\$ (b) (4)

**CUSTOMER SERVICE**

USDA, AMS, LPS, QAD  
 10809 EXEC CENTER DR, STE. 318  
 NATIONAL BILLING OFFICE  
 LITTLE ROCK AR 72211-6022

TOLL FREE :  
 COMMERCIAL : 501-312-2962  
 E-MAIL : QAD.BUSINESSOPS@AMS.USDA.GOV

\*\*\*\*\* FOR YOUR CONVENIENCE, SUBMIT PAYMENT ONLINE AT: WWW.PAY.GOV. CONTACT C \*\*\*\*\*  
 \*\*\*\*\* CUSTOMER SERVICE FOR DETAILED INSTRUCTIONS. \*\*\*\*\*

BILLING RIGHTS SUMMARY  
IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR STATEMENT

IF YOU NEED MORE INFORMATION ABOUT A TRANSACTION ON YOUR STATEMENT, WRITE TO US ON A SEPARATE PIECE OF PAPER AT THE CUSTOMER SERVICE ADDRESS SHOWN ON YOUR STATEMENT. WE MUST HEAR FROM YOU NO LATER THAN 60 DAYS FROM THE CLOSING DATE OF THE STATEMENT ON WHICH THE ERROR OR PROBLEM APPEARED. YOU CAN TELEPHONE US, BUT DOING SO WILL NOT PRESERVE YOUR RIGHTS.

IN YOUR LETTER, GIVE US THE FOLLOWING INFORMATION:

- \*YOUR NAME AND ACCOUNT NUMBER
- \*THE DOLLAR AMOUNT, DOCUMENT NUMBER, AND DATE OF SUSPECTED ERROR
- \*A DESCRIPTION OF THE PROBLEM

YOU DO NOT HAVE TO PAY ANY AMOUNT IN QUESTION WHILE WE ARE INVESTIGATING, BUT YOU ARE STILL OBLIGATED TO PAY THE PARTS OF YOUR BILL THAT ARE NOT IN QUESTION.

FOR NON RECEIPT OF SUPPORT DOCUMENTATION OR QUESTIONS REGARDING THE SERVICE PROVIDED (INSPECTION, OVERTIME, ETC.), PLEASE CONTACT THE AGENCY FIELD OFFICE THAT PROVIDED THE SERVICE. IF THEY ARE UNABLE TO PROVIDE ASSISTANCE, YOU SHOULD CONTACT US AS SOON AS POSSIBLE.

LATE PAYMENT CHARGES

TO PROTECT THE INTEREST OF THE GOVERNMENT ON AMOUNTS OVERDUE, THE DEPARTMENT OF TREASURY REQUIRES A LATE PAYMENT CHARGE ON ALL DELINQUENT DEBTS.

PAYMENTS NOT RECEIVED BY THE DUE DATE ARE SUBJECT TO LATE PAYMENT CHARGES ASSESSED AT THE RATE ESTABLISHED BY THE DEPARTMENT OF TREASURY. ADMINISTRATIVE CHARGES MAY BE ASSESSED AND AN ADDITIONAL SIX PERCENT PER ANNUM PENALTY WILL BE CHARGED FOR PAYMENTS MORE THAN 90 DAYS PAST DUE.



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 3 of 4

Company Name: ETKO - Ecological Farming Controlling Organization

<b>Cost Estimate</b>				
<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	\$ -
<b>Per Diem:</b>	<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
<b>Associated Costs:</b>	<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)
<b>GRAND TOTAL</b>				<b>\$ (8,481.95)</b>

*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


	<b>APPLICATION PACKAGE REVIEW FORM</b>		BELGE NO	GP 02 F 01
	<b>BAŞVURU PAKETİ DEĞERLENDİRME FORMU</b>		TARİH	20.05.2015
	Organik - Organic		REV. NO	05
			SAYFA	1 / 2

<b>Name of applicant</b> Başvuru Sahibi firma	<b>BEL-AGRO LLC</b>		
<b>License No</b> Lisans No	<b>3214</b>	Date / Tarih	<b>20.09.2015</b>
<b>Address</b> Adres	<b>2, Lisova str., Brovary city, Kiev region, 07400, Ukraine</b>		
<b>Tel/Fax / Telefon- Fax</b> <b>Email / Website</b>	<b>+380674047123 Vyacheslav Belov</b> <b>+380503388805 Boutros Iskander</b>		
<b>Contact person</b> Yetkili kişi	<b>Vyacheslav Belov</b>		
<b>Review made by</b> Değerlendirmeyi yapan	<b>(b) (6), (b) (7)(C)</b>		

<b>Initial Inspection</b> İlk Kontrol	<input checked="" type="checkbox"/>	<b>Surveillance Inspection</b> Takip Kontrol	<input checked="" type="checkbox"/>	No: <b>3214-2015.ma</b>
<b>Recertification</b> yes <input type="checkbox"/> no <input checked="" type="checkbox"/>				

<b>Following documents and informations are present:</b> <i>Aşağıda adı geçen dokümanlar ve bilgiler başvuran tarafından iletilmiştir</i>	(Yes) (Evet)	(No) (Hayır)	N/A G/D
<b>Information on the applicant (General background, involvement, product range etc. certification bodies worked with):</b> Başvuran hakkında genel bilgiler (geçmişi, kapsam, ürünler vb.)	Yes		
<b>The scope of certification program concerned:</b> Sertifikasyon programının kapsamı ve ilgili olan konuları			NA
<b>Explanation of the agricultural (plant or animal) production:</b> Tarımsal üretiminizi (bitkisel veya hayvansal) açıklayınız.			NA
<b>Explanation of the processing crop by crop (processing flow chart):</b> Ürünlerin işlenmesini açıklayınız (Ürünler nerede, nasıl, hangi şartlar altında işlenecek vs. bilgiler)			NA
<b>Agricultural units:</b> Zirai Üniteler <b>Farming system:</b> Ziraat Şekli			NA
<b>Animal production (Ranges, Poultry, Fish Ponds, Bird cages etc):</b> Hayvan yetiştirme (çesit, kümes hayvanları, balık havuzları, kuş kafesleri vs)			NA
<b>Natural Collection Areas (Forestry or wild crops)</b> Doğal toplama alanları (orman ya da doğal ürünler)			NA
<b>Processing units /İşletmeler</b>			NA
<b>Products: Ürünler</b>	Yes		
<b>Following documents should be prepared and submitted to ETKO before inspection</b> <i>Aşağıdaki dokümanların kontrol öncesinde hazırlanması ve ETKO'ya ulaştırılması gerekmektedir.</i>			
<b>The last inspection report of the previous inspection body (if any).</b> Müteşebbis şayet başka bir kontrol firmasıyla çalışmış ise en son kontrol raporu			NA
<b>Actions required from previous certification and respective corrective measures.</b> <u>Şayet daha önceden verilmiş herhangi bir uygunsuzluk var ise ve buna ilişkin düzeltici faaliyetler mevcut ise</u>			NA
<b>Registration chamber of commerce or something comparable.</b> Müteşebbisin Ticaret Odası kayıt belgesi	Yes		
<b>Farmer list and agreements.</b> Üretici listeleri ve anlaşmaları			NA
<b>Internal Assessment Documents/OCP Reports completed and approved.</b> İç Denetim Raporları / OUP onaylanmıştır	Yes		
<b>Maps (Overview, Detailed).</b>			

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

	<b>APPLICATION PACKAGE REVIEW FORM</b> <b>BAŞVURU PAKETİ DEĞERLENDİRME FORMU</b> Organik - Organic	BELGE NO	GP 02 F 01
		TARİH	20.05.2015
		REV. NO	05
		SAYFA	2 / 2

Detaylı ve genel haritalar			
<b>Processor Agreements.</b> İşletmecilerle yapılan anlaşma			NA
<b>Processing facility plan and Process Flowcharts.</b> İşletme yerleşim planı ve ürün işleme akış şemaları			NA
<b>Processing aids list (if any)</b> Yardımcı ürün işleme maddeleri (geçerli ise)			NA
<b>List of ingredients (for cases with processing)</b> Kullanılan ingredientler (var ise)			NA
<b>GMO Declarations (if any)</b> Genetik modifikasyondan temizdir belgesi (geçerli ise)			NA
<b>Propagation material approvals</b> Üretim materyali onaylanmalı			NA
<b>Retroactive recognition of former farming system procedure is completed correctly?</b> Geçiş süreci kısaltmasıyla ilgili prosedürler tamamlanmış mı? TI 33 F 01			NA
<b>Certified inputs (if any) such as fertilizers, pest management materials etc.</b> Sertifikalı girdi maddeleri. (Gübre, ilaç vs gibi)			NA
<b>Total Yes/No</b> Toplam Evet /Hayır	4	-	
<b>Comments:</b> Yorumlar BELAGRO deals with marketing of organic products only. They buy organic material from certified producers, processors and export it.  No questions for OCP-Processing as client deals with only trading activities. The questions in OCP –Process report were answered appropriately.			
Assigned inspector Atanan Denetmen*	(b) (6), (b) (7)(C)		
All related documents are present in the application package therefore inspection can be planned. Denetim için gerekli bütün araçlar başvuru paketinde mevcuttur o nedenle denetim planlanabilir.	Majority is provided OK		
ETKO is able to do certification for the applied scope and has resources to realize it. Applicant's documents are kept in clients file. Başvuru yapılan konuda ETKO'nun yetkisi veya yeterliliği mevcut olup başvuru Kabul Edilmiştir. Başvuru belgeleri müşteri dosyasında saklanır.	Yes,		
ETKO is not able to accept this application because of the accreditation scope does not cover it or has not enough resources to realize this audit. Başvuru yapılan konuda ETKO'nun yetkisi veya yeterliliği mevcut olmadığından başvuru Kabul edilemez ve başvuru sahibine yazı ile bildirilir.	NA		

\*ETKO Assign an approved auditor to realize this inspection work. ETKO Söz konusu başvuru ile ilgili olarak yetkilendirilmiş ve nitelendirilmesi tamamlanmış denetmen atar.

\*Information letter related to refusal of the application must be attached to this form and kept in the file of Application Refusal File. Başvurunun reddine ait yazıyı bu forma ekleyip Reddedilen Başvurular dosyasına ekleyiniz.

\*Reviewer of this application pack and/or Auditor declares that the application package related to this operator is complete and inspection could be realized. Atanan denetmen başvuru paketinin tam olduğunu ve denetimin yapılabileceğini beyan eder.

<b>APPLICATION FORM</b> 160 Sokak 13/3 35040 Bornova – İzmir Tel: +90-232-3397606, Fax: 3397607, info@etko.org	Doc Nr	GP 01 F 01
	Date	25.05.2015
	Rev Nr	00
	Page	1/4

Name Applicant	<b>BEL-AGRO LLC</b>		
Address	2, Lisova str., Brovary city, Kiev region, 07400, Ukraine		
Invoice Information	Account (b) (4) (UAH, USD, EUR, RUB) PAT KB EUROBANK, MFO 380355, Kiev, Shevchenka av, 35.		
Tel/Fax/Mobile Phone	+380674047123 Vyacheslav Belov +380503388805 Boutros Iskander		
e-mail /website	<a href="mailto:Tov-belagro@ukr.net">Tov-belagro@ukr.net</a> (b) (6) .l.com		
Applicant contact person	Vyacheslav Belov	*Signature	
Date	08.09.2015		

**\*This form should be signed by a duly authorized person.**

<b>Certification seek for: Indicate which regulations you want to be certified</b>			
TC 27676 <input type="checkbox"/>	Canadian Org. Reg COR <input type="checkbox"/>	NOP <input checked="" type="checkbox"/>	
IACB "Equivalent EC Regulation" <input type="checkbox"/>	Other: <input type="checkbox"/>		
<b>Please indicate if you seek for recertification</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>	

**Indicate the language that producers and processors able to communicate:** In case there is no possibility to find inspector who is able to communicate with the local language, a translator should be provided by the applicant.

