

IACB TC	EC NOP COR	<b>Organic Processing and Marketing Inspection Report</b> <b>Food &amp; Feed</b> <b>Inspection Report Number: <a href="#">VIP GROUP LLC 3188-2015.ma</a></b>		Doc Nr	OP 01 F 07	
			Wine		Date	29.08.2015
			Transport/Storage/Warehouse		Rev No	02
			Compound Feed Processing		Page	19/22
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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"/>	

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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	<b>7.5.2 Documentation to be prepared and status of the product, etko number to be mentioned.</b>				
No 2	<b>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.</b>				
No 3	<b>9.1-9.4, 9.5.1, 9.5.3 - Labels to be approved before use</b>				
No 4	<b>10.1: Stock and financial records to be kept by the unit.</b>				

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					

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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><b>Operation meets requirements of NOP (National Organic Program, USDA) NOP and COR Canadian Organic Regyme</b></li> <li><b>Certification is recommended</b></li> </ul>
D	REPORTING
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li><b>The operation / company has received a copy of the inspection report</b></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: **Kiev**

Date **26.09.2015**

Signature Inspector	Signature Responsible for Operation
<b>(b) (6), (b) (7)(C)</b>	<b>Alexey Kachkovskiy</b>

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Inspector Opinion

**VIP GROUP started for organic operation already in 2014. More consulting activities are done by AK. He has plans to buy and sell organic certified products from the market. Initial product is SF oil, he is planning to trade also other products wheny receive demands. For the moment there is no product yet produced.**



# CERTIFICATION PROPOSAL BELGELENDİRME ÖNERİSİ

<b>Company Name:</b> Müşebbis adı	VIP Group LLC.
<b>Licensee number:</b> Lisans no	ETKO 3188
<b>Address:</b>	9, Boryspilska Str, Kiev, 02099 - UKRAINE

Initial Certification İlk Sertifikalandırma	Recertification	Continuation Devamlılık	YES
<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> Seeds, grouts, flakes, brans, pasta, flour meal of Barley, Buckwheat, Corn, Millet, Oat, Peas, Rye, Sorghum, Spelt and Wheat; Seeds, oil and cake of Soybean, Lupine, Flax, Mustard, Rapeseed, Pumpkin, Sunflower and Walnut

## 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) (6)	<b>Date:</b> Tarih	17.12.2015
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## Final Approval – Son Onay

<b>Name</b> İsim	(b) (6), (b) (7)(C)	<b>Signed:</b> İmza	(b) (6) (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:		01.12.2014	



# CERTIFICATE

## Certificate of Organic Operation

No: UA-3188D-01.2015.r1.NOP

Issued to

VIP GROUP, LLC. - UKRAINE

9, Boryspilska Str, Building 21 Kiev, 02099, Ukraine

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	Barley, grouts,	Seeds, grouts, brans, flakes	A,D,E	Org
2	Buckwheat	Seeds, grouts, flakes	A,D,E	Org
3	Corn	Seeds, grouts, flour meal, flakes	A,D,E	Org
4	Flax	Seeds, oil and cake/expeller	A,D,E	Org
5	Lupine	Seed	A,D,E	Org
6	Millet	Seeds, grouts, flour meal, flakes	A,D,E	Org
7	Mustard	Seeds, oil and cake/expeller	A,D,E	Org
8	Oat	Seeds, grouts, flakes, brans, flour meal	A,D,E	Org
9	Peas	Seeds, grouts, flakes	A,D,E	Org
10	Pumpkin	Kernel	A,D,E	Org
11	Rapeseeds	Seeds, oil and cake/expeller	A,D,E	Org
12	Rye	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	Org
13	Sorghum	Seeds	A,D,E	Org
14	Soybean	Seeds, oil and cake/expeller	A,D,E	Org
15	Spelt (wheat)	Seeds, grouts, flakes, brans, pasta, flour meal	A,D,E	Org
16	Sunflower	Seeds, oil and cake/expeller	A,D,E	Org
17	Walnut	Kernel	A,D,E	Org
18	Wheat	Seeds, grouts, flakes, brans, pasta, flour meal	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

	<p>On Behalf of ETKO Fatih AKSOY</p>	<p>ETKO 160 Sok 13/3 35100 Bornova IZMIR - TURKEY T: +902323397606, F: +902323397607 Email: <a href="mailto:info@etko.org">info@etko.org</a>, <a href="http://www.etko.org">www.etko.org</a></p>
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GP 13 R 03 Rev06 (20151203)

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



## 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	VIP	Date prepared	09.09.2016
Operator No	3188D-01	Date inspection	07.10.2016
Inspector name	(b) (6), (b) (7)(C)	Signature inspector	(b) (6)
Inspector Assignments Authorized	Ceren Bayazit	Signature Assignments Authorized	(b) (6)
Operator Responsible Name	Alexey Kackhovskiy	Signature Responsible	
<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 06.10.2016 Time	Unit	Comment
Trader/Handler	09.00-09.20	VIP	Opening meeting (20min):
	09.20-11.50		-Traceability, Document and record control (60min), -OCP Evaluation (90 min)
	11.50-12.20		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





## KONTROL DETAY PLANI INSPECTION DETAILED PLAN ORGANIC

Doküman No	OP 05 F 04
TARİH	21.07.2016
REV. NO.	05
SAYFA	3/4

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 - İşletmeciyile 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 ari 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			

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	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			

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

	<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	VIP Group LLC.		
Address	9, Boryspilska Str, Kiev, 02099, Ukraine		
Invoice Information	VIP Group LLC. AB "Express Bank", Kiev MFO 322959, code EDRPOU 32822658 Account № (b) (4)		
Tel/Fax/Mobile Phone	Mob.: (b) (6)		
e-mail /website	akachkovskiy@ukr.net		
Applicant contact person	Alexey Kachkovskiy	*Signature	
Date	13.09.2015		

**\*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>		Yes	<input type="checkbox"/> No <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:

1	Scope of Certification: Mark the options certification deemed for	
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 checked="" type="checkbox"/> NO <input 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	ETKO				
Certificates issued	YES				
Indicate if your application / certification was denied / refused / sanctioned					
Explain reason of denial / sanction					
Indicate corrective actions taken					

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

<b>4-For Individual Farms Indicate Production Areas for Organic &amp; Conventional Production:</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	<b>Since which year this farm was certified</b>
--	---





<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	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> 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	4/4

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:** [Courtney, Cheri - AMS](#)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [Zuck, Penelope - AMS](#)  
**Subject:** RE: Proposed Schedule Attached - ETKO and Israel Audits  
**Date:** Wednesday, June 22, 2016 8:08:00 AM  
**Attachments:** [image001.png](#)

---

Good morning Lars,  
The proposed schedule looks fine.  
Regards,  
*Cheri*

---

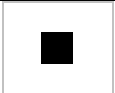
**From:** Crail, Lars - AMS  
**Sent:** Monday, June 20, 2016 3:29 PM  
**To:** Courtney, Cheri - AMS  
**Cc:** Zuck, Penelope - AMS  
**Subject:** Proposed Schedule Attached - ETKO and Israel Audits

Cheri,

Attached is our current proposed audit schedule for ETKO and Israel. There are details yet to be confirmed and filled in; however, this will give you an idea what the status is. I received initial travel approval from the Department of State Turkey Desk. Our next step is to submit an ECC to FAS Ankara (US Embassy in Turkey). I should have all the forms completed to submit the ECC by Wednesday. I have a meeting with ETKO on Tuesday at 12:15 pm to confirm more audit details. I am waiting to hear from Israel on audit details regarding their audit of a certifier and a review audit on a certifier that we will conduct.

One question that I have (and we can discuss on Tuesday) is the allocation of Penny's audit costs for the ETKO's audit.

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



**From:** [Leonardi, Elizabeth V](#)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [Kimberly Sawatzki](#)  
**Subject:** RE: Proposed USDA NOP Audit - February 2017  
**Date:** Monday, January 09, 2017 3:09:09 AM  
**Attachments:** [image001.png](#)

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Good morning, Lars,

Again, this is very helpful. Thank you for it. We definitely need this audit conducted immediately. I am just thinking about your schedule for the Istanbul visit. Based on the likely complexity of the ETKO situation and audit visit, it seems like you may have quite a bit of work in Istanbul. How many different people/organizations do you think you will need to talk with? The city is so difficult to get around (traffic is BAD and unpredictable), so if you will be visiting more than one office and want to have substantive meetings, you will probably want two days of time there. It's just a thought, but before I submit the Dept of State approval request, I just wanted to double check if we should increase the request for two days of work in Istanbul.

Thanks,

Elizabeth Leonardi | Agricultural Attaché | USDA | U.S. Embassy Ankara Turkey  
Office: +90 312 457 7318 | Mobile: (b) (6) | [elizabeth.leonardi@fas.usda.gov](mailto:elizabeth.leonardi@fas.usda.gov)

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---

**From:** Leonardi, Elizabeth V  
**Sent:** Friday, January 06, 2017 8:01 PM  
**To:** Crail, Lars - AMS; Leonardi, Elizabeth V  
**Cc:** Sawatzki, Kimberly S  
**Subject:** Re: Proposed USDA NOP Audit - February 2017

Thanks Lars. This is very helpful. I appreciate the details, it will help with our justification.  
Best regards,

Elizabeth

---

**From:** Crail, Lars - AMS  
**Sent:** Friday, January 6, 2017 19:59  
**To:** Leonardi, Elizabeth V  
**Cc:** Sawatzki, Kimberly S  
**Subject:** RE: Proposed USDA NOP Audit - February 2017

Hi Elizabeth,

Here are some reasons and justifications for conducting the audit now rather than later in the year:

- I am conducting an audit in the Netherlands and attending BIOFACH in Germany during February. Since I will be traveling to Europe, it is economical for the NOP and the certifying bodies if I bundle my activities. The certifier I am scheduled to conduct an audit in the Netherlands also has an office in Izmir, Turkey, which I will audit.
- Travel to Turkey was previously canceled twice in 2016. The second cancellation was a result of travel restrictions due to the bombing of the Atatürk international airport (June 2016) and the Turkish coup d'état attempt (July).
- The NOP Program managers instructed the NOP auditing division to conduct an audit of ETKO during the 1<sup>st</sup> QTR of 2017. This is a time sensitive issue due to multiple factors:
  - The NOP has received multiple complaints regarding grain (corn) exports from Turkey. Part of the NOP Auditor's time will be to investigate the complaints and to collect information from exporters in Istanbul.
  - ETKO was suspended by the EU to conduct organic certification due to fraudulent activities of ETKO certified operations.
  - ETKO's last onsite audit revealed significant compliance issues in 2014. NOP is



required to conduct a surveillance audit to determine if corrective actions have been implemented and are effective. This onsite surveillance audit is overdue and was required to be conducted by January 2016.

- During 2017, NOP has approximately 60 onsite audits. Normally each audit is one week in duration. Due to the large amount of onsite audits and few qualified auditors, postponement of any onsite audit will cause major disruptions to re-scheduling.

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

---

**From:** Leonardi, Elizabeth V [<mailto:LeonardiEV@state.gov>]  
**Sent:** Wednesday, January 4, 2017 9:25 AM  
**To:** Bramhall, Emily - AMS <[Emily.Bramhall@ams.usda.gov](mailto:Emily.Bramhall@ams.usda.gov)>; Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Cc:** Kimberly Sawatzki <[SawatzkiKS@state.gov](mailto:SawatzkiKS@state.gov)>  
**Subject:** RE: Proposed USDA NOP Audit - February 2017

Hi Emily,

Hope your new year is starting out well. I just wanted to follow up with this, as I haven't seen the ecc come through to FAS Ankara yet. We'll need that in order to start the approval process here. When you're filling it out, please request clearance from us, by using the dropdowns:

**Clearance from: Turkey,**

**Post: Ankara,**

**Section: FAS-Foreign Agricultural Service.**

I received more information on the Department of State approval process for Lars' trip because Istanbul is still under an Ordered Departure Status for families of USG staff. The process something that we at the USDA office in Embassy will lead and submit. So there won't be any additional steps for you all, just the ECC. Just as a heads up, we likely won't hear if it will be approved until 2 weeks (or even one week) before the travel date. Just wanted to let you know so you have accurate expectations.

As we work on the justification language, Lars, I was wondering if you can send along some of the reasons I could use regarding why we are requesting this visit/audit now, as opposed to later in the year? Perhaps availability of the auditor, or is there some sort of legal timeframe for audits, urgent concern by USDA or private sector, etc... look forward to your thoughts on this.

Thank you and hope you all had a great holiday,

Elizabeth

Elizabeth Leonardi | Agricultural Attaché | USDA | U.S. Embassy Ankara Turkey

Tel: +90 312 457 7318 | [elizabeth.leonardi@fas.usda.gov](mailto:elizabeth.leonardi@fas.usda.gov)

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**From:** Bramhall, Emily - AMS [<mailto:Emily.Bramhall@ams.usda.gov>]  
**Sent:** Friday, December 23, 2016 5:25 PM  
**To:** Crail, Lars - AMS; Leonardi, Elizabeth V  
**Cc:** Sawatzki, Kimberly S  
**Subject:** RE: Proposed USDA NOP Audit - February 2017

Thank you! I will make sure to put the information below in the request.

Emily Bramhall

Travel Management Specialist

AMS Travel Services Center

1400 Independence Ave. SW Rm. 3949-S

Washington, DC 20250  
Office: 202-690-3741  
Fax: 202-690-2260



---

**From:** Crail, Lars - AMS  
**Sent:** Friday, December 23, 2016 8:49 AM  
**To:** Elizabeth.Leonardi-FASContact <[leonardiev@state.gov](mailto:leonardiev@state.gov)>; Bramhall, Emily - AMS <[Emily.Bramhall@ams.usda.gov](mailto:Emily.Bramhall@ams.usda.gov)>  
**Cc:** Kimberly Sawatzki <[SawatzkiKS@state.gov](mailto:SawatzkiKS@state.gov)>  
**Subject:** FW: Proposed USDA NOP Audit - February 2017

I did not. I handed the request off to our travel office. I'm passing your information off to my travel coordinator. Thanks.

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



---

**From:** Leonardi, Elizabeth V [<mailto:LeonardiEV@state.gov>]

**Sent:** Friday, December 23, 2016 8:45 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Subject:** RE: Proposed USDA NOP Audit - February 2017  
Thanks Lars. Did you put kim at the POC? And clearance by USDA FAS Ankara? I didn't see it come through. Even though you are going to Istanbul, clearance is by FAS Ankara.

Thanks,  
Elizabeth  
Elizabeth Leonardi | Agricultural Attaché | USDA | U.S. Embassy Ankara Turkey  
Tel: +90 312 457 7318 | [elizabeth.leonardi@fas.usda.gov](mailto:elizabeth.leonardi@fas.usda.gov)

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**From:** Crail, Lars - AMS [<mailto:Lars.Crail@ams.usda.gov>]  
**Sent:** Friday, December 23, 2016 4:41 PM  
**To:** Leonardi, Elizabeth V  
**Cc:** Sawatzki, Kimberly S; Claypool, Rebecca E - AMS  
**Subject:** RE: Proposed USDA NOP Audit - February 2017

Hi Elizabeth,  
Thanks for the response. I submitted the ECC yesterday and I'll wait for further instructions.  
Happy Holidays!

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



---

**From:** Leonardi, Elizabeth V [<mailto:LeonardiEV@state.gov>]

**Sent:** Friday, December 23, 2016 4:28 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Cc:** Kimberly Sawatzki <[SawatzkiKS@state.gov](mailto:SawatzkiKS@state.gov)>; Claypool, Rebecca E - AMS

<[Rebecca.E.Claypool@ams.usda.gov](mailto:Rebecca.E.Claypool@ams.usda.gov)>

**Subject:** RE: Proposed USDA NOP Audit - February 2017

Hi Lars,

That's great news. We would very much welcome that.

Travel procedures have been simplified compared to the last time you were coming – thank goodness. But in the meantime, the travel restrictions to travel to Istanbul have been increased because family members have had to leave Istanbul because of some security threats. That said, I believe we can get you approval to go because this visit is considered mission critical work for USDA. I am going to defer to Kim on this though and if she has the updated procedures (though I believe all you need to do on your end is the ECC), and let her follow up on this next week when she's back to the office.

Have a great holiday.

Kind regards,

Elizabeth

Elizabeth Leonardi | Agricultural Attaché | USDA | U.S. Embassy Ankara Turkey

Tel: +90 312 457 7318 | [elizabeth.leonardi@fas.usda.gov](mailto:elizabeth.leonardi@fas.usda.gov)

**Official**

**UNCLASSIFIED**

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

**Sent:** Monday, December 19, 2016 8:38 PM

**To:** Leonardi, Elizabeth V

**Cc:** Sawatzki, Kimberly S; Claypool, Rebecca E - AMS

**Subject:** Proposed USDA NOP Audit - February 2017

Hi Elizabeth,

NOP Management is allowing me to plan an audit in Turkey. I am proposing February 19 – 25<sup>th</sup> and the primary locations are Izmir and Istanbul. Can you briefly provide me the details or instructions for travel to Turkey? If it is the same as before, just let me know and I will complete the travel request. Thank you.

Cheers,

**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.com.tr](mailto:ma@etko.com.tr)  
**To:** [Crail, Lars - AMS](mailto:Crail, Lars - AMS)  
**Cc:** "FATIH AKSOY"  
**Subject:** RE: RE: ETKO Audit - Proposed February 2017  
**Date:** Monday, January 23, 2017 2:52:16 PM  
**Attachments:** [image001.png](#)

---

Dear Lars

I will inform you shortly for audit possibility in Istanbul. Office program Izmir we are available.

Best regards,

Mustafa

---

**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

USDA

■

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**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) .com>

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) <[REDACTED].com>  
**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

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](#)  
**Cc:** "FATIH AKSOY"  
**Subject:** RE: RE: ETKO Audit - Proposed February 2017  
**Date:** Wednesday, January 25, 2017 9:38:00 AM  
**Attachments:** [image001.png](#)  
[9962387001\\_OperationProfile.pdf](#)

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Dear Lars

In Istanbul we have only one operator ARES dealing with trade of frozen fruits and vegetables. Although Ares 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 Ares 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

USDA

■

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**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) .com>

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

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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Operation Profile (9962387001) updated on 1/2/2017

Operation Information

Operation Name: Ares Organic Gida Tek. San. ve Tic. Ltd. Sti.
Operation Status: Certified
Status Effective Date: 11/7/2015
Certifier: [ETKO] Ecological Farming Control Organization
NOP ID: 9962387001
Certifier Client ID: N/A
Other/Former Names: N/A
NOP Anniversary Date: N/A
Business Types/Service: --

Scope and Product Summary

Table with 4 columns: Scope, Status, Effective Date, Certified Products. Row 1: HANDLING, Certified, 11/7/2015, Other: Anise Seed, Apple Dried, Apricot IQF, Apricot Dried, Apricot Kernel, Apricot Halves, Apricot Jam, Black Cherry IQF (Red, Dark), Blackberries IQF, Blackberries Jam, Blueberry IQF, Boulghour Grain, Broccoli IQF, Carrot IQF, Chestnut Dried, Chickpeas Pulses, Cumin Seed, Fennel Seed, Figs Dried, Figs Jam, Grapefruit juice/syrup, Green lentil Grain, Hazelnut Dried, Laurel Leaves, Leek IQF, Linden Leaves, Linden Flowers, Mahleb Seed, Mandarin juice/syrup, Mint Leaves, Nigella Seed, Olive Oil, Olive Seedless, Olive Pepper, Olive Almond, Olive Jam, Olive Paste, Onion IQF, Orange juice/syrup, Oregano Seed, Paper (Red, Yellow, Green), Peach IQF, Peach Jam, Pear IQF, Pear peeled/unpeeled, Plum IQF, Plum Halves, Poppy Seed, Quince Jam, Raspberry IQF, Raspberry Jam, Red Grapefruit juice/syrup, Red lentil Grain, Rosemary Leaves, Sage Leaves, Sour Apricot Dried, Sour cherry IQF, Sour cherry Dried, Sour cherry Pitted/Unpitted, Sour cherry Jam, Strawberries IQF, Strawberries Jam, Sultanas Dried, Sumac Seed, Tomatoes IQF, White Beans Grain, Wild Sour Cherry IQF, Wild Strawberry IQF

Contact Information

**Name:**

**Phone:** N/A

**Email:** N/A

**Website:** N/A

**Addresses:** [Physical Address]  
Altintepe Mah. Istasyon yolu sok. No:3 Maltepe  
İSTANBUL, 34840  
**Turkey**

[Mailing Address]  
Altintepe Mah. Istasyon yolu sok. No:3 Maltepe  
İSTANBUL, 34840  
**Turkey**

**From:** [ma@etko.com.tr](mailto:ma@etko.com.tr)  
**To:** [Crail, Lars - AMS](mailto:Lars.Crail@ams.usda.gov)  
**Subject:** RE: Reinstating Accreditation to the EU Organic Standard  
**Date:** Saturday, November 26, 2016 1:38:44 AM  
**Attachments:** [image001.png](#)

---

Dear Lars

I do not know who makes this type of information in the market but I just want to share with you one experience from Last years Biofach. I had good discussion with IOAS and all went OK until the last day just I was leaving.

IOAS Director Jean Deane called me and asked angrily "Mustafa you said someone that IOAS will reinstate your EU accreditation this summer (I do not remember exactly maybe Spring)? I was shocked but who said this to you? I do not remember saying so to anyone, how can I say that IOAS will reinstate without having the accreditation audits and ETKO successfully complies. I am in this sector since 1990 knowing the accreditation procedures, and I am not naive to say that.

Since then IOAS changed the attitude and slow down the process of ETKO. I do not blame IOAS or EU Commission but they are also affected from this type of mis-information and want to handle ETKO process very carefully.

---

**Best regards,**

**Mustafa**

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

**Sent:** Friday, November 25, 2016 11:53 PM

**To:** ma@etko.com.tr

**Subject:** RE: Reinstating Accreditation to the EU Organic Standard

Hello Mustafa,

Thanks for the confirmation. So ETKO continues to pursue full status with the EU. The information provided to my supervisor was incorrect.

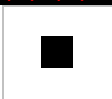
Regards,

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:** Thursday, November 24, 2016 11:01 AM

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

**Subject:** RE: Reinstating Accreditation to the EU Organic Standard

Dear Lars

We are in the process of accreditation with IOAS for the purpose of "European Union Recognition Programme". As I mentioned in October we received a site audit in Ukraine in August and IOAS was planning to continue with Office-site audit in Turkey in early 2017. There might be a delay for some time due to late submission of etko QMS documents for screening to IOAS. I am expecting the audit Schedule from IOAS and will provide you the exact information when IOAS is coming for Office-site audit.



This might be the reason of the information you have.

The best source of information could be IOAS therefore incase clarifications needed, please communicate with David Crucefix from IAOS.

[crucefix@ioas.org](mailto:crucefix@ioas.org)

Best regards

Mustafa

---

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

**Sent:** Wednesday, November 23, 2016 7:30 PM

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

**Subject:** Reinstating Accreditation to the EU Organic Standard

Greetings Mustafa,

My supervisor heard that ETKO will not pursue a request to reinstate their accreditation with the European Union? I am surprised to hear this since we spoke about your plan to receive IOAS early next year for an audit that would result in ETKO regaining their accreditation to the EU Organic Standard.

Can you confirm that the information my supervisor heard is true or false?

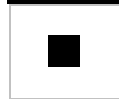
Regards,

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](#)  
**Subject:** RE: Reinstating Accreditation to the EU Organic Standard  
**Date:** Thursday, November 24, 2016 11:01:27 AM  
**Attachments:** [image001.png](#)

---

Dear Lars

We are in the process of accreditation with IOAS for the purpose of “European Union Recognition Programme”. As I mentioned in October we received a site audit in Ukraine in August and IOAS was planning to continue with Office-site audit in Turkey in early 2017. There might be a delay for some time due to late submission of etko QMS documents for screening to IOAS. I am expecting the audit Schedule from IOAS and will provide you the exact information when IOAS is coming for Office-site audit.

This might be the reason of the information you have.

The best source of information could be IOAS therefore incase clarifications needed, please communicate with David Crucefix from IAOS.

[crucefix@ioas.org](mailto:crucefix@ioas.org)

Best regards

Mustafa

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]  
**Sent:** Wednesday, November 23, 2016 7:30 PM  
**To:** MUSTAFA AKYUZ; [ma@etko.com.tr](mailto:ma@etko.com.tr)  
**Subject:** Reinstating Accreditation to the EU Organic Standard

Greetings Mustafa,

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Can you confirm that the information my supervisor heard is true or false?

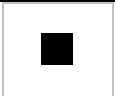
Regards,

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)  
**Subject:** RE: Reinstating Accreditation to the EU Organic Standard  
**Date:** Monday, November 28, 2016 3:05:46 AM  
**Attachments:** [image001.png](#)

---

Thank you Lars,  
Have a nice day.  
Mustafa

---

**From:** Crail, Lars - AMS [mailto:Lars.Crail@ams.usda.gov]  
**Sent:** Saturday, November 26, 2016 6:14 PM  
**To:** ma@etko.com.tr  
**Subject:** RE: Reinstating Accreditation to the EU Organic Standard

Hello Mustafa,

Thanks for sharing this information with me. Unfortunately, there can be misinformation in the organic industry and that is why I wanted to hear from you directly. I don't plan to contact IOAS; there is no reason for me to do so. I expect that your audit with IOAS will go well for you and your company.

I plan to review the 2017 NOP audit calendar in December and contact you with some date options to conduct an onsite audit of ETKO.

Take care.

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:** Saturday, November 26, 2016 1:38 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Subject:** RE: Reinstating Accreditation to the EU Organic Standard

Dear Lars

I do not know who makes this type of information in the market but I just want to share with you one experience from Last years Biofach. I had good discussion with IOAS and all went OK until the last day just I was leaving.

IOAS Director Jean Deane called me and asked angrily "Mustafa you said someone that IOAS will reinstate your EU accreditation this summer (I do not remember exactly maybe Spring)? I was schoked but who said this to you? I do not remember saying so to anyone, how can I say that IOAS will reinstate without having the accreditation audits and ETKO successfully complies. I am in this sector since 1990 knowing the accreditation procedures, and I am not naive to say that.

Since then IOAS changed the attitude and slow down the process of ETKO. I do not blame IOAS or EU Commission but they are also affected from this type of mis-information and want to handle ETKO process very carefully.

---

**Best regards,**

**Mustafa**

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

**Sent:** Friday, November 25, 2016 11:53 PM

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

**Subject:** RE: Reinstating Accreditation to the EU Organic Standard

Hello Mustafa,

Thanks for the confirmation. So ETKO continues to pursue full status with the EU. The information provided to my supervisor was incorrect.

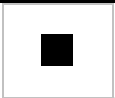
Regards,

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:** Thursday, November 24, 2016 11:01 AM

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

**Subject:** RE: Reinstating Accreditation to the EU Organic Standard

Dear Lars

We are in the process of accreditation with IOAS for the purpose of “European Union Recognition Programme”. As I mentioned in October we received a site audit in Ukraine in August and IOAS was planning to continue with Office-site audit in Turkey in early 2017. There might be a delay for some time due to late submission of etko QMS documents for screening to IOAS. I am expecting the audit Schedule from IOAS and will provide you the exact information when IOAS is coming for Office-site audit.

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The best source of information could be IOAS therefore incase clarifications needed, please communicate with David Crucefix from IAOS.

[crucefix@ioas.org](mailto:crucefix@ioas.org)

Best regards

Mustafa

---

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

**Sent:** Wednesday, November 23, 2016 7:30 PM

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

**Subject:** Reinstating Accreditation to the EU Organic Standard

Greetings Mustafa,

My supervisor heard that ETKO will not pursue a request to reinstate their accreditation with the European Union? I am surprised to hear this since we spoke about your plan to receive IOAS early next year for an audit that would result in ETKO regaining their accreditation to the EU Organic Standard.

Can you confirm that the information my supervisor heard is true or false?

Regards,

Lars Crail



USDA NOP  
202.205.5536 office  
(b) (6) mobile



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**From:** [Crail, Lars - AMS](#)  
**To:** [Zuck, Penelope - AMS](#)  
**Subject:** RE: Turkey Clearance - ETKO  
**Date:** Tuesday, June 21, 2016 5:26:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Please talk to me before making the reservations. We need to change the flight from Istanbul to Izmir. It will occur on Monday rather than Tuesday.

Thanks.

Lars

---

**From:** Zuck, Penelope - AMS  
**Sent:** Tuesday, June 21, 2016 3:46 PM  
**To:** Crail, Lars - AMS  
**Subject:** Turkey Clearance - ETKO

Hi Lars,

Attached are my completed forms for Turkey. I did not make the flight reservations yet, or research the hotels, but I plan to get that accomplished tomorrow.

Thanks,

Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

---

**From:** Crail, Lars - AMS  
**Sent:** Monday, June 20, 2016 3:12 PM  
**To:** Zuck, Penelope - AMS <[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>  
**Subject:** FW: USDA Organic Accreditation Audits

Penny,

Please complete the attached forms. I have drafted an ECC and will submit it along with our forms once you provide them to me.

You may also book your flight reservations according to the schedule I placed on your chair. You can also ask Concur support to look my reservations up and book the same.

Attached is our proposed schedule in Turkey.

Lars

---

**From:** Leonardi, Elizabeth V [<mailto:LeonardiEV@state.gov>]  
**Sent:** Monday, June 20, 2016 10:38 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)>; Sussman, Karen - AMS <[Karen.Sussman@ams.usda.gov](mailto:Karen.Sussman@ams.usda.gov)>  
**Subject:** FW: USDA Organic Accreditation Audits

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.

---

**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:** 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.

---

**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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**From:** [MUSTAFA AKYUZ](mailto:MUSTAFA AKYUZ)  
**To:** [Crail\\_Lars - AMS; ma@etko.com.tr; ETKO UA; fa@etko.com.tr](mailto:Crail_Lars - AMS; ma@etko.com.tr; ETKO UA; fa@etko.com.tr)  
**Subject:** Re: Ukraine Operator Documents  
**Date:** Friday, September 30, 2016 12:10:50 PM  
**Attachments:** [image001.png](#)

---

Dear Lars

Yes we will be waiting your arrival to Kiev. Maybe we should wait you to your hotel Holiday Inn and therefrom we can proceed to Belagro. If you inform me about your estimated arrival time to Kiev would be good. My mobile is always working: (b) (6). Or Ukrainian inspector can contact my colleague Artem about your arrival his mobile will be available: (b) (6)

Meanwhile we had some problems with etko email system therefore we had to update the system. new email [ma@etko.com.tr](mailto:ma@etko.com.tr)

Best regards

Mustafa

2016-09-30 18:06 GMT+03:00 Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>:

Hello Mustafa,

I have attached an updated trip schedule. I will drive from Izyaslav to Kiev on 6 Oct and will be ready to observe one of the inspections that afternoon. Please let me know if this schedule will work for the inspectors.

The inspectors may contact me via Skype: (b) (6)

Best Regards,

Lars Crail

USDA NOP

[202.205.5536](tel:202.205.5536) office

(b) (6) mobile



---

**From:** [ma@etko.org](mailto:ma@etko.org) [mailto:[ma@etko.org](mailto:ma@etko.org)]  
**Sent:** Tuesday, September 20, 2016 8:59 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)>; (b) (6).com  
**Subject:** Ukraine Operator Documents

Dear Lars

I noticed I forgot to attach OCP-Process report of Belagro from 2015

Meanwhile we received updated OCP reports from the operators, you can find attached Review reports of the new OCP-2016 which we already send out to the operators.

We expect receiving some corrections related to issues mentioned with Review reports before the audits.

Best regards,

Mustafa

ETKO Turkey

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**From:** [MUSTAFA AKYUZ](#)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [fa@etko.com.tr](mailto:fa@etko.com.tr); [ETKO UA](#)  
**Subject:** Re: Witness Audit Closing Meeting  
**Date:** Friday, October 14, 2016 1:10:25 AM  
**Attachments:** [image001.png](#)

---

Yes we will be waiting this afternoon I think there is 7 hours time difference so it will be 16.15 - 16.30 h. You can call me when you are ready. Fatih will be with me and I try Artem also join the meeting.

Best regards  
Mustafa

13 Eki 2016 19:55 tarihinde "Crail, Lars - AMS" <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)> yazdi:

Hello Mustafa,

We had discussed conducting a Witness Audit closing meeting on Friday, October 14 at 9:15 – 9:30 hrs via Skype. Will this time work for you?

Regards,

Lars Crail

USDA NOP

[202.205.5536](tel:202.205.5536) office

(b) (6) mobile



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**From:** [MUSTAFA AKYUZ](#)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** Re: Witness Audit Closing Meeting  
**Date:** Friday, October 14, 2016 8:44:12 AM  
**Attachments:** [image001.png](#)

---

No problem, we wait your proposal.

Have a nice weekend.

Mustafa Akyuz

2016-10-13 23:44 GMT+03:00 Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>:

Mustafa,

I must cancel the proposed Skype meeting for Friday. I will contact you next week to set up another opportunity to conduct the closing meeting. My apologies.

Regards,

Lars Crail

USDA NOP

[202.205.5536](tel:202.205.5536) office

(b) (6) mobile



---

**From:** Crail, Lars - AMS

**Sent:** Thursday, October 13, 2016 1:28 PM

**To:** [\[REDACTED\].com](#) <(b) (6)@[REDACTED].com>

**Cc:** [fa@etko.com.tr](mailto:fa@etko.com.tr) <[fa@etko.com.tr](mailto:fa@etko.com.tr)>

**Subject:** RE: Witness Audit Closing Meeting

I meant to say 9:15 – 9:30 hrs Washington DC time.

Lars Crail

USDA NOP

[202.205.5536](tel:202.205.5536) office

(b) (6) mobile



---

**From:** Crail, Lars - AMS  
**Sent:** Thursday, October 13, 2016 12:56 PM  
**To:** [REDACTED].com' (b) (6) [REDACTED].com>  
**Cc:** 'fa@etko.com.tr' <fa@etko.com.tr>  
**Subject:** Witness Audit Closing Meeting

Hello Mustafa,

We had discussed conducting a Witness Audit closing meeting on Friday, October 14 at 9:15 – 9:30 hrs via Skype. Will this time work for you?

Regards,

Lars Crail

USDA NOP

[202.205.5536](tel: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](#)"; [\(b\) \(6\)](#) [.com](#)  
**Subject:** Ukraine Operator Documents  
**Date:** Tuesday, September 20, 2016 8:59:37 AM  
**Attachments:** [BELAGRO 3214 Application Package Review-2016.pdf](#)  
[Ekollum 3141 Application Package Review 2016.pdf](#)  
[BELAGRO 3214 OCP-PROCESSING.2015..pdf](#)  
[VIP Group - 3188 Application Package Review 2016.pdf](#)

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Dear Lars

I noticed I forgot to attach OCP-Process report of Belagro from 2015

Meanwhile we received updated OCP reports from the operators, you can find attached Review reports of the new OCP-2016 which we already send out to the operators.

We expect receiving some corrections related to issues mentioned with Review reports before the audits.

Best regards,

Mustafa

ETKO Turkey




	<b>APPLICATION PACKAGE REVIEW FORM</b>		BELGE NO	GP 02 F 01
	<b>BAŞVURU PAKETİ DEĞERLENDİRME FORMU</b>		TARİH	01.08.2016
	Organik - Organic		REV. NO	06
			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>20.09.2016</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 type="checkbox"/>	<b>Surveillance Inspection</b> Takip Kontrol <input checked="" type="checkbox"/>	No: <b>3214-2016.ma</b>
<b>Recertification</b> yes <input type="checkbox"/> no <input checked="" type="checkbox"/>		

<i>Following documents and informations are present:</i> <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 (çeşit, 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
Client's application and/or certification has been denied by any certifier before applying to ETKO? And/or any pending non compliances are present? Başvuru sahibinin sertifikasyonu ve/veya başvurusu daha önceden reddedilmişmi? Veya açıkta olan uygunsuzluklar mevcutmu?			NA
<b>Registration chamber of commerce or something comparable.</b> Müteşebbisin Ticaret Odası kayıt belgesi	Yes		
<b>Farmer list and agreements.</b>			NA

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	01.08.2016
		REV. NO	06
		SAYFA	2 / 2

Üretici listeleri ve anlaşmaları			
<b>Internal Assessment Documents/OCP Reports completed and approved.</b> İç Denetim Raporları / OUP onaylanmıştır	Yes		
<b>Maps (Overview, Detailed).</b> Detaylı ve genel haritalar			NA
<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: Toplam Evet /Hayır</b>	4	-	

**Comments: Yorumlar**

1	<b>7.5.2 Documentation to be prepared and status of the product, etko number to be mentioned.</b>	<b>When there is trade</b>
2	<b>7.5.3 Containers to be prepared by VIP and quality responsible person will checks the packing and transport. Required documents like TC to be demanded from the seller.</b>	<b>When there is trade</b>
3	<b>9.1-9.4, 9.5.1, 9.5.3 - Labels to be approved before use</b>	<b>When there is trade</b>
4	<b>10.1: Stock and financial records to be kept by the unit and separately.</b>	<b>When there is trade</b>
5	<b>5.3 - Quality manual to be prepared</b>	<b>Until next inspection</b>
6	<b>5.9 - GMO handling must be part of quality manual</b>	<b>Until next inspection</b>
7	<b>10.1 Separate file for organic transaction</b>	<b>Always including old transactions</b>
8	<b>10.1 Compliant procedure</b>	<b>Until next inspection.</b>

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.	Yes
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.