Turkish  English  French  Russian  Romanian   
 Bulgarian  Arabic  Serbian  Persian  Other:

<b>1</b>	<b>Scope of Certification: Mark the options certification deemed for</b>	
A	Unprocessed plant products	<input checked="" type="checkbox"/>
B	Organic Livestock or unprocessed livestock products	<input type="checkbox"/>
C	Aquatic products	<input type="checkbox"/>
D	Processed agricultural products as food	<input checked="" type="checkbox"/>
E	Processed agricultural products as feed	<input checked="" type="checkbox"/>
F	Propagation Material / Nursery (seedlings, young plant)	<input type="checkbox"/>
G	Wild collection	<input type="checkbox"/>
H	Beekeeping	<input type="checkbox"/>
I	Inputs for agriculture	<input type="checkbox"/>
J	Inputs for processing	<input type="checkbox"/>

<b>2- Previous Certification:</b>				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA <input type="checkbox"/>	
<b>Indicate below according to which regulation / standard you were certified</b>					
Regulation	EU/Equivalent IACB	NOP	COR	TC 27676	Other:
Name of the Certifier	none				
Certificates issued					
Indicate if your application / certification was denied / refused / sanctioned					
Explain reason of denial / sanction					
Indicate corrective actions taken					

<b>3-Type of Production</b>	
<b>Individual farm</b>	<input type="checkbox"/>
<b>Producer group</b>	<input type="checkbox"/>

<b>4-For Individual Farms Indicate Production Areas for Organic &amp; Conventional Production:</b>				<b>Since which year this farm was certified</b>
Indicate below table land measures, incase livestock how many animals, species. Please also fill in the columns for conventional land, premises not included for certification. The land, premise and equipment should be identified and they will be inspected by ETKO.				
<b>Name of production place and address</b>	<b>Land measure (ha) or</b>	<b>Which products are</b>	<b>Total Number to</b>	<b>Year</b>



	<b>APPLICATION FORM</b> 160 Sokak 13/3 35040 Bornova – İzmir Tel: +90-232-3397606, Fax: 3397607, info@etko.org	Doc Nr	GP 01 F 01
		Date	25.05.2015
		Rev Nr	00
		Page	3/4


10-Pest, Disease Management and Weed Control: Indicate YES for valid option			
Method applied	Pest management	Disease management	Weed Control
Biological methods			
Mechanical control			
No control is required			
Pesticide / Herbicide use			
Intercropping			
Crop rotation			
Pheromone / Traps			

11-Animal husbandry: Indicate the number and type of animal: Indicate YES for valid option			
Type	Number	Feeding is done fully own produce	Part of the feed material bought
Cattle			
Dairy cows			
Sheep			
Goat			
Beehives			
Poultry			
Other..			

12-Post-harvest processing in the farm, products: Indicate YES for valid option	
Type of process & handling in farm	Short description of process
Washing	
Drying	
Threshing	
Cutting	
Packing	
Brine	
Other	
Other	

13-Storage facilities and handling, type of packing material used for storing:	
How do you store your harvested produce	Bulk <input type="checkbox"/> , Jute sacks <input type="checkbox"/> , Cardboard boxes <input type="checkbox"/> , Plastic cases <input type="checkbox"/> , Other (explain):
you have the same storage facilities for organic products and / or conventional products	
How is the storage area cleaned, explain:	
Do you use other farms stores, warehouses, silos? If yes mention the address	

14-Wild Collection			
Location of the collection	Collected crops	Approximate hectare	Declaration present for past 3 years

<b>APPLICATION FORM</b>		Doc Nr	GP 01 F 01
160 Sokak 13/3 35040 Bornova – İzmir		Date	25.05.2015
Tel: +90-232-3397606, Fax: 3397607, info@etko.org		Rev Nr	00
		Page	4/4

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15-Certified material supply from other certified sources	YES	NO
We do not buy certified material from other suppliers	<input type="checkbox"/>	<input type="checkbox"/>
We buy certified raw material and re-process in our facility or subcontracted facility. Related certificates are present for raw material we buy	<input type="checkbox"/>	<input type="checkbox"/>
We buy already final prepared product and sell, only trade: Related certificates are present for raw material we buy	<input type="checkbox"/>	<input type="checkbox"/>

16	<b>The documents listed below should be prepared before inspection and send to ETKO.</b>
1	The last control report if the enterprise has worked with another control body (if valid)
2	A valid Chamber of Commerce registration document or comparable for the applicant
3	Name of authorized person and position
4	Producer & processor & store lists and agreements
5	Detailed and general maps, parcel numbers.
6	Agreements made with subcontracted processors
7	Process settlement plan and product process flow charts
8	Name of Food additives or processing aids list (if valid)
9	GMO Free Declaration (if valid)
10	If valid, name of the certified inputs (Fertilizer, protection product, fodder etc..)
11	Ownership document of the fields, rental agreement, title deeds something comparable.
12	Farm / Processing facility registration document
13	Organic system plan

<b>17-DECLARATION by The APPLICANT</b>
By submitting this application for certification, the applicant acknowledges that he/she must comply with the applicable organic production and handling standards as defined by the Regulations 834/2007 & 889/2008 (Art.63) and / or Equivalence to Reg. 834/2007 and 889/2008 (point A.5.6.) and / or USDA National Organic Program, Final Rule and must submit an organic production and handling system plan according to the requirements outlined in §205.201 of the NOP Final Rule.
The applicant may withdraw the application prior to issuance of a notice of non-compliance and in this case will neither receive a notice of non-compliance nor a denial of certification. However, the applicant still must bear all costs for all services that have been delivered until the withdrawal.
If the application for certification is accepted, the applicant must sign the ETKO inspection contract in which all deeds and obligations are specified before the inspection and certification procedure can be continued.

<b>18-Checklist:</b> Please check following points and make sure they are all in place before you make this application.		
Do you have those mentioned Regulations in your operation? Yukarıda adı geçen yönetmeliklere sahip misiniz?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you check carefully your products are in compliance with those mentioned Regulations? Ürünlerinizin bu yönetmeliklere uygun bir şekilde üretildiğini kontrol ettiniz mi?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you identify any breach of the Regulations related to your products, ingredients etc? Ürünlerinizde yukarıda adı geçen yönetmeliklere aykırı herhangi bir durum tespit ettiniz mi?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you take corrective measures incase you identified any problems with your products for compliance?. Ürünlerinizle ilgili uyum açısından herhangi bir sorun tespit ettiyseniz, gerekli düzeltmeleri yaptınız mı?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Do you guarantee your products are in compliance with the mentioned Regulations above?. Ürünlerinizin yukarıda adı geçen yönetmeliklere uygun olduğunu teyit edermisiniz?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Did you set up your Quality Management System and system in compliance with the mentioned Regulations /Standards? If not prepared yet, you must provide minimum "Organic Compliance Plan" during the application phase. Organik yönetmelik / standartlara uygunlukla ilgili olarak Kalite Yönetim Sisteminizi oluşturduğunuz mu? Şayet henüz hazır değilse en azından Organik Üretim Planını oluşturmuş olmanız gerekir.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>



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Inspector(s) can describe the control points as: YES=Complies, NO=Does not comply, NA=Not applicable. NC=Nonconformity

NCR Non-Conformities will be listed at the last page section A and B. ETKO inspector will check the answers given by the producer and comment.

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, Accreditation Body, State officials in working hours and copying some documents must be allowed. 205.103,

Statement: As operator I declare that I will perform the operations in accordance with IACB Equivalent European Standard, TC, NOP, COR, BIOSUISSE, KRAV or any other Standard applicable for this operation. In the event of infringement or irregularities, operator 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.

**IMPORTANT NOTE:** There are different sections in this Assessment form which are indicated with different colors:

**WHITE:** Applicable for all type of trade, processing and handling

Valid for	Color	Indication color
Wine		
Transport/Storage/Warehouse	Yellow	
Compound Feed Processing	Light pink	
Feed & Food Processing	Light green	

Unit Name	BEL-AGRO LLC		
Tel / Fax Email / Website	+380674047123 Vyacheslav Belov, +380503388805 Boutros Iskander. <a href="mailto:Tov-belagro@ukr.net">Tov-belagro@ukr.net</a> (b) (6) .com	Date:	26.09.2015
Address	2, Lisova str., Brovary city, Kiev region, 07400, Ukraine	Unit number,	3214
Production	Trading organic products	Report nr	2015
Responsible person	Vyacheslav Belov	Inspector	(b) (6), (b) (7)(C)
Signature responsible		Signature inspector	

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<b>INSPECTION PLAN</b>	Initial Inspection <input checked="" type="checkbox"/>	Surveillance Inspection <input type="checkbox"/>	Unannounced <input type="checkbox"/>	Follow up <input type="checkbox"/>	Additional <input type="checkbox"/>
Time of inspection	Time start inspection	13.50	Time finish inspection		
Indicate where you inspected  <b>Trading activities office visit.</b>	Raw material store <input type="checkbox"/>	Process line <input type="checkbox"/>	End product store <input type="checkbox"/>	Laboratory <input type="checkbox"/>	
	Incoming & processing & outgoing products records <input type="checkbox"/>	Raw material certificates <input type="checkbox"/>	Samples and analyses <input type="checkbox"/>	Financial Accountability <input type="checkbox"/>	
Agreement signed	YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)				
Applicable regulation (s)	IACB <input type="checkbox"/> TC 27676/2010 <input type="checkbox"/> NOP <input checked="" type="checkbox"/> COR <input type="checkbox"/>				
Producer has and understood the Organic Production Regulation?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____) <b>Consultant Alexey Kackhovsky responsible for compliance.</b>				

Indicate Scope of production	<b>NOP Regulation</b>
Indicate persons interviewed	<b>Belov Vyocheslav, Moros Lyudmila, Kackhovsky Alexey</b>
Indicate facilities visited	<b>Only office, administration</b>
Indicate documents reviewed	<b>General look for documentation system for general marketing.</b>

<b>1.PRODUCTS TO BE CERTIFIED</b>			
Product specification to be verified during the inspection and joined to the final report if not submitted with the OCP. <b>Incase needed make a separate list.</b>			
<b>Corn</b>	<b>Seeds</b>		
<b>Flax</b>	<b>Seeds</b>		
<b>Mustard</b>	<b>Seeds</b>		
<b>Peas</b>	<b>Seeds</b>		
<b>Rapeseeds</b>	<b>Seeds, oil</b>		
<b>Soybean</b>	<b>Seeds, oil</b>		
<b>Sunflower</b>	<b>Seeds, oil and cake/expeller</b>		

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2	Corrective measures of deficiencies and/or non-compliances from last inspection List in this section the NCs and Deficiencies from the last inspection: (Extend this table to add all points deemed necessary)	Corrective actions must be reviewed by the inspector during the inspection. Explain shortly implementation of the CAs described during previous inspection.
No 1	NA	
No 2		
No 3		
No 4		
No 5		
No 6		
No 7		

<b>3. Intermediary units to be added to this certified unit details in final report</b> <input type="checkbox"/>		<b>Processing flow charts and/or product flow to be added for each unit 205.270, 834/ Art 19</b>					
<b>1: processing 2: Packing 3: labeling 4: storage 5: export 6: Transport</b>							
Name of unit/ location	Address	Activity					
(b) (4) <b>FACTORY</b>	(b) (4) <b>Factory is certified by own and have separate inspection report.</b>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input checked="" type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>

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Ref	EU Ref		Comment
<b>4</b>		<b>Principles of organic production</b>	
4.1	E	<b>Overall principles</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
4.3		<b>Specific principles applicable to processing of organic food</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	834-Article 6	In addition to the overall principles set out in Article 4, the production of processed organic food shall be based on the following specific principles: 1. the production of organic food from organic agricultural ingredients, except where an ingredient is not available on the market in organic form; 2. the restriction of the use of food additives, of non organic ingredients with mainly technological and sensory functions and of micronutrients and processing aids, so that they are used to a minimum extent and only in case of essential technological need or for particular nutritional purposes; 3. the exclusion of substances and processing methods that might be misleading regarding the true nature of the product; 4. the processing of food with care, preferably with the use of biological, mechanical and physical methods.	Indicate if operator is aware of these principles:  <b>NO processing takes place Belagro is only trader</b>
4.4	E	<b>Specific principles applicable to processing of organic feed</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	834-Article 7	In addition to the overall principles set out in Article 4, the production of processed organic feed shall be based on the following specific principles: 1. the production of organic feed from organic feed materials, except where a feed material is not available on the market in organic form; 2. the restriction of the use of feed additives and processing aids to a minimum extent and only in case of essential technological or zootechnical needs or for particular nutritional purposes; 3. the exclusion of substances and processing methods that might be misleading as to the true nature of the product; 4. the processing of feed with care, preferably with the use of biological, mechanical and physical methods.	Indicate if operator is aware of these principles:  <b>NO processing takes place Belagro is only trader</b>
	§205.201	Has a product specification been completed for each final processed product	<b>Surveyor body checks the product according to national regulation and standards and verifies the products compliance. If product complies with the national regulations requirements than give greenlight.</b>
	§205.605 §205.606	Are all processing aids in compliance with allowed substances according to the National List?	<b>NA</b>
	§205.300-311	Is the organic status on the product specification correct?	<b>Status will be mentioned when there is transaction</b>
<b>5</b>		<b>Production Rules</b>	