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

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

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

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

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

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

Related to transport and storage activities.

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

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

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

### 1.PRODUCTS TO BE CERTIFIED

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

Incase needed make a separate list.

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

		General Principles	COMMENT	COMMENT
A1	205.201	<b>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.</b>		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 products	Belagro is only Trading company, they will buy and export organic certified products from certified sources
A1.2	205.201(a)(1) IACB 5.3	Production process diagram is present for each product (You need to provide a flow chart showing how the product moves in your plant including major equipment)?	-	"

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
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		<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.		Belagro using local Ukrainian regulation for product specification, specifications will be given by the buyer
A1.6	205.201 (a)(3) 889-Article 63 IACB 5.3	A brief description of your quality monitoring practices is prepared? <b>PLEASE EXPLAIN HERE HOW DO YOU MONITOR ORGANIC PRODUCTION PRACTICES TO VERIFY THE ORGANIC PLAN IS EFFECTIVELY IMPLEMENTED</b>	Alexey Kachkovskiy is responsible as consultant for organic production.		Belagro has consultant Alexey Kachkovsky who has since many years' experience in organic agriculture assigned for organic integrity checks.
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 trade yet		No marketing took place yet, as they are planning to start with 2015 crop later in the season.
A1.8	205.201 (a)(5) 889-Article 26 IACB 7.2	A brief description of your management practices used to protect the organic commodities from potential co-mingling and contamination is present? <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 Belagro buys the products, such (b) (4) factory.
A1.9	889/08 Article 31.1 IACB 7.5.2	The operator shall check the closing of the packaging or container where it is required and the presence of the indications. The operator shall crosscheck the information on the label with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts. <b>PLEASE EXPLAIN HERE HOW DO YOU CHECK THE PACKAGE AND THE ACCOMPANYING DOCUMENTS OF THE ORGANIC PRODUCT</b>	We normally nominate (b) (4) (surveyor) for such procedures.		Surveiller body is contracted for the shipments and containers, checking and reporting to Belagro. Belagro will label the containers accordingly and the documents to be indicated the status of the product.
A2		<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 either an organic or conventional form of any ingredient in each formula	We trade singleingredient		There is no complex products with different



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		(e.g. organic raisins or conventional raisins, not both, in organic cake)? <b>PLEASE EXPLAIN YOUR PRODUCT COMPOSITION</b>	products only.	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.	New (b) (4) are used to protect the products from contamination.	
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 maps, incident logs and pesticide use charts? <b>PLEASE EXPLAIN</b>	Na	NA	
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	

Ref Nr	Reg. Nr	Organic Compliance Plan-Processing NOP 205.201, IACB 5.3	Processor Comments	Doc Nr	GP 18 F 01
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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 Belagro. 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	<b>There is no manual prepared yet</b>	
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	<b>As belagro starts lately for organic business, they did not experience with complaints and no procedure is available.</b>	
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	They will buy from certified sources and they will keep the certificates.	
A6.2	205.103(b)(4)	Is there a formal Audit Trail in place with sufficient records to show the following: a) Raw commodity receiving, b) Lot tracking & coding, c) Certification of organic materials, d) Purchasing receipts, e) Production records, f) Inventories and storage locations, g) Sales, shipping and distribution of organic materials and products? <b>PLEASE LIST AND DESCRIBE RELATED DOCUMENTS OF YOUR SYSTEM</b>	We only consultancy/trade company and such commercial docs we have	In Belagro only commercial documents are available, for the moment no documents yet.	
A6.3	205.103(b)(3)	Do you maintain all records for at least five (5) years?	All the records are kept from the beginning.	They understood the rule.	
A6.4		Every producer, processor or operator in the organic project who sells their organic product to the final consumer will be responsible to hold an account on daily basis on the quantity that is sold. Daily account records?	Na	NA, no sales for final consumer present.	
A7	834-Article 19, 23 IACB 7.4, 9.1	<b>Product composition and labelling categories</b>		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> NC <input type="checkbox"/>	



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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? <b>PLEASE EXPLAIN INDICATION STATUS OF ORGANIC</b>	The lot numbers will be generated for each lot for traceability if we will have any bulk deliveries. At the moment the label are in process to be created.	<b>Labels are not yet ready as there is no demand for any 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	Na yet. Will be created and sent for approval	"	

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		before use? <b>PLEASE ATTACH LABEL or INDICATE THE CONTENT HERE</b>	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) [REDACTED] They are certified for food products.	New (b) (4) [REDACTED] are used for oil. These tanks are certified for food grade and they are imported from Germany.	
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) [REDACTED] are stored packed and not possible for any pest-rodents to come inside.	Packing material is already packed and protected. One is 100 kgs heavy and not easy to handle.	
A11		<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	No transaction was made so far.	
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	NA	
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? <b>PLEASE ATTACH ANALYSES REPORT</b>	Na	"	
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		Incase 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	No marketing realized yet.	
A13.2		Incase analyses results show that there is a residue of an organic product then an evaluation report is prepared by the project responsible to identify the causes and send to ETKO when finalized? <b>PLEASE ATTACH THE ANALYSES RESULTS THAT YOU DETECTED RESIDUES</b>	Na yet	No experiance yet	



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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>	
<b>B1</b>	<b>889-Article 29, 30, 33 IACB 7.5.1, 7.5.3</b>	<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	NA	
B1.2		There is a raw, ingredient product receive procedure and all are registered in an auditable format, registration documents are ready for inspection? <b>PLEASE EXPLAIN RECORDING SYSTEM</b>	Na	NA	
B1.3		In case there is a suspicion products are refused and not accepted for processing? <b>PLEASE EXPLAIN REFUSAL SYSTEM</b>	Na	NA	
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	NA	
B1.5	889-Article 66 IACB 10.1	Status of the product are clearly mentioned on the documents kept during the organic products receive? <b>PLEASE EXPLAIN HOW DO YOU RECORD</b>	Will be checked and recorded	Belagro will make sure the labelling and the documents related to transaction for status of the product, when transactions made.	
B1.6	834-Article 23 IACB 9.1	Labels are attached to the incoming goods and it is understandable and visible which regulation it belongs to? <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	Belagro will keep a separate file for organic transactions.	
<b>B2</b>	<b>889-Article 35 IACB 7.5.4</b>	<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	NA, No storage is doen by Blegaro	
B2.2		Stores where organic products are stored clearly indicated and visible? <b>PLEASE EXPLAIN</b>	Na	"	
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?	Na, no processing line.	No processing is done by Belagro, Belagro deals only trading.	

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		<b>PLEASE LIST DISINFECTION MATERIALS</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	NA	
B3.3	205.271	If there is pest control of the bulk or packed organic products used methods or substances comply the organic regulations? <b>PLEASE EXPLAIN</b>	Na	NA	
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	NA	
B3.5		Quality control procedures are present and laboratory analyses are kept for inspections? <b>PLEASE EXPLAIN YOUR PROCEDURES</b>	Quality Manual in development		Belagro will develop quality procedure, will include the sampling and analyses procedure.
B4	205.105(e)	<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		AK is responsible to check the GMO contamination possibilities and to avoid from possible contaminations. In quality procedure they will prepare a section for this requirement.
B4.2	834-Article 10 IACB 5.10	There is no ionizing radiation and sewage sludge use neither for any processing nor any raw material used for the composition of the product? <b>PLEASE EXPLAIN</b>	No	NA	
B5	NOP 205.272 NOP 205.201 889-Article 26 IACB 7.3	<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		It is only trade operation, no processing takes palce.
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 and visible. There is no contact to any conventional product or non-allowed material? <b>PLEASE EXPLAIN</b>	Na		"
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	Na, discussed with	NA	



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		process such as milling, oil or sugar production by giving away certain quantity of organic product for depuration? Do you have a procedure to guarantee separation? <b>PLEASE EXPLAIN HOW DO YOU MAKE IT</b>	processors to take out first <b>07/15</b> after beginning of organic processing	As a general information oil mills needs to disqualify <b>01/15</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		
		Organic Compliance Plan is always present and updated regularly by the responsible	YES		
		Production Process Diagram: (For each final product a separate one) is present	NA		
		Samples of all labels to be used on products are present and approved by ETKO	YES		
		Receiving records are present and complete	YES		
		Stock inventory records are present and complete	NA		
		Production records are present and complete	NA		
		Distribution records are present and complete	YES		
		Product and water analyses reports are present when applicable.	YES	When applies	
		Product specifications for complex products means more than one ingredient are present	NA		
		Processor agreements for subcontracted units are present	NA		
		GMO Free Declarations for ingredients when applicable are present	NA		
		List of processing aids and raw materials is prepared and present	NA		
		Cleaning and disinfection material list and specifications are present for all units	NA		
		Pest-rodent control records are present for all units	NA		
		If the supplier is different incoming raw material certificates are present	NA		
		If the supplier is different inspection report and master certificate of the supplier are present.	YES		
		Organic production regulations are present	YES		
		ETKO file includes all ETKO documents such as contract, inspection report, correspondence, certificates, non-compliance, inspection documents, export documents	YES		
		Complaint procedure is present and includes handling of complaints	YES		
		Sanctions applied to products, subcontracted producers or processors are listed and ETKO is informed on time	NA		
		When there is change of production, composition, products etc OCP is updated and send to ETKO for evaluation before starting process.	YES		
		Contracted producers agreements, field maps are present and complete	NA		
		If applicable; Internal Control System procedures, farmers' inspection and training records are present. Valid only for EC 834/2007, NOP Regulation and BIOSUISSE, not recognized by TC 25841/2005	NA		
D	NOP 205.201(a)	Additional Information Deemed Necessary by ETKO to Evaluate the Compliance with the Regulations	NA		

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### 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: **12,09.2015**

Signature of the representative:

Name of the representative: **Vyacheslav Below**

### ETKO Results of Verification

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

Place, Date: **Brovary City – Kiev** **26.09.2015**

Name ETKO Representative

Signature of ETKO representative

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



	<b>APPLICATION PACKAGE REVIEW FORM</b> <b>BAŞVURU PAKETİ DEĞERLENDİRME FORMU</b> Organik - Organic	BELGE NO	GP 02 F 01
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<b>Name of applicant</b> Başvuru Sahibi firma	<b>EKOLIUM, LLC</b>		
<b>License No</b> Lisans No	<b>3141</b>	Date / Tarih	<b>16.09.2016</b>
<b>Address</b> Adres	<b>9, Boryspilska Str, Kiev, 02099, Ukraine</b>		
<b>Tel/Fax / Telefon- Fax</b> <b>Email / Website</b>	<b>Mob.:</b> (b) (6)		
<b>Contact person</b> Yetkili kişi	(b) (6) .com, <a href="mailto:akachkovskiy@ukr.net">akachkovskiy@ukr.net</a>		
<b>Review made by</b> Değerlendirmeyi yapan	(b) (6), (b) (7)(C)		

<b>Initial Inspection</b> İlk Kontrol	<input type="checkbox"/>	<b>Surveillance Inspection</b> Takip Kontrol	<input checked="" type="checkbox"/>	No: <b>3141D-01-2016.fa</b>
<b>Recertification</b> yes <input checked="" type="checkbox"/> no <input type="checkbox"/>				

<i>Following documents and informations are present:</i> <i>Aşağıda adı geçen dökümanlar 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 (geçmiş, kapsam, ürünler vb.)	X		
<b>The scope of certification program concerned:</b> Sertifikasyon programının kapsamı ve ilgili olan konuları	X		
<b>Explanation of the agricultural (plant or animal) production:</b> Tarımsal üretiminizi (bitkisel veya hayvansal) açıklayınız.			X
<b>Explanation of the processing crop by crop (processing flow chart):</b> Ürünlerin işlenmesini açıklayınız (Ürünler nerede, nasıl, hangi şartlar altında işlenecek vs. bilgiler)			X
<b>Agricultural units:</b> Zirai Üniteler <b>Farming system:</b> Ziraat Şekli			X
<b>Animal production (Ranges, Poultry, Fish Ponds, Bird cages etc):</b> Hayvan yetiştirme (çeşit, kümes hayvanları, balık havuzları, kuş kafesleri vs)			X
<b>Natural Collection Areas (Forestry or wild crops)</b> Doğal toplama alanları (orman ya da doğal ürünler)			X
<b>Processing units /İşletmeler</b>	X		
<b>Products: Ürünler</b>	X		
<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			X
<b>Actions required from previous certification and respective corrective measures.</b> <u>Sayet daha önceden verilmiş herhangi bir uygunsuzluk var ise ve buna ilişkin düzeltici faaliyetler mevcut ise</u>			X
<b>Client's application and/or certification has been denied by any certifier before applying to ETKO? And/or any pending non compliances are present? Başvuru sahibinin sertifikasyonu ve/veya başvurusu daha önceden reddedilmişmi? Veya açıkta olan uygunsuzluklar mevcutmu?</b>			X
<b>Registration chamber of commerce or something comparable.</b> Müteşebbisin Ticaret Odası kayıt belgesi	X		
<b>Farmer list and agreements.</b>	X		

Hazırlayan: KYS Sorumlusu Onaylayan: Genel Müdür



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Üretici listeleri ve anlaşmaları			
<b>Internal Assessment Documents/OCP Reports completed and approved.</b> İç Denetim Raporları / OUP onaylanmıştır	<b>X</b>		
<b>Maps (Overview, Detailed).</b> Detaylı ve genel haritalar			<b>X</b>
<b>Processor Agreements.</b> İşletmecilerle yapılan anlaşma			<b>X</b>
<b>Processing facility plan and Process Flowcharts.</b> İşletme yerleşim planı ve ürün işleme akış şemaları			<b>X</b>
<b>Processing aids list (if any)</b> Yardımcı ürün işleme maddeleri (geçerli ise)			<b>X</b>
<b>List of ingredients (for cases with processing)</b> Kullanılan ingredientler (var ise)			<b>X</b>
<b>GMO Declarations (if any)</b> Genetik modifikasyondan temizdir belgesi (geçerli ise)			<b>X</b>
<b>Propagation material approvals</b> <b>Üretim materyali onaylanmalı</b>			<b>X</b>
<b>Retroactive recognition of former farming system procedure is completed correctly?</b> <b>Geçiş süreci kısaltmasıyla ilgili prosedürler tamamlanmış mı? TI 33 F 01</b>			<b>X</b>
<b>Certified inputs (if any) such as fertilizers, pest management materials etc.</b> Sertifikalı girdi maddeleri. (Gübre, ilaç vs gibi)			<b>X</b>
<b>Total Yes/No</b> Toplam Evet /Hayır	<b>7</b>		<b>17</b>

**Comments:** Yorumlar

**This is the fourth year of inspection with Ekolium, they are dealing with only trade activities with organic products, there is only trading activities with organic raw and processed products that comes from certified sources.**

**Following documents were not provided with the application package**

- Mass balance table for bought and sold products**

**OCP processing, below mentioned part should be explained**

A5.1	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
------	---	--

**-If you have any quality manual please send to ETKO**

A5.3	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 created register for future complaints where is mentioned complaint and taken actions and responsible person (attached). No complaints yet
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**-complaint register system was mentioned in above part of OCP report, please provide mentioned "complaint register document"**

A8.1	When there is no labeling for bulk products do you identify organic products in the form of a lot number or other tracking device? <b>PLEASE EXPLAIN INDICATION STATUS OF ORGANIC</b>	The lot numbers will be generated for each lot for traceability if we will have any bulk deliveries.
------	---	--

**-please send labels to ETKO before use**

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.
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**-If you have complaint and refusal procedure please provide to ETKO or please explain your corrective action system for during the above mentioned cases.**

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B1.5	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>		
B1.7	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 make sure the labelling and the documents related to transaction for status of the product, when transactions made.</b>		
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.		YES
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.		-

\*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 PACKAGE REVIEW FORM</b> <b>BAŞVURU PAKETİ DEĞERLENDİRME FORMU</b> Organik - Organic	BELGE NO	GP 02 F 01
		TARİH	01.08.2016
		REV. NO	06
		SAYFA	1 / 3

<b>Name of applicant</b> Başvuru Sahibi firma	<b>VIP GROUP, LLC</b>		
<b>License No</b> Lisans No	<b>3188</b>	Date / Tarih	<b>14.09.2016</b>
<b>Address</b> Adres	<b>9, Boryspilska Str, Building 21 Kiev, 02099, Ukraine</b>		
<b>Tel/Fax / Telefon- Fax</b>	<b>Mob.: (b) (6)</b>		
<b>Email / Website</b>	<b><a href="mailto:akachkovskiy@ukr.net">akachkovskiy@ukr.net</a></b>		
<b>Contact person</b> Yetkili kişi	<b>Alexey Kachkovskiy</b>		
<b>Review made by</b> Değerlendirmeyi yapan	<b>(b) (6), (b) (7)(C)</b>		

<b>Initial Inspection</b> İlk Kontrol <input type="checkbox"/>	<b>Surveillance Inspection</b> Takip Kontrol <input checked="" type="checkbox"/>	No: <b>3188-2016.ac</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	Yes		
<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 (çeşit, 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>	Yes		
<b>Client's application and/or certification has been denied by any certifier before applying to ETKO? And/or any pending non compliances are present? Başvuru sahibinin sertifikasyonu ve/veya başvurusu daha önceden reddedilmişmi? Veya açıkta olan uygunsuzluklar mevcutmu?</b>			NA
<b>Registration chamber of commerce or something comparable.</b> Müteşebbisin Ticaret Odası kayıt belgesi	Yes		
<b>Farmer list and agreements.</b>			NA

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	01.08.2016
		REV. NO	06
		SAYFA	2 / 3

Üretici listeleri ve anlaşmaları			
<b>Internal Assessment Documents/OCP Reports completed and approved.</b> İç Denetim Raporları / OUP onaylanmıştır	Yes		
<b>Maps (Overview, Detailed).</b> Detaylı ve genel haritalar			NA
<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> <b>Üretim materyali onaylanmalı</b>			NA
<b>Retroactive recognition of former farming system procedure is completed correctly?</b> <b>Geçiş süreci kısaltmasıyla ilgili prosedürler tamamlanmış mı? TI 33 F 01</b>			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	6		18

**Comments:** Yorumlar

The company was certified as organic subcontracted processor since 2014.

Activities of **VIP GROUP, LLC** are:

- Trading of organic agricultural products (processed and unprocessed),
- Control of documentation.

They buy organic material from certified producers, processors and export it.

The documents were provided with the application package (OCPs, trading documents).

There is remain Minor issues from last inspection and corrective actions should be checked.

7.5.2 Documentation to be prepared and status of the product, etko number to be mentioned.	When there is trade
7.5.3 Containers to be prepared by VIP and quality responsible person will checks the packing and transport. Required documents like TC to be demanded from the seller.	When there is trade
9.1-9.4, 9.5.1, 9.5.3 - Labels to be approved before use	When there is trade
10.1: Stock and financial records to be kept by the unit and separately.	When there is trade
5.3 - Quality manual to be prepared	Until next inspection
5.9 - GMO handling must be part of quality manual	Until next inspection
10.1 Separate file for organic transaction	Always including old transactions
10.1 Compliant procedure	Until next inspection.

**Documents provided checked and following questions remain unclear:**

**OCP-Process:**

The questions were answered clearly in OCP –Process. No questions for OCP.

Assigned inspector Atanan Denetmen*	(b) (6), (b) (7)(C)
All related documents are present in the application package therefore inspection	ok

	<b>APPLICATION PACKAGE REVIEW FORM</b> <b>BAŞVURU PAKETİ DEĞERLENDİRME FORMU</b> Organik - Organic	BELGE NO	GP 02 F 01
		TARİH	01.08.2016
		REV. NO	06
		SAYFA	3 / 3

can be planned. Denetim için gerekli bütün araçlar başvuru paketinde mevcuttur o nedenle denetim planlanabilir.	
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.



**From:** [ma](#)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** YNT: RE: ETKO Audit - Proposed February 2017  
**Date:** Tuesday, December 20, 2016 2:23:19 PM  
**Attachments:** [image001.png](#)

---

Ok waiting the instructions. Have a nice day. Mustafa

Samsung Galaxy akıllı telefonumdan gönderildi.

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

Baslangıç tarihi: "Crail, Lars - AMS"  
Tarih: 20.12.2016 20:05 (GMT+03:00)  
Alici: ma@etko.com.tr, 'MUSTAFA AKYUZ'  
Cc: "Claypool, Rebecca E - AMS"  
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]  
**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

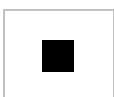


Lars Crail

USDA NOP

202.205.5536 office

(b) (6) mobile



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	<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>EKOLIUM, LLC</b>		
<b>License No</b> Lisans No	<b>3141</b>	Date / Tarih	<b>02.12.2015</b>
<b>Address</b> Adres	<b>9, Boryspilka Str, Kiev, 02099, Ukraine</b>		
<b>Tel/Fax / Telefon- Fax</b> <b>Email / Website</b>	<b>Mob. (b) (6)</b>		
<b>Contact person</b> Yetkili kişi	<b>(b) (6) om, akachkovskiv@ukr.net</b>		
<b>Review made by</b> Değerlendirmeyi yapan	<b>(b) (6), (b) (7)(C)</b>		

<b>Initial Inspection</b> İlk Kontrol <input type="checkbox"/>	<b>Surveillance Inspection</b> Takip Kontrol <input checked="" type="checkbox"/>	No: <b>3141D-01-2015.fa</b>
<b>Recertification</b> yes <input checked="" type="checkbox"/> no <input type="checkbox"/>		

<i>Following documents and informations are present:</i> <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.)	X		
<b>The scope of certification program concerned:</b> Sertifikasyon programının kapsamı ve ilgili olan konuları	X		
<b>Explanation of the agricultural (plant or animal) production:</b> Tarımsal üretiminizi (bitkisel veya hayvansal) açıklayınız.			X
<b>Explanation of the processing crop by crop (processing flow chart):</b> Ürünlerin işlenmesini açıklayınız (Ürünler nerede, nasıl, hangi şartlar altında işlenecek vs. bilgiler)			X
<b>Agricultural units:</b> Zirai Üniteler <b>Farming system:</b> Ziraat Şekli			X
<b>Animal production (Ranges, Poultry, Fish Ponds, Bird cages etc):</b> Hayvan yetiştirme (çeşit, kümes hayvanları, balık havuzları, kuş kafesleri vs)			X
<b>Natural Collection Areas (Forestry or wild crops)</b> Doğal toplama alanları (orman ya da doğal ürünler)			X
<b>Processing units /İşletmeler</b>	X		
<b>Products: Ürünler</b>	X		
<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			X
<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>			X
<b>Registration chamber of commerce or something comparable.</b> Müteşebbisin Ticaret Odası kayıt belgesi	X		
<b>Farmer list and agreements.</b> Üretici listeleri ve anlaşmaları	X		
<b>Internal Assessment Documents/OCP Reports completed and approved.</b> İç Denetim Raporları / OUP onaylanmıştır	X		
<b>Maps (Overview, Detailed).</b> Detaylı ve genel haritalar			X

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

<b>Processor Agreements.</b> İşletmecilerle yapılan anlaşma			X
<b>Processing facility plan and Process Flowcharts.</b> İşletme yerleşim planı ve ürün işleme akış şemaları			X
<b>Processing aids list (if any)</b> Yardımcı ürün işleme maddeleri (geçerli ise)			X
<b>List of ingredients (for cases with processing)</b> Kullanılan ingredientler (var ise)			X
<b>GMO Declarations (if any)</b> Genetik modifikasyondan temizdir belgesi (geçerli ise)			X
<b>Propagation material approvals</b> Üretim materyali onaylanmalı			X
<b>Retroactive recognition of former farming system procedure is completed correctly?</b> Geçiş süreci kısaltmasıyla ilgili prosedürler tamamlanmış mı? TI 33 F 01			X
<b>Certified inputs (if any) such as fertilizers, pest management materials etc.</b> Sertifikalı girdi maddeleri. (Gübre, ilaç vs gibi)			X
<b>Total Yes/No</b> Toplam Evet /Hayır	7		16

**Comments:** Yorumlar

This is the third year of inspection with Ekolium, they are dealing with only trade activities with organic products.

Following documents were not provided with the application package

- Signed new season's contract (The old contract is still valid) – (Contract signed)
- Mass balance table for bought and sold products – (provided during the inspection)

OCP processing,

- A5.1 Quality Manual to be prepared
- A5.3, A13.3 Complaint procedure missing
- A8.1, B1.5 Labels sent to ETKO and to be approved before use,
- B1.7 Separate file for organic transactions should be done
- B4.1 GMO handling must be part of Quality Manual

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.	YES
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.	
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.	

\*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>CERTIFICATION PROPOSAL BELGELENDİRME ÖNERİSİ</b>	No doc	GP 13 F 01
		Date	07.12.2015
		Rev.No	03
		Page	1

<b>Company Name:</b> Müşteşebbis adı	EKOLIUM LLC
<b>Licensee number:</b> Lisans no	3141D-01
<b>Address:</b>	9, Boryspilska Str, Kiev, 02099, Ukraine

Initial Certification İlk Sertifikalandırma	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
	-	<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	Handling; Barley, Buckwheat, Corn, Flax, Lupine, Millet, Mustard, Oat, Peas, Pumpkin, Rapeseeds, Rye, Sorghum, Soybean, Spelt (Wheat), Sunflower, Walnut, Wheat

<b>RECOMMENDATION OF CERTIFICATION</b>			
<p>I declare that this inspection was performed in accordance with the requirements of the ETKO Certification System, and I ensured that all production processes and documents have been reviewed. All the non-conformities affecting the status of the product and production unit have been cleared. All documentation as required by the ETKO Certification System is present and correct. I have fully completed the Inspection Documents 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.</p> <p>Bu kontrolün ETKO Kontrol Sisteminin gerekliliklerine uygun olarak gerçekleştirildiğini, ve üretim ve proses ile ilgili olan bütün işlemleri ve dokümanları kontrol ettiğimi 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. Müşteşebbis dosyası ETKO Prosedürlerinde açıklandığı gibi olup istendiğinde kontrol için hazırdır.</p>			
<b>Name inspector:</b> Kontrolör İsim	(b) (6), (b) (7)(C)	<b>Signed:</b> İmza	(b) (6)
		<b>Date:</b> Tarih	31.12.2015

<b>Certifier Final Approval – Son Onay</b>			
I have fully reviewed the Inspection Documents and agree with the certification decision.			
<b>Name certifier</b> Sertifiker İsim	(b) (6), (b) (7)(C)	<b>Signed:</b> İmza	(b) (6)
		<b>Date:</b> Tarih	31.12.2015
<b>Authorised Accreditation Status</b> Akreditasyon bilgileri	NOP USDA		
<b>Certificate Validity Date:</b> Sertifika son onay tarihi	31.12.2016	<b>Original Validity Date:</b> Sertifika ilk onay tarihi:	07.11.2013

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Lopez, JasonJ - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#); [Yang, RobertH - AMS](#)  
**Subject:** Accreditation Committee - ETKO  
**Date:** Tuesday, May 17, 2016 3:25:07 PM  
**Attachments:** [image001.png](#)

---

Hi Jason,

I hope your audit is going well. Cheri asked me to let you know we have a Renewal of Accreditation to be reviewed by the Accreditation Committee for ETKO.

Here are the links to the documents and files:

Renewal Letter – [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred Renewal.docx](#)

CA Report - [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA CA Report Settlement.docx](#)

Accred Terms - [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred terms.docx](#)

Reference:

SA Chronology Log – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\SA chrono log.docx](#)

Renewal Chrono Log - [P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\NoNC\2013 renewal ETKO Chrono log.docx](#)

Settlement Agreement - [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\Exec Settlement.ETKO.APL-008-16.pdf](#)

File folder (where the letter/report for approval can be found) - [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013](#)

Let me know if you need any additional information.

Thanks,

Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
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**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Yang, RobertH - AMS](#)  
**Subject:** check-in today  
**Date:** Tuesday, July 12, 2016 1:43:51 PM  
**Attachments:** [image001.png](#)

---

Hi Cheri,

For our check-in today, here is a list of things I'd like to go over:

1. ETKO – emailed to you the revised CA Report (to include settlement agreement terms per Miles request) 6/29/16 – have not received a response.
2. IMOCert – revised accreditation dates and CA Report – printed for review and signature – gave to RY today.
3. ETKO – printed resolution letter for certificate noncompliance – put in your mailbox today.
4. Bolicert – CAs were due yesterday in response to the Settlement Agreement. I did not send them a reminder. Has anything been received in the AIA inbox?
5. Ekoagros desk audit – conducting this week. The procedure indicates the NOP 2005 checklist is forwarded to AIA Director for review assignment after completion. What is the next step? Is a NC Report issued?
6. New Zealand – email from Dr. Jolly asking about the status of the review and analysis that was due to him by the end of June. I have not responded.

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
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☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
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**From:** [Crail, Lars - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Yang, RobertH - AMS](#)  
**Subject:** Compliance Audit Options - ETKO

---

I spoke with IOAS and gathered additional information from the US Embassy in Turkey. I will share this information with you in order discuss how to proceed.



**From:** [Davis, Graham - AMS](#)  
**To:** [ma@etko.com.tr](mailto:ma@etko.com.tr)  
**Cc:** [Mann, Renee - AMS](#); [Courtney, Cheri - AMS](#)  
**Subject:** Corrective actions  
**Date:** Friday, December 30, 2016 11:50:23 AM  
**Attachments:** [GP 18 F 21 NOP Certificate 20161118.pdf](#)  
[image001.jpg](#)

---

Dear Dr. Akyuz,

Thank you for submitting the corrective actions for the witness audit that occurred on October 6, 2016. ETKO is correct that the certificate should be renewed annually. The statement, "The certificate should be updated at least annually", however, should be removed from ETKO's certificate template. A situation may occur where a client's renewal is delayed past the 12 months so this statement may cause unnecessary confusion. Please remove the statement from your certificate template and provide the NOP with an updated version.

Thank you.

*Graham*

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell (b) (6)**



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**ETKO**  
**Ecological Farming Control Organization**

160 Sok 13/3 35100 Bornova - IZMIR – TURKEY  
T:+902323397606, F:+902323397607  
E-mail: : info@etko.com.tr , www.etko.com.tr

certifies that

**XXXX**

T+XX-XX-XXX-XXXX / F+XX-XX-XXX-XXXX/ xyz@xxxmail.xxx  
XX

XX

is certified to the USDA organic regulations, 7 CFR Part 205, for the category of:

CROPS/WILD CROPS/HANDLING

Rise - 100% Organic

The certificate should be updated at least annually. Once certified, a production or handling operation's organic certification continues effect until surrendered, suspended or revoked. Status of this certification and specific certified organic products covered may be verified at <http://apps.ams.usda.gov/Integrity/CP/OPP.aspx?cid=27&nopid=9963083101&ret=%252fIntegrity%252fDefault.aspx&retName=Home>

Certifiers ID: 996  
Certificate Nrs: No: XX-XXXX-XX.201X.NOP  
NOP Operation ID: XXXXXXXXXX  
Effective date of certification: Month XX, 2XXX  
Anniversary date: Month XX, 2XXX  
Issue Date: Month XX, 2XXX

On Behalf of ETKO :  
XXXXXXXXXXXX

ORGANIC CERTIFICATE

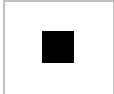


**From:** [Crail, Lars - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** Draft Etko Compliance Audit Options attached  
**Date:** Wednesday, June 15, 2016 10:42:08 AM  
**Attachments:** [ETKO Compliance Audit Options.docx](#)  
[image001.png](#)

---

See attached draft.

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



**ETKO Compliance Audit Options**

Discussion Points

June 15, 2016

**Background:**

ETKO, a USDA accredited certifier based in Izmir, Turkey, entered a settlement agreement with NOP on XXXXX. One of the settlement agreement terms requires ETKO to undergo a compliance audit (additional onsite audit) at their expense. According to the US State Department website, travel to Turkey is restricted to "mission-critical" for USG personnel.

**Options Considered:**

(b) (5)  
[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]



US Embassy Turkey Staff and NOP correspondence:

Hi Lars,

Glad we can be of help. We support your visit, especially if in person monitoring is the best way to ensure compliance and quality of NOP certifying bodies. I would recommend you think of these rules not as restrictions, but as additional steps for consideration and approval. With these additional steps, we still have many USDA official travelers coming to Turkey for meetings and speaking at conferences, etc, including in Izmir, so if an in-person trip is important, you should still pursue it.

If you are considering other options and there are in-person monitoring tasks that we can help with from here, let us know. We get around Turkey quite a bit, including to Izmir.

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)

This email is UNCLASSIFIED.

**From:** Leonardi, Elizabeth V [<mailto:LeonardiEV@state.gov>]  
**Sent:** Thursday, June 02, 2016 7:36 AM  
**To:** Crail, Lars - AMS <[Lars.Crail@ams.usda.gov](mailto:Lars.Crail@ams.usda.gov)>  
**Cc:** Kimberly Sawatzki <[SawatzkiKS@state.gov](mailto:SawatzkiKS@state.gov)>  
**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)
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)

**From:** [Crail, Lars - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Skinner, Rick - AMS](#); [Mann, Renee - AMS](#)  
**Bcc:** [Crail, Lars - AMS](#)  
**Subject:** Ecocert Turkey office  
**Date:** Sunday, January 26, 2014 2:13:06 PM

---

All, I need a decision as to whether I will conduct an onsite assessment of ECOCERT's Turkey office. I am firming up plans to conduct an onsite renewal assessment of ETKO and EcoGlobe during the weeks of May 11<sup>th</sup> and May 18<sup>th</sup>. ETKO's office is located in the same city as ECOCERT's satellite office. Please let me know as soon as possible.

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

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**From:** Courtney, Cheri - AMS  
**Sent:** Wednesday, January 22, 2014 10:24 AM  
**To:** Skinner, Rick - AMS; Mann, Renee - AMS  
**Cc:** Crail, Lars - AMS  
**Subject:** RE: PCO audit date

Hi All,  
Lars is slated to go to Turkey this year perhaps he can cover the satellite offices rather than Columbia.

*Cheri*

---

**From:** Skinner, Rick - AMS  
**Sent:** Tuesday, January 21, 2014 4:32 PM  
**To:** Mann, Renee - AMS  
**Cc:** Courtney, Cheri - AMS  
**Subject:** RE: PCO audit date

*Good afternoon Renee –  
I am working on the initial contact with Ecocert SA – After discussing the activities of the last couple of years with Miguel Caceres, he indicated that the original intent of NOP was to try to perform an assessment at each of the 19 satellite offices of Ecocert within 5 years. With that in mind – and through the process of elimination, have concluded that the*



*offices that perform NOP certification duties that remain on that long list are Nepal, Turkey, Canada, Romania, Southeast Asia, China, and Ecuador. Mike indicated that he reviewed 4 of the 5 offices in Africa and completed Brazil and Germany during the last audit. My question – should I plan to include a couple of these satellite offices into the schedule for this year? Since Ecuador is a new office that was just opened as the 2012 audit completed – and since it was previously tied to the Colombian office that has not had a review, I am thinking that would be a logical one to look at. I'm not sure what the current status of travel in Turkey, Nepal, and Southeast Asia is, and I assume that China is looked at during a higher level visit. Let me know what you think as I would like to get this started. Thanks – Rick*

---

**From:** Mann, Renee - AMS  
**Sent:** Tuesday, January 14, 2014 1:11 PM  
**To:** Skinner, Rick - AMS  
**Subject:** RE: PCO audit date

Hello Rick,

Thank you for the update – and don't worry about not having dates sketched out yet. If possible, please do not schedule the PCO audit any time from August 26 through September 14 (I have a very exciting vacation planned!).

I look forward to hearing more from you about the audit scheduling as time permits.

Safe travels,  
Renee

---

**From:** Skinner, Rick - AMS  
**Sent:** Monday, January 13, 2014 8:43 PM  
**To:** Mann, Renee - AMS  
**Subject:** RE: PCO audit date

*Hello Renee –*

*Very nice to hear from you – and honestly – I have only scanned the assignments that I received late last week. I know that I have 5 or 6 NOP audits to schedule and the best place to start is to eliminate all foreign certifiers in late July – all of August and the first week or two of September. They are all on Holiday and are not available for an audit. I assume that I should schedule that audit in August if at all possible. I am traveling this week but I am planning to send out the initial contact*

*emails this Friday upon my return. I should know more after the initial responses from the certifiers that I have. I do have three domestic certifiers that will need to be scheduled in June, July and August – as well. I will keep you posted and I always look forward to working with someone from NOP. Stay in touch and I will as well!*

*Rick*

---

**From:** Mann, Renee - AMS  
**Sent:** Monday, January 13, 2014 4:42 PM  
**To:** Skinner, Rick - AMS  
**Subject:** PCO audit date

Hello Rick:

I am scheduled to be the second auditor during the PCO audit this year. Would you please let me know approximately when you hope to conduct the PCO audit? I look forward to working (and learning!) from you.

Kind Regards,  
Renee

Ms. Renee Mann  
Accreditation Manager  
USDA National Organic Program  
(202) 690-1312  
[NOP website](#)  
Sign up for our newsletter, the [USDA Organic Insider](#).

**From:** [Tucker, Jennifer - AMS](#)  
**To:** [McEvoy, Miles - AMS](#); [Courtney, Cheri - AMS](#)  
**Cc:** [Kuhn, Meg - AMS](#)  
**Subject:** ETKO - Summary and 2 Options  
**Date:** Wednesday, March 02, 2016 4:42:16 PM

---

Miles and Cheri – Here are two documents for you to consider with ETKO:

Appeals Summary (3 pages): <P:\Appeals\16-008 ETKO\Case Summary.ETKO.APL-008-16.docx>

Based on an initial review and previous discussions, Meg developed the following one-page options paper:

<P:\Appeals\16-008 ETKO\Appeal Options.ETKO.APL-008-16.docx>

I got the sense that you wanted to start with a settlement proposal, which I would offer through the lawyer (b) (5)

We are happy to prepare the draft settlement for review if this is the path you would like to take.

Meg, nice job with these!

Jenny

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#)  
**Subject:** ETKO & Food Safety

---

Hi Cheri,  
I'd like to meet with you to discuss the NoPS for ETKO and Accreditation Committee results for Food Safety Renewal (1 finding was not issued as a noncompliance).

Thanks,  
Penny



**From:** [Howley, JannaB - AMS](#)  
**To:** [Essig, Mario - AMS](#)  
**Subject:** ETKO (Ecological Farming Control Organization)  
**Date:** Tuesday, April 21, 2015 11:48:53 AM

---

Mario:

I checked the ETKO NP1432LCA audit that is in the Audit Onsite History Datasheet as confirmed, and it is not showing up in the Audit Life Cycle report, as RM had identified. I think it's because there are no associated WTL activities, but I wanted to confirm with you that WTL items had to be happening in order for something to populate in the Audit Life Cycle report.

Thanks!

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

**From:** (b) (6), (b) (7)(C)  
**To:** [McEvoy, Miles - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#); [Gebault King, ReneeA - AMS](#); (b) (6);  
(b) (6)  
**Subject:** ETKO  
**Date:** Wednesday, June 17, 2015 8:18:29 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Dear Miles,

We would like to inform you about the measures taken against ETKO, a control body listed in Annex IV to Regulation (EC) No 1235/2008. As this control body is NOP accredited, the information below may be useful to you.

In recent months the Commission received several notifications from Member States concerning high volume shipments of organic goods imported from Ukraine into the Union containing residues of plant protection products that are not allowed in organic farming according to Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008. The goods in question had been certified under Regulation (EC) No 834/2007 by “Ekolojik Tarim Kontrol Organizasyonu” (ETKO).

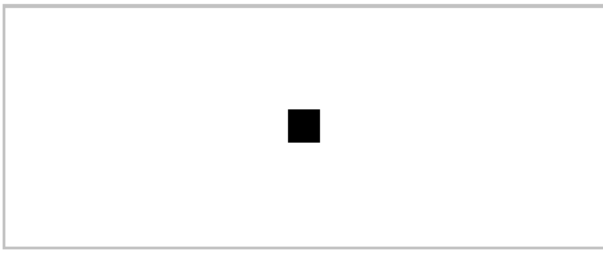
Following information received by the Commission from ETKO and an on-the-spot examination of its activities by its accreditation body, serious deficiencies in the checks carried out and a substantial number of non-conformities were documented, which all together indicated a systematic malfunctioning of the control measures applied. It also appeared that ETKO was unable to take adequate corrective measures in respect of the deficiencies reported and in response to the serious infringements observed.

Consequently, ETKO has been withdrawn from Annex IV in accordance with points (d), (e) and (f) of the first subparagraph of Article 12(2) of Regulation (EC) No 1235/2008.

Best regards,

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





**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO accred renewal documents for your review  
**Date:** Thursday, May 12, 2016 9:38:54 AM  
**Attachments:** [image001.png](#)

---

Cheri,

Please review the following documents regarding ETKO's renewal of accreditation:

For your review and approval:

Letter – [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred Renewal.docx](#)

CA Report - [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA CA Report Settlement.docx](#)

Accred Terms - [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred terms.docx](#)

Reference:

SA Chronology Log – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\SA chrono log.docx](#)

Renewal Chrono Log - [P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\NoNC\2013 renewal ETKO Chrono log.docx](#)

Settlement Agreement - [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\Exec Settlement.ETKO.APL-008-16.pdf](#)

File folder (where the letter/report for approval can be found) - [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013](#)

Also, the settlement agreement language indicates NOP agrees to withdraw its Notice of Proposed Suspension of Accreditation. (b) (5)

[REDACTED]

**NOTE: This file will need to go to the Accreditation Committee for review and approval.**

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

**From:** [Lopez, JasonJ - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#); [Yang, RobertH - AMS](#); [Crail, Lars - AMS](#); [Zuck, Penelope - AMS](#); [Nally Yanessa, Shannon - AMS](#); [Ayers, JoshuaB - AMS](#)  
**Subject:** ETKO Accreditation Committee  
**Date:** Thursday, May 26, 2016 9:48:57 AM

---

I made an error. The ETKO accreditation committee is scheduled from 11:30 – 12:30

Good morning all,

The accreditation committee meeting to review ETKO's renewal is today at 11:00 am in room 0727.

If you are not able to attend the meeting in person please use the following conference number

(b) (6) and access code (b) (6) to participate.

Kind regards,

***Jason Lopez***

Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave, SW  
Room 2649- South, Stop 0268  
Washington, DC 20250-0268  
Office: (202)260-9445  
[Get USDA Organic Insider Updates!](#)



**From:** [Lopez, JasonJ - AMS](#)  
**To:** [Mann, Renee - AMS](#); [Crail, Lars - AMS](#); [Zuck, Penelope - AMS](#); [Courtney, Cheri - AMS](#); [Yang, RobertH - AMS](#); [Ayers, JoshuaB - AMS](#); [Nally, Yanessa, Shannon - AMS](#)  
**Subject:** ETKO Accreditation Committee Meeting

---

Hello All,

ETKO's accreditation renewal is ready for the accreditation committees review. Please review the documents below before the meeting.

Here are the links to the documents and files:

Renewal Letter – P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred Renewal.docx <file:///\\sitnobpfs1\Program\AIA\ACA-Active\ETKO-Turkey\Accred%20Approv\2013\ETKO%20Accred%20Renewal.docx>

CA Report - P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA CA Report Settlement.docx <file:///\\sitnobpfs1\Program\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA%20CA%20Report%20Settlement.docx>

Accred Terms - P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred terms.docx <file:///\\sitnobpfs1\Program\AIA\ACA-Active\ETKO-Turkey\Accred%20Approv\2013\ETKO%20Accred%20terms.docx>

Reference:

SA Chronology Log – P:\AIA\ACA-Active\ETKO-Turkey\Settlement\SA chrono log.docx <file:///\\sitnobpfs1\Program\AIA\ACA-Active\ETKO-Turkey\Settlement\SA%20chrono%20log.docx>

Renewal Chrono Log - P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\NoNC\2013 renewal ETKO Chrono log.docx <file:///\\sitnobpfs1\Program\AIA\ACA-Active\ETKO-Turkey\2013%20Renewal\NoNC\2013%20renewal%20ETKO%20Chrono%20log.docx>

Settlement Agreement - P:\AIA\ACA-Active\ETKO-Turkey\Settlement\Exec Settlement.ETKO.APL-008-16.pdf

<file:///\\sitnobpfs1\Program\AIA\ACA-Active\ETKO-Turkey\Settlement\Exec%20Settlement.ETKO.APL-008-16.pdf>

File folder (where the letter/report for approval can be found) - P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013 <file:///\\sitnobpfs1\Program\AIA\ACA-Active\ETKO-Turkey\Accred%20Approv\2013>

Thank you

**From:** [Lopez, JasonJ - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#); [Yang, RobertH - AMS](#); [Crail, Lars - AMS](#); [Zuck, Penelope - AMS](#); [Nally Yanessa, Shannon - AMS](#); [Ayers, JoshuaB - AMS](#)  
**Subject:** ETKO Accreditation Committee  
**Date:** Thursday, May 26, 2016 9:02:02 AM

---

Good morning all,

The accreditation committee meeting to review ETKO's renewal is today at 11:00 am in room 0727. If you are not able to attend the meeting in person please use the following conference number (b) (6) and access code (b) (6) to participate.

Kind regards,

***Jason Lopez***

Accreditation Manager  
USDA National Organic Program  
1400 Independence Ave, SW  
Room 2649- South, Stop 0268  
Washington, DC 20250-0268  
Office: (202)260-9445  
[Get USDA Organic Insider Updates!](#)

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Mann, Renee - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO and OIA Proposed Suspensions  
**Date:** Friday, February 19, 2016 12:55:23 PM  
**Attachments:** [image001.png](#)

---

Hi Renee,

It was brought to my attention that (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ?

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
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**From:** [Claypool, Rebecca E - AMS](#)  
**To:** [Mann, Renee - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO annual report documents for your review  
**Date:** Wednesday, January 25, 2017 10:49:28 AM

---

Renee:

Please review the following documents regarding ETKO's annual report:

For your approval:

Letter – [P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2017\No Ann Rept ETKO 012517.docx](#)

Report – [P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2017\NOP-2024-AnnualReportChecklist.2016\\_RC.pdf](#)

Thanks,  
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:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Yang, RobertH - AMS](#)  
**Subject:** ETKO annual report noncompliance documents for your review  
**Date:** Friday, June 03, 2016 9:22:47 AM  
**Attachments:** [image001.png](#)

---

Cheri:

Please review the following documents regarding ETKO's noncompliance as a result of the 2016 annual report review:

For your approval:

Letter – <P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016\ETKO AR NoNC.docx>

Reference:

Certificate template – <P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016\GP 13 F 03 NOP certificate.Rev05.doc>

Sample certificate issued - <P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\Corr Action\TR-BIO-109-2190-2015-r1.NOP.pdf>

Chronology Log - <P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016\AR chrono log.docx>

File folder (where the letter/report for approval can be found) - <P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016>

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
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**From:** [Kuhn, Meg - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Mann, Renee - AMS](#); [Yang, RobertH - AMS](#)  
**Subject:** ETKO appeal - settlement executed  
**Date:** Wednesday, April 13, 2016 4:41:12 PM

---

Dear Cheri,

The settlement agreement that resolved the appeal between NOP and ETKO has been executed. In the settlement, the NOP agreed to withdraw the Notice of Proposed Suspension and also accepted the corrective and preventive actions ETKO has submitted to address the May 15, 2015 Notice of Noncompliance. This is a reminder to AIA to follow up on those actions, and any other accreditation actions that may need to occur in order to resolve the 2013 Renewal process.

If you have any questions, please do not hesitate to reach out to me or Jenny.

Thanks,

Meg

## **Meg Kuhn**

Appeals Specialist  
Office of the Deputy Administrator  
National Organic Program  
U.S. Department of Agriculture  
Room 2649-So. (Stop 0268)  
1400 Independence Ave SW  
Washington, DC 20250-0268  
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[meg.kuhn@ams.usda.gov](mailto:meg.kuhn@ams.usda.gov)  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

*Organic Integrity from Farm to Table, Consumers Trust the Organic Label*

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Please consider sustainability before printing this e-mail or attachments

**From:** [Kuhn, Meg - AMS](#)  
**To:** [Tucker, Jennifer - AMS](#); [Courtney, Cheri - AMS](#)  
**Cc:** [Michael, Matthew - AMS](#)  
**Subject:** ETKO Appeal  
**Date:** Tuesday, January 12, 2016 1:40:26 PM

---

Hi all,

FYI - I just got off the phone with Richard Siegel, a DC lawyer who ETKO retained to file its appeal of NOP's December 18, 2015 Notice of Proposed Suspension of Accreditation. The appeal should be submitted by Friday, Jan 15 or Mon, Jan 18 at the latest, via registered email.

Thanks,  
Meg

## **Meg Kuhn**

Appeals Specialist  
Office of the Deputy Administrator  
National Organic Program  
U.S. Department of Agriculture  
Room 2649-So. (Stop 0268)  
1400 Independence Ave SW  
Washington, DC 20250-0268  
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Direct: 202.205.9644  
Cell: (b) (6)  
[meg.kuhn@ams.usda.gov](mailto:meg.kuhn@ams.usda.gov)  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

*Organic Integrity from Farm to Table, Consumers Trust the Organic Label*

*Stay connected with the NOP Organic Insider! [Register here.](#)*



Please consider sustainability before printing this e-mail or attachments

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [Mann, Renee - AMS](#); [Courtney, Cheri - AMS](#)  
**Subject:** ETKO audit  
**Date:** Tuesday, April 26, 2016 3:26:56 PM  
**Attachments:** [image001.png](#)

---

Hi Lars,

As part of a settlement agreement with ETKO, NOP will need to conduct an on-site audit within 12 months of the settlement agreement signing, which is dated April 6, 2016. This audit will focus on verifying implementation of the corrective and preventive action that ETKO submitted in response to the NOP's May 13, 2015 Notice of Noncompliance and will be at ETKO's expense. Could you please add this to the audit schedule to take place before April 6, 2017?

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
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[Join the NOP mailing list](#)

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Yang, RobertH - AMS](#)  
**Subject:** ETKO CA Report documents for your review  
**Date:** Wednesday, June 15, 2016 11:14:08 AM  
**Attachments:** [image001.png](#)

---

Cheri:

Please review the following documents regarding ETKO's Corrective Actions – Accepted according to the Settlement Agreement:

For your approval:

Letter – <P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA ETKO CA letter.docx>

Report – <P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA ETKO CA Report Settlement.docx>

Reference:

Chronology Log - <P:\AIA\ACA-Active\ETKO-Turkey\Settlement\SA chrono log.docx>

File folder (where the letter/report for approval can be found) - <P:\AIA\ACA-Active\ETKO-Turkey\Settlement>

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

**From:** [Davis, Graham - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO CA Report  
**Date:** Thursday, December 22, 2016 1:35:59 PM  
**Attachments:** [image001.jpg](#)

---

Cheri- ETKO added the statement “The certificate should be updated at least annually” which I am assuming came from [Section 3.4 of NOP 2603](#). My question is (b) (5)

[REDACTED]

[REDACTED] y?

Thanks.

*Graham*

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell: (b) (6)**



[Join the NOP mailing list](#)



**From:** [Howley, JannaB - AMS](#)  
**To:** [Zuck, Penelope - AMS](#)  
**Subject:** ETKO CAs  
**Date:** Monday, August 24, 2015 3:03:26 PM

---

Penny:

I have a meeting with Miles tomorrow morning to discuss a plan to review ETKO, ETKO's operations, and their organic products. Has ETKO provided you, to date, adequate corrective actions to the noncompliances they received during their recent audit? I am sure the question will be asked tomorrow.

Thanks!

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

**From:** [Howley, JannaB - AMS](#)  
**To:** [Schmale, Valerie - AMS](#)  
**Subject:** ETKO Certificate  
**Date:** Monday, July 13, 2015 2:09:58 PM  
**Attachments:** [TR-OT-004-I-2314-2011-NOP.pdf](#)

---

Here you go.

**Janna Howley**

Accreditation Manager | USDA National Organic Program

Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268

202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

# CERTIFICATE



Certificate for production, processing and marketing  
of organic products.

No: **TR-OT-004-I-2314-2011.NOP**

Issued to

**Fine Food Gıda San. Ve Tic. İhr. İth. A.Ş.**  
Yenişehir – Bursa Yolu 28. km. Yenice Kasabası İnegöl - BURSA  
**TURKEY**

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. It covers the processing units, products and agricultural units as mentioned in the following annexes.

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.

## Production

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

**Organic and IC fresh fruit and Vegetables**

**Processing (IQF), Packing, Storing, Marketing and Export of Fruits**

**100-95% organic (&205.301b)**

**NONE**

Operator is entitled to use indications referring to organic production methods according to the **NOP Regulation**. Only the original certificate is valid, copies have to be marked as such. This present certificate is not lot-related transaction certificate and does not guarantee any product characteristics. Certification can be surrendered, suspended or revoked in case of deviations of the NOP Final Rule occurs. Certification is not valid after revocation and must be returned to ETKO after cancellation of the certification.

Validity: Certification is good until surrendered, suspended or revoked

Place and date of issue : IZMIR, December 05, 2011  
Effective date of certification : January 28, 2010  
Next renewal date : December 04, 2012

Authorized Name  
**Dr. Mustafa AKYÜZ**



(b) (6)

**ETKO**  
EKOLOJİK TARIM KONTROL ORG. LTD. ŞTİ.  
160 Sk. No: 13/7 35040 Bornova-İZMİR  
Tel: 0.232. 339 76 06 Fax: 339 76 07  
Bornova V.D. 381 023 6931

EKOLOJİK TARIM  
**etko**  
KONTROL ORGANİZASYONU

ETKO Ekolojik Tarım Kontrol Organizasyonu Ltd. Şti.  
160 Sokak No:13/7 (35040) Bornova / İZMİR  
Tel: +90.232.339 76 06  
Fax: +90.232.339 76 07  
e-mail: info@etko.org Page 1/2



## Annex to certificate number TR-OT-004-I-2314 - 2011.NOP

This certificate relates to the following process (es), production unit(s) and products which meet the criteria of NOP: **205.404**

### Processing units:

Unit nr	Unit	Process	Address
2314D-01	Fine Food A.Ş.	Üretim, şoklama (IQF), paketlenme, depolama, pazarlama ve ihracat	Marmaracık Köyü Yenişehir - BURSA

### Agricultural units:

Unit nr	Unit	Total area, crops and farmers	Status
2314F-01	Marmaracık Köyü Yenişehir -BURSA	(b) (4) ha, Pepper Capia, (b) (6) farmer	
		(b) (4) ha, Papper CW, (b) (6) farmer	Organic
		(b) (4) ha, Tomatoes, (b) (6) farmer	Organic
		(b) (4) ha, Onions, (b) (6) farmer	Organic
		(b) (4) ha, Peas, (b) (6) farmer	Organic
		(b) (4) ha, Broccoli, (b) (6) farmer	Organic
		(b) (4) ha, Sweet Corn, (b) (6) farmer	Organic

### Products:

Product nr	Product	Final product	Expected or realized ton total harvest (ton)	Status	Processing unit
2314P-01	Tomatoes (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-02	Green Pepper (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-03	Capia Pepper (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-04	Cherry (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-05	Onions (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-06	Peas (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-07	Tomatoes (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-08	Green Pepper (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-09	Capia Pepper (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-10	Onions (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-11	Peas (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-12	Broccoli (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-13	Corn (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-14	Sour cherry (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-15	Sour cherry (2011)	IQF	(b) (6)	Organic	2314D-01
2314P-16	Strawberry (2010)	IQF	(b) (6)	Organic	2314D-01
2314P-17	Strawberry (2011)	IQF	(b) (6)	Organic	2314D-01

### Number 2314-2011.mye and 26/08/2011 report.

During inspection of which the results are laid down in the inspection report, has been established that the mentioned agricultural unit(s) and field(s) and harvested products thereof, meet(s) the criteria of **USDA NOP Final Rule 7 CFR Part 205** including the amending regulations, and the corresponding criteria of the mentioned category (ies) in the overview on the front page of this certificate. Based on the annual inspections, which ETKO performs, this certificate is updated and kept into force. This certification is good until surrendered, suspended or revoked.

Date of issue: 05 / 12 /2011

Next renewal date: 04 / 12 /2012

Izmir/TÜRKİYE

ETKO Ltd

Authorized name: Dr. Mustafa AKYÜZ

(b) (6)



ETKO LTD. ŞTİ.  
Tel: 0.232. 339 76 06 Fax: 339 76 07  
Bornova V.D. 381 023 6931

**From:** [Howley, JannaB - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Michael, Matthew - AMS](#); [Mann, Renee - AMS](#)  
**Subject:** ETKO Certified Operations Spreadsheet  
**Date:** Tuesday, July 07, 2015 4:32:27 PM  
**Attachments:** [ETKO Operations List w Scopes.xls](#)

---

All:

Attached is the spreadsheet ETKO submitted at the beginning of the year, identifying all of their certified operations. The majority are in Turkey and Ukraine; they certify 29 grower groups (yikes!), ranging in size from 2 to 360 sub-units. Anything highlighted in yellow is a grower group. They have no US operations.

I will look up their previous NCs – cleared during their last audit – to see if I can identify commonalities between the old NCs, outstanding NCs and the new NCs. I will let everyone know what I find.

Thanks,

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.



**NOP 2024-2, 2014 Lists of Certified Operations - Located outside the U.S.**

All information must be submitted in Excel format and in English. PDF submissions will not be accepted.

Please provide the following information for all certified organic operations by close of business on January 2, 2015. Begin data entry on row 7 and use the format specified. Thank you.

**Scope**

Certifying Agent	Certification #	Status	Crops	Livestock	Handling	Wild Crops	Grower Group	Grower Group Size	Country
Etiko - Ecological Farming Controlling Organization	2009	Certified	No	No	Yes	No	Yes	231	Turkey
Etiko - Ecological Farming Controlling Organization	2014	Certified	Yes	No	Yes	Yes	Yes	15	Turkey
Etiko - Ecological Farming Controlling Organization	2044	Certified	Yes	No	No	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2058	Certified	No	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2070	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2120	Certified	Yes	No	Yes	No	Yes	360	Turkey
Etiko - Ecological Farming Controlling Organization	2158	Certified	Yes	No	Yes	Yes	No		Turkey
Etiko - Ecological Farming Controlling Organization	2190	Certified	No	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2203	Certified	Yes	No	Yes	No	Yes	129	Turkey
Etiko - Ecological Farming Controlling Organization	2314	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2328	Certified	Yes	No	Yes	No	Yes	14	Turkey
Etiko - Ecological Farming Controlling Organization	2387	Certified	No	No	Yes	Yes	No		Turkey
Etiko - Ecological Farming Controlling Organization	2391	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2453	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2475	Certified	Yes	No	Yes	No	Yes	47	Turkey
Etiko - Ecological Farming Controlling Organization	2484	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2508	Certified	No	No	Yes	No	Yes	36	Turkey
Etiko - Ecological Farming Controlling Organization	2516	Certified	Yes	No	No	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2527	Certified	No	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2534	Certified	No	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2542	Certified	Yes	No	Yes	No	Yes	21	Turkey
Etiko - Ecological Farming Controlling Organization	2573	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2629	Certified	Yes	No	Yes	No	Yes	101	Turkey
Etiko - Ecological Farming Controlling Organization	2633	Certified	Yes	No	No	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	3077	Certified	Yes	No	Yes	No	Yes	2	Kazakhstan
Etiko - Ecological Farming Controlling Organization	3180	Certified	Yes	No	Yes	No	Yes	4	Kazakhstan
Etiko - Ecological Farming Controlling Organization	3138	Surrendered							Korea, Republic of (South Korea)
Etiko - Ecological Farming Controlling Organization	3142	Certified	Yes	No	Yes	No	No		Korea, Republic of (South Korea)
Etiko - Ecological Farming Controlling Organization	3149	Certified	Yes	No	Yes	No	No		Korea, Republic of (South Korea)
Etiko - Ecological Farming Controlling Organization	3026	Certified	No	No	Yes	Yes	Yes	15	Russia
Etiko - Ecological Farming Controlling Organization	2650	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2654	Certified	Yes	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	2669	Certified	No	No	Yes	No	No		Turkey
Etiko - Ecological Farming Controlling Organization	3114	Certified	Yes	No	Yes	No	Yes	19	Turkey
Etiko - Ecological Farming Controlling Organization	3121	Certified	Yes	No	Yes	No	Yes	17	Turkey
Etiko - Ecological Farming Controlling Organization	3126	Certified	Yes	No	Yes	No	Yes	2	Turkey
Etiko - Ecological Farming Controlling Organization	3127	Certified	Yes	No	Yes	No	Yes	5	Turkey
Etiko - Ecological Farming Controlling Organization	3128	Certified	Yes	No	Yes	No	Yes	5	Turkey
Etiko - Ecological Farming Controlling Organization	3076	Certified	Yes	No	Yes	No	Yes	5	Ukraine
Etiko - Ecological Farming Controlling Organization	3087	Certified	Yes	No	Yes	No	Yes	11	Ukraine
Etiko - Ecological Farming Controlling Organization	3090	Certified	Yes	No	Yes	No	Yes	9	Ukraine
Etiko - Ecological Farming Controlling Organization	3092	Certified	Yes	No	Yes	No	Yes	8	Ukraine
Etiko - Ecological Farming Controlling Organization	3093	Certified	Yes	No	Yes	No	Yes	12	Ukraine
Etiko - Ecological Farming Controlling Organization	3094	Certified	Yes	No	Yes	No	Yes	4	Ukraine
Etiko - Ecological Farming Controlling Organization	3132	Surrendered							Ukraine
Etiko - Ecological Farming Controlling Organization	3141	Certified	No	No	Yes	No	No		Ukraine
Etiko - Ecological Farming Controlling Organization	3170	Certified	Yes	No	Yes	No	Yes	6	Ukraine
Etiko - Ecological Farming Controlling Organization	3172	Certified	Yes	No	Yes	No	Yes	4	Ukraine
Etiko - Ecological Farming Controlling Organization	3193	Certified	No	No	Yes	No	No		Ukraine
Etiko - Ecological Farming Controlling Organization	3194	Certified	No	No	Yes	No	No		Ukraine
Etiko - Ecological Farming Controlling Organization	3195	Certified	No	No	Yes	No	No		Ukraine
Etiko - Ecological Farming Controlling Organization	3006	Certified	Yes	No	Yes	No	Yes	5	Ukraine
Etiko - Ecological Farming Controlling Organization	3013	Certified	Yes	No	Yes	No	Yes	10	Ukraine
Etiko - Ecological Farming Controlling Organization	3020	Certified	Yes	No	Yes	No	No		Ukraine
Etiko - Ecological Farming Controlling Organization	3096	Certified	No	No	Yes	No	No		Ukraine
Etiko - Ecological Farming Controlling Organization	3120	Certified	Yes	No	Yes	No	No	5	Ukraine
Etiko - Ecological Farming Controlling Organization	3140	Certified	Yes	No	Yes	No	Yes	7	Ukraine

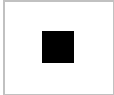
**From:** [Crail, Lars - AMS](#)  
**To:** [McEvoy, Miles - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#); [Yang, RobertH - AMS](#)  
**Subject:** ETKO Compliance Audit Options  
**Date:** Wednesday, June 15, 2016 4:46:35 PM  
**Attachments:** [image001.png](#)  
[ETKO Compliance Audit Options.docx](#)

---

Miles,

Attached is a memo for your review and consideration regarding a proposal to conduct the ETKO onsite compliance audit. I will be in the office on Thursday and Friday if you would like to discuss it in person.

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



**From:** [Crail, Lars - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO Compliance Audit  
**Date:** Wednesday, June 15, 2016 10:22:38 AM  
**Attachments:** [image001.png](#)

---

Cheri,

My email does work; however, I am not able to retrieve messages stored on my archive folder. I'm still unable to access the USDA NOP server.

Miles just declined my meeting with him on Tuesday. I'm wondering whether you spoke to him? I'm currently putting some discussion points together to share with him regarding compliance audit options. Has he already made a decision?

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



**From:** [Davis, Graham - AMS](#)  
**To:** [Mann, Renee - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO corrective actions documents for your review  
**Date:** Thursday, December 22, 2016 10:34:09 AM  
**Attachments:** [image003.jpg](#)

---

Renee/Cheri:

Please review the following documents regarding ETKO's corrective actions:

For your approval:

Letter – <P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\CA\NP6279LCA ETKO NoNC Res 122216.docx>

Report – <P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\CA\NP6279LCA CA Report ETKO 122116.docx>

Reference:

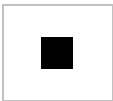
Chronology Log - <P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\CA\Chrono Log ETKO.docx>

File folder (where the letter/report for approval can be found) - <P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\CA>

Thanks,

*Graham*

**Graham Davis**  
**Accreditation Manager**  
**USDA | NATIONAL ORGANIC PROGRAM**  
**1400 Independence Ave SW | 2649-S | Washington DC 20250**  
**Desk: 202-692-0047 | Cell: (b) (6)**



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**From:** [Howley, JannaB - AMS](#)  
**To:** [Zuck, Penelope - AMS](#)  
**Subject:** ETKO Corrective Actions in WTL  
**Date:** Thursday, June 18, 2015 10:18:10 AM

---

Penny:

I am doing the monthly audit-WTL reconciliation for Renee Mann, and I went ahead and added the ETKO Corrective Action Report to the WTL, assigned to you, because I saw in the file that you'd received the CAs and were working on them. So you don't need to add it in...

Just wanted to give you an FYI in case you went to add it in, saw it already there, and thought you might be losing your mind.

Janna

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.



**From:** [Mann, Renee - AMS](#)  
**To:** [Howley, JannaB - AMS](#); [Zuck, Penelope - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO follow-up  
**Date:** Tuesday, August 25, 2015 11:58:50 AM

---

Hi all –

Here is my understanding of the follow-up items from our meeting with Miles today.

1. AIA will determine if we can do compliance audit in Fall. QAD auditor? Penny – can you please follow-up with Lars?
2. RGK – get full EU audit from Manuel.
3. Janna – get full Canada audit from Valeriya.
4. Penny – get additional Corrective actions. Ask ETKO to respond to nonconformances identified by EU/COO.

Thanks,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

**From:** [Howley, JannaB - AMS](#)  
**To:** [Mann, Renee - AMS](#)  
**Subject:** ETKO NC Matrix  
**Date:** Thursday, June 25, 2015 12:46:37 PM

---

Renee:

Here is a [link to the matrix](#) I've developed to categorize the NCs they received from the US, Canada and EU. RGK is following up with the EU today to have them send their NCs on to me.

Thanks,

**Janna Howley**

Accreditation Manager | USDA National Organic Program

Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268

202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

**From:** [Howley, JannaB - AMS](#)  
**To:** [Mann, Renee - AMS](#); [Michael, Matthew - AMS](#); [Courtney, Cheri - AMS](#)  
**Subject:** ETKO NC Meeting

---

ETKO has recently had its accreditation suspended by both the Canadian and European Union organic programs. (b) (5) [REDACTED]  
[REDACTED] This meeting is to discuss potential next steps in this process.

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Yang, RobertH - AMS](#)  
**Subject:** ETKO Noncompliance - Annual Report  
**Date:** Wednesday, June 15, 2016 10:05:51 AM  
**Attachments:** [image001.png](#)

---

Cheri,

Please review the following documents regarding ETKO's noncompliance as a result of the 2016 annual report review. I revised the format of the noncompliance to match the Noncompliance Report format as instructed:

For your approval:

Letter – [P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016\ETKO AR NoNC.docx](#)

Reference:

Certificate template – [P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016\GP 13 F 03 NOP certificate.Rev05.doc](#)

Sample certificate issued - [P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\Corr Action\TR-BIO-109-2190-2015-r1.NOP.pdf](#)

Chronology Log - [P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016\AR chrono log.docx](#)

File folder (where the letter/report for approval can be found) - [P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016](#)

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO NoPS  
**Date:** Wednesday, December 16, 2015 8:17:27 AM  
**Attachments:** [image001.png](#)

---

Hi Cheri,

Here is a very rough draft of the ETKO Notice of Proposed Suspension with some comments within:  
[P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\NoPS\ETKO NoPS 12 15 15.docx](#)

Also, I drafted the Settlement Agreement and cover letter:

Agreement – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\ETKO Settlement.docx](#)

Letter - [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\Settlement agreement cover letter.docx](#)

Let me know what you think.

Thanks,

Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**

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☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)

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**From:** [McEvoy, Miles - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Crail, Lars - AMS](#); [McEvoy, Miles - AMS](#)  
**Subject:** Etko note  
**Date:** Friday, March 20, 2015 7:58:21 AM

---

We need to discuss about Ukraine sunflower issue.

Miles V McEvoy  
Deputy Administrator  
USDA National Organic Program

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Yang, RobertH - AMS](#)  
**Subject:** ETKO Notice of Resolution for your review  
**Date:** Thursday, July 07, 2016 8:47:04 AM  
**Attachments:** [image001.png](#)

---

Cheri:

Please review the following documents regarding ETKO's notice of resolution for noncompliance AIA6155PZ issued from the result of the annual report review:

For your approval:

Letter – <P:\AIA\ACA-Active\ETKO-Turkey\Compliance\2016\ETKO AR NoRes.docx>

Reference:

Chronology Log - <P:\AIA\ACA-Active\ETKO-Turkey\Ann Repts\2016\AR chrono log.docx>

File folder (where the letter/report for approval can be found) - <P:\AIA\ACA-Active\ETKO-Turkey\Compliance\2016>

Thanks,  
Penny



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**From:** [Mann, Renee - AMS](#)  
**To:** [Zuck, Penelope - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO proposed suspension and settlement  
**Date:** Friday, December 11, 2015 10:49:21 AM

---

Hi Penny,

Miles would like the ETKO proposed suspension and settlement to be a priority when you return from your audit. He would like to get it out next week. I assume this will push some other things aside, so let's talk about it when you get back to the office. Also, I'm not sure if (b) (5)

[REDACTED] we can at least do our best to get a draft to Miles.

Thanks,  
RM

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

**From:** [Lusby, MaryLou - AMS](#)  
**To:** [Crail, Lars - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#)  
**Subject:** ETKO report posed to the 01 Report folder on the NOP P drive  
**Date:** Tuesday, February 24, 2015 2:15:22 PM

---

Lars,

I have saved the following NOP checklists in word and pdf file to the 01 Report Folder on the NOP: P drive

- NP4132LCA ETKO Izmir Turkey (checklists 2005 & 3 - 2005-4)

According to our conversation on February 4, 2015 I am sending this to you first before the Accreditation Manager who would handle this.

Also just to let you know there are several reports for Food Safety as well in the 01 Report folder.

Sincerely,

Mary Lou

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** ETKO settlement agreement CA report  
**Date:** Wednesday, June 29, 2016 10:20:59 AM  
**Attachments:** [image001.png](#)

---

Hi Cheri,

I revised the ETKO CA report to include the terms of the Settlement Agreement as requested by Miles. Can you please review the letter and the Report and if approved, I will print them and forward the folder to Miles tomorrow?:

Letter – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA ETKO CA letter.docx](#)

CA Report – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA ETKO CA Report Settlement.docx](#)

Reference:

SA – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\Exec Settlement.ETKO.APL-008-16.pdf](#)

Chrono log – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\SA chrono log.docx](#)

Thanks,

Penny



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☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
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**From:** [Howley, JannaB - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#)  
**Subject:** ETKO Suspension of Accreditation  
**Date:** Wednesday, July 01, 2015 12:27:48 PM

---

Cheri & Renee:

Here is the [ETKO matrix](#) I compiled, listing the NOP, COR and EU noncompliances identified by each organization. I also created a chrono log, and housed all of the information under a Compliance folder. At the bottom of the document is a list of the commonalities of issues that I identified in reviewing all of the NCs. I've also included the list here:

**Commonalities Identified:**

1. (b) (5) [Redacted]

Thanks,

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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**From:** [Mann, Renee - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Howley, JannaB - AMS](#)  
**Subject:** ETKO suspension  
**Date:** Monday, June 15, 2015 4:19:21 PM

---

Hi Cheri and Janna:

Miles just came into my office (I think because you're in a meeting, Cheri) to ask if we can look into ETKO. He said they were suspended by the EU (he thinks) and Canada (based on the email). I'm working on ANSI stuff right now, but I think we should talk.