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5.1		<b>Compliance with standards</b>	
	834-Article 8	Operators shall comply with the production rules set out in the relevant sections 5-10. In order to demonstrate compliance they are obliged to maintain the relevant records described in section 10.	
5.2	E	<b>Adherence to the control system</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	834-Article 28	<p>1. Any operator who produces, prepares, stores, or exports from a third country organic products or who places such products on the market shall, prior to placing on the market of any products as organic or in conversion to organic:</p> <p>2. Is there any subcontracted facility/processing unit/warehouse etc belongs to applicant client.</p>	<p>Indicate if operator managing any other operation beside organic production unit: If yes, operator accept include all units to be freely inspected by ETKO.</p> <p><b>Only organic</b></p>
5.3		<b>Minimum control requirements</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 63 205.201	<p>1. When the control arrangements are first implemented, the operator shall draw up and subsequently maintain:</p> <p>(a) a full description of the unit and/or premises and/or activity;</p> <p>(b) all the practical measures to be taken at the level of the unit and/or premises and/or activity to ensure compliance with the organic production rules;</p> <p>(c) the precautionary measures to be taken in order to reduce the risk of contamination by unauthorised products or substances and the cleaning measures to be taken in storage places and throughout the operator's production chain. Where appropriate, the description and measures provided for in the first subparagraph may be part of a quality system as set up by the operator.</p>	<b>OCP report is available</b>
		<b>Pest control:</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Art.35.	Pest/rodent management systems in place? Subcontracting or internal procedres could be implemented	Expliane the method/material used:
	205.271, 205.601	Are sufficient procedures implemented to prevent any infestation? If no, are the used substances compliant to the National list?	<b>NA</b>
5.9	C	<b>Prohibition on the use of GMOs</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	834-Article 9 889-Article 69	<p>1-Indicate if there is use of GMOs in any form?</p> <p>2-Indicate if there is use of non-organic products purchased from third parties. If yes a vendor declaration is prepared?</p>	<p><b>(Annex XIII Vendor Declaration GMO Free)</b></p> <p><b>In case GMO risk products are traded declaration to be provided. It is not valid for the moment.</b></p>
5.10	C	<b>Prohibition on the use of ionising radiation</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	834-Article 10 / 205.105	Indicate if any food, feed or of raw materials used in organic food or feed treated with ionizing radiation?	
<b>7</b>		<b>Production of Processed Food</b>	

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7.1	C	<b>General rules</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	834-Article 19	<p>1. The preparation of processed organic food shall be kept separate in time or space from non-organic food.</p> <p>2. Substances and techniques that reconstitute properties that are lost in the processing and storage of organic food, that correct the results of negligence in the processing of these products or that otherwise may be misleading as to the true nature of these products shall not be used.</p>	<b>Belagro does not process products only trading. Responsibility of this requirement belongs to the supplier.</b>
7.2	C	<b>Rules for the production of processed feed and food</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 26	<p>1. Additives, processing aids and other substances and ingredients used for processing food or feed and any processing practice applied, such as smoking, shall respect the principles of good manufacturing practice.</p> <p>2. Operators producing processed feed or food shall establish and update appropriate procedures based on a systematic identification of critical processing steps.</p> <p>3. The application of the procedures referred to in paragraph 2 shall guarantee at all times that the produced processed products comply with the organic production rules.</p> <p>4. Operators shall comply with and implement the procedures referred to in paragraph 2. In particular, operators shall:</p> <p>(a) take precautionary measures to avoid the risk of contamination by unauthorised substances or products;</p> <p>(b) implement suitable cleaning measures, monitor their effectiveness and record these operations;</p> <p>(c) Guarantee that non-organic products are not placed on the market with an indication referring to the organic production method.</p>	<p>1-Processing feed or food complies basic rules of good manufacturing practices?</p> <p>1-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> NC <input type="checkbox"/> Comment: <b>No process</b></p> <p>2-Operator established and updated procedures identifying critical processing steps?</p> <p>2-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> NC <input type="checkbox"/> Comment: <b>No process</b></p> <p>3-Procedures implemented by the operator guarantees that products comply with the organic production rules?</p> <p>3-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> NC <input type="checkbox"/> Comment: <b>No process</b></p> <p>4-Operator complies a, b, c mentioned requirements</p> <p>4a-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>No process</b></p> <p>4b-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>No process</b></p> <p>4c-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>No process</b></p>
	834-Art.10, 889-Art.26	Are products and substances used for cleaning and disinfection approved for food production?	<b>No process</b>
	§205.105	Is case of use of chlorine material in the cleaning water, is the allowed quantity of 4ppm respected?	<b>No process</b>
7.3	C	<b>Split operations</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____) In case the operation is not split, pass to section 7.4
	889-Article 26 205.201 §205.272	<p>Further to the provisions laid down in 7.2, when non-organic products are also prepared or stored in the preparation unit concerned, the operator shall:</p> <p>1. carry out the operations continuously until the complete run has been dealt with, separated by place or time from similar operations performed on non-organic products;</p> <p>2. store organic products, before and after the operations, separate by place or time from non-organic products;</p> <p>3. inform the control body thereof and keep available an updated register of all operations and quantities processed;</p> <p>4. take the necessary measures to ensure identification of lots and to avoid mixtures or exchanges with non-organic products;</p>	<p>Explain how separation is guaranteed:</p> <p><b>No process by belagro</b></p>

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		5. Carry out operations on organic products only after suitable cleaning of the production equipment.	
7.4		<b>Ingredients</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/> (Nr. _____)
	834-Article 19	<p>The following conditions shall apply to the composition of organic processed food:</p> <ol style="list-style-type: none"> <li>the product shall be produced mainly from ingredients of agricultural origin; in order to determine whether a product is produced mainly from ingredients of agricultural origin, added water and cooking salt shall not be taken into account;</li> <li>only additives, processing aids, flavourings, water, salt, preparations of micro-organisms and enzymes, minerals, trace elements, vitamins, as well as amino acids and other micronutrients in foodstuffs for particular nutritional uses may be used, and only in so far as they have been authorised for use in organic production in accordance with Annex XI;</li> <li>non-organic agricultural ingredients may be used only if they have been authorised for use in organic production by the control body. Such authorisation shall only be granted if the ingredient in question is not available as organic and the authorisation shall be reviewed annually (see 7.4.2).</li> <li>an organic ingredient shall not be present together with the same ingredient in non-organic form or an ingredient in conversion;</li> <li>food produced from in-conversion crops shall contain only one crop ingredient of agricultural origin.</li> </ol>	<p>Explaine which category of ingredients used:</p> <p><b>Belagro will trade single ingredient tproducts as mentioned in the product list</b></p>
7.4.1		<b>Use of certain products and substances in processing of food</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/> (Nr. _____)
	889-Articles 27 and 27a; ( see 1254 / 2008)	<ol style="list-style-type: none"> <li>Only the following substances can be used in the processing of organic food and wine: <ol style="list-style-type: none"> <li>substances listed in Annex VIII to this Standard;</li> <li>preparations of micro-organisms and enzymes normally used in food processing; however, enzymes to be used as food additives have to be listed in Annex VIII, Section A;</li> <li>substances, and products labelled as natural flavouring substances or natural flavouring preparations;</li> <li>colours for stamping meat and eggshells ;</li> <li>drinking water and salt (with sodium chloride or potassium chloride as basic components) generally used in food processing;</li> <li>Minerals (trace elements included), vitamins, amino acids, and micronutrients, only authorised as far their use is legally required in the foodstuffs in which they are incorporated.</li> </ol> </li> <li>For the purpose of the calculation referred to at 9.1, <ol style="list-style-type: none"> <li>food additives listed in Annex VIII and marked in the column of the additive code number, shall be calculated as ingredients of agricultural origin;</li> <li>Preparations and substances referred to in paragraph 1.(b),(c),(d),(e), and (f) of this Article and substances not marked with an asterisk in the column of the additive code number shall not be calculated as ingredients of agricultural origin.</li> <li>yeast and yeast products shall be calculated as ingredients of agricultural origin as of 31 December 2013;</li> </ol> </li> </ol>	<p>Explaine which substances used for processed products:</p> <p><b>No processing takes place with belagro</b></p>

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		(d) With regard to the production of organic yeast , the following substances may be used in the production, confection and formulation of yeast: (1) substances listed in Annex VIII, Section C; (2) products and substances referred to in 7.4.1.1(b) and (e) above;	
7.4.2		<b>Authorisation of non-organic food ingredients of agricultural origin</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 29	An ingredient of agricultural origin may only be used in non-organic form under the following conditions: 1. The operator has notified the control body of all the requisite evidence showing that the ingredient concerned is not produced in sufficient quantity in the country or production in accordance with the organic production rules or cannot be imported from other countries; 2. The control body has issued formal authorisation which will be reviewed annually; 3. The authorisation may be withdrawn when evidence suggests that the supply situation has improved.	In case valid explain which ingredients used: <b>Not Applicable</b>
7.4.2.1		<b>Addition of non-organic yeast extract</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 46a (see 1254/2008 )	The addition of up to 5% non-organic yeast extract or autolysate to the substrate (calculated in dry matter) is allowed for the production of organic yeast, where operators are unable to obtain yeast extract or autolysate from organic production.	<b>Not Applicable</b>
7.4.3	C	<b>Specific provisions for seaweed</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 29a (see 710)	1. If the final product is fresh seaweed, flushing of freshly harvested seaweed shall use seawater. If the final product is dehydrated seaweed, potable water may also be used for flushing. Salt may be used for removal of moisture. 2. The use of direct flames which come in direct contact with the seaweed shall be prohibited for drying. If ropes or other equipment are used in the drying process they shall be free of anti-fouling treatments and cleaning or disinfection substances except where a product is listed in Annex VII for this use.	<b>Not Applicable</b>
7.4.4	E	<b>Specific provisions for wine</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 29c and d (see 203/2012)	1. Products of the wine sector shall be produced from organic raw material. 2. Only products and substances listed in Annex VIIIa can be used for the making of wine sector products, including during the processes and oenological practices, subject to restrictions and conditions laid down in this standardi. 3. Products and substances listed in Annex VIIIa to this Regulation, shall be derived from organic raw material, if available. Specific products and substances are marked in Annex VIIIa. 4. Only oenological practices, processes and treatments, including the restrictions provided for in Article 120c and 120d of Regulation (EC) No 1234/2007 and in Articles 3, 5 to 9 and 11 to 14 of Regulation (EC) No 606/2009 and in their Annexes, used before 1 August 2012 are permitted. 5. The use of the following oenological practices, processes and treatments is prohibitedii: (a) partial concentration through coolingiii; (b) elimination of sulphur dioxide by physical processes;	1-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: 2-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: 3-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: 4-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: 5-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: 6-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: 7-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not Applicable</b>



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		(c) electro dialysis treatment to ensure the tartaric stabilisation of the wine; (d) partial dealcoholisation of wine; (e) treatment with cation exchangers to ensure the tartaric stabilisation of the wine; 6. The use of the following oenological practices, processes and treatments is permitted under the following conditions: (a) for heat treatments, the temperature shall not exceed 70°C; (b) for centrifuging and filtration with or without an insert filtering agent, the size of the pores shall be not smaller than 0.2 micrometer; 7. The use of the following oenological practices, processes and treatment is permitted until further review (a) heat treatments, (b) use of ion exchange resins, c) reverse osmosis	
7.4.5	E	<b>Catastrophic circumstances</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 47(e) (see 203/2012)	1. The control body may authorise on a temporary basis the use of sulphur dioxide up to the maximum content to be fixed in accordance with Annex I B to Regulation (EC) No 606/2009v, if the exceptional climatic conditions of a given harvest year deteriorate the sanitary status of organic grapes in a specific geographical area because of severe bacterial attacks or fungal attacks, which oblige the winemaker to use more sulphur dioxide than in previous years to obtain a comparable final product. 2. Upon approval by the control body, the individual operators shall keep documentary evidence of the use of the above exceptions.	<b>Not Applicable</b>
7.4.6		<b>Wine Transitional Period and Sale of Existing Stock</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
		Stocks of wine produced until 31 July 2012 in accordance with either Regulation (EEC) No 2092/91 or Regulation (EC) No 834/2007 may continue to be brought on the market until stocks are exhausted, and subject to the following labelling requirements: a) The "Organic logo of the EU" may be used provided that the wine-making process complies with this ACB standard. b) Operators using "Organic logo of the EU" shall keep recorded evidence for at least 5 years after they have placed the wine produced from organic grapes on the market, including quantities of wine in litres, per wine category and per year. b) Where documentary evidence is not available, such wine may be labelled as "wine made from organic grapes", provided that it complies with this ACB standard. c) Wine labelled as "wine made from organic grapes" cannot bear the "Organic logo of the EU."	<b>Not Applicable</b>
7.4.7		<b>Specific provisions for yeast production</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
		For the production of organic yeast only organically produced substrates shall be used.	<b>Not Applicable</b>
7.5.1		<b>Collection of products and transport to preparation units</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)