Thanks,  
RM

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

**From:** [Mann, Renee - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Zuck, Penelope - AMS](#); [Howley, JannaB - AMS](#)  
**Subject:** ETKO

---

Discuss ETKO - proposed suspension

**From:** [Zuck, Penelope - AMS](#)  
**To:** [McEvoy, Miles - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#); [Mann, Renee - AMS](#)  
**Subject:** ETKO  
**Date:** Tuesday, September 08, 2015 4:33:48 PM  
**Attachments:** [image001.png](#)

---

Dear Miles,

We have discussed how to proceed with ETKO's renewal of accreditation along with the investigation into their suspensions with the EU and Canada. We would like to propose the following options:

1. (b) (5) [Redacted]  
[Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
- [Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
  - [Redacted]
- [Redacted]
  - [Redacted]

These options were based upon the high number and severity of noncompliances. Here is a brief history:

- 2007 Audit – 4 noncompliances
- 2008 Renewal Desk Audit – 6 noncompliances
- 2009 Audit – 5 of the above 10 noncompliances were cleared while the other 5 remained outstanding and **21 new** noncompliances were identified.
- 2009 Corrective Actions were accepted for all noncompliances to be verified at the next audit
- 2014 Audit – 24 noncompliances were cleared, 1 noncompliance was withdrawn, 1 noncompliance remains outstanding (see below), and **6 new** noncompliances were identified.

**Outstanding Noncompliance since 2009:**

**NP922ZZA.NC21** - 7 CFR §205.501(a)(4) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part."  
*Interviews conducted, records reviewed, and witness inspections observed, verified a general lack of*

*understanding of the NOP standards.* While personnel had sufficient experience and education in organic agricultural production and handling practices, there was insufficient understanding on the application of the NOP standards as evidenced by inadequate information in the approved organic compliance (system) plans with no issues of concern or non-compliances being identified over multiple years of certification. The primary Certification Committee (CC) member with expertise in crops was not familiar with basic requirements such as the 90/120 day rule for raw manure application, did not know where to reference in the NOP Rule to determine if an input is permitted, and did not know when commercially available seeds and planting stock could be used. Additionally, while it was stated that the Certification Committee (CC) had received training there were no training records for any of the CC members prior to 2009.

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

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

1. Label review – the label review checklist did not include USDA organic regulation label requirements to be verified.
2. Inspectors during the witness audits used incorrect regulation citations during exit interviews to identify findings.
3. OCP templates state the incorrect USDA organic regulations.
4. Inspectors are using outdated USDA organic regulations (2010).
5. Inspectors and reviewers not readily able to look up regulations.
6. ETKO personnel have an incomplete understanding of the noncompliance and adverse action notification procedures.
7. Several crop operation OCPs reviewed by the NOP auditor indicated “Not Applicable” for Crop Rotation practice standard (205.205).
8. ETKO personnel did not understand and document buffer zone requirements (205.202(c)).

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

Your thoughts?

Please let me know if you have any questions or would like any additional information.

Thank you,  
Penny



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**From:** [Tucker, Jennifer - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [McEvoy, Miles - AMS](#)  
**Cc:** [Kuhn, Meg - AMS](#)  
**Subject:** For your review: ETKO - revised summary/settlement  
**Date:** Tuesday, March 08, 2016 1:41:09 PM

---

### Internal deliberative

Miles and Cheri – Here are links to the revised ETKO summary and proposed settlement – there could be (b) (5)

[P:\Appeals\16-008 ETKO\Case Summary.ETKO.APL-008-16.docx](#)

[P:\Appeals\16-008 ETKO\Settlement.ETKO.APL-008-16.docx](#)

I have the hard copy in my office – if you are good with these documents, we will put in Miles box for review.

Nice job, Meg!

Jenny





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Dickinson, ND 58601, USA  
Tel: +1 701 483 5504 Fax: +1 701 483 5508  
E Mail: info@ioas.org  
Web: www.ioas.org

**Certification Body**  
**Ekolojik Tarim Kontrol Orgasyonu - ETKO**  
160 Sokak 13/7, 35040 Bornova, Izmir, Turkey

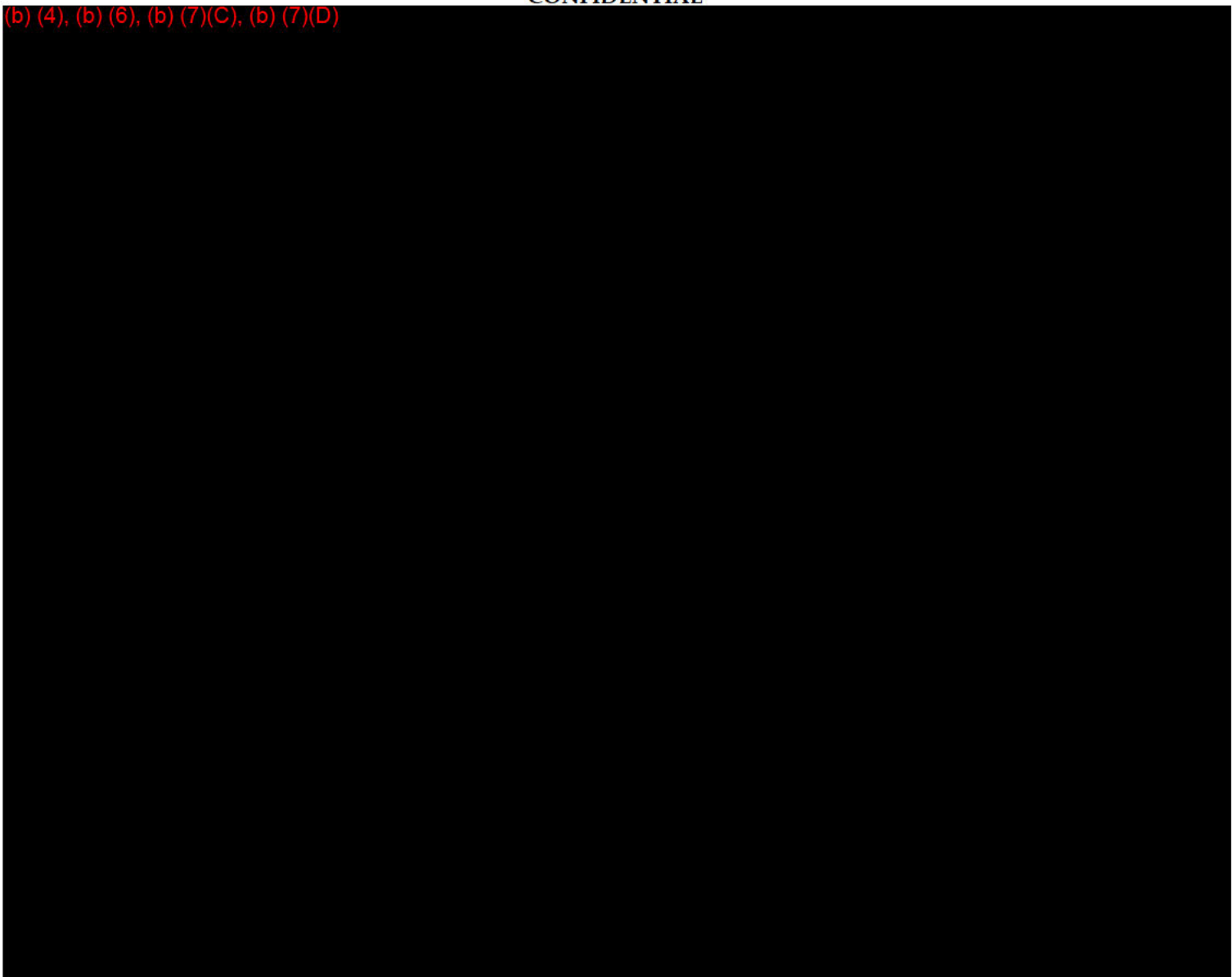
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(b) (4), (b) (6), (b) (7)(C), (b) (7)(D)



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(b) (4)



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<sup>1</sup>Any operator which contracts work to a non-certified, but inspected entity.

<sup>2</sup>Any operator which produces or handles certified product but is not certified in its own right.

<sup>3</sup>Only include groups in which less than 100% of members are inspected by you.

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(b) (4)

[Redacted content]

<sup>4</sup>Count grower groups as 1 and include all non-certified sub-licensees in the total.

<sup>5</sup> Indicate A,B,C,D,E,F according to EU categorisation or according to categorisation in the standard (crop, livestock etc)

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**IOAS desk review:** Satisfactory.

**Further review on-site:** ETKO did not communicate with IMO Switzerland when assessing the application of the previously sanctioned operator # 3184. See file review #3184 under 4.2.

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<sup>6</sup> Use categories according to your standard. Use EU codes (A-F) where appropriate.

<sup>7</sup> Use chemical name, not Brand name.

<sup>8</sup> Total inspections = the total number of inspections performed other than unannounced.

<sup>9</sup> Additional inspections = all announced inspections which are additional to the annual inspection. For SAN means verification audits.

<sup>10</sup> The number of inspections performed unannounced. For SAN this means research and non-programmed audits.

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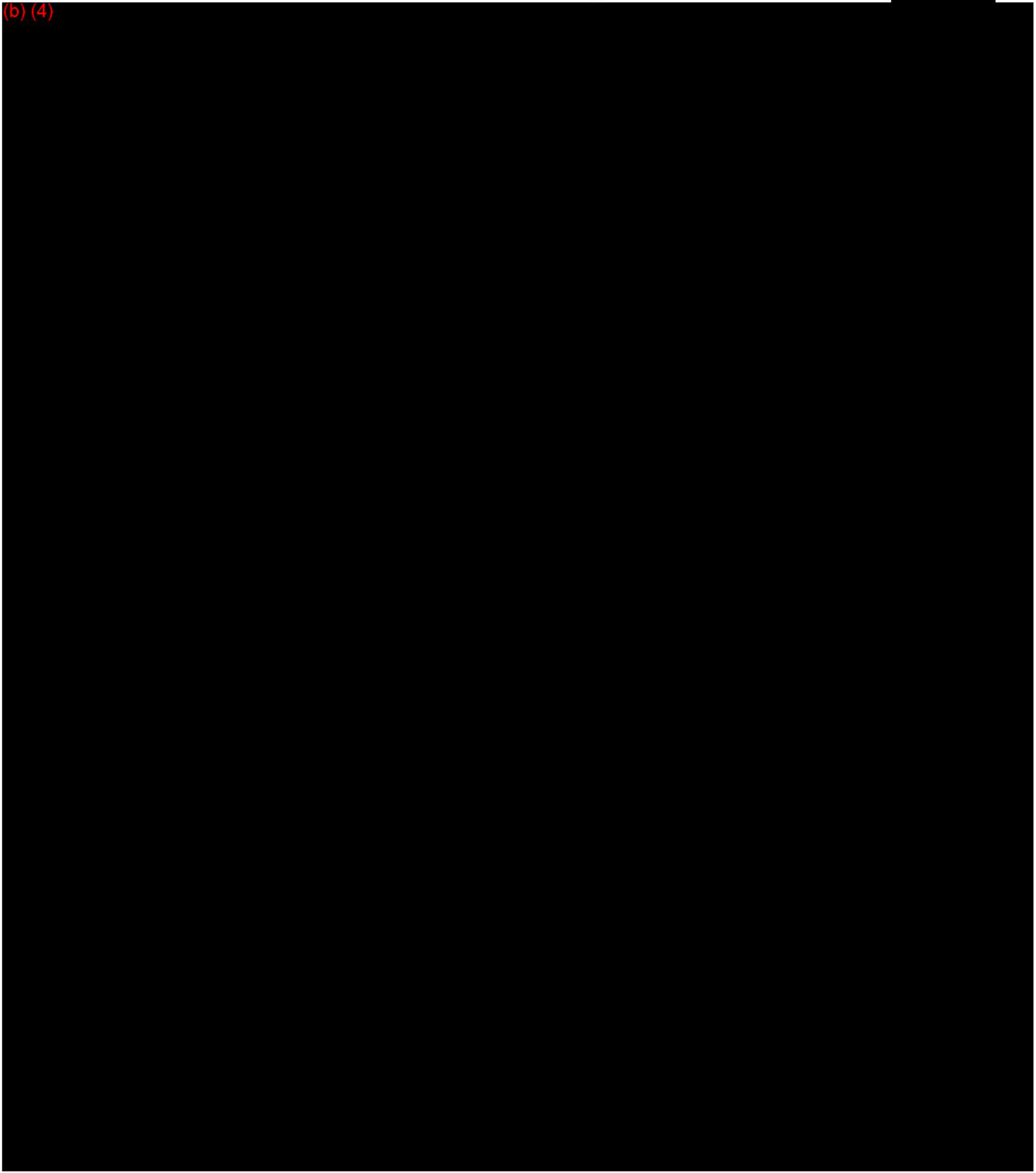
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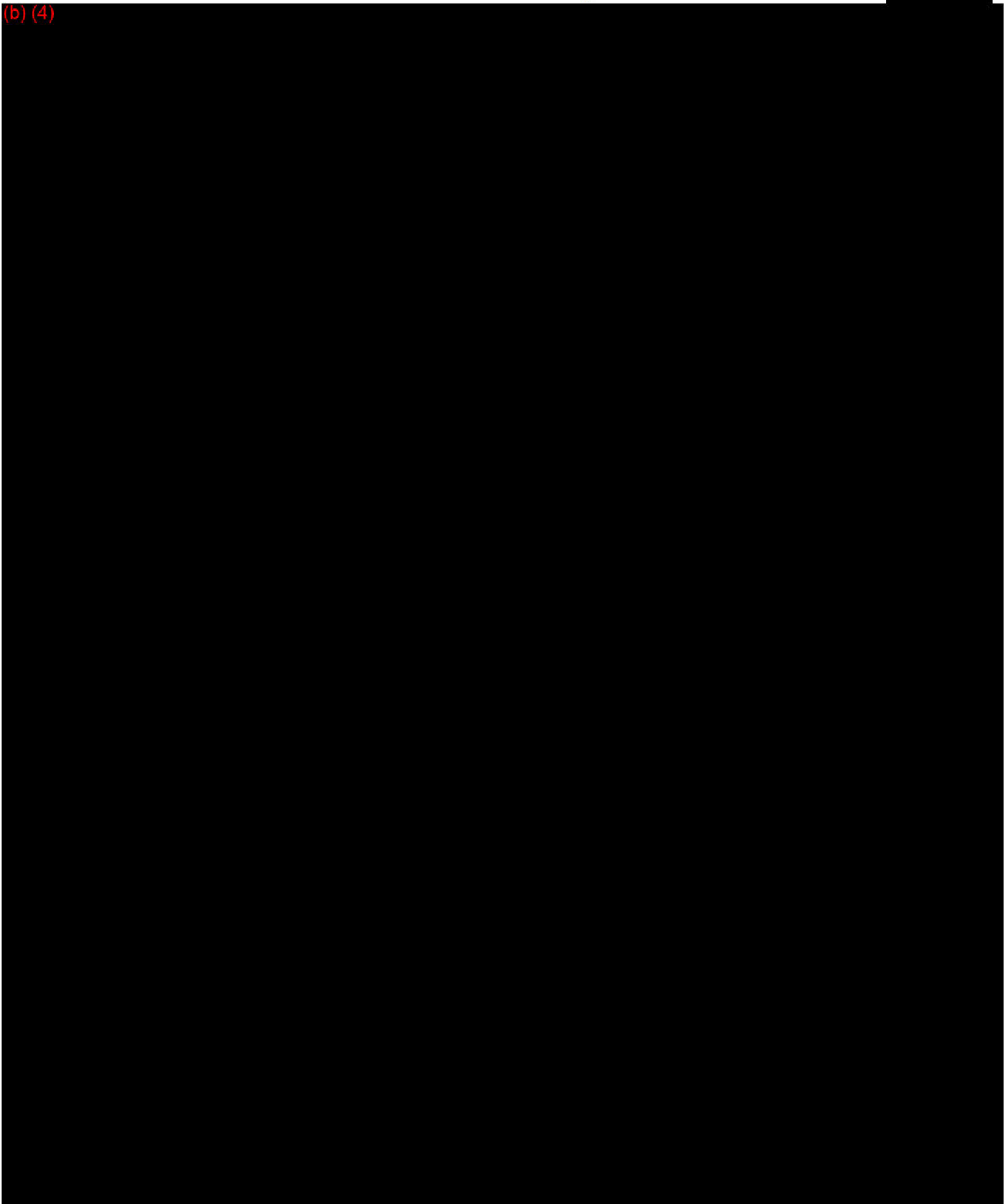
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<sup>16</sup> Data provided by SKAL (March 6, 2015). This table was updated for accuracy during the course of the on-site visit.





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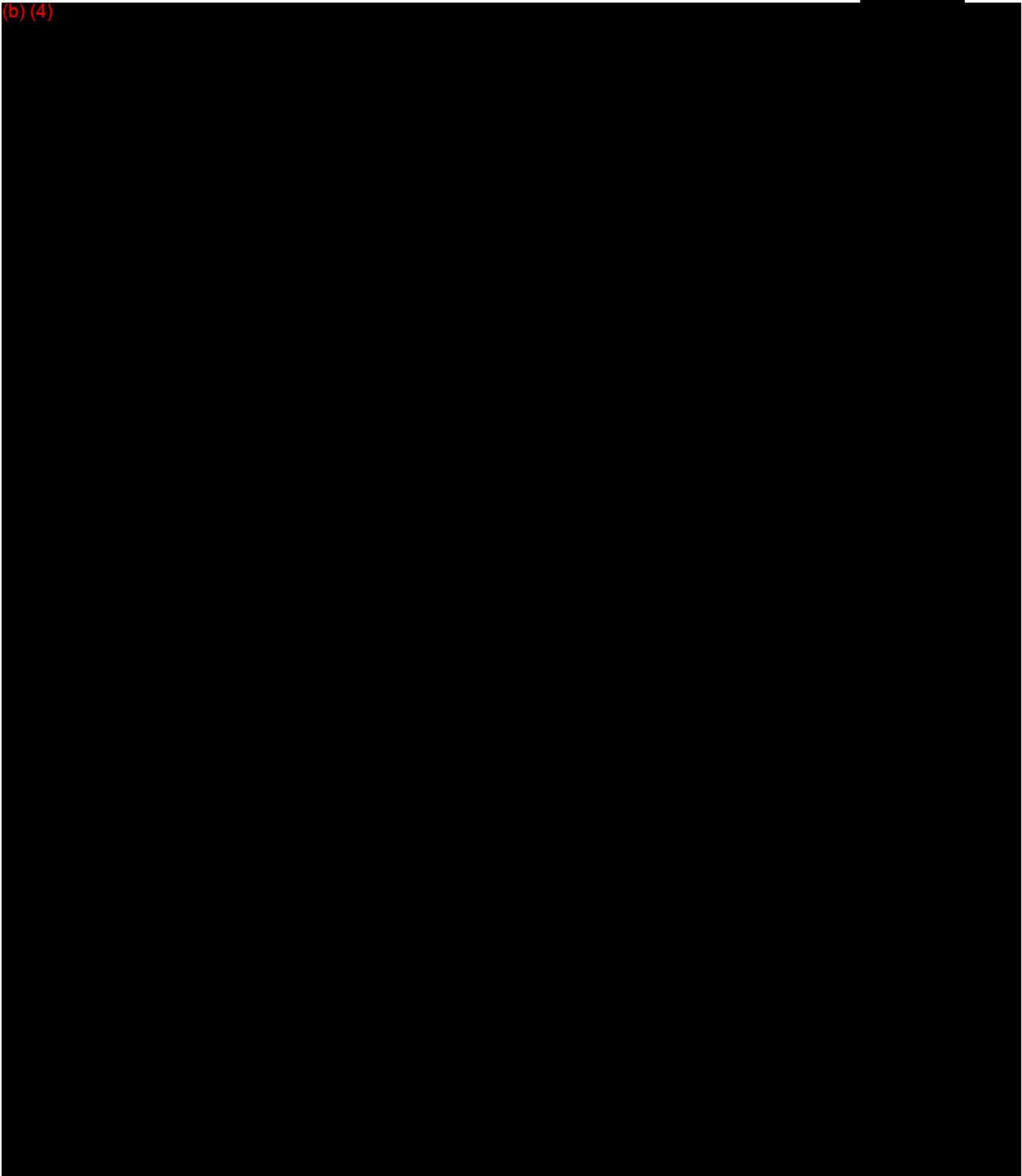
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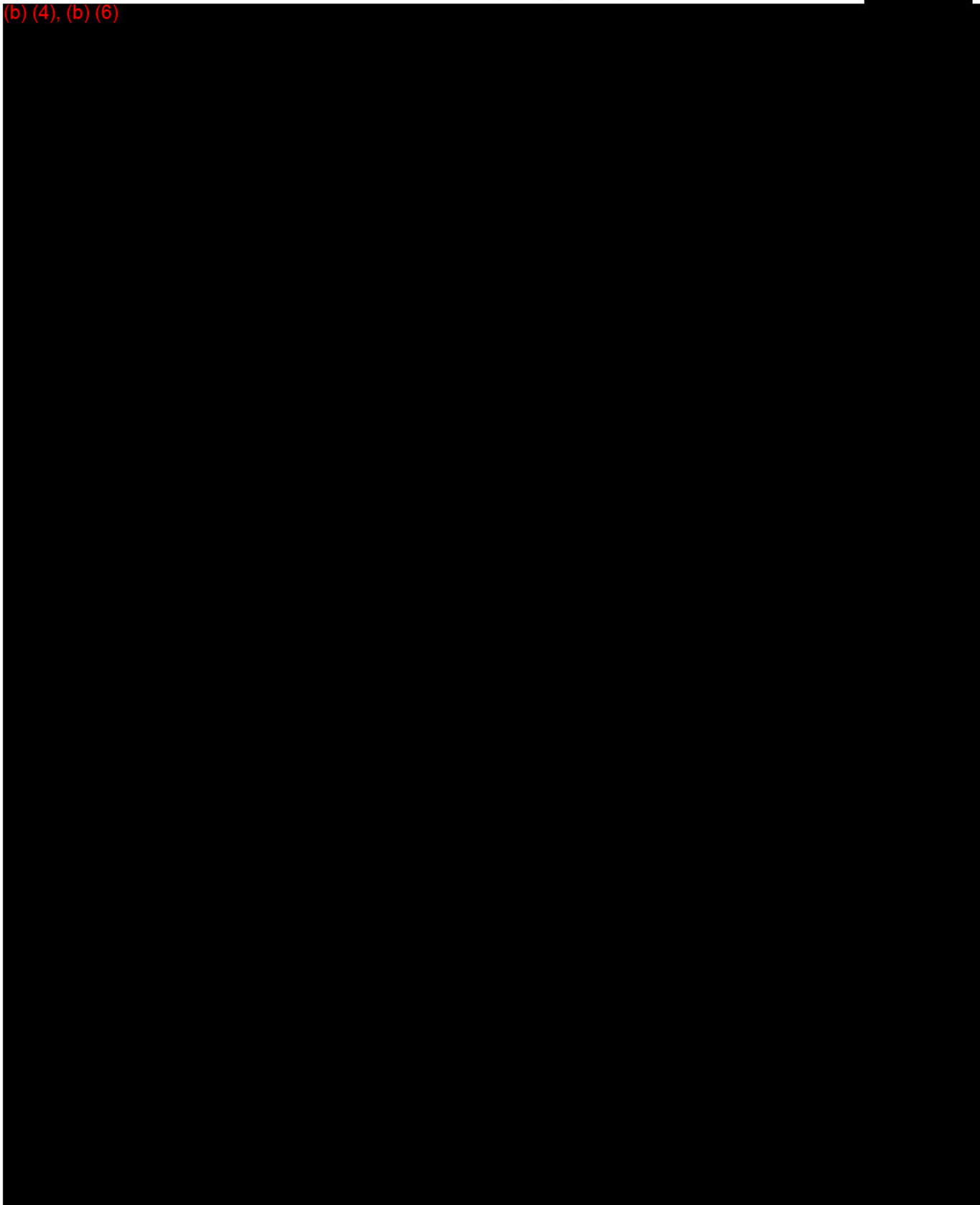
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Date: Mar 01

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(b) (4), (b) (6)

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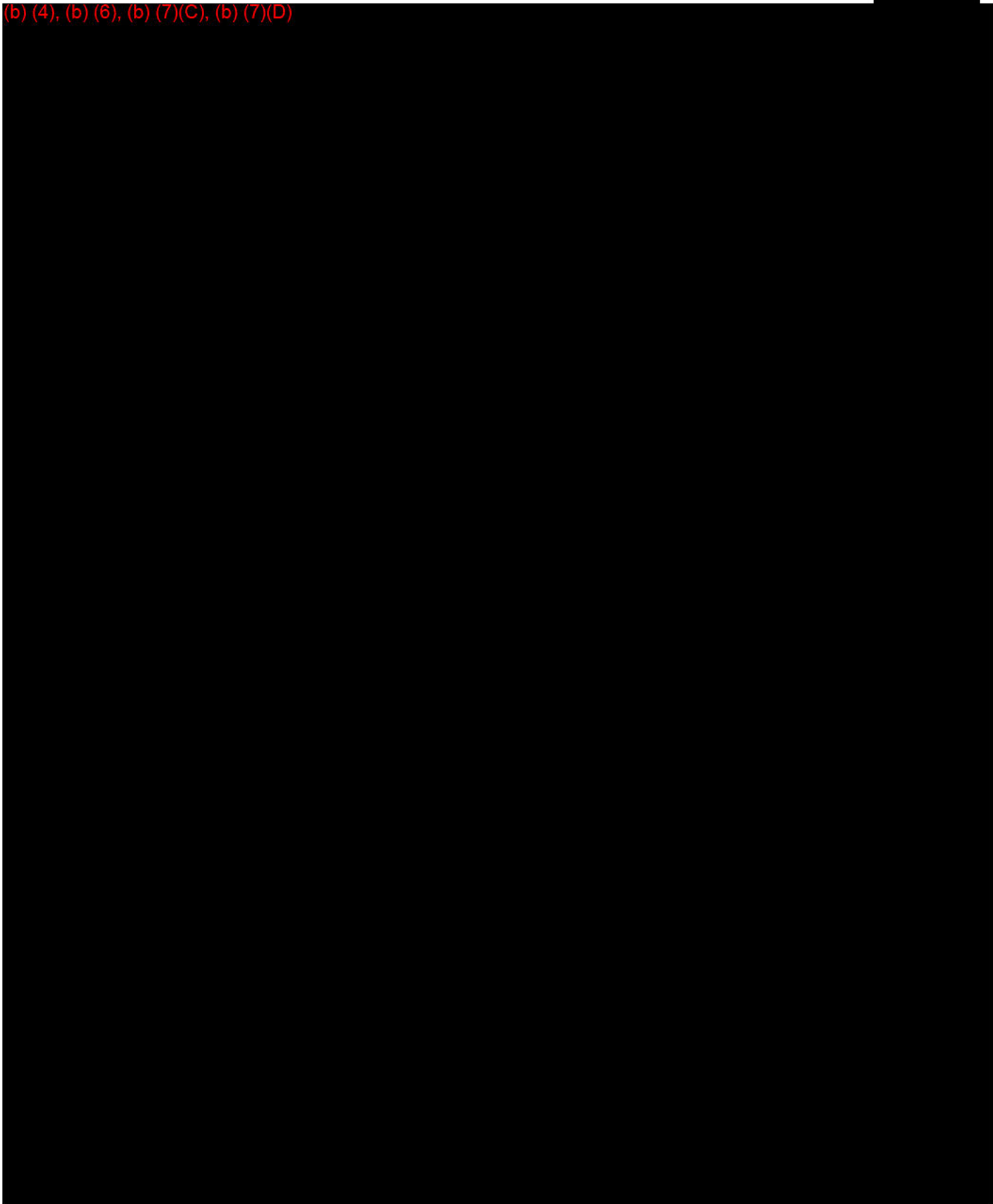
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(b) (4), (b) (6), (b) (7)(C), (b) (7)(D)