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C	889-Article 30	Operators may carry out simultaneous collection of organic and non-organic products, only where appropriate measures are taken to prevent any possible mixture or exchange with nonorganic products and to ensure the identification of the organic products. The operator shall keep the information relating to collection days, hours, circuit and date and time of reception of the products available to the control body.	Not Applicable
7.5.2		<b>Packaging and transport of products to other operators or units</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
C	889-Article 31	<p>1. Operators shall ensure that organic products are transported to other units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by law:</p> <p>(a) the name and address of the operator and, where different, of the owner or seller of the product;</p> <p>(b) the name of the product or a description of the compound feedingstuff accompanied by a reference to the organic production method;</p> <p>(c) the name and/or the code number of the control body to which the operator is subject; and</p> <p>(d) where relevant, the lot identification mark according to a marking system either approved at national level or agreed with the control body and which permits to link the lot with the accounts referred to in Section 10.</p> <p>The information referred to in points (a) to (d) of the first subparagraph may also be presented on an accompanying document, if such a document can be undeniably linked with the packaging, container or vehicular transport of the product. This accompanying document shall include information on the supplier and/or the transporter.</p> <p>2. The closing of packaging, containers or vehicles shall not be required where:</p> <p>(a) transportation is direct between an operator and another operator who are both subject to the organic control system, and</p> <p>(b) the products are accompanied by a document giving the information required under paragraph 1, and</p> <p>(c) both the expediting and the receiving operators shall keep documentary records of such transport operations available for the control body of such transport operations.</p>	<p>Explain packaging and transport practices:</p> <p><b>Belagro deals with the packaging containers, they bring the (b) (4) to the oil factory and fill in the organic oil in to the new (b) (4).</b></p> <p><b>Labelling to be done when the trading activitiw starts. BA responsible mentioned labels will be prepared and approved before using by etko.</b></p> <p><b>Documentation to be prepared and status of the product, etko number to be mentioned.</b></p>
7.5.3	C	<b>Reception of products from other units and other operators</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 33 889-Article 29 205.103	<p>On receipt of an organic product, the operator shall check the closing of the packaging or container where it is required and the presence of the indications provided to in 7.5.2.</p> <p>The operator shall crosscheck the information on the label referred to in 7.5.2 with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts referred to in Section 10.</p> <p>2. The operator shall verify the documentary evidence of his/her suppliers.</p>	<p><b>Containers will be prepared by BA and quality responsible person will checks the packing and transport. Required documents like TC will be demanded from the buyer.</b></p>
7.5.4	C	<b>Storage of products</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)

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	889-Article 35 205.201a5 9205.272	<p>1. For the storage of products, areas shall be managed in such a way as to ensure identification of lots and to avoid any mixing with or contamination by products and/or substances not in compliance with the organic production rules. Organic products shall be clearly identifiable at all times.</p> <p>2. Where operators handle both non-organic products and organic products, including organic plant, seaweed, livestock and aquaculture animals, and the latter are stored in storage facilities in which also other agricultural products or foodstuffs are stored:</p> <p>(a) the organic products shall be kept separate from the other agricultural products and/or foodstuffs;</p> <p>(b) every measure shall be taken to ensure identification of consignments and to avoid mixtures or exchanges with non-organic products;</p> <p>(c) Suitable cleaning measures, the effectiveness of which has been checked, have been carried out before the storage of organic products; operators shall record these operations.</p>	<p>Explain storage conditions:</p> <p><b>No storage takes place with Belagro</b></p>
<b>8</b>	c	<b>Production of Processed Feed</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
8.1		<b>General rules</b>	
	834-Article 18 889-Article 22	<p>1. Production of processed organic feed shall be kept separate in time or space from production of processed non-organic feed.</p> <p>2. Organic feed materials, or feed materials from production in conversion, shall not enter simultaneously with the same feed materials produced by non-organic means into the composition of the organic feed product.</p> <p>3. Any feed materials used or processed in organic production shall not have been processed with the aid of chemically synthesised solvents.</p> <p>4. Substances and techniques that reconstitute properties that are lost in the processing and storage of organic feed, that correct the results of negligence in the processing or that otherwise may be misleading as to the true nature of these products shall not be used.</p>	<p><b>No processed feed is marketed yet, maybe SFC will be done in the future. Only organic quality is considered.</b></p>
8.2	c	<b>Transporting animal feed to other production/preparation units or storage premises</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 32	<p>In addition to the provisions of 7.5.2, when transporting feed to other production or preparation units or storage premises, operators shall ensure that the following conditions are met:</p> <p>1. during transport, organically-produced feed, in-conversion feed, and non-organic feed shall be effectively physically separated;</p> <p>2. the vehicles and/or containers which have transported non-organic products are used to transport organic products provided that:</p> <p>(a) suitable cleaning measures, the effectiveness of which has been checked, have been carried out before commencing the transport of organic products; operators shall record these operations,</p> <p>(b) all appropriate measures are implemented, depending on the risks to organic integrity and, where necessary, operators shall guarantee that non-organic products cannot be placed on the market with an indication referring to organic production, and</p>	<p>Explain transport practices:</p> <p><b>Organic oil products are transported in new (b) (4) containers and separated from any other products, no possible contamination is present with (b) (4) .</b></p>

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		(c) the operator shall keep documentary records of such transport operations available for the control body; 3. the transport of finished organic feed shall be separated physically or in time from the transport of other finished products; 4. During transport, the quantity of products at the start and each individual quantity delivered in the course of a delivery round shall be recorded.	
8.3		<b>Transport of live fish</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/> (Nr. _____)
c	889-Article 32a. (see 710)	1. Live fish shall be transported in suitable tanks with clean water which meets their physiological needs in terms of temperature and dissolved oxygen. 2. Before transport of organic fish and fish products, tanks shall be thoroughly cleaned, disinfected and rinsed. 3. Precautions shall be taken to reduce stress. During transport, the density shall not reach a level which is detrimental to the species. 4. Documentary evidence shall be maintained for paragraphs 1 to 3.	<b>Not Applicable</b>
9		<b>Labelling</b>	
9.1		<b>Use of terms referring to organic production</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/> (Nr. _____)
c	834-Article 23	1. For the purposes of this Standard a product shall be regarded as bearing terms referring to the organic production method where, in the labelling, advertising material or commercial documents, such a product, its ingredients or feed materials are described in terms suggesting to the purchaser that the product, its ingredients or feed materials have been obtained in accordance with the rules laid down in this Standard. In the labelling and advertising of live or unprocessed agricultural products, terms referring to the organic production method may be used only where, in addition, all the ingredients of that product have also been produced in accordance with the requirements laid down in this Standard. 2. Labelling as referred to in paragraph 1 shall not be used for a product for which it has to be indicated in the labelling or advertising that it contains GMOs, consists of GMOs, or is produced from GMOs. 3. As regards processed food, the labelling referred to in paragraph 1 may be used: (a) in the sales description, provided that: (i) the processed food complies with 7.1.1, 7.4.1a,b&d; (ii) at least 95 % by weight, of its ingredients of agricultural origin are organic; (b) only in the list of ingredients, provided that the food complies with 7.4; (c) in the list of ingredients and in the same visual field as the sales description, provided that: (i) it contains other ingredients of agricultural origin that are all organic; (ii) the food complies with 7.1.1, 7.4.1a,b &d. The list of ingredients shall indicate which ingredients are organic.	<b>Explain labelling: Annex Label Assessment to be done, Labels to be approved before use.</b>

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		In the case where points (b) and (c) of this paragraph apply, the references to the organic production method may only appear in relation to the organic ingredients and the list of ingredients shall include an indication of the total percentage of organic ingredients in proportion to the total quantity of ingredients of agricultural origin. The terms and the indication of percentage referred to in the previous subparagraph shall appear in the same colour, identical size and style of lettering as the other indications in the list of ingredients.	
9.2		<b>Compulsory indications</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/> (Nr. _____)
E	834-Article 24	<p>1. Where terms in line with 9.1 are used:</p> <p>(a) a code number of the control body to which the operator who has carried out the most recent production or preparation operation is subject, shall also appear in the labelling</p> <p>(b) as regards pre-packaged food the Community logo may also appear on the packaging;</p> <p>(c) where the Community logo is used, an indication of the place where the agricultural raw materials of which the product is composed have been farmed, shall also appear in the same visual field as the logo and shall take one of the following forms, as appropriate:</p> <p>"EU Agriculture", where the agricultural raw material has been farmed in the EU;</p> <p>"non-EU Agriculture", where the agricultural raw material has been farmed in third countries;</p> <p>"EU/non-EU Agriculture", where part of the agricultural raw materials has been farmed in the Community and a part of it has been farmed in a third country.</p> <p>The above mentioned indication "EU" or "non-EU" may be replaced or supplemented by a country in the case where all agricultural raw materials of which the product is composed have been farmed in that country.</p> <p>For the above mentioned "EU" or "non-EU" indication, small quantities by weight of ingredients may be disregarded provided that the total quantity of the disregarded ingredients does not exceed 2 % of the total quantity by weight of raw materials of agricultural origin.</p> <p>The above mentioned "EU" or "non-EU" indication shall not appear in a colour, size and style of lettering more prominent than the sales description of the product.</p> <p>2. The indications referred to in paragraph 1 shall be marked in a conspicuous place in such a way as to be easily visible, clearly legible and indelible.</p>	<p><b>Explain labelling: Annex Label Assessment to be done,</b></p> <p><b>Labels to be approved before use.</b></p>
9.3		<b>Organic production logos</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/> (Nr. _____)
C	834-Article 25	<p>1. Community organic production logo may be used in the labelling, presentation and advertising of products which satisfy the requirements set out under this Standard.</p> <p>The Community logo shall not be used in the case of in-conversion products and food as referred to in 9.1.3 (b) and (c).</p> <p>2. National and private logos may be used in the labelling, presentation and advertising of products which satisfy the requirements set out under this Standard.</p>	<b>Labels to be approved before use.</b>
9.4		<b>Conditions for the use of the code number and place of origin</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input checked="" type="checkbox"/> Comment:

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E	889-Article 58.	<p>1. The indication of the code number of the control body shall :</p> <p>(a) start with the acronym identifying the third country of origin<sup>vii</sup></p> <p>(b) include a term which establishes a link with the organic production method<sup>viii</sup></p> <p>(c) include a reference number to be decided by the competent authority;</p> <p>(d) be placed immediately below the Community logo, where the Community logo is used in the labelling.</p> <p>2. The indication of the place where the agricultural raw materials of which the products is composed have been farmed shall be placed immediately below the code number referred to in paragraph 1.<sup>ix</sup></p>	<p><b>ETKO Code Number: Country Code-BIO-109</b>  <b>TR-BIO-109, UA-BIO-109, RS-BIO-109, RU-BIO-109</b></p> <p><b>Labels to be approved before use.</b></p>
	205.300-311, 605-606	<b>NOP Labelling</b>	
		Are the used additives and processing aids allowed for organic production?	Single ingredient
		Are the used non-agricultural ingredients allowed for organic production?	Single ingredient
		In case of use of non-organic agricultural ingredients, is it proved that they are not available as organic on the market?	Single organic ingredient
		Is the reference to ETKO correct? (certified organic by ETKO)	Labels to be approved before use.
		Is the USDA logo correctly used?	Labels to be approved before use.
		In case of control body change, how many "old" labels are in stock or already on products to be sold?	NA
9.5	C	<b>Specific labelling requirements for feed</b>	
9.5.1		<b>Scope, use of trade marks and sales descriptions</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 59	<p>1. This section shall not apply to pet food and feed for fur animals.</p> <p>2. The trade marks and sales descriptions bearing an indication referred to in 9.1 may be used only if at least 95 % of the product's dry matter is comprised of feed material from the organic production method.</p>	Labels to be approved before use.
9.5.2	C	<b>Indications on processed feed</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 60 (see 710—Article 38.13)	<p>1. Without prejudice to 9.5.3 and 9.5.1.2, the terms referred to in 9.1 may be used on processed feed provided that:</p> <p>(a) the processed feed complies all provisions of this Standard and in particular with 6.16.4, and 6.16.5, for livestock, with 11.7.1.d and 8.1 for aquaculture animals, and 8.1 for both.</p> <p>(b) the processed feed complies with the provisions of this Standard and in particular with 6.7.4.3 and 7.2;</p> <p>(c) all ingredients of plant or animal origin contained in the processed feed are from organic production</p> <p>(d) at least 95 % of the product's dry matter is organic.</p> <p>2. Subject to the requirements laid down in points (a) and (b) of paragraph 1, the following statement is permitted in the case of products comprising variable quantities of feed materials from the organic production method and/or feed materials from products in conversion to organic farming and/or non-</p>	<p>1-Did operator applied to ETKO for label assessment?  Labels used are all approved by ETKO?  1-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment:  If labels were not approved by ETKO, still the labels comply the labelling requirements mentioned in this section?  2-Is there any specific labelling used by the operator for the feed containing products from in-conversion and / or non-organic materials?  <b>If yes what statement is used to indicate allowance for organic farming?</b>  2-Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> NC <input type="checkbox"/> Comment:</p>

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		organic materials: <b>'may be used in organic production in accordance with Regulations (EC) 834/2007 and (EC) 889/2008'</b> .	<b>There is no processed feed material dealt with for the moment, products are all single ingredient and incase required SFC will be a feed component material</b>
9.5.3	C	<b>Conditions for the use of indications on processed feed</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 61	<p>1. The indication provided for at 9.5.2 shall be:</p> <p>(a) separate from the wording describing the product and the manufacturer</p> <p>(b) presented in a colour, format or character font that does not draw more attention to it than to the description or name of the animal feedingstuff referred to in (a) above;</p> <p>(c) accompanied, in the same field of vision, by an indication by weight of dry matter referring:</p> <p>(i) to the percentage of feed material(s) from the organic production method;</p> <p>(ii) to the percentage of feed material(s) from products in conversion to organic farming;</p> <p>(iii) to the percentage of feed material(s) not covered by points (i) and (ii);</p> <p>(iv) to the total percentage of animal feed of agricultural origin;</p> <p>(d) accompanied by a list of names of feed materials from the organic production method;</p> <p>(e) Accompanied by a list of names of feed materials from products in conversion to organic production.</p> <p>2. The indication may be also accompanied by a reference to the requirement to use the feedingstuffs in accordance with the requirements for in-conversion feed (6.7.4.3) and non-organic feed (6.7.4.4).</p>	Evaluate the indications used on processed feed <b>Labels to be approved before use in case there is export of processed feed material.</b>
9.6		<b>Other specific labelling requirements</b>	
9.6.1		<b>In-conversion products of plant origin</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 14	<p>In-conversion products of plant origin may bear the indication <b>'product under conversion to organic farming'</b> provided that:</p> <p>1. a conversion period of at least 12 months before the harvest has been complied with;</p> <p>2. the indication shall appear in a colour, size and style of lettering which is not more prominent than the sales description of the product, the entire indication shall have the same size of letters;</p> <p>3. the product contains only one crop ingredient of agricultural origin;</p> <p>4. the indication is linked to the code number of the control body referred to at 9.2.</p>	Evaluate the indication <b>"product under conversion to organic farming"</b> Does it comply the requirements mentioned in this section?  <b>No in conversion products are dealt with.</b>
<b>10</b>		<b>Record keeping responsibilities of operators</b>	<b>Operators oblige to keep the stock and financial records for ETKO to verify:</b>
10.1	C	<b>General</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)
	889-Article 66	<p>1. Stock and financial records shall be kept in the unit or premises and shall enable the operator to identify and the control body to verify:</p> <p>(a) the supplier and, where different, the seller, or the exporter of the products;</p> <p>(b) the nature and the quantities of organic products delivered to the unit and, where relevant, of all materials bought and the use of such materials, and, where relevant, the composition of the compound feedingstuffs;</p> <p>(c) the nature and the quantities of organic products held in storage at the premises;</p>	<b>Did operator kept its records available as mentioned in this requirement?</b>  <b>There is no transaction made yet, but documents to be kept when there is marketing in place in a separate file.</b>

IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: BELAGRO 3214-2015.ma</b>		Doc Nr	OP 01 F 07
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		(d) the nature, the quantities and the consignees and, where different, the buyers, other than the final consumers, of any products which have left the unit or the first consignee's premises or storage facilities; (e) in case of operators who do not store or physically handle such organic products, the nature and the quantities of organic products bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers, and where different, the consignees. 2. The documentary accounts shall also comprise the results of the verification at reception of organic products and any other information required by the control body for the purpose of proper control. The data in the accounts shall be documented with appropriate justification documents. The accounts shall demonstrate the balance between the input and the output. 3. Where an operator runs several production units in the same area, the units for non-organic products, together with storage premises for input products must also be subject to the minimum control requirements.	
205.103	889-Art.26, 63, 66, 69	Are all records kept for min. 5 years?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
		Are records for organic raw materials available? (Invoices, delivery notes, supplier certificate..)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
		Are the compulsory informations indicated? (buyer, product, origin, organic reference, quantity, harvest date)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
		Are all organic certificates of suppliers available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
		Are processing records available and plausible?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: NA
		Are storage records (raw material/ingoing goods, final product/outgoing goods) available and plausible?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: NA
		Are the records of traceability system available and sufficient to follow a batch?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
		Are agreements with subcontracted operators or subcontracting operators available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: NA
		Are cleaning records available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: NA
		Are pest control records available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: NA
		Are analysis records available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
		Are complaint record available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
	c	<b>Units processing animal feed</b>	
10.8	889-Article 89	For the purposes of proper control of the operations, the documentary accounts referred to in 10.1 shall include information on the origin, nature and quantities of feed materials, additives, sales and finished products.	Did feed processor kept documentary accounts including information on the origin, nature and quantities of feed materials, additives, sales and finished products Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> NC <input type="checkbox"/> Comment: <b>No feed traded yet</b>
		<b>Sale, marketing and export</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> (Nr. _____)



IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: BELAGRO 3214-2015.ma</b>		Doc Nr	OP 01 F 07
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	Are organic processed products direct sold/ exported by the operation?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment:
	Does the company buy and sell organic products from other certified operations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment:
	Are the records of incoming/ outgoing organic products available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
	If yes, are name of supplier/buyer, product, quantity and organic status indicated on labelling/ records?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
	Are all organic certificates of suppliers valid and available?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>
	In case of sale or export, how is it assured that containers/ transport have not been treated with prohibited substances?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>(b) (4) are provided as brand new for food grade.</b>

### 11- RISK ANALYSES

	<b>Analyses, pesticide residues</b> IACB 5.3, 6.5.3, 6.8.2.2, 6.8.3, 7.2, 7.5.4	
	Is there an analysis plan implemented?	YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Trade Not started yet</b>
	Is a procedure implemented in case of residues found in analyses?	YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Trade Not started yet</b>
	<b>Contamination Risk</b> IACB 5.3, 6.5.3, 6.8.2.2, 6.8.3, 7.2, 7.5.4	
	Describe if there is contamination risk from any source related to chemical and microbiological: Do you recommend any analyses? Explain which kind of analyses are needed? <input type="checkbox"/> no contamination possible <input type="checkbox"/> from processing line <input type="checkbox"/> from conventional products <input type="checkbox"/> from transport <input checked="" type="checkbox"/> <b>analyses needed</b> <input type="checkbox"/> analyses not needed	YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>In case of sales analyses is required from the batch being exported.</b>
	Fertiliser <input type="checkbox"/> Herbicide <input type="checkbox"/> Pesticide <input type="checkbox"/> Fungicide <input type="checkbox"/> GMO <input type="checkbox"/> Antibiotic <input type="checkbox"/> Heavy Metal <input type="checkbox"/> Microbiological <input type="checkbox"/> Water pollution <input type="checkbox"/> Radioactivity <input type="checkbox"/> Toxin <input type="checkbox"/>	
	<b>Samples and analyses – Örnekler ve analizler</b>	
	Analyses do exist for	<input type="checkbox"/> raw materials <input type="checkbox"/> end-products <b>Not started yet</b>
	Samples from each batch are kept for	_____ months. <b>Not started yet</b>
	Analyses include GMO control?	YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/> Comment: <b>Not started yet</b>

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**11.1 Sampling:** (Mention in this chapter if there is any sample taken)

Indicate if no samples were taken during the inspection:

Producer no	Product	*Amount tons	Date	ETKO	Seal No Licensee	Laboratory
Not started yet						

\*Amount: The total quantity of the sampled product. (How much product is present in the stock)

<b>12</b>  IACB 10.1-889 Article 66	<b>INPUT – OUTPUT BALANCE CHECK:</b> Calculate incoming raw material and outgoing final product, give examples of different products as raw material, final product, production ratios and losses. Example: 51% Sunflower cake + 44% Sunflower oil + 5% Husk. Make an overall calculation for incoming raw material and outgoing finished product and compare with daily processing capacity. Such as daily capacity of process is 120 tons of Sunflower seeds, processed and exported material (SFC + SFO) in this facility is x tons. Take the list of processed and exported products from this unit. Take an overview electronic list and also hand written or computer registered incoming-outgoing products list.																												
<b>PREVIOUS YEAR CROP</b>																													
<table border="1" style="width: 100%;"> <thead> <tr> <th>Product</th> <th>Bought products kg</th> <th>Processed products kg</th> <th>Sales Org kg</th> <th>Sales Conv kg</th> <th>Total loss kg</th> <th>Stock kg</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Product	Bought products kg	Processed products kg	Sales Org kg	Sales Conv kg	Total loss kg	Stock kg	NA																				
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13	IACB 10.1-889 Article 66	ADDENDUM PAGES TO BE INCLUDED	Attached	Not attached	Not applicable	Comment incase NA and Not Attached
		Documents				
		Facility map (for each operation belonging to: stores, sites etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		Production Process Diagram: (For each final product a separate one)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		Samples of all labels to be used on products	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	To be approved when trade is started
		Book keeping records explaining product flow and traceability. Copy of records kept in computer system, hand written registration documents, input-output balance calculation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Trade was not started yet
		Product and water (if valid) analyses reports.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Trade was not started yet
		Product specification	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		Last inspection report and certificate (if the unit has been certified by other agencies)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	First time inspection
		Processor agreement for subcontracted facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		Processor organization chart	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There are only 1 person in the office.
		Processor chamber of commerce register document	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
		List of processing aids and GMO Free Declarations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		List of raw materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Product list
		List of finished products	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Product list
		List of suppliers purchasing certified products and related certificates	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not started yet
		List of cleaning agents used	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		List of pest control material used	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: BELAGRO 3214-2015.ma</b>		Doc Nr	OP 01 F 07
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## 14 EVALUATION RESULTS

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:			
	Possible Deficiencies "Point of Attention" to be reported:	Evidence Provided Explain shortly evidence provided	Review results of Deficiencies:		
			Complies	No Compliance	Annex No
No 1	7.5.2 Documentation to be prepared and status of the product, etko number to be mentioned.				
No 2	7.5.3 Containers to be prepared by BA and quality responsible person will checks the packing and transport. Required documents like TC to be demanded from the seller.				
No 3	9.1-9.4, 9.5.1, 9.5.3 - Labels to be approved before use				
No 4	10.1: Stock and financial records to be kept by the unit.				

B	Inspector Section: List in this section the points you described as possible nonconformity. (Extend this table to add all points deemed necessary)	Reviewer section: Nonconformities must be reviewed by a different person than the inspector. Name reviewer:			
	Possible Nonconformities to be reported:	Evidence Provided Explain shortly evidence provided	Review results of Nonconformities:		
			Complies	No Compliance	Annex No
No 1					
No 2					
No 3					

IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: BELAGRO 3214-2015.ma</b>		Doc Nr	OP 01 F 07
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C	EVALUATION OF THE OPERATION
<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Deficiencies are described in Section "Possible Deficiencies to be reported"</li> <li>For deficiencies, a separated "non-compliance" report is issued by ETKO. A first review by ETKO office will indicate to the operator the corrective measures to be implemented as well as a deadline.</li> <li>The deficiencies must be rectified within the deadlines specified in order to continue the certification process.</li> </ul>
<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Noncompliances were revealed and are described in Section "Possible Noncompliances to be reported"</li> <li>For non-compliances, a separated non-compliance report is issued by ETKO. A first review by ETKO office will indicate to the operator the corrective measures to be implemented as well as a deadline.</li> <li>ETKO must be informed of the rectification of these noncompliances within the deadlines specified before a decision on certification can be made.</li> </ul>
<input type="checkbox"/>	<ul style="list-style-type: none"> <li>Operation meets requirements of IACB Equivalent Standard to Regulations (EC) 834/2007 and 889/2008</li> <li>Certification is recommended</li> </ul>
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Operation meets requirements of NOP (National Organic Program, USDA) NOP and COR Canadian Organic Regyme</li> <li>Certification is recommended</li> </ul>
D	REPORTING
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>The operation / company has received a copy of the inspection report</li> </ul>
<input type="checkbox"/>	<ul style="list-style-type: none"> <li>The operation / company will be sent a copy of the inspection report within the next 30 days.</li> </ul>

Place: **Brovary City – Kiev**

Date **26.09.2015**

Signature Inspector	Signature Responsible for Operation
(b) (6), (b) (7)(C)	Vyacheslav Belov

IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: <a href="#">BELAGRO 3214-2015.ma</a></b>		Doc Nr	OP 01 F 07	
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Inspector Opinion

**BELAGRO just started for organic operation, will buy and sell organic certified products from the market. Initial product is SF oil, they are planning to trade also other products wheny receive demands. For the moment there is no product yet produced.**

# CERTIFICATE

## Certificate of Organic Operation

No: UA-3214D-01.2015.r1.NOP

Issued to

**BEL-AGRO LLC. - UKRAINE**

**2, Lisova str., Brovary city, Kiev region, 07400**

ETKO has performed an inspection, as mentioned in articles of the "NOP regulation Final Rule 7 CFR Part 205", on organic production of agricultural products and indications referring there to on agricultural products and foodstuffs, assigned by the following company. This certificate refers only the organic origin and the equivalence to the NOP Final Rule.