Doc # :FR0525  
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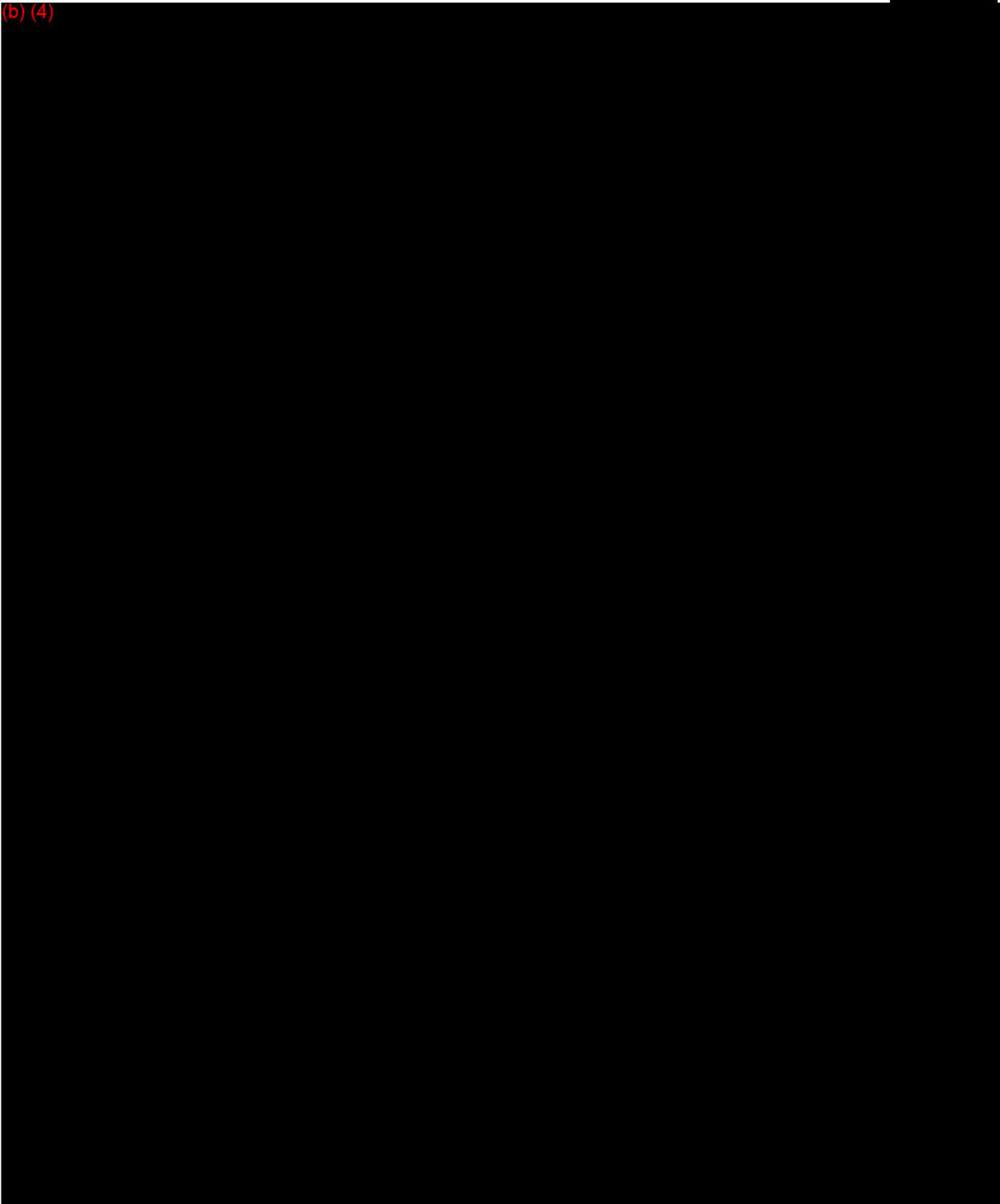
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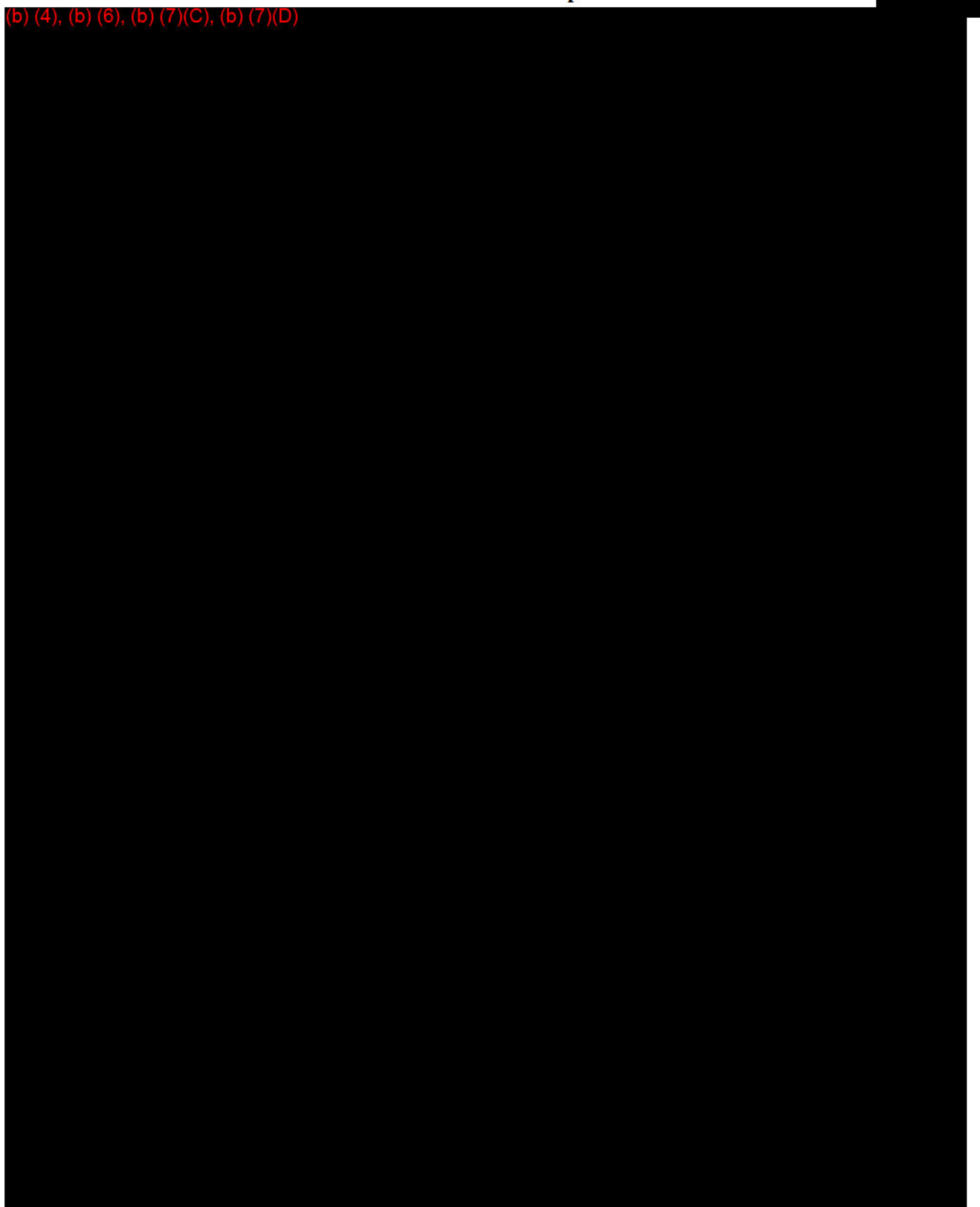
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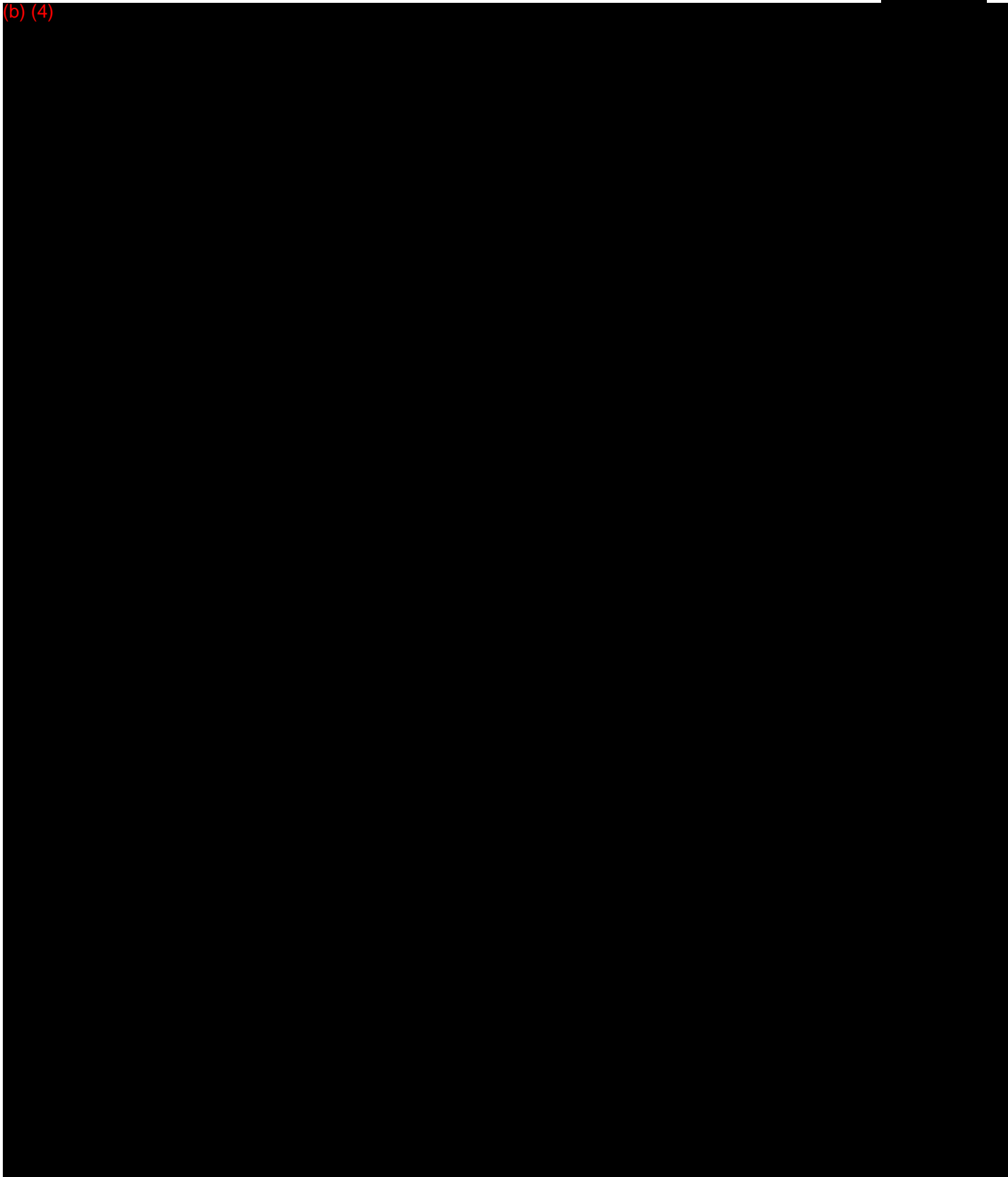
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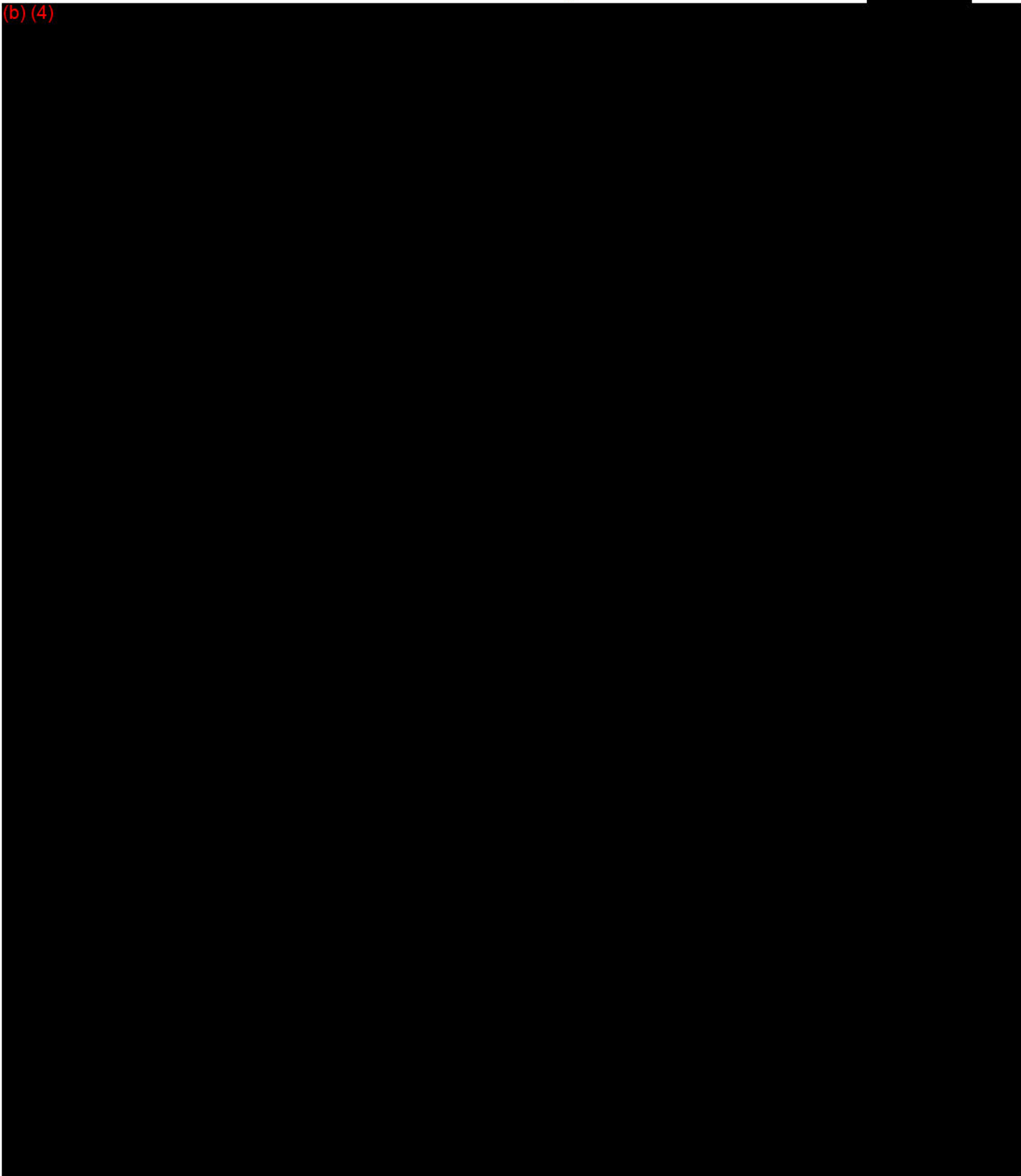
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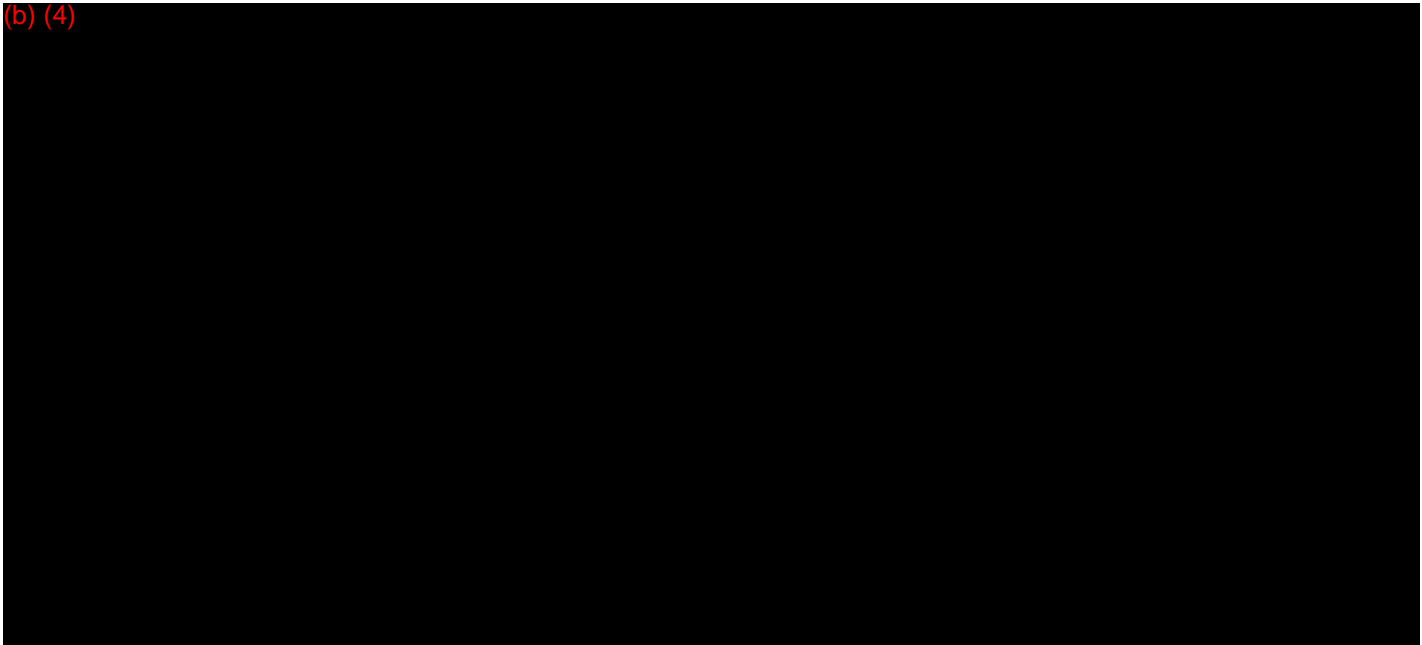
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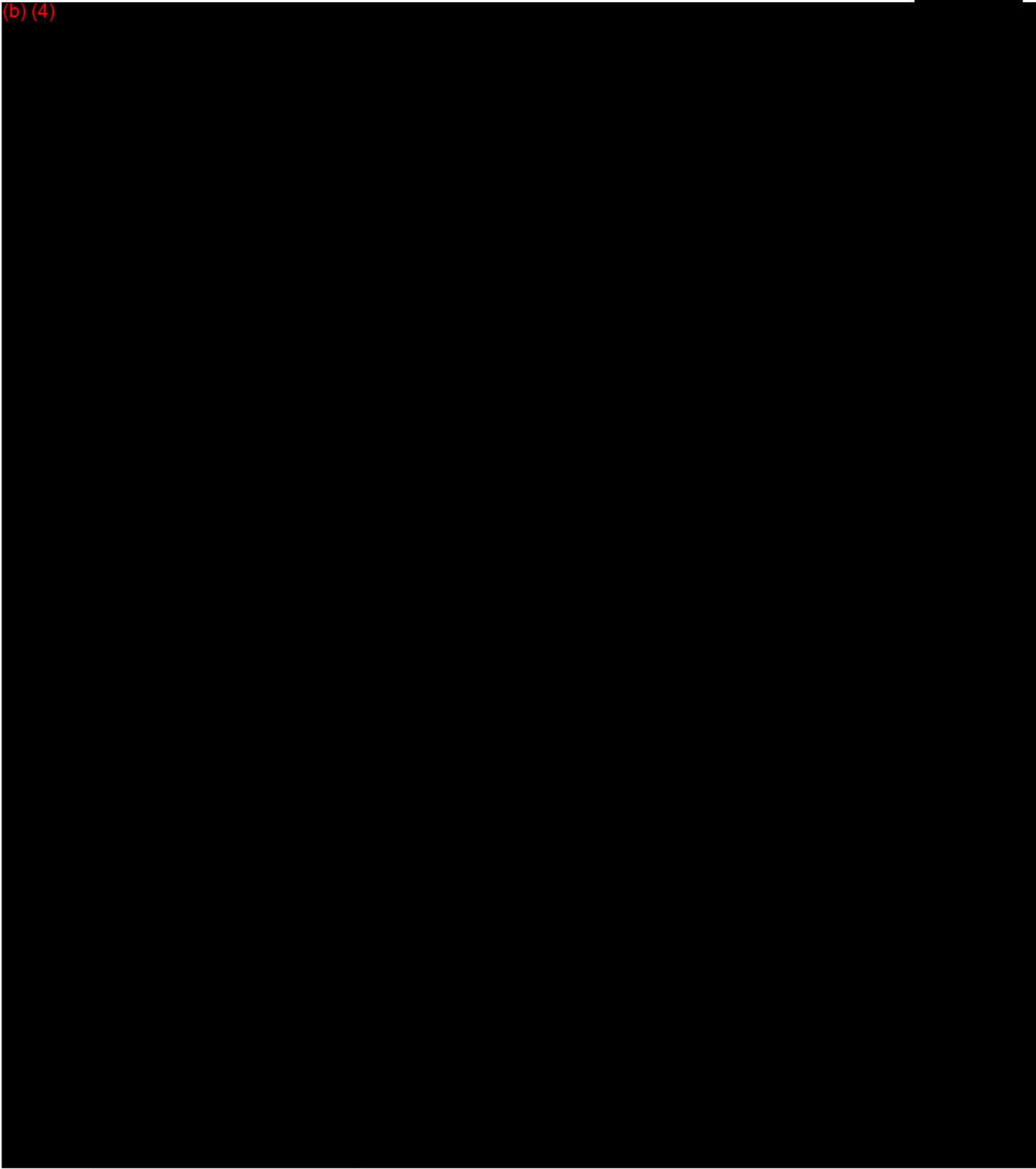
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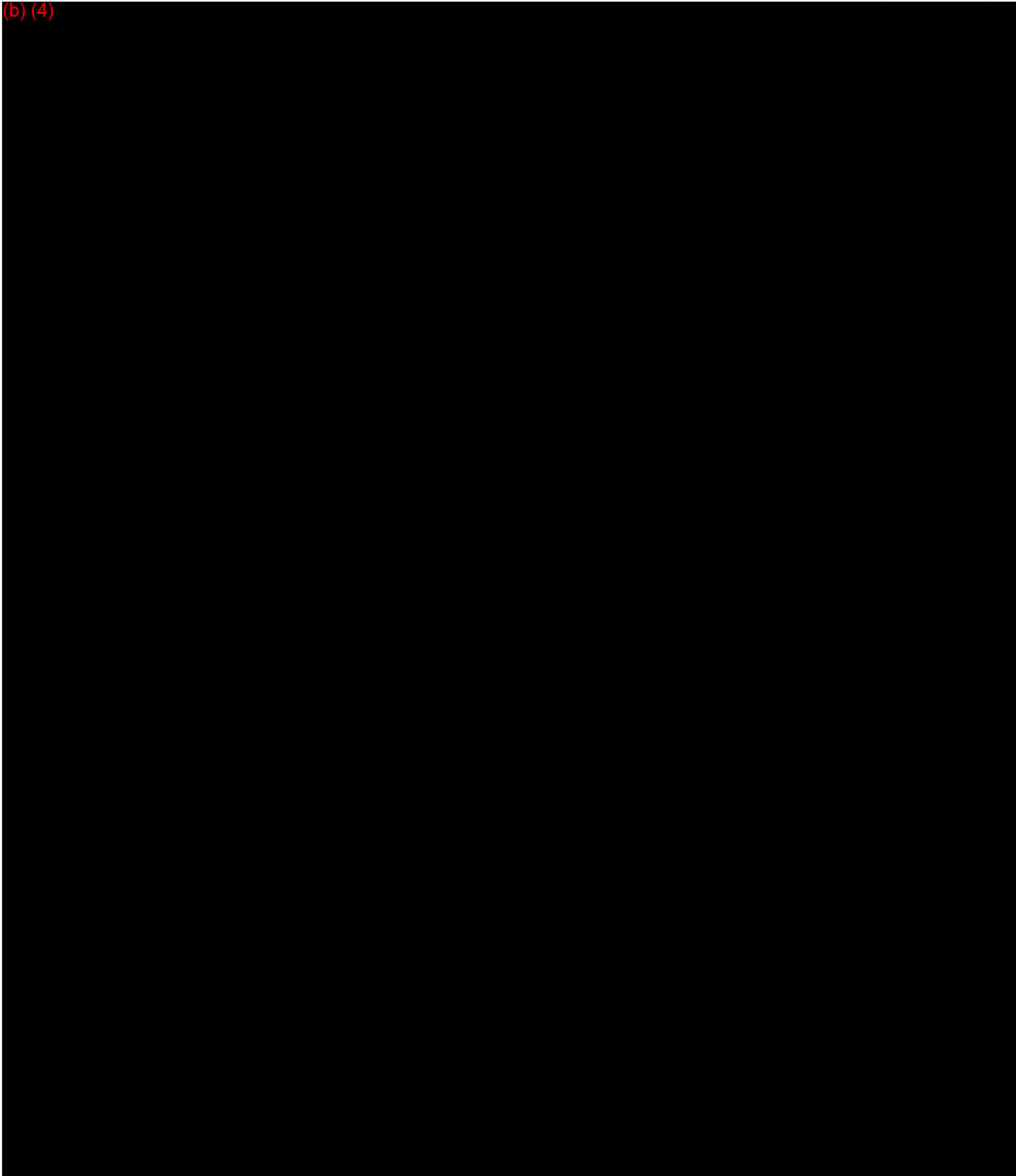
<sup>17</sup>Scheme provided by ETKO prior to the visit



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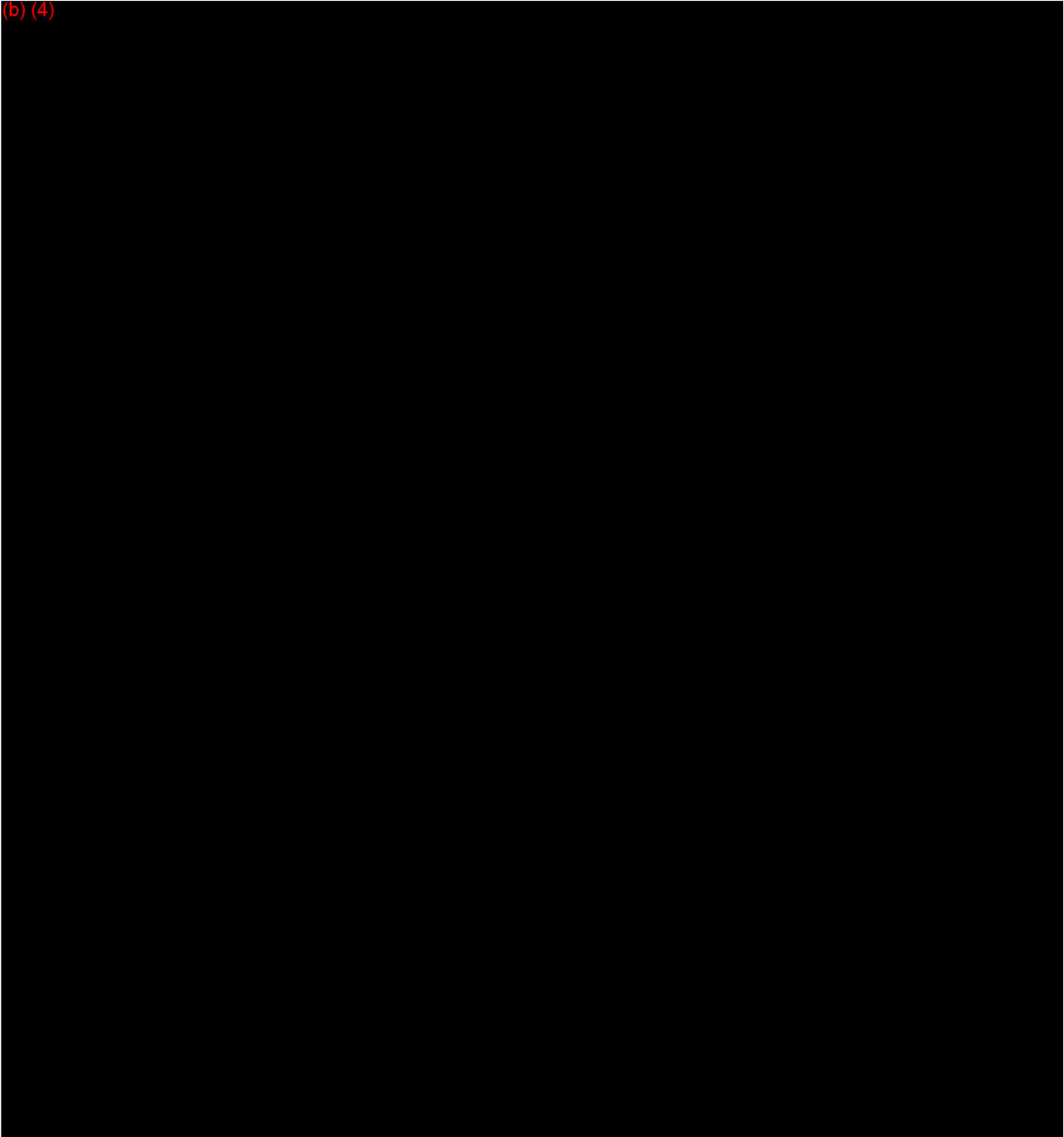
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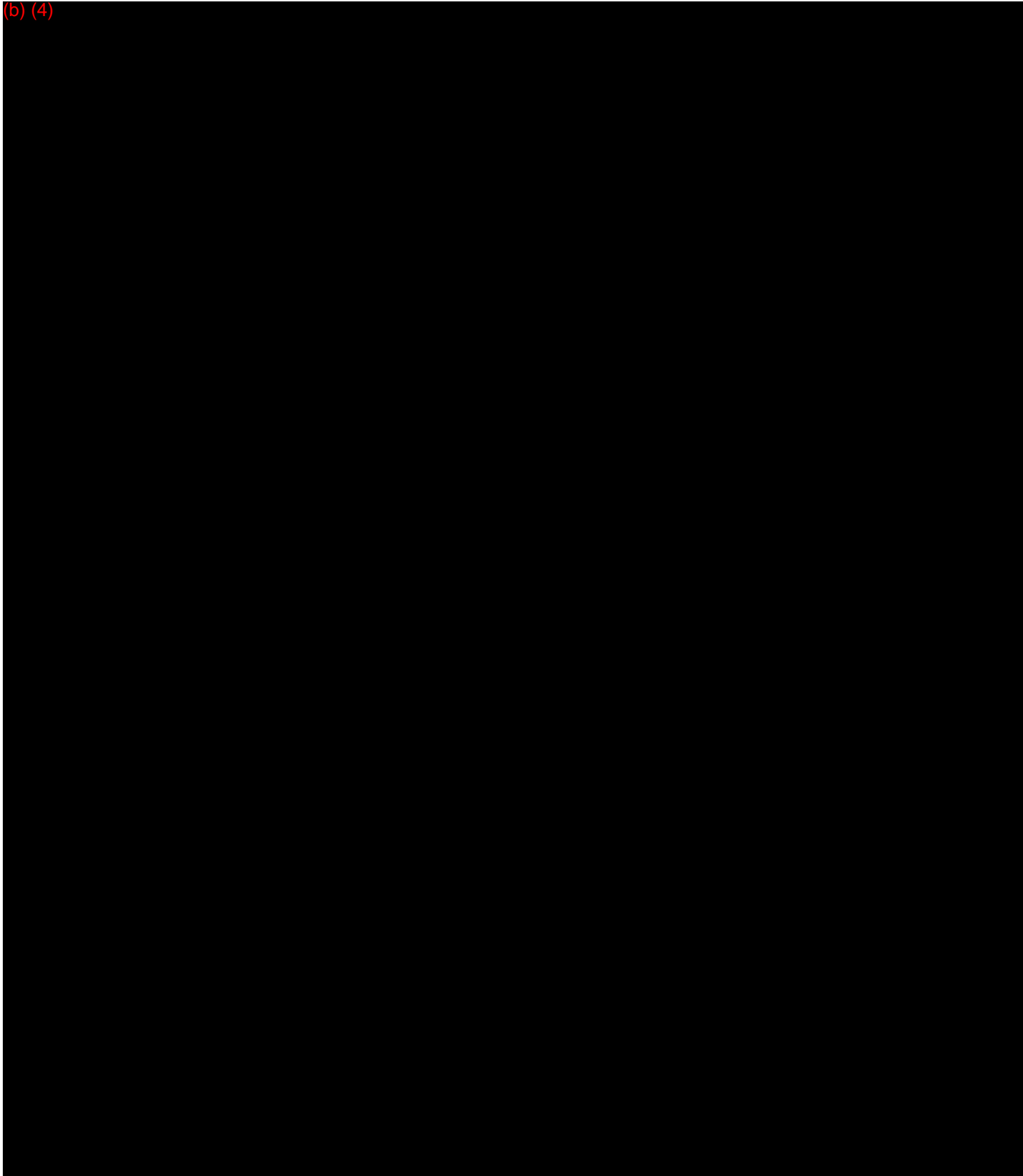
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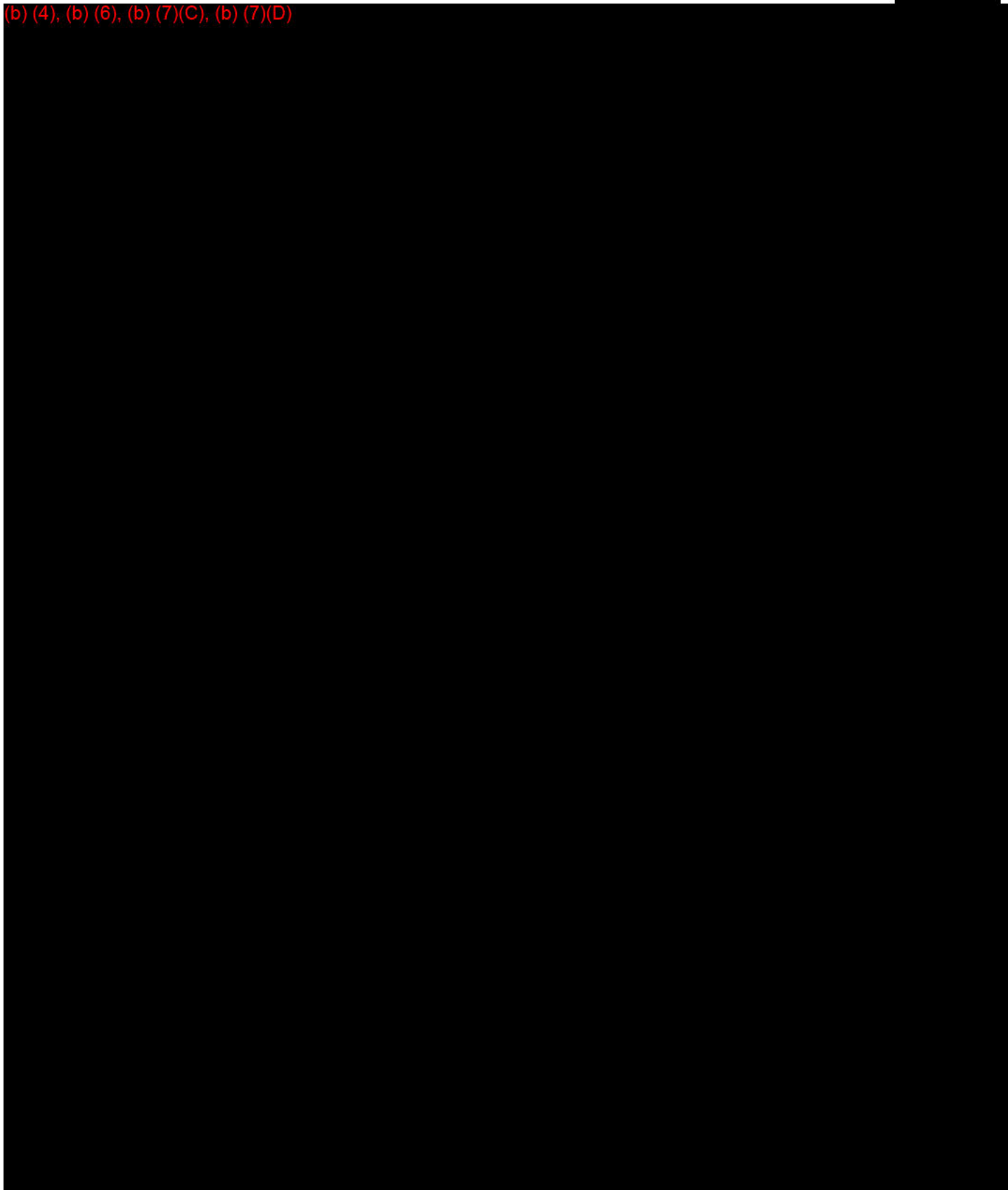
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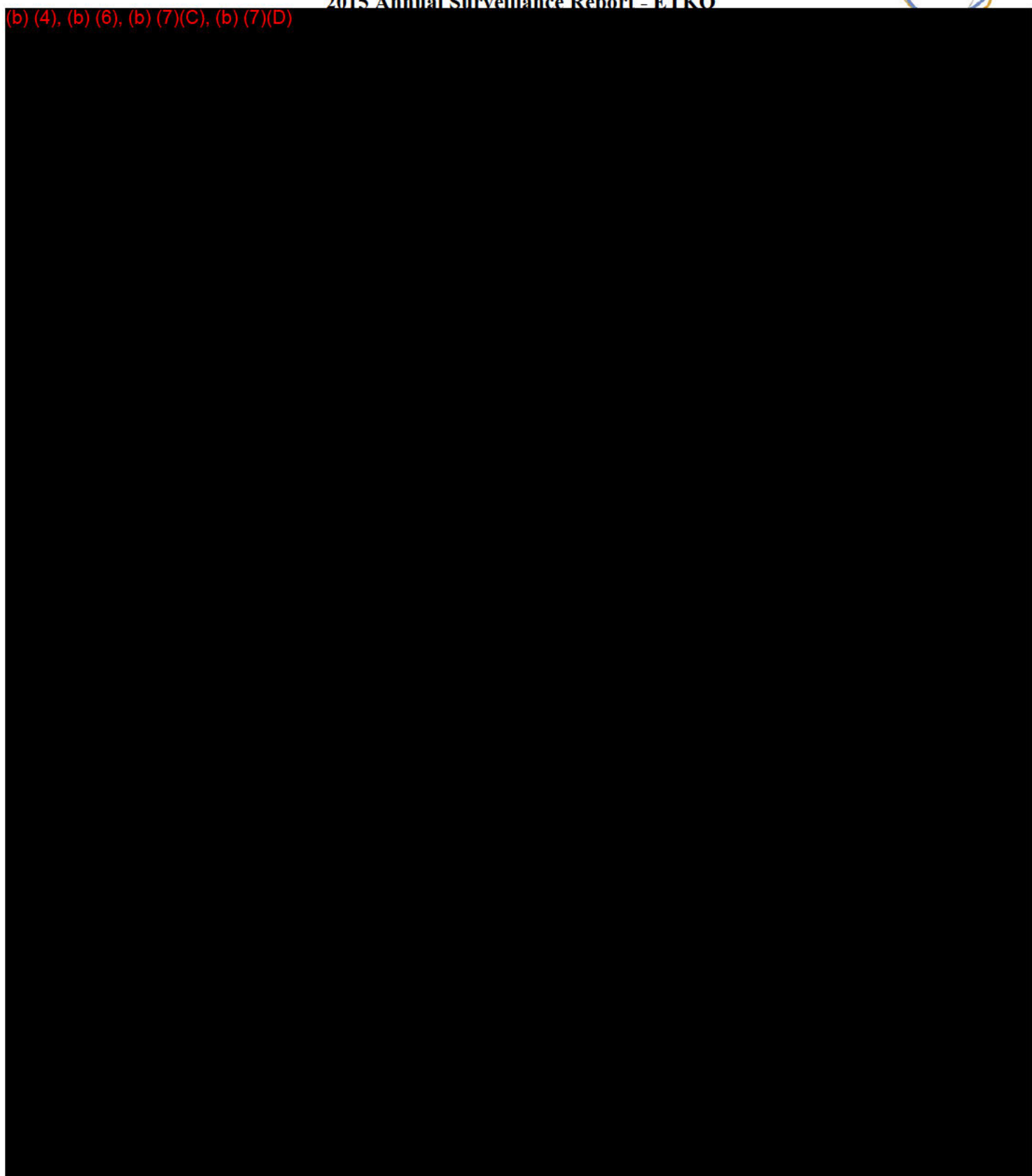
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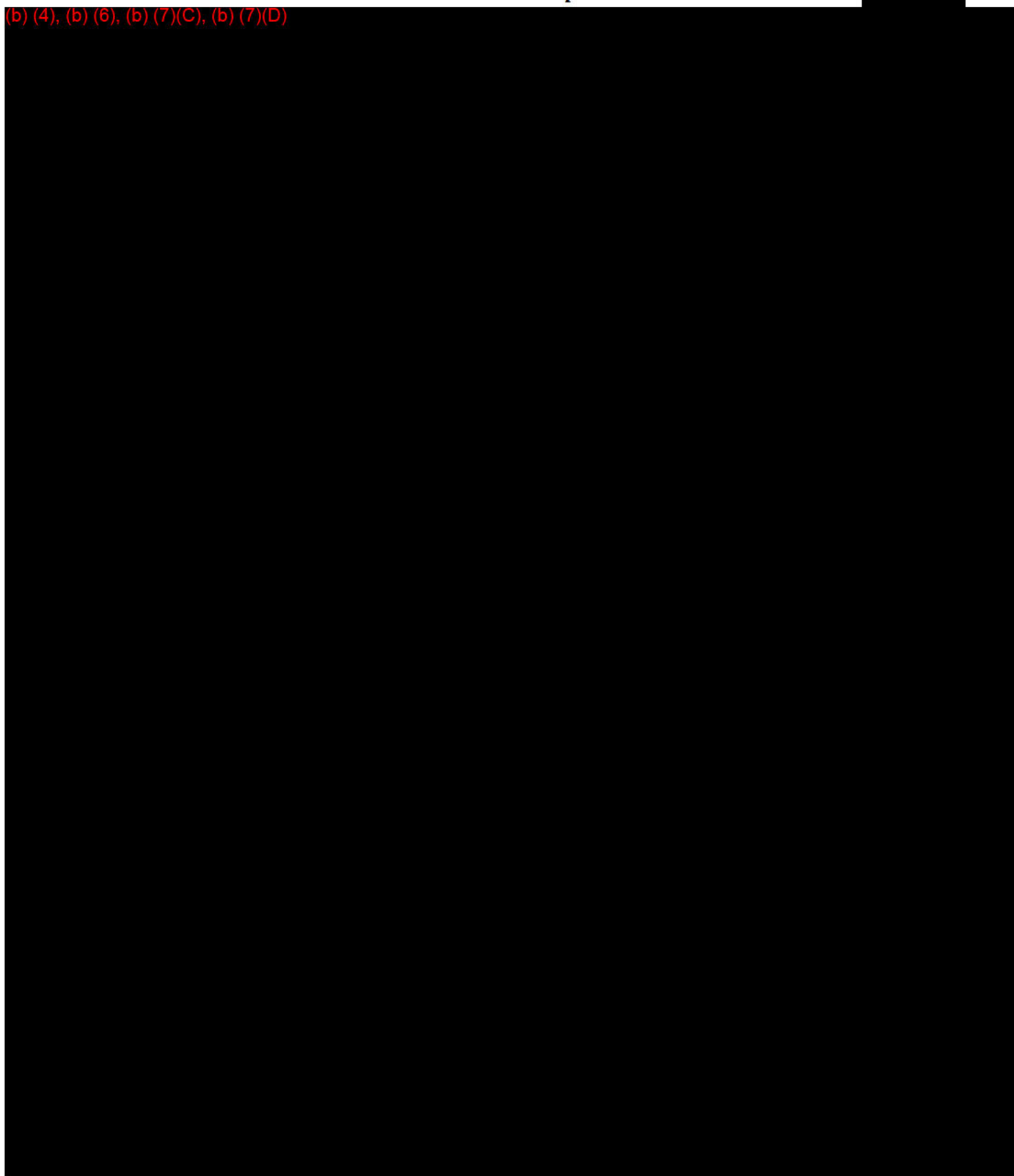
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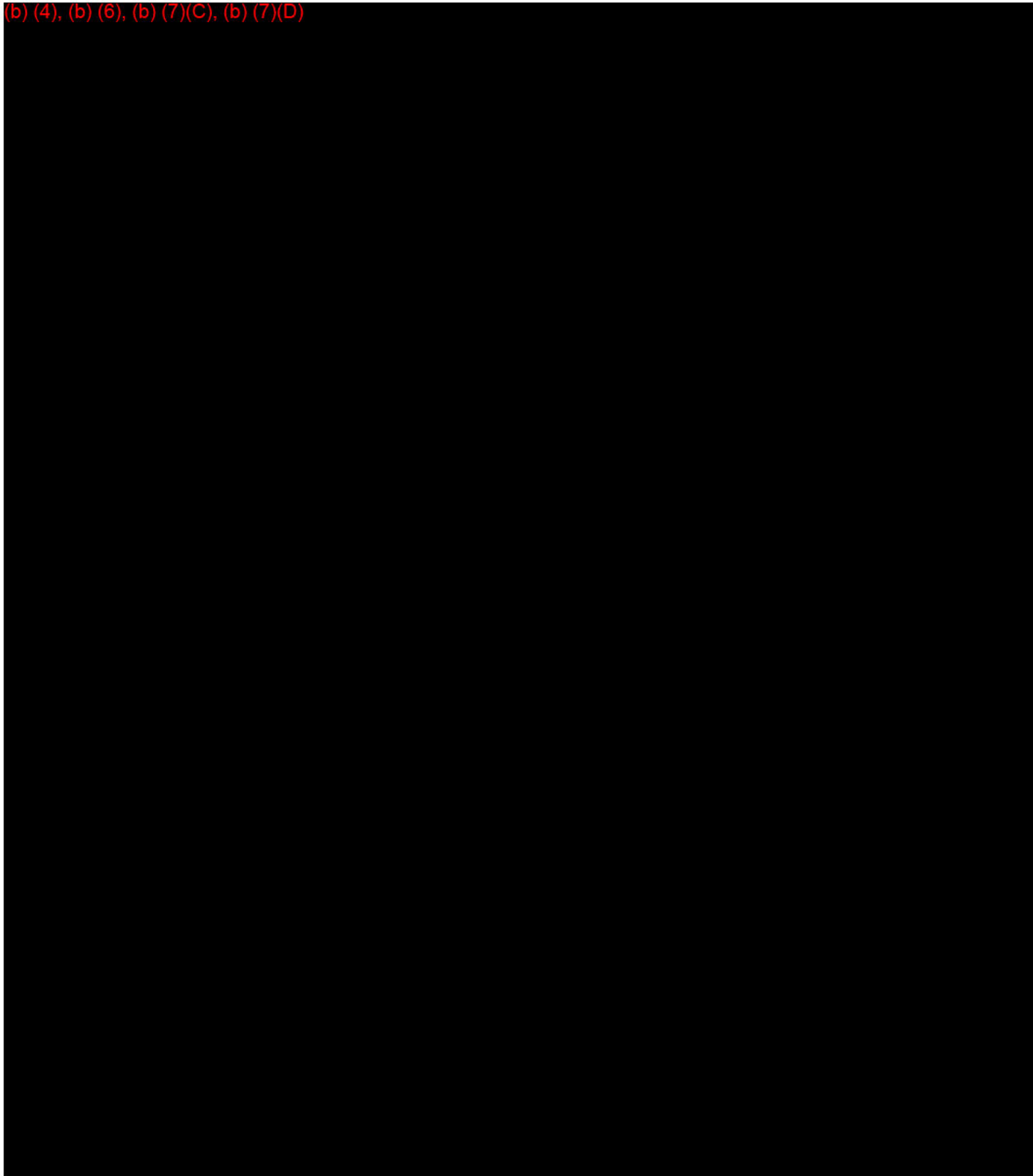
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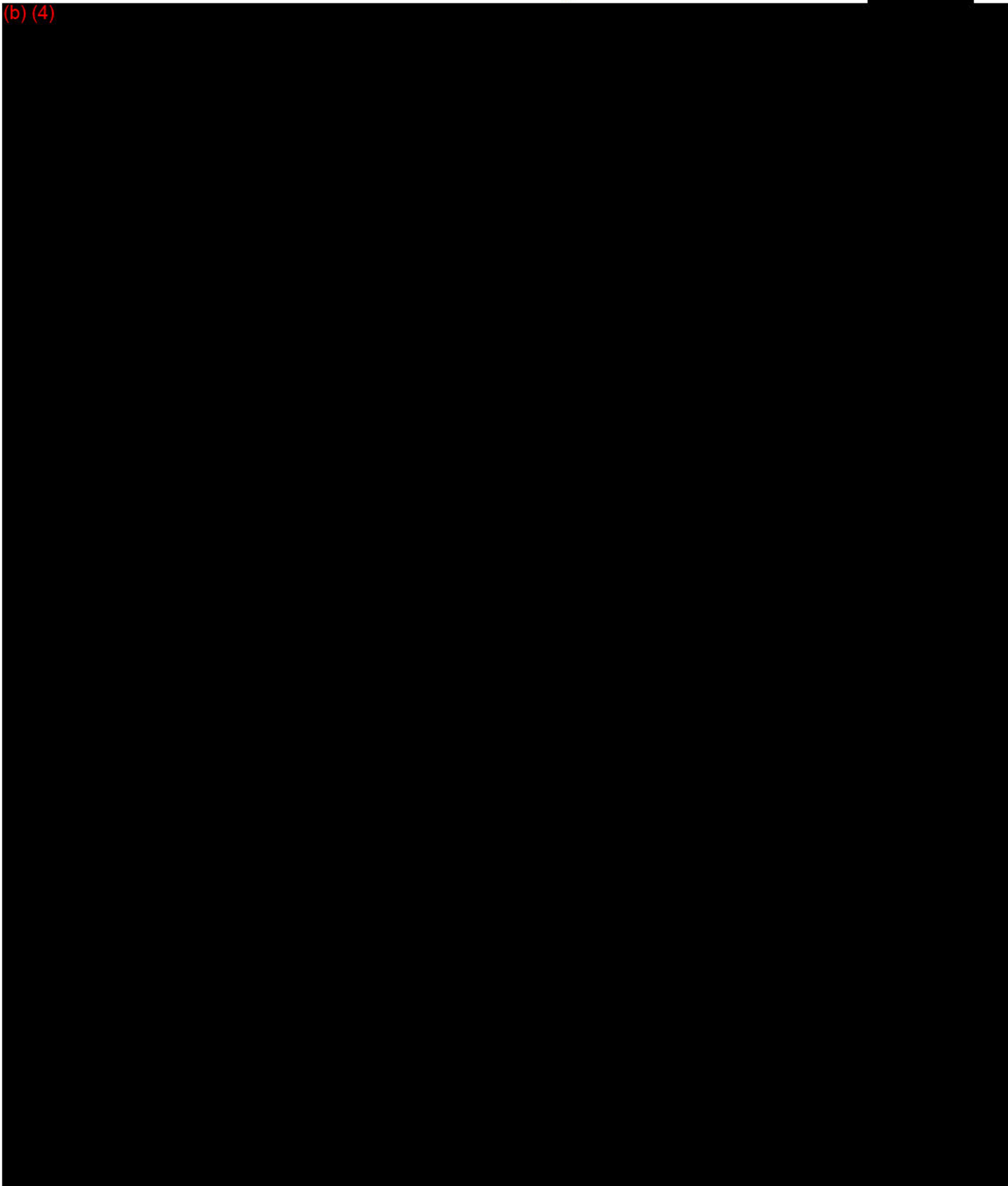