Any reference to the organic production made has to respect the requirements as determined in Subpart D of the rule. Any other rules of labeling as determined by national food acts have to be followed.

### Scopes: HANDLING

**100% Organic (&205.301 a);**

Product no	Name product	Product Category	Status
1	Corn	A,D,E	Org
2	Flax	A,D,E	Org
3	Mustard	A,D,E	Org
4	Peas	A,D,E	Org
5	Rapeseeds, rapeseeds oil	A,D,E	Org
6	Soybean, soybean oil	A,D,E	Org
7	Sunflower, sunflower oil and cake	A,D,E	Org

\*Product categories; Unprocessed plant products (A), Processed agricultural products for use as food (D), Processed agricultural products for use as feed (E), Vegetative propagating material and seeds for cultivation (F)

This certificate is valid for the above mentioned products. Certification renewal must be done annually before the anniversary date. Once certified, a production or handling operation's organic certification continues in effect until surrender, suspension or revocation.

Based on the annual inspections, which ETKO performs, this certificate is updated and kept into force.

The certificate must be returned to ETKO on the day of cancellation of the certification contract or on suspension or revocation of the certification

Place and date of issue  
Effective date of certification  
Next renewal date  
Last Inspection date

Izmir, TURKEY, December 17, 2015  
December 01, 2014  
December 17, 2016  
September 26, 2015



On Behalf of ETKO  
Fatih AKSOY

ETKO  
160 Sok 13/3 35100 Bornova  
IZMIR - TURKEY  
+902323397606, F: +902323397607  
Email: [info@etko.org](mailto:info@etko.org), [www.etko.org](http://www.etko.org)

GP 13 F 03 Rev06 (2015/12/03)

The authenticity and validity of this document can be verified on [www.etko.org](http://www.etko.org)

# CERTIFICATION PROPOSAL BELGELENDİRME ÖNERİSİ

<b>Company Name:</b> Müşebbis adı	BEL-AGRO LLC
<b>Licensee number:</b> Lisans no	ETKO 3214
<b>Address:</b>	2, Lisova str., Brovary city, Kiev region, 07400, Ukraine

Initial Certification İlk Sertifikalandırma	YES	Recertification	Continuation Devamlılık
<b>Change to certification and reason for change: (Attach Copy of Certificate)</b> Sertifikasyonun değiştirilmesi ve nedeni (Sertifikayı ekleyiniz)			
<b>Change of Address</b> Adres değişikliği		<b>Change of production</b> Üretimde değişiklik	
<b>Change of Name</b> İsim değişikliği		<b>Change of processing</b> İşletmede değişiklik	
<b>Change of products</b> Ürün değişikliği		<b>Change of status</b> Statü değişikliği	YES
		<b>Other (Please state):</b> Diğer (Açıklayınız)	

<b>Standard(s):</b> (To be displayed on certificate) Yönetmelikler (Sertifikada belirtilecek olan)	NOP
<b>Scope of certification</b> Sertifikasyonun kapsamı	<b>Handling Organic products</b> Corn, Flax, Mustard, Peas, Rapeseeds, Soybean and Sunflower. Rapeseeds Oil, Soybean Oil and Sunflower Oil, Sunflower Cake/Expeller

## RECOMMENDATION OF HEAD INSPECTOR

I declare that this inspection was performed in accordance with the requirements of the ETKO Certification System, and that the inspector has ensured that all production processes and documents have been reviewed. All the non-conformities have been cleared. All documentation as required by the ETKO Certification System is present and correct. I have fully reviewed the Inspection Report and agree with the recommendation for certification. The Client file structure is as specified within the ETKO Procedures and is available for inspection when requested.

Bu kontrolün ETKO Kontrol Sisteminin gerekliliklerine uygun olarak gerçekleştirildiğini, ve kontrolörün üretim ve proses ile ilgili olan bütün işlemleri ve dokümanları kontrol ettiğini beyan ederim. Bütün uygunsuzluklar düzeltici faaliyetlerle kapatılmıştır. ETKO Sertifikasyon Sistemi gereği olan bütün dokümanlar doğru ve mevcuttur. Kontrol raporunu tamamı ile değerlendirdim ve sertifikasyonun önerilmesi için hemfikirim. Müşebbis dosyası ETKO Prosedürlerinde açıklandığı gibi olup istendiğinde kontrol için hazırdır.

<b>Name:</b> İsim	(b) (6), (b) (7)(C)	<b>Signed:</b> İmza	(b) (6)	<b>Date:</b> Tarih	17.12.2015
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## Final Approval

<b>Name</b> İsim	(b) (6), (b) (7)(C)	<b>Signed:</b> İmza	(b) (6)	<b>Date:</b> Tarih	17.12.2015
<b>Authorised Accreditation Status</b> Akreditasyon bilgileri	USDA				
<b>Certificate Validity Date:</b> Sertifika son onay tarihi	31.12.2016	<b>Original Validity Date:</b> Sertifika ilk onay tarihi:	13.10.2015		





## KONTROL DETAY PLANI INSPECTION DETAILED PLAN ORGANIC

Doküman No	OP 05 F 04
TARİH	21.07.2016
REV. NO.	05
SAYFA	2/4

Operator Name	BELAGRO	Date prepared	09.09.2016
Operator No	3214D-01	Date inspection	06.10.2016
Inspector name	(b) (6), (b) (7)(C)	Signature inspector	(b) (6)
Inspector Assignments Authorized	Ceren Bayazit	Signature Assignments Authorized	(b) (6)
Operator Responsible Name	Vyacheslav Belov	Signature Responsible	(b) (6)
<input type="checkbox"/>	We accept the inspector assigned and declare that we did not have any commercial relationship with him/her since last 24 month		
<input type="checkbox"/>	We do not have any family or any other relationship with the assigned inspector to violate confidentiality and neutrality rules.		
<input type="checkbox"/>	I declare as assigned inspector I took the necessary inspection documents, procedures and when valid the latest inspection results of the operator from ETKO.		
Scope	<input type="checkbox"/> TC 27676/2010	<input type="checkbox"/> EC Equivalent IACB St	<input checked="" type="checkbox"/> NOP
	<input type="checkbox"/> BIOSUISSE	<input type="checkbox"/> KANADA/(COR)	<input type="checkbox"/> Diğer
Aim of the inspection	<input type="checkbox"/> Initial inspection	<input checked="" type="checkbox"/> Surveillance	<input type="checkbox"/> Follow up
<input type="checkbox"/> COSMOS	<input type="checkbox"/> TEXTILE OCS	<input type="checkbox"/> TEXTILE GOTS	<input type="checkbox"/> Unannounced
Course of the inspection	Date Time	Unit	Comment
Trader/Handler	06.10.2016 14.00-14.20	BELAGRO	Opening meeting (20min):
	14.20-16.50		-Traceability, Document and record control (60min): -OCP Evaluation (90 min)
	16.50-17.20		Closing meeting, providing of inspector findings, summary (30min).

NOTE: Inspector assigned for this particular audit must receive documents required from ETKO at least 2 days before the audit day. Minimum documents are the checklists, Non conformity forms, previous audit documents (if applicable) and current version of the procedure(s), standard / regulation. For this reason inspector consult the application department.

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür



## KONTROL DETAY PLANI INSPECTION DETAILED PLAN ORGANIC

Doküman No	OP 05 F 04
TARİH	21.07.2016
REV. NO.	05
SAYFA	1/4

### Dear responsible

ETKO assigned following inspector(s) to realize the inspection as scheduled below. In case of an objection for the inspector and the program ETKO must be informed within 2 days.

You can find below the audit program for your operations. ETKO Auditor(s) will come to your office to start the audit together with your responsible staff for the program you are running. It is very important to have all responsible staff and all valid Quality Management System documentation and records of your production to save time and finish the audit. This will save your time and also cost. Audit will start with opening meeting and then proceed to the site audit to inspect production, handling practices, sampling, record control etc., and finally will finish with Closing Meeting, auditor will summarize the audit results.

### During the audits at least following staff members must be present:

- Producer / Responsible person for production / Program Manager
- Management representative
- If valid, internal inspector who did internal inspections to the producers
- QMS responsible.

### During the audit at least following records must be available and ready for audit:

Traceability records including:

- Harvest quantities
- Production / Processing records
- Stock amounts
- Marketing records and related documents.

### Other documents:

- Internal inspection records
- Internal Audit records
- Analyses results (when valid soil, water, product)
- Records of the previous Nonconformities, corrective actions taken and implementation of the Corrective Actions. (when valid)

### Analyses:

- ETKO use approved laboratories which is listed on the website. In case you have an objection to any of them you must inform ETKO on time (latest during inspection)

If you have any comments and question do not hesitate to contact to us.  
[info@etko.org](mailto:info@etko.org) T:+90-232-3397606 F:+90-232-3397607

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Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

No	İşletme – Process & Handling Konu - Subject	Denetleme Inspection		
		Evet Yes	Hayır No	G/D N/A
1	Opening Meeting and presentation of Inspection team. Açılış toplantısı,ETKO ve Denetim ekibinin tanıtılması			
2	Meeting processor - İşletmeciyle görüşme			
3	Regulation present - Yönetmeliklerin mevcudiyeti			
4	Evaluation non conformities - Geçmiş ihlaller ile ilgili görüşme			
5	Inspection processing lines - İşletme hatlarının ziyaretleri			
6	Facility plan, process flow charts – Yerleşim planları, işleme akış şemaları kontrol edilmesi			
7	Store check - Depoların kontrol edilmesi			
8	Hygiene - İşletmenin genel temizliği, hijyen			
9	Contamination possibilities from surrounding - Çevresel etmenlerden bulaşma riski			
10	Facility pest management - İşletmede Zararlı Mücadelesi			
11	Propagation material store - Kullanılan üretim materyalinin depolanması			
12	Production inputs GMO Free Declarations – Üretim girdilerinin ve GMO dan arı belgelerinin incelenmesi			
13	Water used and the source - Kullanılan su ve kaynağı			
14	Waste water and waste water treatment - Atıksu ve arıtma tesisi			
15	Packing, labelling control - Paketleme, etiketleme kontrolü			
16	Documentation control, marketing, incoming, outgoing, loss and stock books – İşletme kayıtları ve pazarlama bilgileri, giriş, çıkış, fire ve stok miktarları.			
17	Sampling for analyses and evaluation of the results – Analiz için örnekleme ve tahlil sonuçlarının incelenmesi			
18	Separation of organic and in conversion from conventional – İşletmede Organik ve geçiş ürünlerinin normal ürünlerden ayrımı			
19	Transport of goods to processing unit - Ürünün proses yerine ulaştırılması			
20	Sale and transport system to the buyer - Ürünün alıcıya satılması ve taşıma şekli			
21	Training of the personnel dealing with organic – İşletmede çalışanların organik ürünlerle ilgili eğitimi			
22	Inspection of certified goods by other CBs – Diğer kuruluşlardan sertifikalı ham ve işlenmiş ürünlerle ilgili kontroller			
23	<b>Quality Management System (If present) – Critical Control Points</b> İşletmeye ait yürütülen Kalite Yönetim Sistemi (mevcut ise) – <b>Kritik Kontrol Noktaları</b>			
24	Product specifications – Ürün Spesifikasyonları			
25	<b>Control of usage Of Logo, Licences, Conformity Marks</b> <b>Logoların, Lisansların, Uygunluk İşaretinin Kullanımının Kontrolü</b>			
26	Closing meeting and reporting of results Kapanış toplantısı, Uygunsuzlukların sunulması ve Raporlama			

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Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

**KONTROL DETAY PLANI**
  
**INSPECTION DETAILED PLAN ORGANIC**

Doküman No	OP 05 F 04
TARİH	21.07.2016
REV. NO.	05
SAYFA	4/4

No	Farm Production – Zirai Üretim Konu – Subject	Denetleme Inspection		
		Evet Yes	Hayır No	G/D N/A
1	Opening Meeting and presentation of Inspection team. Açılış toplantısı,ETKO ve Denetim ekibinin tanıtılması			
2	Meeting producer - Üreticiyle görüşme			
3	Regulations present - Yönetmeliklerin mevcudiyeti			
4	Evaluation non conformities - Geçmiş ihlaller ile ilgili görüşme			
5	Visiting production fields - Üretim yerlerinin ziyaretleri			
6	Inspection maps - Haritaların kontrol edilmesi			
7	Transfer of hives or animal - Hayvanların – Kovanların başka yerlere götürülmesi			
8	Inspection stables - Barınakların kontrol edilmesi			
9	Feeding animal – bees - Hayvanların - Kovanların beslenmesi			
10	Environmental contamination possibilities - Çevresel etmenlerden bulaşma riski			
11	Contamination from neighbours Komşulardan bulaşma riski			
12	Propagation material check - Kullanılan üretim materyalinin genel durumu			
13	Situation pest-disease and management - Hastalık – Zararlı Durumu ve Mücadelesi			
14	Land tillage, fertilisation - Toprak işleme, gübreleme veya besleme metodu			
15	Irrigation and source of water - Sulama şekli ve su kaynakları			
16	Harvest time and method - Hasat zamanı, şekli			
17	Post-harvest processes such as handling, transport, store, drying etc. Hasat sonrası işlemler. İlk process, taşıma, depolama, paketleme etiketleme vs.			
18	Stores situation - Depoların genel durumu			
19	Records of producers and marketing - Üretici kayıtları ve pazarlama bilgileri			
20	Sampling for analyses - Analiz için örnekleme			
21	Separation organic – in conversion - Organik ve geçiş ürününün ayrımı			
22	Transport products to processor - Ürünün proses yerine ulaştırılması			
23	Marketing system to buyers –Ürünün alıcıya satılması şekli			
24	Üreticiye ait mevcut Kalite Yönetim Sistemi (mevcut ise)			
25	Control of usage Of Logo, Licences, Conformity Marks Logoların, Lisansların, Uygunluk İşaretinin Kullanımının Kontrolü			
26	Closing meeting and reporting of results Kapanış toplantısı, Uygunsuzlukların sunulması ve Raporlama			

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Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür

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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	Ekolium LLC. ETKO 3141		
NAME PROCESSOR	same		
PROCESSING SITE ADDRESS	9, Boryspilka 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.

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 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? <b>PLEASE ATTACH FACILITY MAP</b>	We are only office for Trading without physical contact with	Ekolium is only Trading company, they will buy and export organic

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			products	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)? <b>PLEASE ATTACH PROCESS DIAGRAM FOR EACH PRODUCT</b>	-	"	
A1.3	IACB 5.3	A brief description of each process must be given? <b>PLEASE ATTACH THE DOCUMENTS (PROCEDURES) SHOWING FULL DESCRIPTION OF THE PROCESS OF: LABELLING, PACKAGING, STORING, TRANSPORTATION PROCESS AND OTHER PROCESS IN THE FACILITY.</b>	-	"	
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? <b>PLEASE EXPLAIN BRIEFLY PRODUCTION PRACTICES, FREQUENCY AND VOLUME</b>	-	"	
A1.5	205.201 (a)(2)	Accurate Product Specifications were prepared and present for all complex products seeking certification? <b>PLEASE ATTACH PRODUCT SPECIFICATIONS</b>	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? <b>PLEASE EXPLAIN HERE HOW DO YOU MONITOR ORGANIC PRODUCTION PRACTICES TO VERIFY THE ORGANIC PLAN IS EFFECTIVELY IMPLEMENTED</b>	I'm personally 13 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? <b>PLEASE LIST WHICH DOCUMENTS YOU KEEP FOR AUDIT TRAIL</b>	We didn't start with our own trade yet	No marketing took place yet, as they are planning to start with 2015 crop later in the beginning 2016.	
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? <b>PLEASE EXPLAIN HERE HOW DO YOU AVOID CO-MINGLING AND CONTAMINATION</b>	We are not planning bulk deliveries. Always products will be packed in (b) (4) (b) (4) (oils) and (b) (4) New (b) (4).	Products are all certified from the origin, (b) (4), (b) (4) in sea containers transport is used for oil, 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 verifications shall be explicitly mentioned in the documentary accounts. <b>PLEASE EXPLAIN HERE HOW DO YOU CHECK THE PACKAGE AND THE ACCOMPANYING DOCUMENTS</b>	We normally nominate (b) (4) (surveyor) for such procedures.	Surveyor body is contracted for the shipments and containers, checking and reporting to Ekolium. Ekolium will label the containers accordingly and the documents to	

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		<b>OF THE ORGANIC PRODUCT</b>		be indicated the status of the product.	
A2		<b>Product Protection – Please maintain, and make available, Product Protection Procedures for each on-site inspection.</b>		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 <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)? <b>PLEASE EXPLAIN YOUR PRODUCT COMPOSITION</b>	We trade singleingredient products only.	There is no complex products 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 <b>PLEASE EXPLAIN HERE HOW DO YOU AVOID</b>	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? <b>PLEASE EXPLAIN HOW DO YOU AVOID</b>	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? <b>PLEASE EXPLAIN HOW DO YOU PROTECT ORGANIC INTEGRITY DURING TRANSPORT</b>	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 sued. Also there is an alternative (b) (4) which could be up to (b) (4) within a container.	
A3	205.201(a) 205.271 889-Article 63 IACB 5.3	<b>Facility Pest Management – Please maintain, and make available, copies of your Facility Pest Management Program for each on-site inspection.</b>		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? <b>PLEASE EXPLAIN HERE YOUR PEST MANAGEMENT METHOD</b>	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 <b>PLEASE LIST HERE SUBSTANCES USED INSIDE THE FACILITY</b>	Na	NA	
A3.3	205.271(c)	Used only when preventive and control measures are not effective? <b>PLEASE EXPLAIN THE REASON OF USE</b>	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 <b>PLEASE LIST MATERIALS USED AND NOT ON THE NATIONAL LIST</b>	Na	NA	
A3.5	205.271(d)(e)	are measures taken to prevent contact of the organic products with the substance used? <b>PLEASE EXPLAIN HOW TO PREVENT CONTACT TO ORGANIC PRODUCTS</b>	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? <b>PLEASE EXPLAIN WHEN THERE IS ANY METHOD AGAINST THE ORGANIC REGULATION</b>	Na	NA	
A3.7	205.201(a), 205.271	Does your pest management program include facility	Na	NA	

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		maps, incident logs and pesticide use charts? <b>PLEASE EXPLAIN</b>			
A4	889-A834-Art.10, 26, 35 IACB 7.2, 7.5.4	<b>Sanitation – Please maintain, and make available, Sanitation Procedures for each on-site inspection.</b>		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? <b>PLEASE EXPLAIN</b>	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? <b>PLEASE EXPLAIN SANITATION METHOD</b>	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? <b>PLEASE EXPLAIN CLEANING METHOD</b>	No reuse of (b) (4) 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? <b>PLEASE INDICATE HOW DO YOU SECURE THAT</b>	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? <b>EXPLAIN WHICH CLEANING MEASURES YOU TAKE and HOW IT IS CHECKED AND RECORDED</b>	We buy from organic certified processings and they put product at their place in our new (b) (4)	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	<b>Quality Assurance-Please maintain, and make available, Quality Procedures for each on-site inspection.</b>		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? <b>PLEASE LIST DOCUMENTS RELATED TO QUALITY MANAGEMENT</b>	At the moment Quality Management is based on own experiences	There is no manual prepared yet	
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.)? <b>PLEASE INDICATE WHICH QUALITY SYSTEM CERTIFICATION PRESENT</b>	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? <b>PLEASE INDICATE THE NAME OF THE PROCEDURE AND DOCUMENTS</b>	We are in process to create such procedure	As Ekolium starts lately for organic business, they did not experience with complaints and no procedure is available.	
A6	889-Article 66 IACB 10.1	<b>Record Keeping (Audit Trail) – Please maintain, and make available all record keeping for each onsite inspection.</b>		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? <b>PLEASE EXPLAIN IF ALL SUBCONTRACTED UNITS HAVE ORGANIC CERTIFICATION</b>	We will buy only from certified operators	Ekolium will buy 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,	We only consultancy/trade company and such commercial docs we have	In Ekolium only commercial documents are available, for the moment no documents yet.	



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		f) Inventories and storage locations, g) Sales, shipping and distribution of organic materials and products? <b>PLEASE LIST AND DESCRIBE RELATED DOCUMENTS OF YOUR SYSTEM</b>			
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	<b>Product composition and labelling categories</b>		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 prepared and send to ETKO for approval? <b>PLEASE ATTACH PRODUCTS SPECIFICATIONS</b>	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" <b>PLEASE LIST 100% ORGANIC PRODUCTS</b>	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. <b>PLEASE LIST 95% ORGANIC PRODUCTS</b>	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? <b>PLEASE LIST HERE OR A SEPARATE SHEET THE INGREDIENTS WITH PERCENTAGES</b>	Na		"
A7.5		70% organic products contains minimum 70% organic certified ingredients and labelled as "Made with organic----" <b>PLEASE LIST IF YOU HAVE 70% ORGANIC PRODUCTS</b>	Na		"
A7.6		Traceability of the multi ingredient products are set and kept in good order for inspections. <b>PLEASE LIST MULTI INGREDIENT PRODUCTS</b>	Na		"
A7.8		In case use of conventional agriculture ingredients, you have enough evidence indicating non availability of related ingredients. , <b>PLEASE LIST CONVENTIONAL INGREDIENTS USED IF ANY AND ATTACH NON-AVAILABILITY DECLARATIONS</b>	Na		"
A7.9		All non agricultural ingredients & processing aids are included in organic regulation <b>PLEASE LIST AGRICULTURAL INGREDIENTS AND PROCESSING AIDS</b>	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? <b>PLEASE LIST PROCESSING AIDS, MATERIAL OR INGREDIENT USED</b>	Na		"
A8	834-Article 19, 23 IACB 7.4, 9.1	<b>Labelling</b>		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?	The lot numbers will be generated for each lot for traceability if we will		Labels are not yet ready as there is no demand for any

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		<b>PLEASE EXPLAIN INDICATION STATUS OF ORGANIC</b>	have any bulk deliveries. At the moment the label are in process to be created.	<b>product yet. When there is demand labels will be prepared and send to etko for approval</b>	
A8.2	205.307	There is always label attached to raw material and is it visible? <b>PLEASE EXPLAIN HOW DO YOU INDICATE</b>	Na yet	"	
A8.3	205.307	There is always label attached to final packed product? <b>PLEASE ATTACH THE LABELS USED or INDICATE THE LABEL CONTENT HERE</b>	Na yet	"	
A9.4	205.307	Labels for raw material and final product complies the organic regulations and approved by ETKO before use? <b>PLEASE ATTACH LABEL or INDICATE THE CONTENT HERE</b>	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? <b>PLEASE INDICATE WHICH CATEGORIES YOU APPLIED FOR</b>	Na yet	"	
A10		<b>Packing Material</b>		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? <b>PLEASE EXPLAIN YOUR PROCEDURE TO EVALUATE PACKING MATERIAL</b>	Only new (b) (4) . They are certified for food products.	<b>New (b) (4) are used for oil. These tanks are certified for food grade and they are imported from Germany. For grains (b) (4) or (b) (4) will be used.</b>	
A10.2		Packing material was stored in a way that no pest-rodent can nest and reproduce, no physical pollutants are present? <b>PLEASE EXPLAIN HOW YOU STORE PACKING MATERIAL</b>	These (b) (4) are stored packed and not possible for any pest-rodents to come inside.	<b>Packing material is already packed and protected. One is 100 kgs heavy and not easy to handle.</b>	
A11		<b>Recertification</b>		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? <b>PLEASE ATTACH CERTIFICATION DOCUMENTS OF THE SUPPLIER</b>	Na yet	<b>No transaction was made so far.</b>	
A11.2		The certifier of the supplier is accredited (USDA, ISO 65, EN 45011)? <b>PLEASE ATTACH THE CERTIFIERS ACCREDITATION LETTER</b>	Na yet	"	
A11.3		Analyses report of the product is present? <b>PLEASE ATTACH THE ANALYSES RESULTS OF THE ORGANIC PRODUCTS YOU BUY</b>	Na yet	"	
A12	889-Articles 27 and 27a; IACB 7.4.1	<b>Water use</b>		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? <b>PLEASE ATTACH WATER ANALYSES RESULT</b>	We don't use any water	<b>NA</b>	
A12.2		Only drinkable water is used as ingredient of the final product? <b>PLEASE EXPLAIN THE SOURCE OF THE WATER</b>	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?	Na	"	