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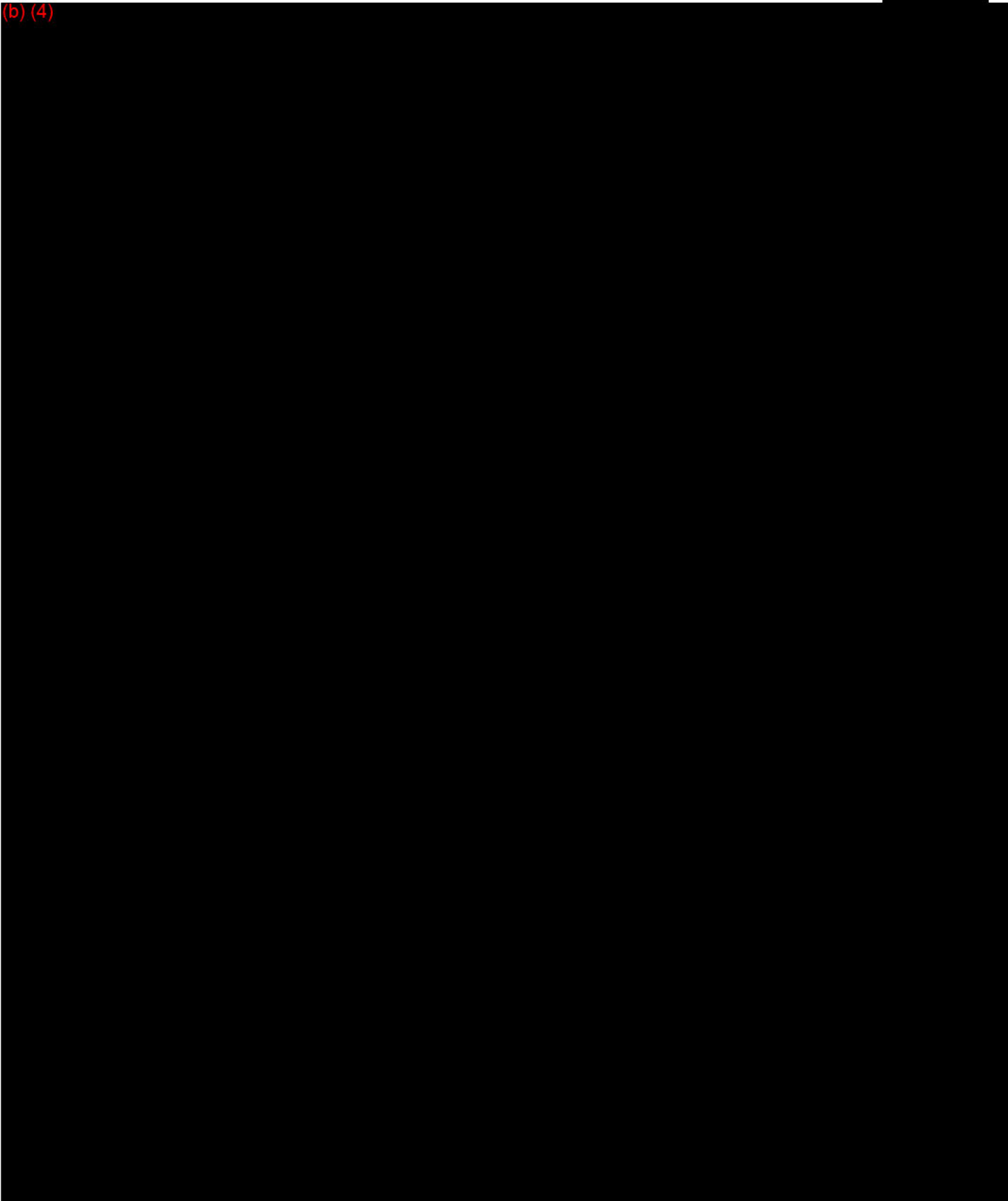
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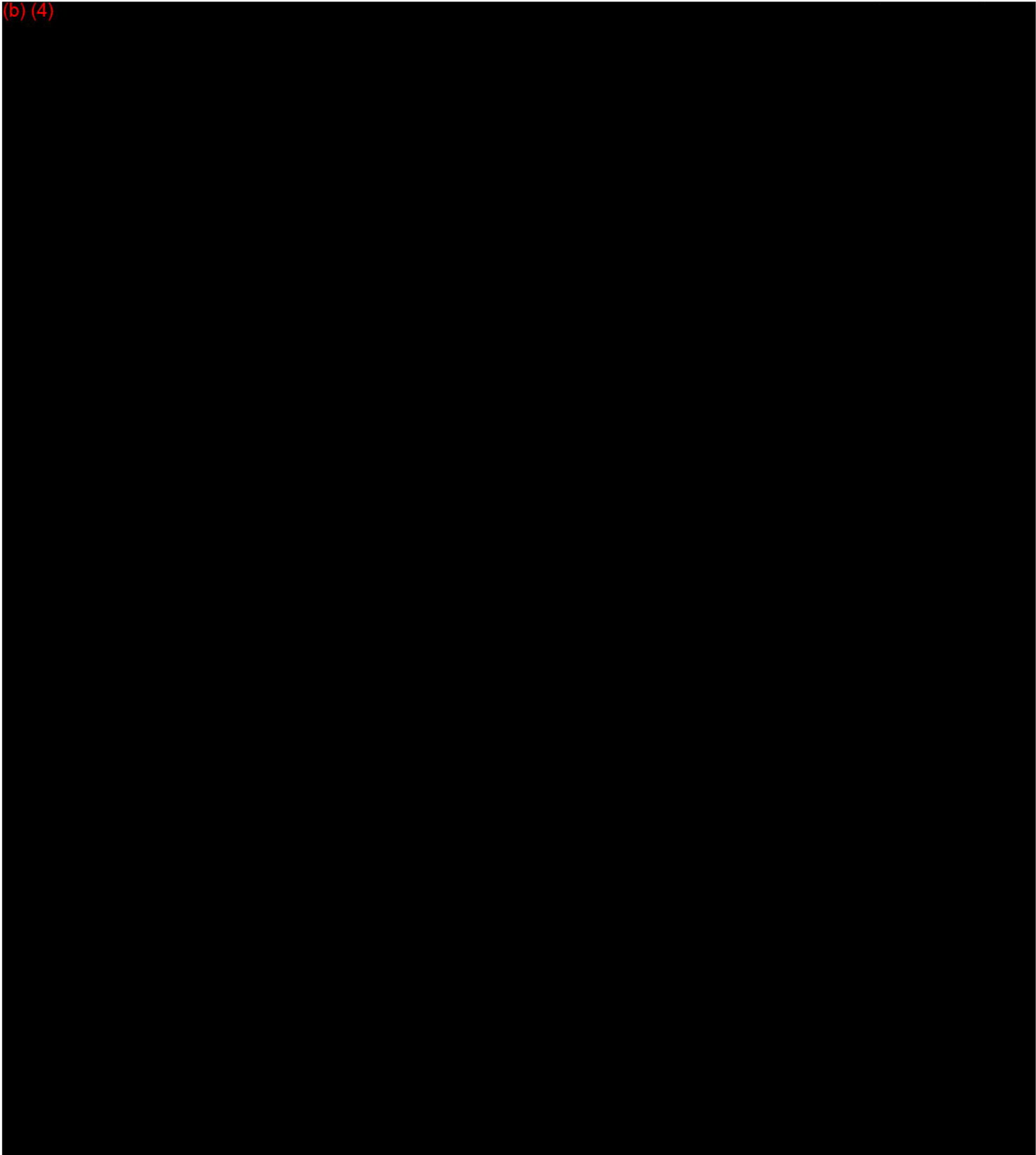
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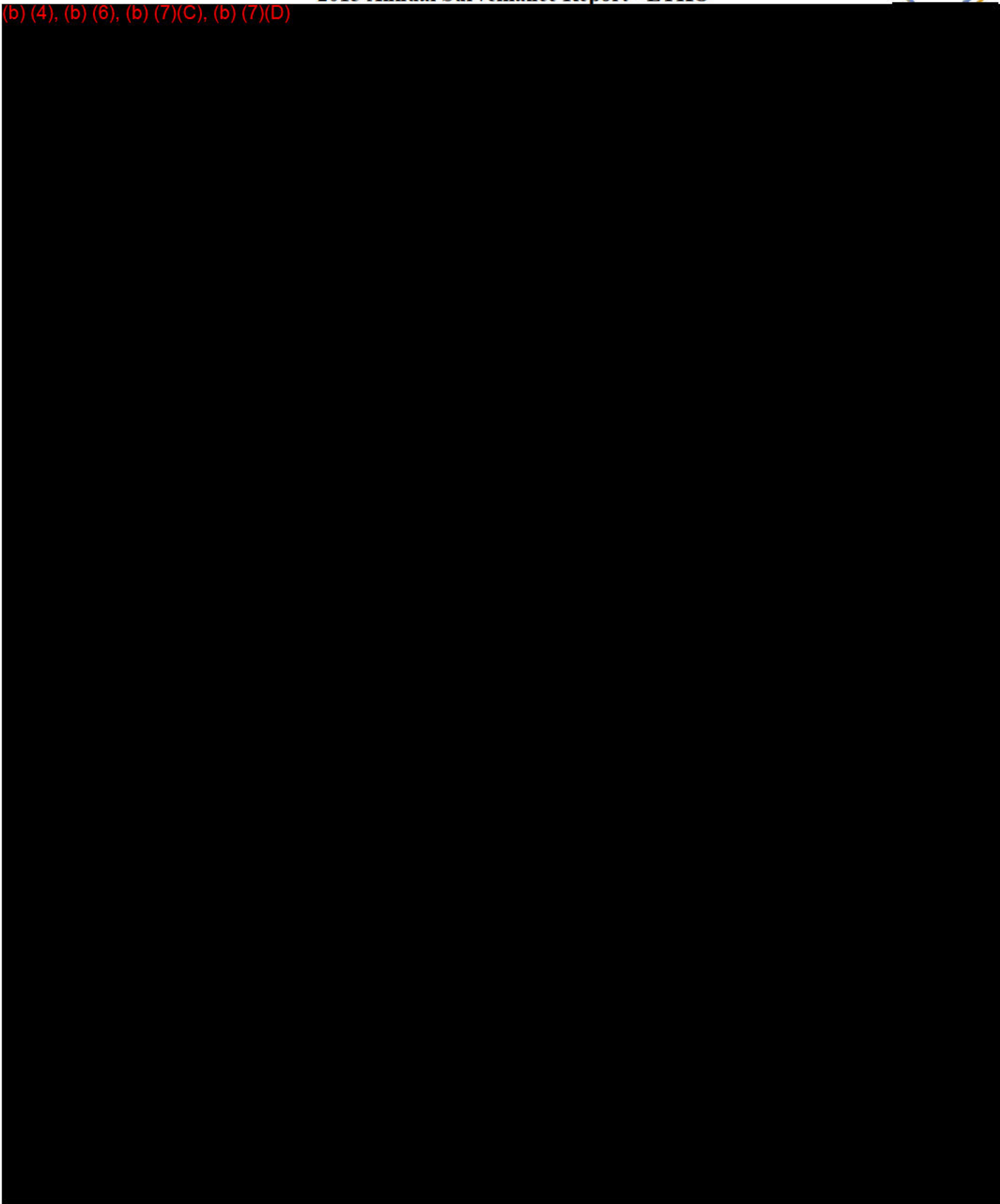
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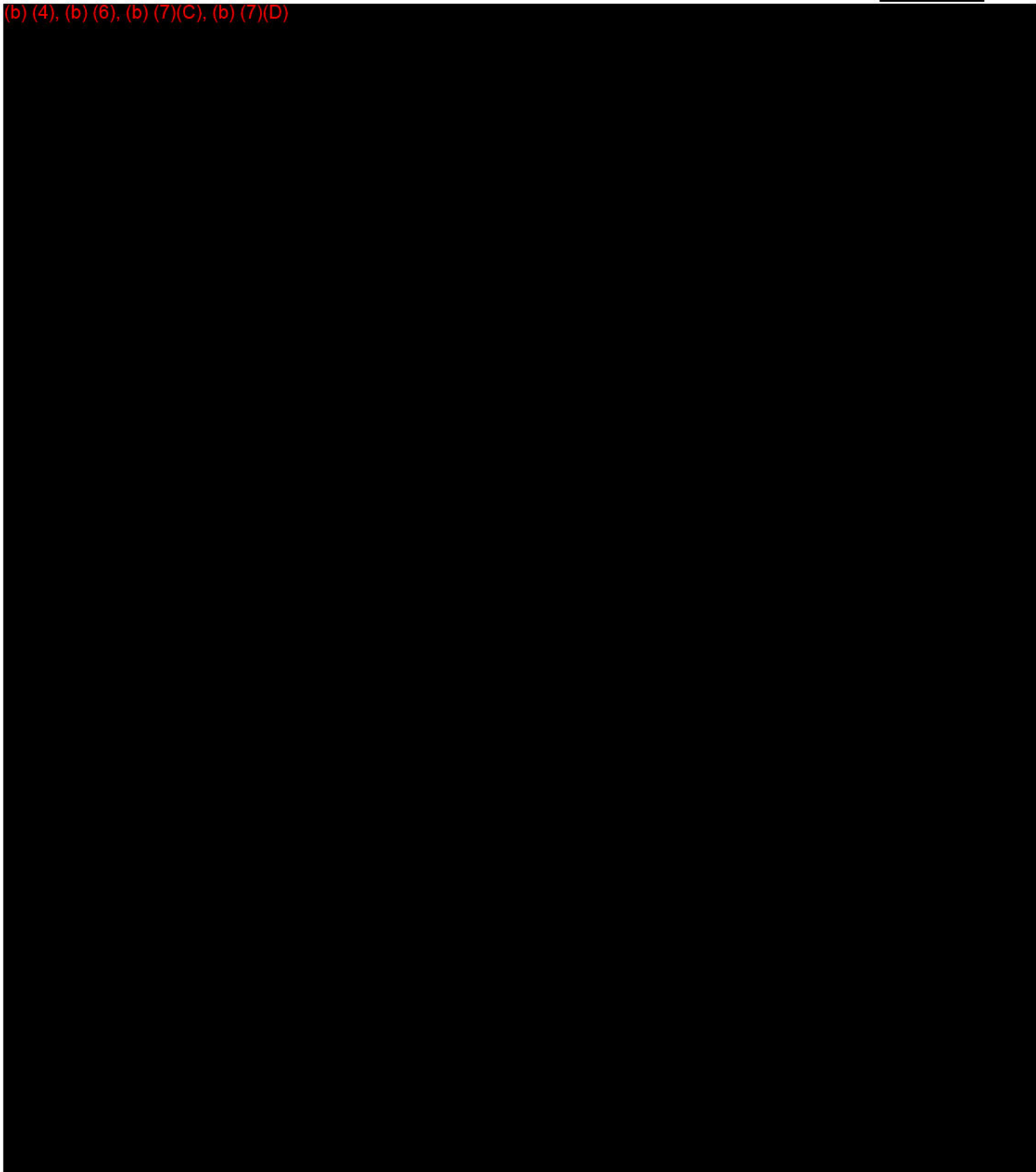
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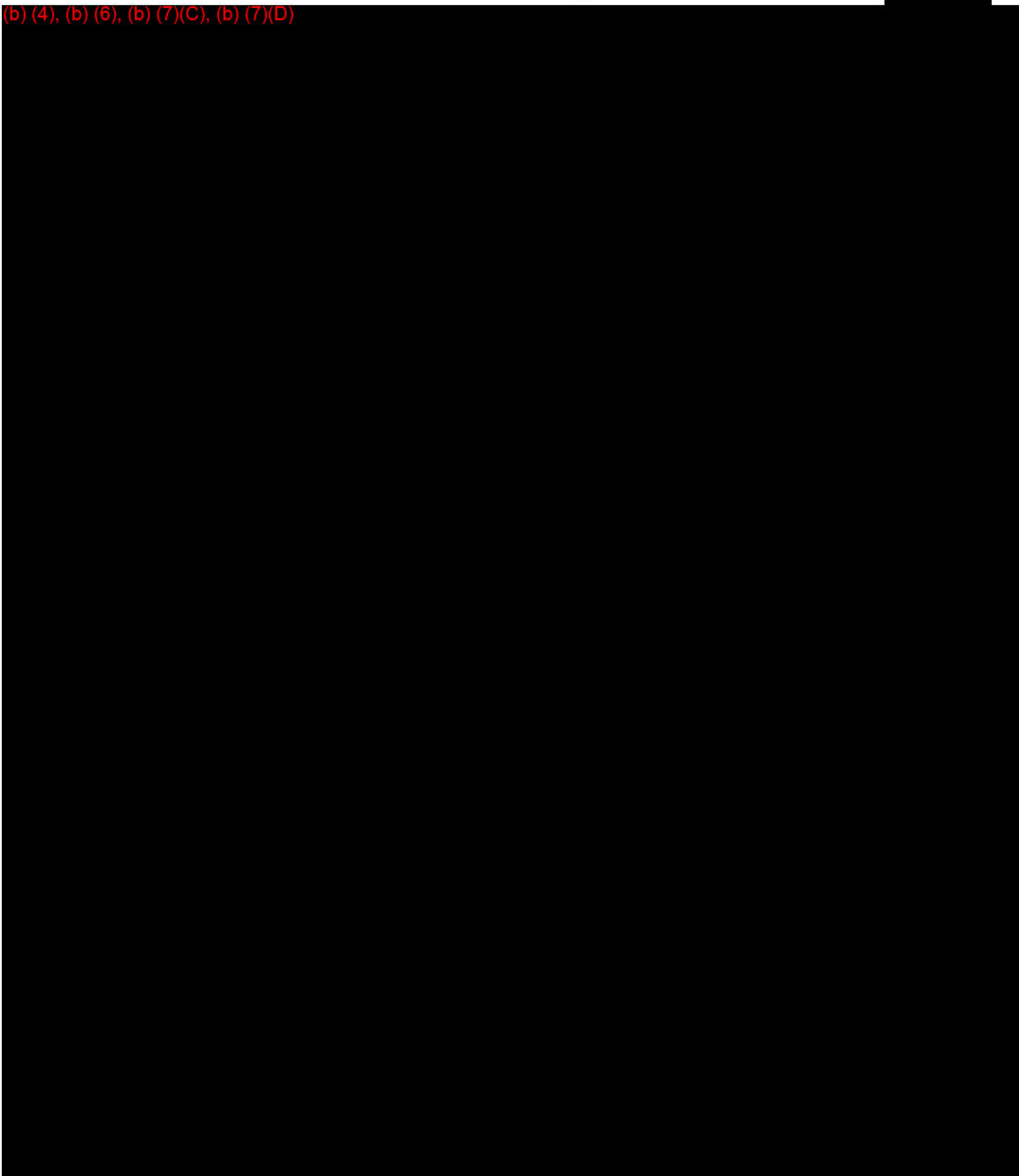
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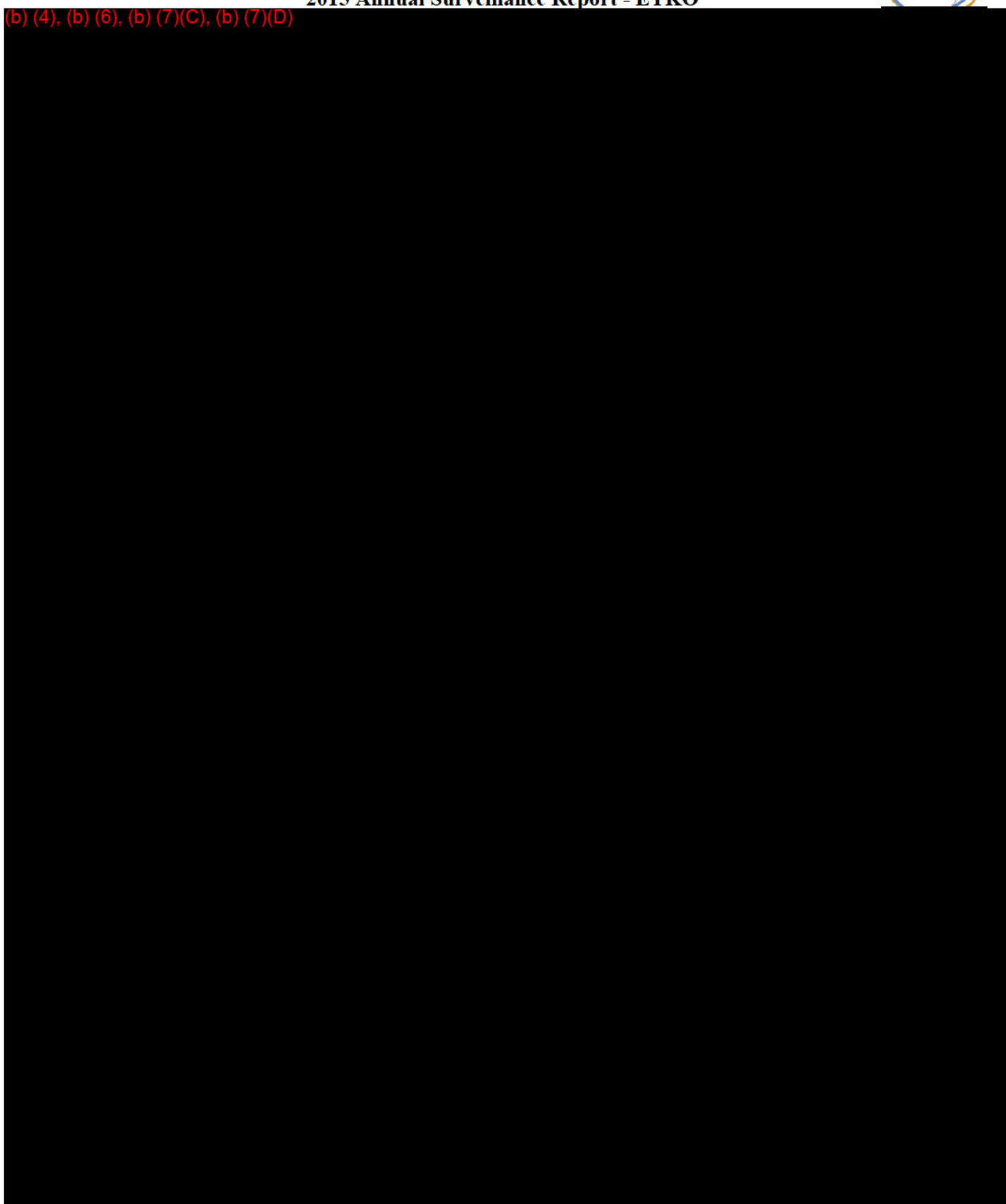
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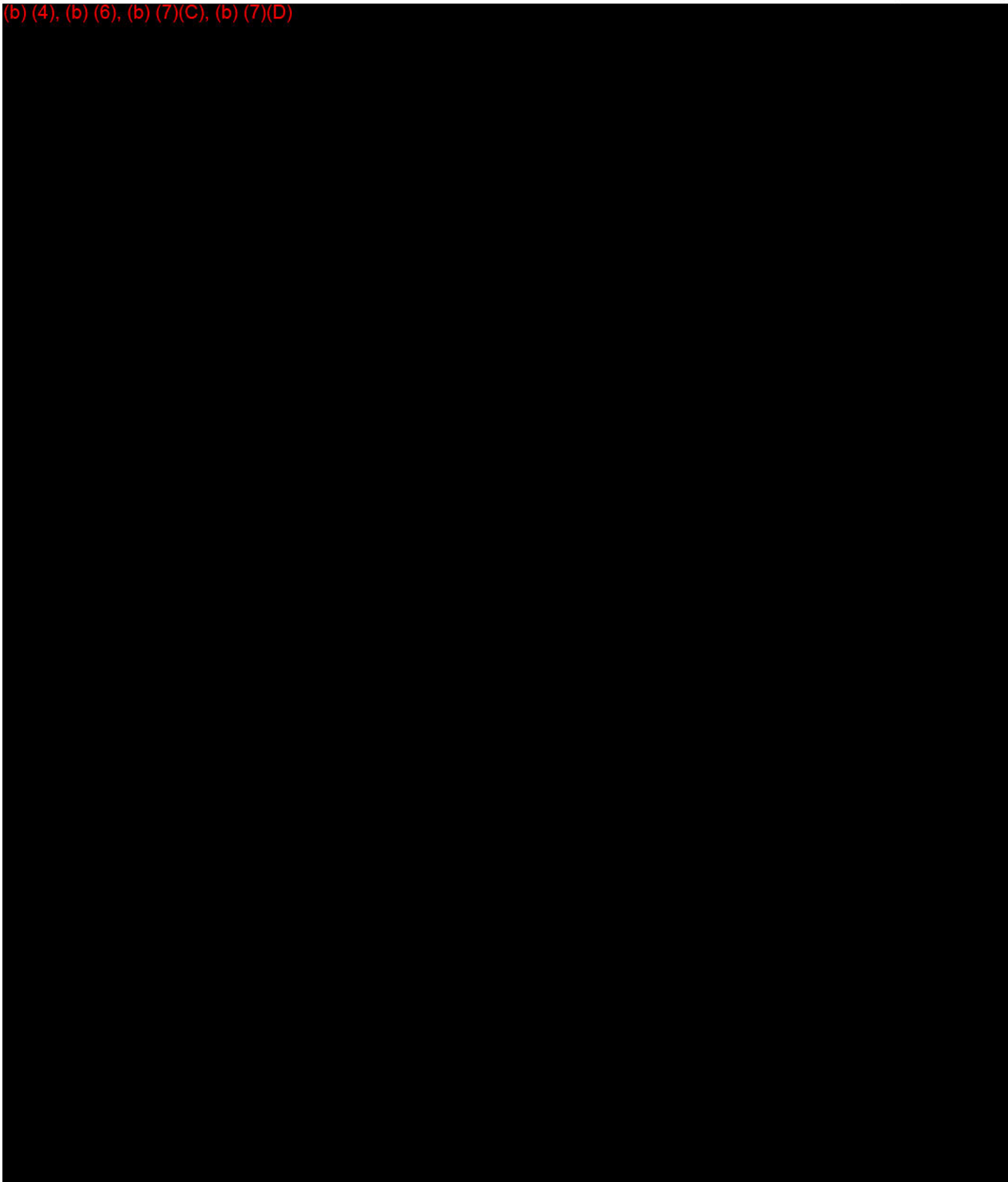
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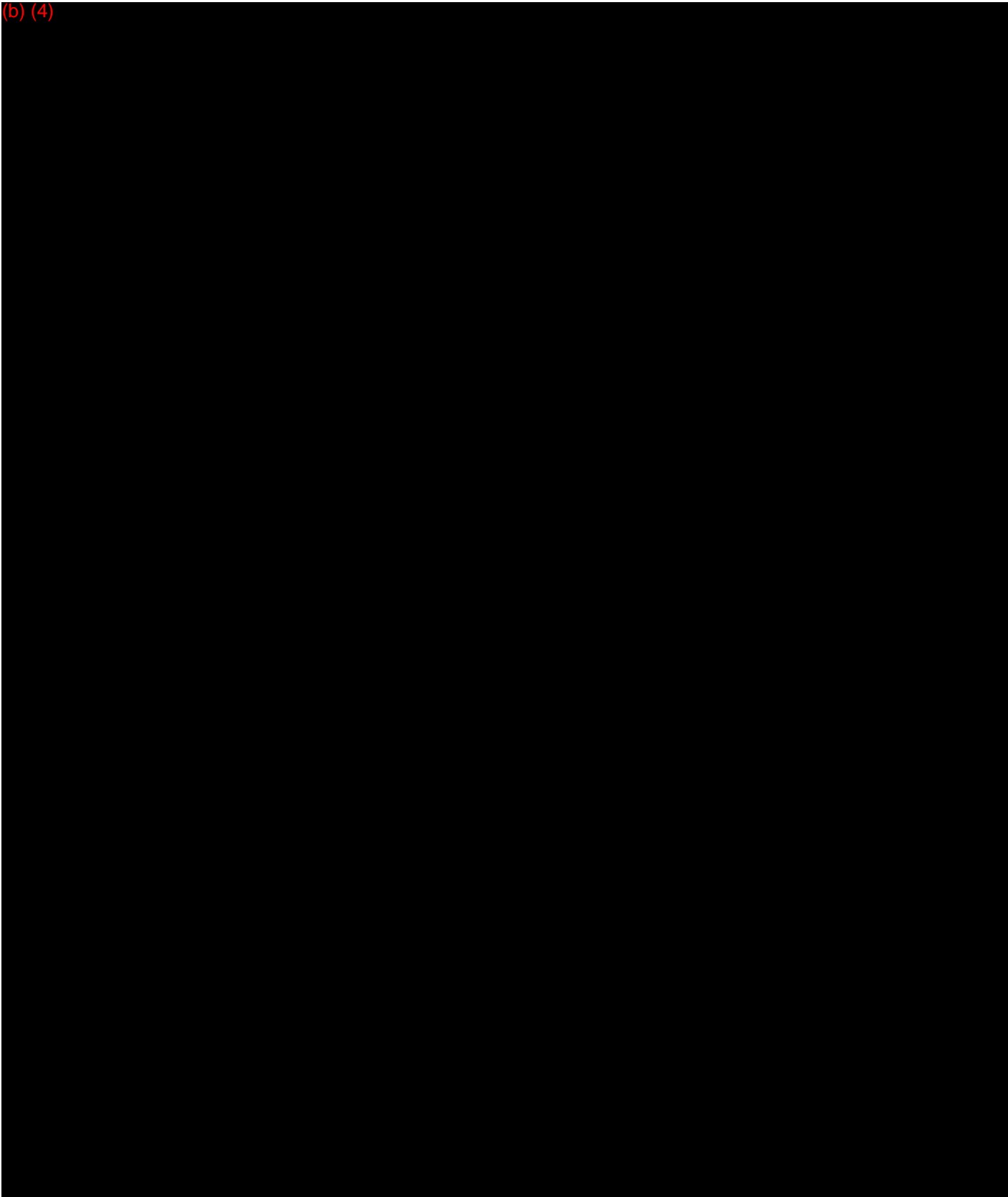
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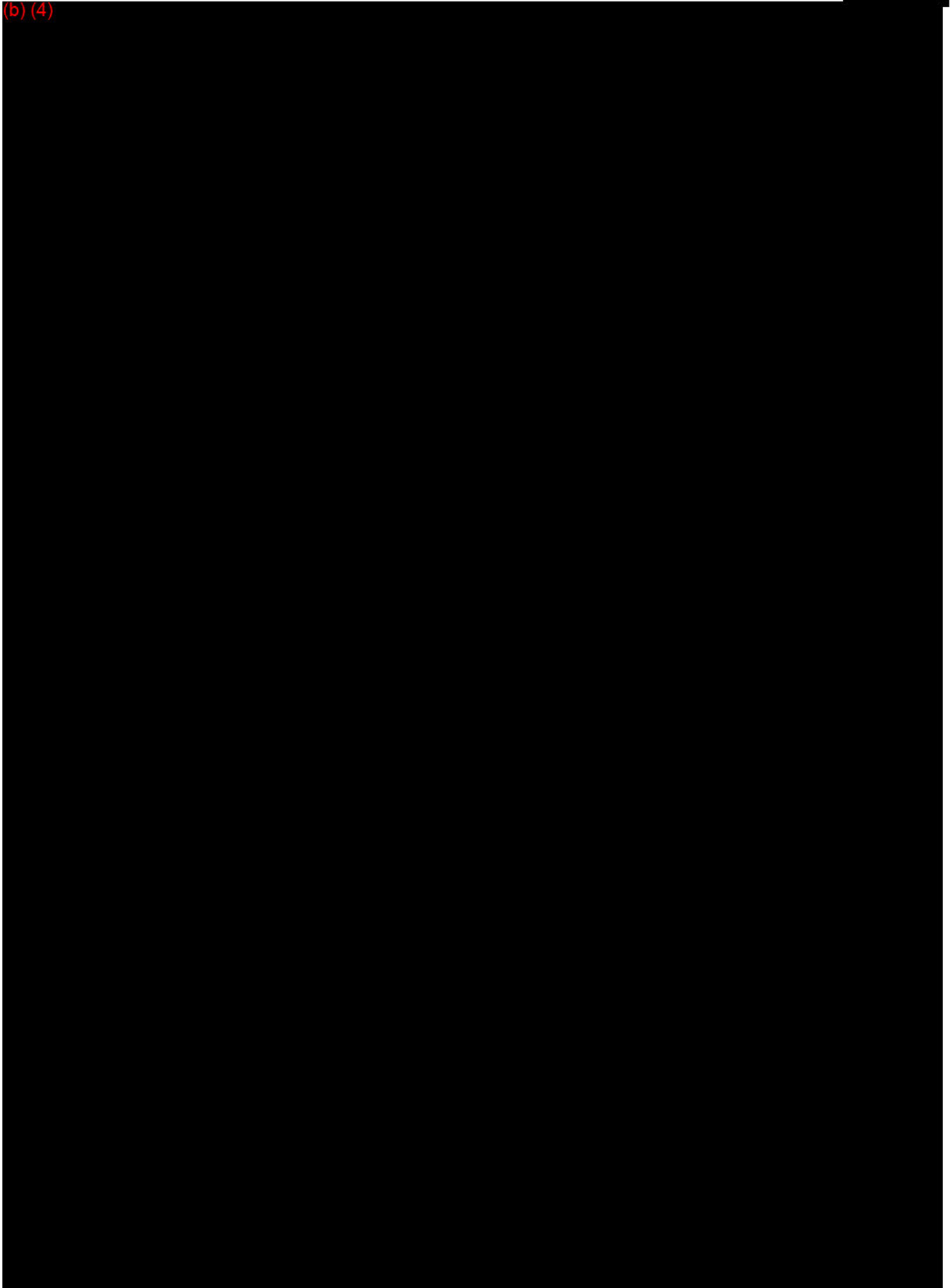
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**Evaluator signatures:**

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**Disclaimer**

The issues raised in this report are based on standard audit techniques which rely on sampling and therefore it cannot be assumed that others do not exist which may be raised at a later date.

**From:** [Mann, Renee - AMS](#)  
**To:** [Zuck, Penelope - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: ETKO  
**Date:** Friday, November 06, 2015 5:09:25 PM  
**Attachments:** [15EU visitreport etko\\_final.pdf](#)

---

Penny,  
I'm forwarding this to you for your information.

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, November 06, 2015 4:56 PM  
**To:** Mann, Renee - AMS <Renee.Mann@ams.usda.gov>  
**Subject:** FW: ETKO

---

**From:** [REDACTED]  
**Sent:** Friday, November 06, 2015 1:47 PM  
**To:** McEvoy, Miles - AMS  
(b) (6) [REDACTED] Courtney, Cheri - AMS  
**Subject:** Re: ETKO

Dear Miles

According to IOAS policy, we need the permission of the CB concerned to circulate any reports. I've been in contact with Mustafa Akyuz and he has agreed that we may send the report to you.

Best regards

(b)  
(6)

[REDACTED]  
(b) [REDACTED]  
(7) [REDACTED]  
(C) [REDACTED]

[REDACTED]

---

**From:** McEvoy, Miles - AMS <[Miles.McEvoy@ams.usda.gov](mailto:Miles.McEvoy@ams.usda.gov)>

**Sent:** Thursday, October 29, 2015 7:53 AM

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

**Cc:** (b) (6) Courtney, Cheri - AMS

**Subject:** RE: ETKO

Dear (b) (6)

(6)  
Thanks for this information. Could IOAS share the surveillance visit report or any additional information on ETKO?

Best regards,  
Miles

Miles V McEvoy  
Deputy Administrator  
Agricultural Marketing Service  
National Organic Program

---

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

**Sent:** Wednesday, October 28, 2015 5:21 AM

**To:** McEvoy, Miles

(b) (6)

**Subject:** ETKO

Dear Miles

IOAS suspended ISO 65 accreditation of ETKO with scope of an EU equivalent standard for all scopes and all countries in May, 2015. The reason for this was due to serious breaches in the manner in which they carried out organic inspection and certification. Almost immediately afterward the CFIA in Canada also suspended ETKO for the same reason.

And in June the European Commission removed their recognition as a 3<sup>rd</sup> country certification body again for all EU scopes and in all countries.

After a full and enhanced surveillance visit, ETKO remains accredited by the IOAS for COSMOS, GOTS and Textile Exchange accreditation. The IOAS found that different personnel were involved and that the inspection and certification process did not exhibit the same flaws as were found in the certification of organic production and processing.

ETKO is currently working toward re-instatement of their ISO accreditation - although given that ISO Guide 65 has now been replaced by ISO 17065, this will now involve an assessment against the new standard.

I was asked to write to you by the IOAS Board of Directors who have noted that ETKO

appears to remain accredited by the NOP and wished to ensure that you were aware of decisions made by other authorities. If I can be of further assistance, please don't hesitate to get in touch.

Best regards

(b)

(6),

(b)

(7)

(C)

[Redacted signature block]

**From:** [Zuck, Penelope - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Mann, Renee - AMS](#)  
**Subject:** FW: ETKO  
**Date:** Friday, September 04, 2015 10:14:34 AM  
**Attachments:** [image001.png](#)

---

Cheri:

Please see the revised draft message to Miles with Renee's edits below...

Thank you,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

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**From:** Mann, Renee - AMS  
**Sent:** Thursday, September 03, 2015 5:38 PM  
**To:** Zuck, Penelope - AMS <Penelope.Zuck@ams.usda.gov>  
**Subject:** RE: ETKO

Hi Penny,

This is beautiful! I would make a tiny change (in green). The (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

Also, I highlighted the sections of the NoNC that are similar. You could bold or italicize, I just thought those sections might need to pop out.

Thanks,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Zuck, Penelope - AMS  
**Sent:** Thursday, September 03, 2015 4:36 PM  
**To:** Mann, Renee - AMS  
**Subject:** ETKO

Hi Renee,  
Here is my draft email to Miles:

Dear Miles,

We have discussed how to proceed with ETKO's renewal of accreditation along with the investigation into their suspensions with the EU and Canada. We would like to propose the following options:

1. (b) (5) [REDACTED]  
[REDACTED]
  - [REDACTED]  
[REDACTED]  
[REDACTED]
  - [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- [REDACTED]  
[REDACTED]

These options were based upon the high number and severity of noncompliances. Here is a brief history:

2007 Audit – 4 noncompliances

2008 Renewal Desk Audit – 6 noncompliances

2009 Audit – 5 of the above 10 noncompliances were cleared while the other 5 remained outstanding and **21 new** noncompliances were identified.

2009 Corrective Actions were accepted for all noncompliances to be verified at the next audit

2014 Audit – 24 noncompliances were cleared, 1 noncompliance was withdrawn, 1 noncompliance remains outstanding (see below), and **6 new** noncompliances were identified.

**Outstanding Noncompliance since 2009:**

**NP922ZZA.NC21** - 7 CFR §205.501(a)(4) states, "A private or governmental entity accredited as a certifying agent under this subpart must: Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part."

*Interviews conducted, records reviewed, and witness inspections observed, verified a general lack of understanding of the NOP standards. While personnel had sufficient experience and education in organic agricultural production and handling practices, there was insufficient understanding on the*



*application of the NOP standards as evidenced by inadequate information in the approved organic compliance (system) plans with no issues of concern or non-compliances being identified over multiple years of certification. The primary Certification Committee (CC) member with expertise in crops was not familiar with basic requirements such as the 90/120 day rule for raw manure application, did not know where to reference in the NOP Rule to determine if an input is permitted, and did not know when commercially available seeds and planting stock could be used. Additionally, while it was stated that the Certification Committee (CC) had received training there were no training records for any of the CC members prior to 2009.*

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

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

1. Label review – the label review checklist did not include USDA organic regulation label requirements to be verified.
2. Inspectors during the witness audits used incorrect regulation citations during exit interviews to identify findings.
3. OCP templates state the incorrect USDA organic regulations.
4. Inspectors are using outdated USDA organic regulations (2010).
5. Inspectors and reviewers not readily able to look up regulations.
6. ETKO personnel have an incomplete understanding of the noncompliance and adverse action notification procedures.
7. Several crop operation OCPs reviewed by the NOP auditor indicated “Not Applicable” for Crop Rotation practice standard (205.205).
8. ETKO personnel did not understand and document buffer zone requirements (205.202(c)).

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

Your thoughts?

Please let me know if you have any questions or would like any additional information.

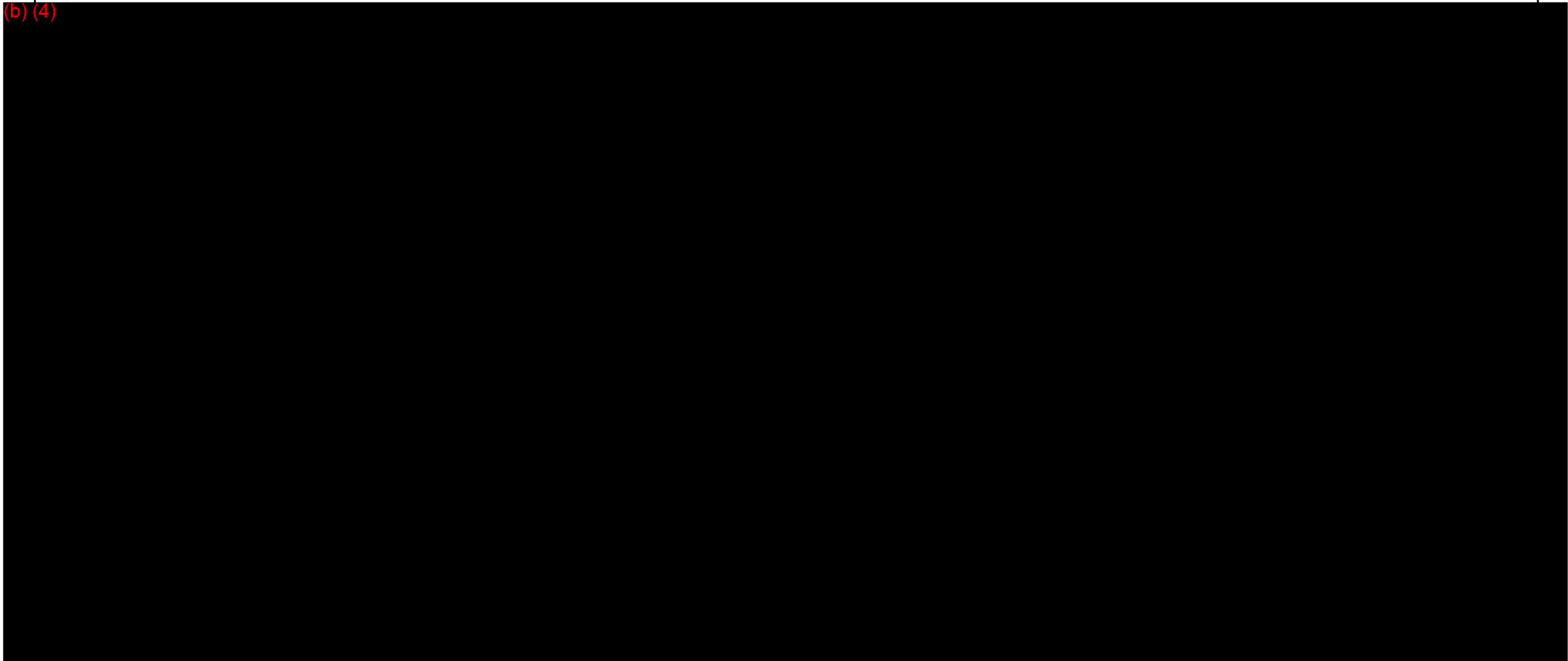
Thank you,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

**Nonconformities raised by IOAS at on-site surveillance of ETKO – March 10-13, 2015**

	NC #	Text of non conformity	Reg ref	IOAS Report ref	Previously set NC by IOAS <sup>1</sup>
Operator information					



(b) (4)

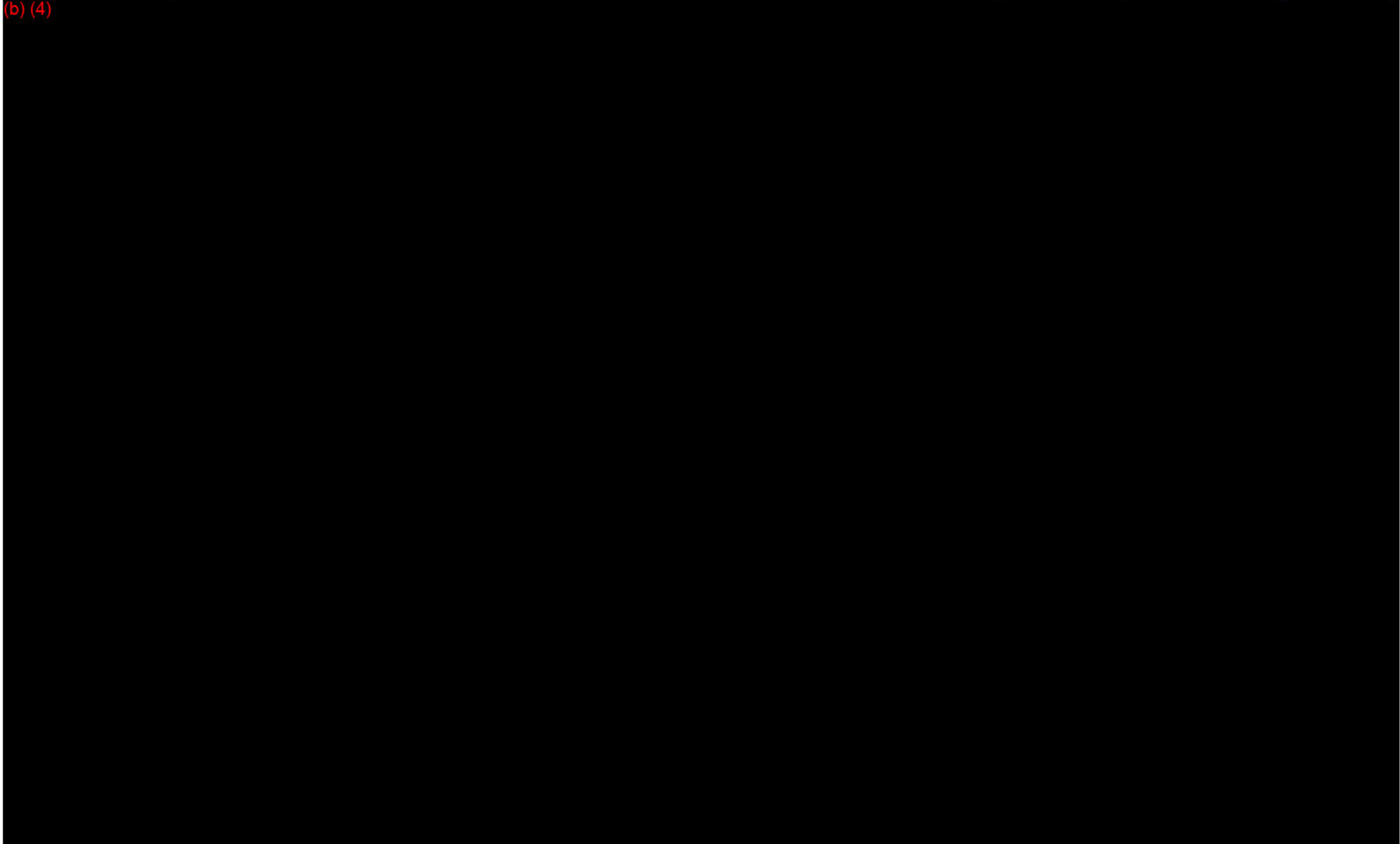
<sup>1</sup> The non compliance has been set at a previous IOAS surveillance/assessment visit, resolved but now found to be implemented unsatisfactorily.

	NC #	Text of non conformity	Reg ref	IOAS Report ref	Previously set NC by IOAS <sup>1</sup>
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(b) (4)



	NC #	Text of non conformity	Reg ref	IOAS Report ref	Previously set NC by IOAS <sup>1</sup>
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(b) (4)

	NC #	Text of non conformity	Reg ref	IOAS Report ref	Previously set NC by IOAS <sup>1</sup>
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(b) (4)



<b>OFIS INTC reference</b>	<b>Product</b>	<b>Pesticide residues found mg/kg</b>	<b>Ukraine company</b>	<b>Ukraine exporter</b>
<b>32/2015</b>	wheat	cypermethrin 0,013 dimethoate 0,050 tebuconazole 0,034	Agrofirm "Ukraina" Ltd.	PP Barbet Kherson
<b>245</b>	sunflower expeller	glyphosate 0,120	TK-14.3135-008-C	"NT-NOVA" LTD Kherson
<b>244</b>	sunflower expeller	metalaxyl 0,020	TK-14.3140-002-C  Ykos and K  TD Prodexim  Pioner	Ukrainian Food Corporation LLC  Kherson
<b>228</b>	sunflower expeller	carbendazim 0,050 fludioxonil 0,012 metalaxyl 0,134 thiamethoxam 0.025	SGS 7500021-14-0001	Ukrainian Food Corporation LLC  Kherson
<b>188</b>	rapeseed	chlormequat 0,032	3097F-03 PE "Yugagrofarm"	PEE "TKK-Invest"

				Kherson
<b>038</b>	rapeseed	carbofuran, chlorpyrifos, cypermethrin, diazinon, malathion, pirimifos-methyl	TK-12.3080-012-C	SADEKO Ltd.  Kherson

**From:** [Howley, JannaB - AMS](#)  
**To:** [Michael, Matthew - AMS](#)  
**Cc:** [Mann, Renee - AMS](#); [Courtney, Cheri - AMS](#)  
**Subject:** FW: ETKO  
**Date:** Thursday, August 27, 2015 10:57:42 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[15EU.visitreport etko\\_final.pdf](#)  
[150324 NC table etko.pdf](#)  
[Overview cases OFIS ETKO Ukraine.docx](#)

---

Matthew:

The EU shared with the NOP their entire ETKO audit report, which led to the EU suspending ETKO's accreditation. The attached documents include what substances were detected, at what levels, and the names of companies involved. I know you were trying to determine if ETKO certified operations' products were coming into the United States, and this may help.

Thanks,

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

---

**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, August 27, 2015 10:46 AM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Courtney, Cheri - AMS; Howley, JannaB - AMS  
**Subject:** RE: ETKO

Dear Renée,

We are happy to send you more information on this case to help you in your investigations.

You will find attached the IOAS audit report and an overview of the non-compliances related to ETKO notified by EU Member States through our Organic Farming Information System (OFIS).

Hope this helps.

I take the opportunity to ask you something. In the framework of our IT project for setting up an electronic certificate of inspection for imported organic products, we need to put the contact information of the USDA certifiers into the system. I have found the information in your website in PDF: <http://www.ams.usda.gov/sites/default/files/media/OrganicCertifyingAgents.pdf>

Do you have this information in a Word document or an Excel table? It would be much easier for us for transferring the data to the system.



Thanks

Best regards

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

■

■

■

■

---

**From:** Gebault King, ReneeA - AMS [<mailto:ReneeA.GebaultKing@ams.usda.gov>]  
**Sent:** Wednesday, August 26, 2015 6:37 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** Courtney, Cheri - AMS; Howley, JannaB - AMS  
**Subject:** RE: ETKO

Dear (b) (6),  
(b) (7)

Thank you for providing the information regarding ETKO. As the NOP has delved into the situation further, additional questions have arisen and I am seeking your assistance to gather more information.

Would it be possible to obtain the following items?:

1. The IOAS audit report with regard to ETKO.
2. The names of any of the operations connected to the EU's letter, which stated, "high volume shipments of organic goods imported from Ukraine into the Union containing residues of plant protection products that are not allowed in organic farming." (This comes from the **COMMISSION IMPLEMENTING REGULATION (EU) 2015/931 of 17 June 2015 amending and correcting Regulation (EC) No 1235/2008**

**laying down detailed rules for implementation of Council Regulation (EC) No 834/2007 as regards the arrangements for imports of organic products from third countries, which you provided to the NOP on 18 June 2015.)**

Thank you for your assistance with this issue. I look forward to your reply.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312 | Mobile: (b) (6)  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

USDA National Organic Program | 1400 Independence Ave SW | Room 2649-South, Stop 0268  
Washington, D.C. 20250-0268 | Tel: 202.720.3252 | Fax: 202.205.7808 | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)  
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---

**From:** (b) (6), (b) (7)(C)  
**Sent:** Tuesday, June 30, 2015 10:36 AM  
**To:** Gebault King, ReneeA - AMS  
**Cc:** Courtney, Cheri - AMS  
**Subject:** RE: ETKO

Dear Renée,

In terms of nonconformities, relevant information was primarily sourced from the IOAS audit report. In summary the assessors found the ETKO control system deficient in its implementation in a number of important aspects including:

- Insufficient rigour and integrity of inspection
- Acceptance of vague authority declarations on previous land use without checking veracity
- Inability to demonstrate effective controls
- Poor management of sample taking
- Inattention to dates of last use of non-allowed inputs and parallel production
- Lack of on-site input/output balance audits at handlers and processors
- Lack of regulation of non-organic seed use
- Not holding the operator to account for failings by sub-contractors
- Sales by sub-contractors
- An inspector payment system in Ukraine that lends itself to conflicting interest

With specific regard to the irregularity cases notified in OFIS, the assessors found that the

ETKO investigation was unable to demonstrate full traceability of the product or fully link available samples and analyses to the shipments. More details can be made available where necessary.

These nonconformities together with the recurrence of irregularity cases notified in OFIS indicated a systematic malfunctioning of the control measures applied. It also appeared that ETKO was unable to take adequate corrective measures in respect of the deficiencies reported and in response to the serious infringements observed. In such circumstances the risk existed for the consumer to be misled about the true nature of the products certified by ETKO. Consequently, ETKO was withdrawn from the EU list.

Best regards,

(b) (6), (b) (7)(C) [Redacted]

[Redacted]

[Redacted]

[Redacted]

---

**From:** Gebault King, ReneeA - AMS [<mailto:ReneeA.GebaultKing@ams.usda.gov>]  
**Sent:** Friday, June 26, 2015 3:45 PM  
**To:** (b) (6), (b) (7)(C) [Redacted]  
**Subject:** FW: ETKO

Dear Manuel,

I hope this e-mail finds you well. The USDA NOP is in need of additional information regarding ETKO. I would appreciate it if the EU could share information on the specific nonconformities and other deficiencies noted with respect to ETKO.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312 | Mobile: (b) (6)

[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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Subscribe to the USDA's [Organic Insider](#) to receive updates in your e-mail!

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Friday, June 19, 2015 1:59 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** Courtney, Cheri - AMS; (b) (6)  
**Subject:** RE: ETKO

Dear (b) (6),  
(b) (7)

Thank you for providing information on the actions the EU has taken with regard to Ekolojik Tarim Kontrol Organizasyonu (ETKO).

The USDA NOP is currently in the process of gathering information on the situation with ETKO. To this end, the USDA NOP would appreciate if the EU could share information on the specific nonconformities and other deficiencies noted with respect to ETKO.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312 | Mobile: (b) (6)

[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

USDA National Organic Program | 1400 Independence Ave SW | Room 2649-South, Stop 0268  
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Subscribe to the USDA's [Organic Insider](#) to receive updates in your e-mail!

---

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

**Sent:** Wednesday, June 17, 2015 8:18 AM

**To:** McEvoy, Miles - AMS

**Cc:** Courtney, Cheri - AMS; Gebault King, ReneeA - AMS; (b) (6)

**Subject:** ETKO

Dear Miles,

We would like to inform you about the measures taken against ETKO, a control body listed in Annex IV to Regulation (EC) No 1235/2008. As this control body is NOP accredited, the information below may be useful to you.

In recent months the Commission received several notifications from Member States concerning high volume shipments of organic goods imported from Ukraine into the Union containing residues of plant protection products that are not allowed in organic farming according to Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008. The goods in question had been certified under Regulation (EC) No 834/2007 by "Ekolojik Tarim Kontrol Organizasyonu" (ETKO).

Following information received by the Commission from ETKO and an on-the-spot examination of its activities by its accreditation body, serious deficiencies in the checks carried out and a substantial number of non-conformities were documented, which all together indicated a systematic malfunctioning of the control measures applied. It also appeared that ETKO was unable to take adequate corrective measures in respect of the deficiencies reported and in response to the serious infringements observed.

Consequently, ETKO has been withdrawn from Annex IV in accordance with points (d), (e) and (f) of the first subparagraph of Article 12(2) of Regulation (EC) No 1235/2008.

Best regards,

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



[Redacted signature area]

(b) (6), (b) (7)(C) [Redacted]

[Redacted]

[Redacted]

**From:** [Mann, Renee - AMS](#) on behalf of [McEvoy, Miles - AMS](#)  
**To:** [Howley, JannaB - AMS](#); [Zuck, Penelope - AMS](#); [Mann, Renee - AMS](#); [Yang, RobertH - AMS](#)  
**Subject:** FW: ETKO

---

-----Original Appointment-----

**From:** McEvoy, Miles - AMS  
**Sent:** Friday, August 21, 2015 3:03 PM  
**To:** McEvoy, Miles - AMS; Mann, Renee - AMS; Yang, RobertH - AMS  
**Subject:** ETKO  
**When:** Tuesday, August 25, 2015 9:00 AM-9:30 AM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Miles office

Review ETKO issues  
Develop plan to review ETKO, ETKO certified operations, and ETKO certified organic products.

Ideas-

(b) (5)

A large black rectangular redaction box covers the majority of the text in this section. The text "(b) (5)" is visible at the top left of the redacted area.

**From:** [Gebault King, ReneeA - AMS](#)  
**To:** [Howley, JannaB - AMS](#)  
**Subject:** FW: ETKO  
**Date:** Tuesday, June 30, 2015 10:47:53 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
**Importance:** High

---

FYI

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Tuesday, June 30, 2015 10:36 AM  
**To:** Gebault King, ReneeA - AMS  
(b) (6) Courtney, Cheri - AMS  
**Subject:** RE: ETKO

Dear Renée,

In terms of nonconformities, relevant information was primarily sourced from the IOAS audit report. In summary the assessors found the ETKO control system deficient in its implementation in a number of important aspects including:

- Insufficient rigour and integrity of inspection
- Acceptance of vague authority declarations on previous land use without checking veracity
- Inability to demonstrate effective controls
- Poor management of sample taking
- Inattention to dates of last use of non-allowed inputs and parallel production
- Lack of on-site input/output balance audits at handlers and processors
- Lack of regulation of non-organic seed use
- Not holding the operator to account for failings by sub-contractors
- Sales by sub-contractors
- An inspector payment system in Ukraine that lends itself to conflicting interest

With specific regard to the irregularity cases notified in OFIS, the assessors found that the ETKO investigation was unable to demonstrate full traceability of the product or fully link available samples and analyses to the shipments. More details can be made available where necessary.

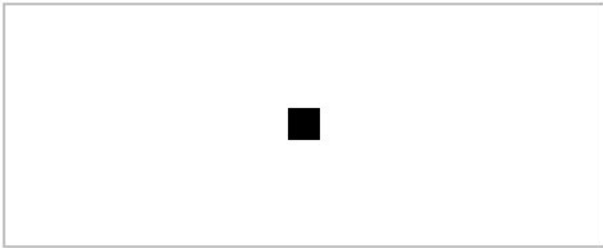
These nonconformities together with the recurrence of irregularity cases notified in OFIS indicated a systematic malfunctioning of the control measures applied. It also appeared that ETKO was unable to take adequate corrective measures in respect of the deficiencies reported and in response to the serious infringements observed. In such circumstances the risk existed for the consumer to be misled about the true nature of the products certified by ETKO. Consequently, ETKO was withdrawn from the EU list.

Best regards,

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



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



---

**From:** Gebault King, ReneeA - AMS [<mailto:ReneeA.GebaultKing@ams.usda.gov>]

**Sent:** Friday, June 26, 2015 3:45 PM

**To:** [Redacted]

**Subject:** FW: ETKO

Dear (b) (6),  
(b) (7)

I hope this e-mail finds you well. The USDA NOP is in need of additional information regarding ETKO. I would appreciate it if the EU could share information on the specific nonconformities and other deficiencies noted with respect to ETKO.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312 | Mobile: (b) (6)  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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---

**From:** Gebault King, ReneeA - AMS

**Sent:** Friday, June 19, 2015 1:59 PM

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

**Cc:** Courtney, Cheri - AMS; (b) (6)

**Subject:** RE: ETKO

Dear (b) (6),  
(b) (7)

Thank you for providing information on the actions the EU has taken with regard to Ekolojik Tarim Kontrol Organizasyonu (ETKO).

The USDA NOP is currently in the process of gathering information on the situation with ETKO. To this end, the USDA NOP would appreciate if the EU could share information on the specific nonconformities and other deficiencies noted with respect to ETKO.

Kind regards,

*Renee*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312 | Mobile: (b) (6)

[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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---

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

**Sent:** Wednesday, June 17, 2015 8:18 AM

**To:** McEvoy, Miles - AMS

**Cc:** Courtney, Cheri - AMS; Gebault King, ReneeA - AMS; (b) (6)

**Subject:** ETKO

Dear Miles,

We would like to inform you about the measures taken against ETKO, a control body listed in Annex IV to Regulation (EC) No 1235/2008. As this control body is NOP accredited, the information below may be useful to you.

In recent months the Commission received several notifications from Member States

concerning high volume shipments of organic goods imported from Ukraine into the Union containing residues of plant protection products that are not allowed in organic farming according to Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008. The goods in question had been certified under Regulation (EC) No 834/2007 by “Ekolojik Tarim Kontrol Organizasyonu” (ETKO).

Following information received by the Commission from ETKO and an on-the-spot examination of its activities by its accreditation body, serious deficiencies in the checks carried out and a substantial number of non-conformities were documented, which all together indicated a systematic malfunctioning of the control measures applied. It also appeared that ETKO was unable to take adequate corrective measures in respect of the deficiencies reported and in response to the serious infringements observed.

Consequently, ETKO has been withdrawn from Annex IV in accordance with points (d), (e) and (f) of the first subparagraph of Article 12(2) of Regulation (EC) No 1235/2008.

Best regards,

(b) (6), (b) (7)(C) [Redacted]

[Redacted]

[Redacted]

[Redacted]

**From:** [Gebault King, ReneeA - AMS](#)  
**To:** [Howley, JannaB - AMS](#)  
**Subject:** FW: ETKO  
**Date:** Monday, June 29, 2015 9:44:09 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

FYI

---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Friday, June 26, 2015 9:45 AM  
**To:** [REDACTED]  
**Subject:** FW: ETKO

Dear (b) (6),  
(b) (7)

I hope this e-mail finds you well. The USDA NOP is in need of additional information regarding ETKO. I would appreciate it if the EU could share information on the specific nonconformities and other deficiencies noted with respect to ETKO.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312 | Mobile: (b) (6)  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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---

**From:** Gebault King, ReneeA - AMS  
**Sent:** Friday, June 19, 2015 1:59 PM  
**To:** [REDACTED]  
**Cc:** Courtney, Cheri - AMS; (b) (6)  
[REDACTED]  
**Subject:** RE: ETKO

Dear (b) (6),  
(b) (7)

Thank you for providing information on the actions the EU has taken with regard to Ekolojik Tarim Kontrol Organizasyonu (ETKO).

The USDA NOP is currently in the process of gathering information on the situation with ETKO. To this end, the USDA NOP would appreciate if the EU could share information on the specific nonconformities and other deficiencies noted with respect to ETKO.

Kind regards,

*Renée*

Renée Gebault King, Ph.D.  
Accreditation Manager

Office: 202.690.1312 | Mobile: (b) (6)  
[ReneeA.GebaultKing@ams.usda.gov](mailto:ReneeA.GebaultKing@ams.usda.gov)

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---

**From:** (b) (6), (b) (7)(C)  
**Sent:** Wednesday, June 17, 2015 8:18 AM  
**To:** McEvoy, Miles - AMS  
**Cc:** Courtney, Cheri - AMS; Gebault King, ReneeA - AMS; (b) (6)  
**Subject:** ETKO

Dear Miles,

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Following information received by the Commission from ETKO and an on-the-spot examination of its activities by its accreditation body, serious deficiencies in the checks carried out and a substantial number of non-conformities were documented, which all together indicated a systematic malfunctioning of the control measures applied. It also appeared that ETKO was unable to take adequate corrective measures in respect of the deficiencies reported and in response to the serious infringements observed.

Consequently, ETKO has been withdrawn from Annex IV in accordance with points (d), (e) and (f) of the first subparagraph of Article 12(2) of Regulation (EC) No 1235/2008.

Best regards,

(b) (6), (b) (7)(C) [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**From:** [Courtney, Cheri - AMS](#)  
**To:** [Michael, Matthew - AMS](#)  
**Subject:** FW: ETKO  
**Date:** Wednesday, June 17, 2015 12:20:24 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Matthew

The EU (see the details below) and Canada has suspended ETKO - we may want to (b) (5).

*Cheri*

---

**From:** (b) (6), (b) (7)(C)  
**Sent:** Wednesday, June 17, 2015 8:18 AM  
**To:** McEvoy, Miles - AMS  
**Cc:** Courtney, Cheri - AMS; Gebault King, ReneeA - AMS; (b) (6)  
**Subject:** ETKO

Dear Miles,

We would like to inform you about the measures taken against ETKO, a control body listed in Annex IV to Regulation (EC) No 1235/2008. As this control body is NOP accredited, the information below may be useful to you.

In recent months the Commission received several notifications from Member States concerning high volume shipments of organic goods imported from Ukraine into the Union containing residues of plant protection products that are not allowed in organic farming according to Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008. The goods in question had been certified under Regulation (EC) No 834/2007 by "Ekolojik Tarim Kontrol Organizasyonu" (ETKO).

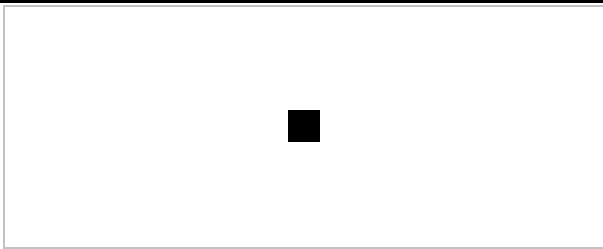
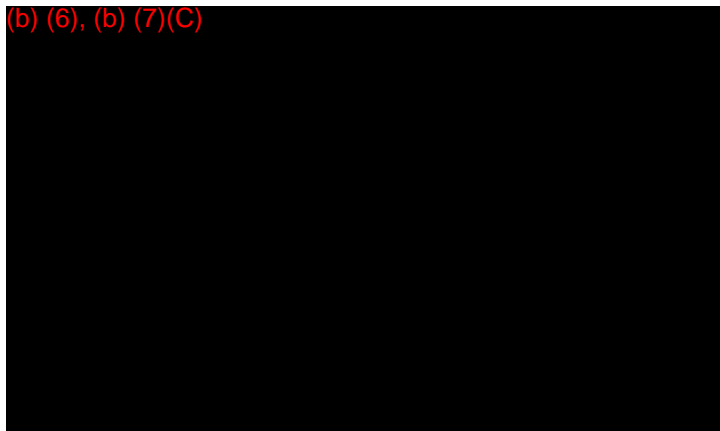
Following information received by the Commission from ETKO and an on-the-spot examination of its activities by its accreditation body, serious deficiencies in the checks carried out and a substantial number of non-conformities were documented, which all together indicated a systematic malfunctioning of the control measures applied. It also appeared that ETKO was unable to take adequate corrective measures in respect of the deficiencies reported and in response to the serious infringements observed.

Consequently, ETKO has been withdrawn from Annex IV in accordance with points (d), (e) and (f) of the first subparagraph of Article 12(2) of Regulation (EC) No 1235/2008.