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		<b>PLEASE ATTACH ANALYSES REPORT</b>			
A12.4		Only drinkable water is used for washing products? <b>PLEASE EXPLAIN THE SOURCE OF WATER</b>	Na		"
A12.5		Boiler additives used are listed on the national list? <b>PLEASE LIST IF ANY BOILER ADDITIVES USED</b>	Na		"
A13		<b>Complaints and Non conformities</b>		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? <b>PLEASE INDICATE THE COMPLAINTS YOU RECEIVED</b>	Na yet		<b>No marketing realized yet.</b>
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? <b>PLEASE ATTACH THE ANALYSES RESULTS THAT YOU DETECTED RESIDUES</b>	Na yet		<b>No experience yet</b>
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? <b>PLEASE EXPLAIN WHAT HAPPENED</b>	Na yet. Will act accordingly.		<b>Complaint handling procedure will developed and include this requirement</b>
B1	889-Article 29, 30, 33 IACB 7.5.1, 7.5.3	<b>Goods reception</b>		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? <b>PLEASE EXPLAIN TRANSPORT SYSTEM</b>	We have no contact with products and raw material		<b>NA</b>
B1.2		There is a raw, ingredient product receive procedure and all are registered in an auditable format, registration documents are ready for inspection? <b>PLEASE EXPLAIN RECORDING SYSTEM</b>	Na		<b>NA</b>
B1.3		In case there is a suspicion products are refused and not accepted for processing? <b>PLEASE EXPLAIN REFUSAL SYSTEM</b>	Na		<b>NA</b>
B1.4		Following product flow within the processing unit is completely separated and precautionary measures are taken against contamination? <b>PLEASE EXPLAIN SEPARATION SYSTEM</b>	Na		<b>NA</b>
B1.5	889-Article 66 IACB 10.1	Status of the product are clearly mentioned on the documents kept during the organic products receive? <b>PLEASE EXPLAIN HOW DO YOU RECORD</b>	Will be checked and recorded		<b>Ekolium will make sure the labelling and the documents related to transaction for status of the product, when transactions made.</b>
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? <b>PLEASE EXPLAIN INDICATION SYSTEM</b>	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? <b>PLEASE EXPLAIN TREACEABILITY SYTEM</b>	In our bookkeeping system possible to check what was bought and what was sold		<b>Ekolium will keep a separate file for organic transactions.</b>
B2	889-Article 35 IACB 7.5.4	<b>Storage</b>		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? <b>PLEASE EXPLAIN HOW DO YOU KEEP STORES CLEAN</b>	We have no own storages		<b>NA, No storage is done by Ekolium</b>
B2.2		Stores where organic products are stored clearly indicated and visible?	Na		"

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		<b>PLEASE EXPLAIN</b>			
B2.3		Stock inventory is kept always updated, ready for inspections anytime? <b>PLEASE EXPLAIN</b>	Na		"
B2.4		Do you keep records for incoming-outgoing raw and processed products in auditable format? <b>PLEASE EXPLAIN</b>	Na		"
B2.5		Labels are attached to the stored goods and it is understandable and visible which regulation it belongs to? <b>PLEASE EXPLAIN THE LABEL USED</b>	Na		"
<b>B3</b>	<b>834-Article 6 IACB 4.3, 4.4</b>	<b>Processing line</b>		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? <b>PLEASE LIST DISINFECTION MATERIALS</b>	Na, no processing line.		<b>No processing is done by Ekolium, Ekolium deals only trading.</b>
B3.2		Only allowed methods and materials were used during the processing, they comply the organic regulations? <b>PLEASE LIST ALL MATERIAL USED</b>	Na		<b>NA</b>
B3.3	205.271	If there is pest control of the bulk or packed organic products used methods or substances comply the organic regulations? <b>PLEASE EXPLAIN</b>	Na		<b>NA</b>
B3.4		Records related to processing times, quantities of raw and finished material are kept for organic products processing for inspections? <b>PLEASE EXPLAIN</b>	Na		<b>NA</b>
B3.5		Quality control procedures are present and laboratory analyses are kept for inspections? <b>PLEASE EXPLAIN YOUR PROCEDURES</b>	Quality Manual in development		<b>Ekolium will develop quality procedure, will include the sampling and analyses procedure.</b>
<b>B4</b>	<b>205.105(e)</b>	<b>Excluded Methods</b>		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? <b>PLEASE ATTACH DECLARATIONS</b>	Na		<b>AK is responsible to check the GMO contamination possibilities and to avoid from possible contaminations. In quality procedure he will prepare a section for this requirement.</b>
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? <b>PLEASE EXPLAIN</b>	No		<b>NA</b>
<b>B5</b>	<b>NOP 205.272 NOP 205.201 889-Article 26 IACB 7.3</b>	<b>Separation in Split Operations</b>		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? <b>PLEASE ATTACH PROCEDURE</b>	We have no own processing, only Trade		<b>It is only trade operation, no processing takes place.</b>
B5.2		Separation of organic raw material during receive is possible by documents, indication of status is present? <b>PLEASE EXPLAIN YOUR SYSTEM</b>	Na		"
B5.3		Separation of organic products in store is present	Na		"

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		and visible. There is no contact to any conventional product or non-allowed material? <b>PLEASE EXPLAIN</b>			
B5.4	205.605	Processing lines were completely cleaned with allowed substances and methods before organic processing? <b>PLEASE LIST CLEANING MATERIAL</b>	Na		"
B5.5		Workers who are in charge were trained to handle organic products to avoid contamination and commingling? <b>PLEASE EXPLAIN TRAINING</b>	Na		"
B5.6		Organic products certified according to different regulations were separately handled, labelled and stored? <b>PLEASE EXPLAIN SEPARATION</b>	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 deperation? Do you have a procedure to guarantee separation? <b>PLEASE EXPLAIN HOW DO YOU MAKE IT</b>	Na, discussed with processors to take out first <b>(b)(4)</b> after beginning of organic processing		<b>NA</b> As a general information oil mills needs to disqualify <b>(b)(4)</b> of daily production capacity.
C	205.103(b)(2)(4)	<b>DOCUMENTS ALWAYS TO BE KEPT READY FOR INSPECTION BY LICENCE HOLDER</b>			
		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		Ok
		Organic Compliance Plan is always present and updated regularly by the responsible	YES		Ok
		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		Labels to be approved before use
		Receiving records are present and complete	YES		OK
		Stock inventory records are present and complete	YES		OK
		Production records are present and complete	NA		OK
		Distribution records are present and complete	YES		OK
		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		NA
		Processor agreements for subcontracted units are present	NA		NA
		GMO Free Declarations for ingredients when applicable are present	NA		NA
		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		OK, In file
		Organic production regulations are present	YES		Yes, he is very experienced
		ETKO file includes all ETKO documents such as contract, inspection report, correspondence, certificates, non-compliance, inspection documents, export documents	YES		Should be implemented, but there is no received complaints yet

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		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	NA	
		When there is change of production, composition, products etc OCP is updated and send to ETKO for evaluation before starting process.	YES	NA	
		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: **11.11.2015**

Signature of the representative:

Name of the representative: **Alexey Kachkovskiy**

### ETKO Results of Verification

NON COMPLIANCES	TOTAL	ITEM NUMBERS
MAJOR		
MINOR		
POINT of ATTENTION		<b>A5.1 Quality Manual to be prepared</b>
		<b>A5.3, A13.3 Complaint procedure,</b>
		<b>A8.1, B1.5 Labels to be approved before use,</b>
		<b>B1.7 Separate file for organic transactions</b>
		<b>B4.1 GMO handling must be part of Quality Manual</b>

Place, Date: **Kiev 24.12.2015**

Name ETKO Representative

Signature of ETKO representative

**(b) (6), (b) (7)(C)**

IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: 3141D-01-2015.fa</b>		Doc Nr	OP 01 F 07
			Wine		Date
Transport/Storage/Warehouse			Rev No	03	
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Feed&Food Processing					

Inspector(s) can describe the control points as: YES=Complies, NO=Does not comply, NA=Not applicable. NC=Nonconformity

NCR Non-Conformities will be listed at the last page section A and B. ETKO inspector will check the answers given by the producer and comment.

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, Accreditation Body, State officials in working hours and copying some documents must be allowed. 205.103,

Statement: As operator I declare that I will perform the operations in accordance with IACB Equivalent European Standard, TC, NOP, COR, BIOSUISSE, KRAV or any other Standard applicable for this operation. In the event of infringement or irregularities, operator 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.

**IMPORTANT NOTE:** There are different sections in this Assessment form which are indicated with different colors:

**WHITE:** Applicable for all type of trade, processing and handling

Valid for	Color	Indication color
Wine		
Transport/Storage/Warehouse	Yellow	
Compound Feed Processing	Light pink	
Feed & Food Processing	Light green	

Unit Name	EKOLIUM LLC		
Tel / Fax Email / Website	Tel: +380-50-3444265, +380-50-3388805, <a href="mailto:akachkovskiy@ukr.net">akachkovskiy@ukr.net</a> , <b>(b) (6)</b> .com	Date:	24.12.2015
Address	9, Boryspilska Str, Kiev, 02099, Ukraine	Unit number,	3141D-01
Production	Organic seeds, grouts and flour meal of Barley, Buckwheat, Corn, Millet, Oat, Peas, Rye, Sorghum and Wheat; Organic seeds, oil and cake of Flax, Mustard, Rapeseed, Soybean and Sunflower; Pumpkin and Walnut (kernel).	Report nr	3141D-01-2015.fa
Responsible person	ALEXIY KACHKOVSKIY	Inspector	<b>(b) (6), (b) (7)(C)</b>
Signature responsible		Signature inspector	

IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: 3141D-01-2015.fa</b>		Doc Nr	OP 01 F 07
			Wine	Date	20.10.2015
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<b>INSPECTION PLAN</b>	Initial Inspection <input type="checkbox"/>	<b>Surveillance Inspection</b> <input checked="" type="checkbox"/>	Unannounced <input type="checkbox"/>	Follow up <input type="checkbox"/>	Additional <input type="checkbox"/>
Time of inspection	Time start inspection	<b>11.00</b>	Time finish inspection	<b>16.00</b>	
Indicate where you inspected	Raw material store <input type="checkbox"/>	Process line <input type="checkbox"/>	End product store <input type="checkbox"/>	Laboratory <input type="checkbox"/>	
	<b>Incoming &amp; processing &amp; outgoing products records</b> <input checked="" type="checkbox"/>	Raw material certificates <input type="checkbox"/>	Samples and analyses <input type="checkbox"/>	<b>Financial Accountability</b> <input checked="" type="checkbox"/>	
Agreement signed	<b>YES</b> <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/> <b>NC</b> <input type="checkbox"/> (Nr. _____)				
Applicable regulation (s)	IACB <input type="checkbox"/> TC 27676/2010 <input type="checkbox"/> <b>NOP</b> <input checked="" type="checkbox"/> COR <input type="checkbox"/>				
Producer has and understood the Organic Production Regulation?	<b>YES</b> <input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/> <b>NC</b> <input type="checkbox"/> (Nr. _____)				

Indicate Scope of production	<b>Organic seeds, grouts and flour meal of Barley, Buckwheat, Corn, Millet, Oat, Peas, Rye, Sorghum and Wheat; Organic seeds, oil and cake of Flax, Mustard, Rapeseed, Soybean and Sunflower; Pumpkin and Walnut (kernel).</b>
Indicate persons interviewed	<b>Mr. Alexey Kackovskiy</b>
Indicate facilities visited	<b>Only trading activities present</b>
Indicate documents reviewed	<b>Book keeping recors, imveices, AKT, Transport documents</b>

<b>1. PRODUCTS TO BE CERTIFIED</b>			
Product specification to be verified during the inspection and joined to the final report if not submitted with the OCP. <b>Incase needed make a separate list.</b>			
<b>Barley</b>	<b>Seeds, grouts, brans, flakes</b>	<b>Pumpkin</b>	<b>Kernel</b>
<b>Buckwheat</b>	<b>Seeds, grouts, flakes</b>	<b>Rapeseeds</b>	<b>Seeds, oil and cake/expeller</b>
<b>Corn</b>	<b>Seeds, grouts, flour meal, flakes</b>	<b>Rye</b>	<b>Seeds, grouts, flakes, brans, pasta, flour meal</b>
<b>Flax</b>	<b>Seeds, oil and cake/expeller</b>	<b>Sorghum</b>	<b>Seeds</b>
<b>Lupine</b>	<b>Seed</b>	<b>Soybean</b>	<b>Seeds, oil and cake/expeller</b>
<b>Millet</b>	<b>Seeds, grouts, flour meal, flakes</b>	<b>Spelt (wheat)</b>	<b>Seeds, grouts, flakes, brans, pasta, flour meal</b>
<b>Mustard</b>	<b>Seeds, oil and cake/expeller</b>	<b>Sunflower</b>	<b>Seeds, oil and cake/expeller</b>
<b>Oat</b>	<b>Seeds, grouts, flakes, brans, flour meal</b>	<b>Walnut</b>	<b>Kernel</b>
<b>Peas</b>	<b>Seeds, grouts, flakes</b>	<b>Wheat</b>	<b>Seeds, grouts, flakes, brans, pasta, flour meal</b>



IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: 3141D-01-2015.fa</b>		Doc Nr	OP 01 F 07
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2	Corrective measures of deficiencies and/or non-compliances from last inspection List in this section the NCs and Deficiencies from the last inspection: (Extend this table to add all points deemed necessary)	Corrective actions must be reviewed by the inspector during the inspection. Explain shortly implementation of the CAs described during previous inspection.
No 1	NA	
No 2		
No 3		
No 4		
No 5		
No 6		
No 7		

3. Intermediary units to be added to this certified unit details in final report <input type="checkbox"/>		Processing flow charts and/or product flow to be added for each unit 205.270, 834/ Art 19					
1: processing 2: Packing 3: labeling 4: storage 5: export 6: Transport							
Name of unit/ location	Address	Activity					
NA		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
		1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>