Best regards,

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

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





**From:** [Mann, Renee - AMS](#)  
**To:** [Courtney, Cheri - AMS](#); [Yang, RobertH - AMS](#)  
**Subject:** FW: ETKO appeal - settlement executed  
**Date:** Friday, April 22, 2016 9:14:42 AM

---

Hi Robert,

We'll have somebody else work on the ETKO settlement follow-up so you can focus on India project.

Thanks,  
Renee

---

**From:** Kuhn, Meg - AMS  
**Sent:** Wednesday, April 13, 2016 4:41 PM  
**To:** Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>  
**Cc:** Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>  
**Subject:** ETKO appeal - settlement executed

Dear Cheri,

The settlement agreement that resolved the appeal between NOP and ETKO has been executed. In the settlement, the NOP agreed to withdraw the Notice of Proposed Suspension and also accepted the corrective and preventive actions ETKO has submitted to address the May 15, 2015 Notice of Noncompliance. This is a reminder to AIA to follow up on those actions, and any other accreditation actions that may need to occur in order to resolve the 2013 Renewal process.

If you have any questions, please do not hesitate to reach out to me or Jenny.

Thanks,  
Meg

## **Meg Kuhn**

Appeals Specialist  
Office of the Deputy Administrator  
National Organic Program  
U.S. Department of Agriculture  
Room 2649-So. (Stop 0268)  
1400 Independence Ave SW  
Washington, DC 20250-0268  
Main Office: 202.720.3252  
Direct: 202.205.9644  
Cell: (b) (6)  
[meg.kuhn@ams.usda.gov](mailto:meg.kuhn@ams.usda.gov)  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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Please consider sustainability before printing this e-mail or attachments

**From:** [Mann, Renee - AMS](#)  
**To:** [Zuck, Penelope - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: ETKO appeal - settlement executed  
**Date:** Monday, April 25, 2016 12:13:46 PM

---

Hi Penny,

Can you please follow up on the ETKO appeal settlement, and just make sure that AIA knows what it needs to do? I assume you will find it here: P:\Appeals\1 CLOSED Appeals\FY 2016\16-008 ETKO. If you can't confirm which file it is, definitely ask Meg. I am asking you to do this because Robert is busy with the India report and we are trying to keep things off his plate until that finishes.

Thanks,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
Sign up for the [USDA Organic Insider](#)

---

**From:** Kuhn, Meg - AMS  
**Sent:** Wednesday, April 13, 2016 4:41 PM  
**To:** Courtney, Cheri - AMS <Cheri.Courtney@ams.usda.gov>  
**Cc:** Mann, Renee - AMS <Renee.Mann@ams.usda.gov>; Yang, RobertH - AMS <RobertH.Yang@ams.usda.gov>  
**Subject:** ETKO appeal - settlement executed

Dear Cheri,

The settlement agreement that resolved the appeal between NOP and ETKO has been executed. In the settlement, the NOP agreed to withdraw the Notice of Proposed Suspension and also accepted the corrective and preventive actions ETKO has submitted to address the May 15, 2015 Notice of Noncompliance. This is a reminder to AIA to follow up on those actions, and any other accreditation actions that may need to occur in order to resolve the 2013 Renewal process.

If you have any questions, please do not hesitate to reach out to me or Jenny.

Thanks,  
Meg

**Meg Kuhn**  
Appeals Specialist  
Office of the Deputy Administrator  
National Organic Program  
U.S. Department of Agriculture  
Room 2649-So. (Stop 0268)

1400 Independence Ave SW  
Washington, DC 20250-0268  
Main Office: 202.720.3252  
Direct: 202.205.9644  
Cell: (b) (6)  
[meg.kuhn@ams.usda.gov](mailto:meg.kuhn@ams.usda.gov)  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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**From:** [Claypool, Rebecca E - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: ETKO noncompliance documents for your review  
**Date:** Wednesday, November 16, 2016 9:40:21 AM

---

Hi Cheri,  
Here is the ETKO NC Report I completed yesterday.

Thanks,  
Rebecca

---

**From:** Claypool, Rebecca E - AMS  
**Sent:** Tuesday, November 15, 2016 12:20 PM  
**To:** Mann, Renee - AMS <Renee.Mann@ams.usda.gov>  
**Subject:** ETKO noncompliance documents for your review

Renee:  
Please review the following documents regarding ETKO's noncompliance docs:

For your approval:  
Letter – [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\NC\NP6279LC NoNC ETKO 111516.docx](#)  
Report – [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\NC\NP6279LC NC Report ETKO 111516.docx](#)

Reference:  
Chronology Log – [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\NP6279LCA ChronoLog ETKO WA 111516.docx](#)  
File folder (where the letter/report for approval can be found) - [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine](#)

Thanks,  
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:** [Mann, Renee - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Claypool, Rebecca E - AMS](#)  
**Subject:** FW: ETKO noncompliance documents for your review  
**Date:** Wednesday, November 16, 2016 10:19:48 AM

---

Hi Cheri,

Please review the ETKO witness audit letter/report below. I reviewed this and it looks great!

Thanks,

Renee

**Renee Mann**

Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program

---

**From:** Claypool, Rebecca E - AMS  
**Sent:** Tuesday, November 15, 2016 12:20 PM  
**To:** Mann, Renee - AMS <Renee.Mann@ams.usda.gov>  
**Subject:** ETKO noncompliance documents for your review

Renee:

Please review the following documents regarding ETKO's noncompliance docs:

For your approval:

Letter – [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\NC\NP6279LC NoNC ETKO 111516.docx](#)

Report – [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\NC\NP6279LC NC Report ETKO 111516.docx](#)

Reference:

Chronology Log – [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine\NP6279LCA ChronoLog ETKO WA 111516.docx](#)

File folder (where the letter/report for approval can be found) - [P:\AIA\ACA-Active\ETKO-Turkey\2016 WA Ukraine](#)

Thanks,

Rebecca

**Rebecca Claypool**

**Accreditation Manager**

**USDA National Organic Program**

**1400 Independence Ave SW**

**Washington, DC 20250**

**(202) 350-5706**

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**From:** [Mann, Renee - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: ETKO Noncompliances  
**Date:** Saturday, August 29, 2015 4:59:37 PM  
**Attachments:** [image001.png](#)  
**Importance:** High

---

FYI – for the ETKO discussion.

---

**From:** Zuck, Penelope - AMS  
**Sent:** Friday, August 28, 2015 9:06 AM  
**To:** Mann, Renee - AMS  
**Subject:** ETKO Noncompliances  
**Importance:** High

Hi Renee,  
It has taken me some time to re-review all of the CA submissions from ETKO and to answer your questions in the CA Report. Please review my responses in the CA Report:

CA Report - [P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\Corr Action\NP4132LCA CA Report.docx](#)

And my draft email to ETKO from the follow-up to our meeting earlier this week:

Dear Mustafa,

There are still a number of items that need to be addressed in reference to the noncompliance report issued for ETKO's NOP renewal assessment as follows:

1. (b) (5) [Redacted]

In addition, (b) (5) [Redacted]

(b) (5)

Please submit the above information/documentation directly to me by **September 10, 2015**. Let me know if you have any questions or need any clarification.

Regards,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)



**From:** (b) (6), (b) (7)(C)  
**To:** [Gebault King, ReneeA - AMS](#)  
**Cc:** (b) (6); [Courtney, Cheri - AMS](#); [Howley, JannaB - AMS](#)  
**Subject:** RE: ETKO  
**Date:** Thursday, August 27, 2015 10:46:35 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[15EU visitreport etko final.pdf](#)  
[150324 NC table etko.pdf](#)  
[Overview cases OFIS ETKO Ukraine.docx](#)

---

Dear Renée,

We are happy to send you more information on this case to help you in your investigations.

You will find attached the IOAS audit report and an overview of the non-compliances related to ETKO notified by EU Member States through our Organic Farming Information System (OFIS).

Hope this helps.

I take the opportunity to ask you something. In the framework of our IT project for setting up an electronic certificate of inspection for imported organic products, we need to put the contact information of the USDA certifiers into the system. I have found the information in your website in PDF: <http://www.ams.usda.gov/sites/default/files/media/OrganicCertifyingAgents.pdf>

Do you have this information in a Word document or an Excel table? It would be much easier for us for transferring the data to the system.

Thanks

Best regards

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



[Redacted signature block]

[Redacted signature block]

**From:** [Mann, Renee - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: ETKO NoPS documents for your review  
**Date:** Wednesday, September 16, 2015 4:45:20 PM  
**Attachments:** [image001.png](#)

---

Hi Cheri –

I talked with Penny and she thought we were still issuing a NoPS to ETKO. I told her that perhaps

(b)  
(5)

Thanks,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Zuck, Penelope - AMS  
**Sent:** Wednesday, September 16, 2015 1:28 PM  
**To:** Mann, Renee - AMS  
**Subject:** RE: ETKO NoPS documents for your review

Renee,

(b) (5)

Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

---

**From:** Mann, Renee - AMS  
**Sent:** Wednesday, September 16, 2015 12:50 PM  
**To:** Zuck, Penelope - AMS <[Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)>  
**Subject:** RE: ETKO NoPS documents for your review

Hi Penny,

Do you still want me to review this? (b) (5)

-RM

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Zuck, Penelope - AMS  
**Sent:** Thursday, September 10, 2015 3:46 PM  
**To:** Mann, Renee - AMS  
**Subject:** ETKO NoPS documents for your review

Renee:

Please review the following documents regarding ETKO's Notification of Proposed Suspension. I left some areas highlighted where dates, etc. would need to be inserted. I also left some of the comments and track changes in the CA Report for reference and clarification at this point.

For your review!:

NoPS – <P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\NoPS\NoPS.docx>

CA Report – <P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\Corr Action\NP4132LCA CA Report edited.docx>

Settlement Agreement - <P:\AIA\ACA-Active\ETKO-Turkey\Settlement\ETKO Settlement.docx>

Reference:

Chronology Log - <P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\NoNC\2103 renewal ETKO Chrono log.docx>

File folder (where the letter/report for approval can be found) - <P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal>

Thanks,  
Penny



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☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

**From:** [Mann, Renee - AMS](#)  
**To:** [Courtney, Cheri - AMS](#)  
**Cc:** [Zuck, Penelope - AMS](#)  
**Subject:** FW: ETKO renewal documents for your review  
**Date:** Wednesday, August 19, 2015 2:48:03 PM  
**Attachments:** [image001.png](#)

---

Hi Cheri,

I reviewed the ETKO renewal documents. Penny did a great job of drafting this and getting responses from ETKO.

(b) (5)

Please see my comments in the CA report.

Thanks,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Zuck, Penelope - AMS  
**Sent:** Wednesday, August 19, 2015 11:47 AM  
**To:** Mann, Renee - AMS  
**Subject:** ETKO renewal documents for your review

Renee:

Please review the following documents regarding ETKO's renewal accreditation:

For your approval:

Renewal Letter – [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred Renewal.docx](#)  
CA Report – [P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\Corr Action\NP4132LCA CA Report.docx](#)  
Terms – [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\ETKO Accred terms.docx](#)  
Certificate - [P:\AIA\ACA-Active\ETKO-Turkey\Accred Approv\2013\NOP AccCert.pub](#)

Reference:

Chronology Log - [P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\NoNC\2103 renewal ETKO Chrono log.docx](#)  
File folder (where the CA report and corrective actions can be found) - [P:\AIA\ACA-Active\ETKO-Turkey\2013 Renewal\Corr Action](#)

REMINDER: This renewal will need to go to the Accreditation Committee and there is an outstanding investigation into EU and COR noncompliances that led to suspension of ETKO's accreditations. Here is the chrono log for the investigation: [P:\AIA\ACA-Active\ETKO-Turkey\Compliance\2015\ETKO EU COO NOP NC Chrono Log.docx](#)

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER|**  
USDA • AMS • NOP | 1400 Independence Ave SW| 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)

**From:** [Mann, Renee - AMS](#)  
**To:** [Zuck, Penelope - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: ETKO report posed to the 01 Report folder on the NOP P drive  
**Date:** Friday, April 10, 2015 6:25:22 PM

---

Hello Penny,

Could you please process this audit report (you will be writing a NC report and NC letter) for ETKO?

Thank you,  
Renee M

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Crail, Lars - AMS  
**Sent:** Friday, April 03, 2015 12:12 PM  
**To:** Mann, Renee - AMS  
**Subject:** RE: ETKO report posed to the 01 Report folder on the NOP P drive

That's strange. I must have misread her email. I conducted the ETKO and the FS audits; therefore, both can be assigned. Lars

---

**From:** Mann, Renee - AMS  
**Sent:** Friday, April 03, 2015 12:09 PM  
**To:** Crail, Lars - AMS  
**Subject:** RE: ETKO report posed to the 01 Report folder on the NOP P drive

Hi Lars –  
Have you reviewed the ETKO report yet? Maybe I missed an email here.

Thanks,  
Renee

Renee Mann  
Assistant Director, Accreditation and International Activities Division  
USDA National Organic Program  
(202) 260-8635  
[Join the NOP mailing list.](#)

---

**From:** Crail, Lars - AMS  
**Sent:** Wednesday, February 25, 2015 6:04 AM  
**To:** Lusby, MaryLou - AMS  
**Cc:** Courtney, Cheri - AMS; Mann, Renee - AMS  
**Subject:** Re: ETKO report posed to the 01 Report folder on the NOP P drive

Thanks Marylou. I will review the report within the next day or two. I conducted the Food Safety audit, so you can move that report forward for assignment.

Lars Crail  
USDA AMS NOP  
(b) (6) mobile

On Feb 24, 2015, at 4:15 PM, Lusby, MaryLou - AMS <[MaryLou.Lusby@ams.usda.gov](mailto:MaryLou.Lusby@ams.usda.gov)> wrote:

Lars,

I have saved the following NOP checklists in word and pdf file to the 01 Report Folder on the NOP: P drive

- NP4132LCA ETKO Izmir Turkey (checklists 2005 & 3 - 2005-4)

According to our conversation on February 4, 2015 I am sending this to you first before the Accreditation Manager who would handle this.

Also just to let you know there are several reports for Food Safety as well in the 01 Report folder.

Sincerely,

Mary Lou

**From:** [Courtney, Cheri - AMS](#)  
**To:** [Yang, RobertH - AMS](#)  
**Subject:** FW: ETKO settlement agreement CA report  
**Date:** Wednesday, June 29, 2016 3:24:38 PM  
**Attachments:** [image001.png](#)

---

*Cheri*

---

**From:** Zuck, Penelope - AMS  
**Sent:** Wednesday, June 29, 2016 10:21 AM  
**To:** Courtney, Cheri - AMS <[Cheri.Courtney@ams.usda.gov](mailto:Cheri.Courtney@ams.usda.gov)>  
**Subject:** ETKO settlement agreement CA report

Hi Cheri,

I revised the ETKO CA report to include the terms of the Settlement Agreement as requested by Miles. Can you please review the letter and the Report and if approved, I will print them and forward the folder to Miles tomorrow?:

Letter – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA ETKO CA letter.docx](#)

CA Report – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\NP4132LCA ETKO CA Report Settlement.docx](#)

Reference:

SA – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\Exec Settlement.ETKO.APL-008-16.pdf](#)

Chrono log – [P:\AIA\ACA-Active\ETKO-Turkey\Settlement\SA chrono log.docx](#)

Thanks,  
Penny



**PENNY ZUCK | USDA-NATIONAL ORGANIC PROGRAM | ACCREDITATION MANAGER |**  
USDA • AMS • NOP | 1400 Independence Ave SW | 2649-S | Washington DC 20250  
☎ 202.260.9444 | Fax 202.205.7808 | ✉ [Penelope.Zuck@ams.usda.gov](mailto:Penelope.Zuck@ams.usda.gov)  
[Join the NOP mailing list](#)



**From:** [Courtney, Cheri - AMS](#) on behalf of [AMS - AIAinbox](#)  
**To:** [Reid, John - AMS](#)  
**Cc:** [Swartwood, Stacy - AMS](#)  
**Subject:** FW: ETKO website changed  
**Date:** Friday, November 18, 2016 9:14:16 AM  
**Attachments:** [Screenshot 2016-11-18 11.13.25.png](#)

---

FYI

*Cheri*

---

**From:** ma@etko.com.tr [mailto:ma@etko.com.tr]  
**Sent:** Friday, November 18, 2016 3:18 AM  
**To:** AMS - AIAinbox <AIAinbox@ams.usda.gov>  
**Cc:** (b) (6) @etko.com.tr>  
**Subject:** ETKO website changed

Dear Madam / Sir

We had an update for website therefore please correct ETKO references for email and website addresses as following:

Website: [www.etko.com.tr](http://www.etko.com.tr)  
Public Email: [info@etko.com.tr](mailto:info@etko.com.tr)

Have a nice day

Mustafa Akyuz

ETKO Turkey

T: +90-232-3397606  
F: +90-232-3397607  
[www.etko.com.tr](http://www.etko.com.tr)



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## [ETKO] Ecological Farming Control Organization Certifier Profile

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### Certifier Information



**Certifier Name:** Ecological Farming Control Organization

**Abbreviation:** ETKO

**NOP Code:** 996

**Certified Operations:** 29 (of 86)

**Last Publication Date:** 11/15/2016 12:50:07 AM

**Headquarters Address:** 160 Sokak 13/3, Bornova - Izmir, 35100 TUR

**Contact:** Dr. Mustafa Akyuz

**Public Phone:** 90 232 339 76 06

**Public E-Mail:** [info@etko.org](mailto:info@etko.org)

**Website:** [www.etko.org](http://www.etko.org)

**NOP Certificate and Accreditation Documents:** [http://www.ams.usda.gov/sites/default/files/media/NOP\\_ETKO.pdf](http://www.ams.usda.gov/sites/default/files/media/NOP_ETKO.pdf)

**Office Locations**

Certified Operation Locations

Accredited Scopes

### Office Locations

**Countries:**

Turkey

**From:** [Howley, JannaB - AMS](#)  
**To:** [Zuck, Penelope - AMS](#); [Gebault King, ReneeA - AMS](#); [Mann, Renee - AMS](#)  
**Subject:** FW: FW: IMPORTANT: NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO (Out of the office)  
**Date:** Wednesday, August 26, 2015 1:59:53 PM

---

FYI...

-----Original Message-----

From: Postmaster@inspection.gc.ca [<mailto:Postmaster@inspection.gc.ca>] On Behalf Of Valeriya Staykova  
Sent: Wednesday, August 26, 2015 1:53 PM  
To: Howley, JannaB - AMS  
Subject: Re: FW: IMPORTANT: NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO (Out of the office)

Hello / Bonjour,

I am out of the office and will return on Monday August 31st, 2015. For urgent matters, please contact Benoit Dube at [benoit.dube@inspection.gc.ca](mailto:benoit.dube@inspection.gc.ca).

Je suis absent du bureau et serai de retour lundi le 31 aout 2015. Pour une assistance immédiate veuillez communiquer avec Benoit Dube au [benoit.dube@inspection.gc.ca](mailto:benoit.dube@inspection.gc.ca).

Thank you/Merci

Valeriya

**From:** [Howley, JannaB - AMS](#)  
**To:** [Valeriya Staykova](#)  
**Cc:** [Mann, Renee - AMS](#); [Courtney, Cheri - AMS](#); [Zuck, Penelope - AMS](#); [Gebault King, ReneeA - AMS](#)  
**Subject:** FW: IMPORTANT: NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO  
**Date:** Wednesday, August 26, 2015 1:52:05 PM

---

Good Afternoon, Valeriya:

I hope you are doing well and have had a nice summer. The NOP continues to review information related to our recent audit of ETKO. We were hoping that CFIA would be able to share a copy of their full audit report with the NOP, as well as the names of any operations where CFIA auditing identified the use of prohibited substances. The NOP is also trying to determine whether ETKO certified operations' products are being imported into the United States, so this information would be very helpful.

Additionally, I wanted to let you know that my last day with the National Organic Program will be Friday, September 4<sup>th</sup>. I have enjoyed working with you, and with the other CFIA staff involved with organic regulations. Renée Gebault King, another Accreditation Manager in our Accreditation and International Activities (AIA) division, will be your USCOEA liaison now. She has been cc:ed on this email and will contact you to introduce herself.

Penny Zuck, Accreditation Manager, AIA, who is also cc:ed on this email, will be handling our ongoing review of the ETKO accreditation issue.

Thank you, and please don't hesitate to contact me with any questions.

### **Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

---

**From:** Valeriya Staykova [<mailto:Valeriya.Staykova@inspection.gc.ca>]  
**Sent:** Friday, June 19, 2015 12:25 PM  
**To:** Howley, JannaB - AMS  
**Cc:** Courtney, Cheri - AMS; Rola Yehia  
**Subject:** RE: IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO

Hello Hanna ,

As requested please find below a list of the NCs issued during the 2015 Surveillance audit at ETKO . These NCs cover both ISO 17065 and the COR specific requirements.

NC 1 : ETKO are not following their own policy of completing a risk assessment form for each operation on an annual basis  
Norm ref: COR C.2.3.10, ETKO procedure

NC 2: ETKO are not conducting input:output audits at on-site inspections of handling and processing units.  
Norm ref: COR C.2.3.12

NC 3 : ETKO do not make clear in compliance forms and assessment (inspection) forms (ETKO formats) nor in nonconformity forms (completed by the inspector) the standard reference (or on occasions the standard) against which the operator is being assessed.  
Norm ref: CAN 7.4.4,

NC 4: ETKO do not make sure that all relevant forms and contracts are signed and dated.  
Norm ref: ISO/CAN 4.2 & 7.2, CAN 2.1.1, .

NC 5: ETKO are not complying with requirements on provision of information in inspection reports.  
Norm ref: COR C2.23.2

- Transparency of process – the operator file whether paper or electronic should allow easy traceability of the process from application through to decision. Information on files is not easy to follow and there are frequently no links between statements in the inspection report and evidence.
- o Inspection reports do not indicate time and duration of inspection (C2.3.22.1).
- o Inspection reports do not indicate names of interviewees (C2.3.22.2).
- o Inspection reports indicate which fields of farms were visited but do not refer to which buildings were visited (C2.3.22.3).
- o When labels approved.

NC 6 : ETKO inspections are not sufficiently investigative to objectively verify the information provided by the operator and do not provide sufficient evidence of compliance to the standard for the certification body to make a competent decision. Note: this includes contradictory information in inspection reports, copied text from one report to another, zero or minimal issue of nonconformities, retroactive conversion as standard for new projects, inspections that do not visit important locations on the farm and insufficient provision of evidence by inspectors.  
Norm ref: ISO/IEC17065/COR 7.4.4

NC 7: ETKO awarded COR certification without 12 months application of the standard on the farms. Organic certification status was just based upon no use of prohibited inputs.  
Norm ref: Canada standard 5.1.1

- Conversion period - The issue of conversion period under the Canada standard is much clearer that there must be a 12 month period of verified implementation of the standard, not just absence of prohibited products. Although noted in the visit relating to EU equivalence the requirements under Canada are more explicit so is raised here as a separate issue;

NC 8 : ETKO are not regulating the use of non-organic seed in Ukraine and the inspectors appear to be denying what appears to be common knowledge that GMO seed for crops commonly grown in ETKO projects (maize, soybean) are widely available and used, despite the authorities not permitting them.  
Norm ref: COR Std 5.3.2

Issue: It is generally accepted that there are no organic seeds available in Ukraine and this has led to ETKO not regulating and recording the use of non-organic seed. Regular purchases of hybrids are wrongly reported as own reproduction from elite seeds on farms. As there are no records it cannot be demonstrated that the bought in seeds really are untreated nor whether the seeds are not from GM sources.  
Evidence: ETKO have no register of approvals of non-organic seed and were only able to show a few examples of information provided by Ukraine operators.

NC 9: ETKO list of approved outsourced services does not include all service providers, agreements are not in place with all providers and annual performance review policy of ETKO is not being met.  
Norm reference: ISO 65 4.4, (ISO 17065 6.2.2)

Please note that under the Canada Organic Regime while under suspension ETKO cannot accept new applications, issue certificates of inspection, or certify products as organic however products already certified by ETKO as meeting the Canadian Organic requirements are not affected.

It would be appreciated if you could share with us the NOP findings as well.

In addition, we have received an inquiry from ETKO in regards to the status the NOP certified organic products imported to Canada. We would appreciate your opinion on this matter.

Thank you,  
Regards,  
Valeriya

Meanwhile I would like to learn the position of NOP certified products coming to Canadian market. Is it possible that NOP certified clients (other than COR certified clients) can export products in to Canada with NOP certificates?

>>> "Howley, JannaB - AMS" <[JannaB.Howley@ams.usda.gov](mailto:JannaB.Howley@ams.usda.gov)> 2015-06-17 9:37 AM >>>

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Would you please let us know the reasons for ETKO's suspension? It would be helpful to know whether the reasons for CFIA's suspension of their accreditation are similar to any noncompliances – and ETKO's proposed corrective actions - identified during their NOP audit.

Thanks so much,

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268  
202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

---

**From:** Valeriya Staykova [<mailto:Valeriya.Staykova@inspection.gc.ca>]  
**Sent:** Monday, June 15, 2015 2:27 PM  
**To:** Courtney, Cheri - AMS; Howley, JannaB - AMS  
**Cc:** McEvoy, Miles - AMS; Rola Yehia  
**Subject:** IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO

Dear Cheri and Janna,

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As per section 4 of the *Organic Products Regulations 2009* the suspension will remain in effect until the required corrective measures specified in the report are implemented

by ETKO and verified by the CFIA. Please note that until such time that ETKO's suspension is lifted, ETKO shall not accept and process applications from operators under the Canada Organic Regime.

Could you please advise on ETKO's accreditation status under the NOP since this might affect the importation of organic products to Canada under the USCOEA.

Should you have any questions or require further clarification please feel free to contact me.

Thank you.

Regards,

Valeriya

Valeriya Staykova  
Lead Auditor /Chef-auditeur  
Labelling, Organic Regime and Packaging/  
Étiquetage, Le Régime Bio et Emballage  
Consumer Protection and Market Fairness | Division de la protection des consommateurs et de l'équité des marchés  
Canadian Food Inspection Agency | Agence canadienne d'inspection des aliments

1400 Merivale Road, Tower 2  
Floor 6, Room 252

Ottawa, Ontario K1A 0Y9  
Tel: (613) 773-6222, Fax 613-773 - 5961  
[valeriya.staykova@inspection.gc.ca](mailto:valeriya.staykova@inspection.gc.ca)

**From:** [Howley, JannaB - AMS](#)  
**To:** [Mann, Renee - AMS](#)  
**Subject:** FW: IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO  
**Date:** Friday, June 19, 2015 1:38:58 PM

---

Renee:

CFIA's noncompliances from their recent ETKO audit.

Janna

---

**From:** Valeriya Staykova [mailto:Valeriya.Staykova@inspection.gc.ca]  
**Sent:** Friday, June 19, 2015 12:25 PM  
**To:** Howley, JannaB - AMS  
**Cc:** Courtney, Cheri - AMS; Rola Yehia  
**Subject:** RE: IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO

Hello Hanna ,

As requested please find below a list of the NCs issued during the 2015 Surveillance audit at ETKO . These NCs cover both ISO 17065 and the COR specific requirements.

NC 1 : ETKO are not following their own policy of completing a risk assessment form for each operation on an annual basis

Norm ref: COR C.2.3.10, ETKO procedure

NC 2: ETKO are not conducting input:output audits at on-site inspections of handling and processing units.

Norm ref: COR C.2.3.12

NC 3 : ETKO do not make clear in compliance forms and assessment (inspection) forms (ETKO formats) nor in nonconformity forms (completed by the inspector) the standard reference (or on occasions the standard) against which the operator is being assessed.

Norm ref: CAN 7.4.4,

NC 4: ETKO do not make sure that all relevant forms and contracts are signed and dated.

Norm ref: ISO/CAN 4.2 & 7.2, CAN 2.1.1, .

NC 5: ETKO are not complying with requirements on provision of information in inspection reports.

Norm ref: COR C2.23.2

· Transparency of process – the operator file whether paper or electronic should allow easy traceability of the process from application through to decision. Information on files is not easy to follow and there are frequently no links between statements in the inspection report and evidence.

o Inspection reports do not indicate time and duration of inspection (C2.3.22.1).

o Inspection reports do not indicate names of interviewees (C2.3.22.2).

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important locations on the farm and insufficient provision of evidence by inspectors.



Norm ref: ISO/IEC17065/COR 7.4.4

NC 7: ETKO awarded COR certification without 12 months application of the standard on the farms. Organic certification status was just based upon no use of prohibited inputs.

Norm ref: Canada standard 5.1.1

· Conversion period - The issue of conversion period under the Canada standard is much clearer that there must be a 12 month period of verified implementation of the standard, not just absence of prohibited products. Although noted in the visit relating to EU equivalence the requirements under Canada are more explicit so is raised here as a separate issue;

NC 8 : ETKO are not regulating the use of non-organic seed in Ukraine and the inspectors appear to be denying what appears to be common knowledge that GMO seed for crops commonly grown in ETKO projects (maize, soybean) are widely available and used, despite the authorities not permitting them.

Norm ref: COR Std 5.3.2

Issue: It is generally accepted that there are no organic seeds available in Ukraine and this has led to ETKO not regulating and recording the use of non-organic seed. Regular purchases of hybrids are wrongly reported as own reproduction from elite seeds on farms. As there are no records it cannot be demonstrated that the bought in seeds really are untreated nor whether the seeds are not from GM sources.

Evidence: ETKO have no register of approvals of non-organic seed and were only able to show a few examples of information provided by Ukraine operators.

NC 9: ETKO list of approved outsourced services does not include all service providers, agreements are not in place with all providers and annual performance review policy of ETKO is not being met.

Norm reference: ISO 65 4.4, (ISO 17065 6.2.2)

Please note that under the Canada Organic Regime while under suspension ETKO cannot accept new applications, issue certificates of inspection, or certify products as organic however products already certified by ETKO as meeting the Canadian Organic requirements are not affected.

It would be appreciated if you could share with us the NOP findings as well.

In addition, we have received an inquiry from ETKO in regards to the status the NOP certified organic products imported to Canada. We would appreciate your opinion on this matter.

Thank you,  
Regards,  
Valeriya

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Meanwhile I would like to learn the position of NOP certified products coming to Canadian market. Is it possible that NOP certified clients (other than COR certified clients) can export products in to Canada with NOP certificates?

>>> "Howley, JannaB - AMS" <[JannaB.Howley@ams.usda.gov](mailto:JannaB.Howley@ams.usda.gov)> 2015-06-17 9:37 AM >>>

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Thanks so much,

**Janna Howley**

Accreditation Manager | USDA National Organic Program

Room 2649-S (Stop 0268) | 1400 Independence Ave SW | Washington, DC 20250-0268

202-692-0047 Direct | [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

[Sign up here](#) for the NOP Organic Insider, the National Organic Program's email notification service.

---

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

**Sent:** Monday, June 15, 2015 2:27 PM

**To:** Courtney, Cheri - AMS; Howley, JannaB - AMS

**Cc:** McEvoy, Miles - AMS; Rola Yehia

**Subject:** IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO

Dear Cheri and Janna,

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Could you please advise on ETKO's accreditation status under the NOP since this might affect the importation of organic products to Canada under the USCOEA.

Should you have any questions or require further clarification please feel free to contact me.

Thank you.

Regards,

Valeriya

Valeriya Staykova

Lead Auditor /Chef-auditeur  
Labelling, Organic Regime and Packaging/  
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[valeriya.staykova@inspection.gc.ca](mailto:valeriya.staykova@inspection.gc.ca)

**From:** [Howley, JannaB - AMS](#)  
**To:** [Mann, Renee - AMS](#)  
**Cc:** [Courtney, Cheri - AMS](#)  
**Subject:** FW: IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO  
**Date:** Monday, June 15, 2015 4:21:24 PM  
**Attachments:** [ETKO Accred Certificate 092710.pdf](#)

---

Renee:

This is what I just sent to Valeriya in Canada, because she'd inquired as to ETKO's current status.

Janna

---

**From:** Howley, JannaB - AMS  
**Sent:** Monday, June 15, 2015 4:12 PM  
**To:** 'Valeriya Staykova'  
**Cc:** McEvoy, Miles - AMS; Courtney, Cheri - AMS; Rola Yehia; Yang, RobertH - AMS  
**Subject:** RE: IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO

Valeriya:

Thank you for letting us know about ETKO's status under COR. ETKO is currently accredited under the NOP, and I've attached their certificate. They underwent a renewal audit last year and are currently in the process of resolving any noncompliances in order to receive their five-year renewal certificate.

Please don't hesitate to contact me with any questions,

**Janna Howley**

Accreditation Manager | USDA National Organic Program  
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# United States Department of Agriculture

Agricultural Marketing Service  
National Organic Program

*Ekolojik Tarim Kontrol Organizasyonu*

**Bornova—Izmir, Turkey**

meets all the requirements prescribed in the National Organic Program Regulations

**7 CFR Part 205**

**As an Accredited Certifying Agent**

for the scope of

**Crops, Wild Crops and Handling**

This certificate is receivable by all officers of all courts of the United States as prima facie evidence of the truth of the statements therein contained. This certificate does not excuse failure to comply with any of the regulatory laws enforced by the U.S. Department of Agriculture.

Annual status of this accreditation may be verified at <http://www.ams.usda.gov>

**CERTIFICATE OF ACCREDITATION**

Certificate No: **NP9222ZZA**

Issue Date: **January 22, 2008**

Renewal Date: **January 22, 2013**

**Rayne Pegg**  
Administrator  
Agricultural Marketing Service



The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program.

**From:** [Howley, JannaB - AMS](#)  
**To:** [Mann, Renee - AMS](#)  
**Subject:** FW: IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO  
**Date:** Friday, June 26, 2015 9:57:49 AM

---

Renee:

I am assuming there is no reason that we cannot share ETKO's current NOP NCs with CFIA, is there?  
I'll send them to CFIA today if you confirm that it's ok.

Thanks!

Janna

---

**From:** Valeriya Staykova [mailto:Valeriya.Staykova@inspection.gc.ca]  
**Sent:** Friday, June 19, 2015 12:25 PM  
**To:** Howley, JannaB - AMS  
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>>> "Howley, JannaB - AMS" <[JannaB.Howley@ams.usda.gov](mailto:JannaB.Howley@ams.usda.gov)> 2015-06-17 9:37 AM >>>



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Accreditation Manager | USDA National Organic Program

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

**Sent:** Monday, June 15, 2015 2:27 PM

**To:** Courtney, Cheri - AMS; Howley, JannaB - AMS

**Cc:** McEvoy, Miles - AMS; Rola Yehia

**Subject:** IMPORTANT : NOTICE OF ACCREDITATION SUSPENSION under COR - ETKO

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Should you have any questions or require further clarification please feel free to contact me.

Thank you.

Regards,

## Valeriya

Valeriya Staykova

Lead Auditor /Chef-auditeur

Labelling, Organic Regime and Packaging/

Étiquetage, Le Régime Bio et Emballage

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

[valeriya.staykova@inspection.gc.ca](mailto:valeriya.staykova@inspection.gc.ca)

**From:** [Courtney, Cheri - AMS](#) on behalf of [AMS - AIAinbox](#)  
**To:** [Crail, Lars - AMS](#)  
**Subject:** FW: NOP Witness Audit Engagement Ltr and Cost Esti - October 2016 in Ukraine  
**Date:** Friday, September 09, 2016 3:42:09 PM  
**Attachments:** [NP6279LCA 1415 ETKO Izmir, Turkey 08 25 16 signed.pdf](#)  
[ETKO ACCOUNT SUMMARY.PDF](#)  
[image002.jpg](#)  
**Importance:** High

---

Lars, these docs are located in the ETKO folder.

*Cheri*

---

**From:** ma@etko.org [mailto:ma@etko.org]  
**Sent:** Friday, September 09, 2016 9:39 AM  
**To:** Crail, Lars - AMS <Lars.Crail@ams.usda.gov>  
**Cc:** fa@etko.org; Claypool, Rebecca E - AMS <Rebecca.E.Claypool@ams.usda.gov>; AMS - AIAinbox <AIAinbox@ams.usda.gov>; AMS - QAD AuditService <QAD.AuditService@ams.usda.gov>  
**Subject:** RE: NOP Witness Audit Engagement Ltr and Cost Esti - October 2016 in Ukraine  
**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  
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](mailto:ma@etko.org)  
**Cc:** [fa@etko.org](mailto: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

Dear Mustafa,

Attached is an audit engagement letter and cost estimate for the proposed witness audit in October. Let me know if you have any questions.

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

QAD 1415 Form  
Page 1 of 4

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

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

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

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

--



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

QAD 1415 Form  
Page 2 of 4

Company Name: ETKO - Ecological Farming Controlling Organization

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

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





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

QAD 1415 Form  
Page 3 of 4

Company Name: ETKO - Ecological Farming Controlling Organization

<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:	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



**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.